I-270 Corridor Improvements

Final Environmental Impact Statement - I-270 Corridor Improvements Project

Appendix C
Comments Received on the Draft Environmental Impact Statement

NOTE: This appendix is not able to be included with the Final EIS/ROD due to accessibility requirements. If you would like a copy of this appendix, please contact the project team at cdot_i270@state.co.us or 303-512-4270.

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

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 46
Post Office Box 25207
Denver, Colorado 80225-0007

4111

January 14, 2026

IN REPLY REFER TO:
ER 25/0563

William Schiebel
2829 W. Howard Pl.
Denver, CO 80204

Subject: DOT-FHWA, DEIS, I-270 Corridor Improvements Project, Denver CO

Dear William Schiebel,

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for the U.S. Department of Transportation - Federal Highway Administration (DOT-FHWA) Interstate 270 (I-270) Corridor Improvements Project, Denver and Adams Counties CO, posted on November 21, 2025. The U.S. Geological Survey (USGS) has the following comments associated with a potential disturbance to USGS infrastructure near this location.

1 **USGS Comments – Streamgages near proposed project location**

The DEIS describes the need for improvements to Interstate I-270 north and east of Denver CO to Commerce City CO and outlines the proposed I-270 Corridor Improvements Project. The proposed project covers a 6.5-mile stretch of I-270 from Interstate 25 (I-25)/US Highway 36 (US 36) interchange to Interstate 70 (I-70). I-270 is part of the Primary Highway Freight System and Strategic Highway Network. A no action alternative and two build alternatives are evaluated in the DEIS.

The USGS operates streamgages throughout the U.S. to collect water quantity and quality data for a variety of purposes. Continuous operation of USGS streamgages is essential for our stakeholders. Streamgages have permanent infrastructure and are vulnerable to disruption when construction occurs in the vicinity of them. The USGS maintains the following active streamgaging stations within the area affected by the I-270 Corridor Improvements Project.

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Response to Comment 1

The streamgage information provided was added to the Draft Environmental Impact Statement (EIS) through errata. See Appendix F, E-016 and E-086, of the Final EIS for the revised figure that shows the streamgages. See Table 2-1 of Chapter 2.0, E-026, E-087, and E-090, of the Final EIS and Chapter 5.0 of the Record of Decision for the new paragraph about the streamgages and mitigation item that was added.

2 William Schiebel

Station Number	Station Name	Site Type	Data Collected
06714360	Sand Crk abv Burlington Ditch nr Commerce City, CO	Streamgage	Discharge
394839104570300	Sand Creek at Mouth nr Commerce City, CO	Streamgage	Discharge

The Colorado Water Science Center operates these stations and should be contacted and given sufficient advance notice before construction near these active USGS streamgages. Efforts should be made to both preserve these stations and minimize impacts to data collected at these stations.

Thank you for the opportunity to review and comment on this proposed project. If you have any questions concerning our comments, please contact Alison Gordon (agordon@usgs.gov) and Frederick Spitz (fspitz@usgs.gov), coordinators of USGS Environmental Document Reviews.

If you have any questions for the Department, please contact me at (303) 478-3373, or courtney_hoover@ios.doi.gov.

Sincerely,

COURTNEY HOOVER

Digitally signed by COURTNEY HOOVER
Date: 2026.01.14 08:53:23 -07'00'

Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance

TRANSMITTED ELECTRONICALLY – NO HARDCOPY TO FOLLOW

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Janurary 20, 2026

Ref: 8EJC-NE

Lindsay Edgar
Environmental Protection Specialist
Federal Highway Administration
12300 West Dakota Avenue Suite 180
Lakewood, CO 80228

Dear Lindsay Edgar,

1 In accordance with Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency has reviewed the November 2025 Federal Highway Administration's (FHWA) and Colorado Department of Transportation (CDOT) Draft Environmental Impact Statement (Draft EIS) for I-270 Corridor Improvements Project (Project). The CAA Section 309 role requires the EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The proposed Project is in Commerce City in Adams County and in the City and County of Denver, Colorado. The study area covers the full extent of I–270 from Interstate 25 to Interstate 70, a length of approximately 6.5 miles. The Project's purpose is to implement transportation solutions that would modernize the I–270 corridor to accommodate existing and forecasted transportation needs that FHWA and CDOT identified.

EPA appreciates the NHWA and CDOT's coordination and invitation to participate as a Cooperating Agency for this Project. In this role, EPA submitted scoping comments on September 18, 2024 and provided input on the preliminary Draft EIS on July 2, 2025. We would also like to extend our thanks in inviting EPA staff to participate in the I-270 Air Quality Technical Working Group. Based on our review of the Draft EIS, we have no additional comments on the content or analysis of the document.

Response to Comment 1

Comments noted.

If we may be of assistance in any regard, feel free to contact either me or Laura Margason, the EPA's lead NEPA reviewer on this project. We can be reached at (303) 312-7011, dorian.david.i@epa.gov and (303) 312-6665, margason.laura@epa.gov, respectively.

Sincerely,

DAVID DORIAN Digitally signed by DAVID DORIAN
Date: 2026.01.20 08:54:44 -07'00'

David I. Dorian
Acting NEPA Branch Manager

Cc: Troy Halouska; CDOT Region 1; troy.halouska@state.co.us

2

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Date: Thursday, January 15, 2026 3:20:10 PM

Which topic(s) does your comment relate to?
Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
Colorado Parks and Wildlife has reviewed the draft Environmental Impact Statement (EIS) provided to stakeholder groups and the public on November 21, 2025. Colorado Parks and Wildlife agrees with CDOT's proposed minimization and mitigation efforts in regard to wildlife and wildlife habitats, including aquatic resources outlined in the EIS.
1 Colorado Parks and Wildlife recommends implementing the following additional measures to further protect wildlife and their habitats. CPW recommends conducting Burrowing Owl surveys prior to disturbance of any Prairie Dog colonies if disturbance is planned to occur between March 15- August 31st. CPW recommends conducting raptor surveys prior to construction if activities are to occur during raptor nesting season.
2 CPW recommends evaluating and considering bat-friendly bridge designs that allow bats to use the bridges as roost sites. CPW looks forward to further discussion and engagement with CDOT regarding SB40 and aquatic habitat protection. Please reach out to us if there are any questions on any of our recommendations or if your team would like to collaborate on any portions of the project.
Name (first and last)
Lexi Hamous
Address
6060 Broadway
City
Denver
Neighborhood/ZIP Code
80216
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
lexi.hamous-miller@state.co.us

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The burrowing owl and raptor survey information provided was added to the Draft Environmental Impact Statement (EIS) through errata. See Table 2-1 of Chapter 2.0, E-024 and E-070, of the Final EIS and Chapter 5.0 of the Record of Decision (ROD) for the new mitigation item that was added.

Response to Comment 2

Bat-friendly bridge design coordination was added to the Draft EIS through errata. See Table 2-1 of Chapter 2.0, E-025 and E-071, of the Final EIS and Chapter 5.0 of the ROD for the new mitigation item that was added.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/16/2026 9:20 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
Adams County comments to support the preferred alternative
Provide your comment below:

1 To the I-270 Project Team: Adams County strongly supports the I-270 Draft Environmental Impact Statement (DEIS) and urges the Colorado Department of Transportation (CDOT) to advance the Preferred Alternative into the Final EIS and Record of Decision. I-270 is a critical freight and mobility corridor, and its long-standing safety, congestion, and infrastructure deficiencies present regional economic, environmental, and public-health risks. The County supports a safety-driven, climate-smart modernization that improves reliability for freight, commuters, and transit while delivering funded and enforceable mitigation for the communities most impacted by the corridor. Advancing the Preferred Alternative will reduce implementation risk, improve corridor performance, and produce more equitable, resilient, and future-ready outcomes. As CDOT advances the project, Adams County offers the following action-oriented recommendations for inclusion in the Final EIS and Record of Decision. Communities along the I-

2 270 corridor are among the most disproportionately impacted in the state, and this condition should directly inform mitigation priorities, funding allocations, and implementation decisions. • Link Monitoring to Mitigation. Clearly connect air-quality, noise, and environmental monitoring commitments to funded mitigation actions, including defined thresholds, decision triggers, and

3 implementation pathways that deliver measurable health benefits to disproportionately impacted communities. • Advance Indoor Air-Quality Protections. Commit to feasible indoor air-quality mitigation strategies for homes, schools, and community facilities adjacent to the corridor through Community Enhancement funding and partnerships with local and regional organizations. Leverage Adams County Health Department as a community liaison, to increase

4 impact and reach. • Preserve and Protect Community Enhancement Funding. Maintain at least the current 1.5–2.5 percent allocation of total project costs (approximately $20–25 million) for community-recommended enhancements and expand this allocation where feasible. Prioritize additional Community Enhancement budget if additional grant funding is obtained and

5 alleviates other project costs. • Elaborate on the Air-Quality Monitoring Approach. Provide an opportunity for stakeholders and the public to comment on an air monitoring approach, including which pollutants are being monitored and when for the interim, pre-, during, and post-construction. Ensure the air monitoring approach has a clear strategy for communicating

Response to Comment 1

Comments noted.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines per federal regulations at 23 Code of Federal Regulations (CFR) 772. Noise mitigation was evaluated for areas with noise levels at sensitive receptors that meet or exceed the thresholds for the specific land use. Mitigation must be reasonable and feasible to be recommended for implementation. The evaluation identified one noise wall that is recommended to be implemented as a part of the project near the South Rose Hill neighborhood. See Section 5.4.4, IMP4, of the Final EIS for additional information on the noise analysis and mitigation.

Based on the analysis results summarized in Appendix E3, Air Quality Technical Report, of the Draft EIS, the project is not expected to cause substantial adverse effects on air quality, and the project meets transportation conformity requirements. Therefore, permanent air quality mitigation is not warranted.

See Section 5.4.4, IMP1, IMP2, and IMP7, of the Final EIS for additional information on the EOs, what constitutes federal mitigation, noise mitigation, and air quality mitigation.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Response to Comment 4

See Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as federal mitigation.

Additional community improvements as part of the disproportionately impacted communities analysis required by SB 21-260 codified in CRS 43-1-128, including the percentage of project funding committed to those improvements, are discussed in the State Community Analysis Technical Report, which is available on the project website.

Response to Comment 5

Air quality monitoring during preconstruction and during construction is required by state regulation CRS 43-1-128 for this project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the Record of Decision (ROD). Air quality monitoring will be completed in compliance with state regulation and related guidance. Refer to the State Air Quality and Community Analysis Technical Reports for additional information on air monitoring for the project, which is available on the project website.

real-time air quality information with the public. Pursue grant funding and formal collaborations with local governments, regional agencies, and academic partners to increase pollutant coverage, monitoring duration, and geographic representation before, during and post-construction. Evaluate concentration trends in pollutants throughout the project phases, including how long any transient construction-related shifts, lasts. • Strength Transit
6 Coordination and Continuity. Share transit-related community input and analysis with RTD to inform its Comprehensive Operational Analysis, while committing to improved bus stop amenities and sustained microtransit service during construction. • Maximize Stormwater and
7 Environmental Benefits. Pursue additional state and external funding to enhance stormwater and water-quality improvements and extend benefits beyond the project footprint into surrounding neighborhoods and waterways. • Commit to Low-Maintenance Landscaping and Aesthetic
8 Enhancements. Implement landscaping consistent with state water-conservation policies and community enhancement commitments, particularly outside the right-of-way. • Communicate Commitments Clearly. Proactively communicate community-recommended enhancements and
9 mitigation actions to corridor residents to demonstrate that community input is shaping outcomes beyond roadway capacity improvements. • Acknowledge Health Impacts from Construction: Work and support Adams County Health Department as a liaison to the
10 community, community partners, and to potential public health programming to mitigate negative mental and physical health outcomes from exposure to prolonged construction. Adams County supports advancing the Preferred Alternative and encourages CDOT to use the Final EIS to translate community engagement and technical analysis into enforceable commitments. These actions will strengthen the project and ensure that I-270 modernization delivers
11 measurable safety, environmental, and equity benefits for the communities and industries that depend on this corridor. Sincerely, Julie Duran Mullica Chair, Adams County Board of County Commissioners

Name (first and last)
Michele Riccio, Transportation Planner, Adams County
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 6

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding Flatiron Flyer 5 buses and stops. Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

See Section 5.4.3, ALT6, of the Final EIS for additional information on transit and RTD coordination.

Response to Comment 7

Typical water quality mitigation is included in the project, such as detention basins to comply with Municipal Separate Storm Sewer System permit requirements and Section 402 stormwater permitting during construction, but additional mitigation is not required. See Chapter 5.0 of the ROD for more information on water quality mitigation.

See Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as mitigation.

Additional water quality improvements that the state is committed to implement as part of the project based on the state analysis of disproportionately impacted communities as a result of SB 21-260, codified in CRS 43-1-128, are discussed in the State Community Analysis Technical Report, which is available on the project website.

Response to Comment 8

Typical landscaping mitigation, such as using native trees and shrubs, is included but additional mitigation is not required. See Chapter 5.0 of the ROD for more information on landscaping-related mitigation.

See Section 5.4.4, IMP2, of the Final EIS for information on what is classified as mitigation.

Additional landscaping improvements that the state is committed to implement as part of the project based on the state analysis of disproportionately impacted communities as a result of SB 21-260, codified in CRS 43-1-128, are discussed in the State Community Analysis Technical Report, which is available on the project website.

Response to Comment 9

The community-recommended improvements from the disproportionately impacted communities analysis required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Community Analysis Technical Report. Community involvement around these improvements are also discussed in that technical report, which is available on the project website.

Response to Comment 10

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process.

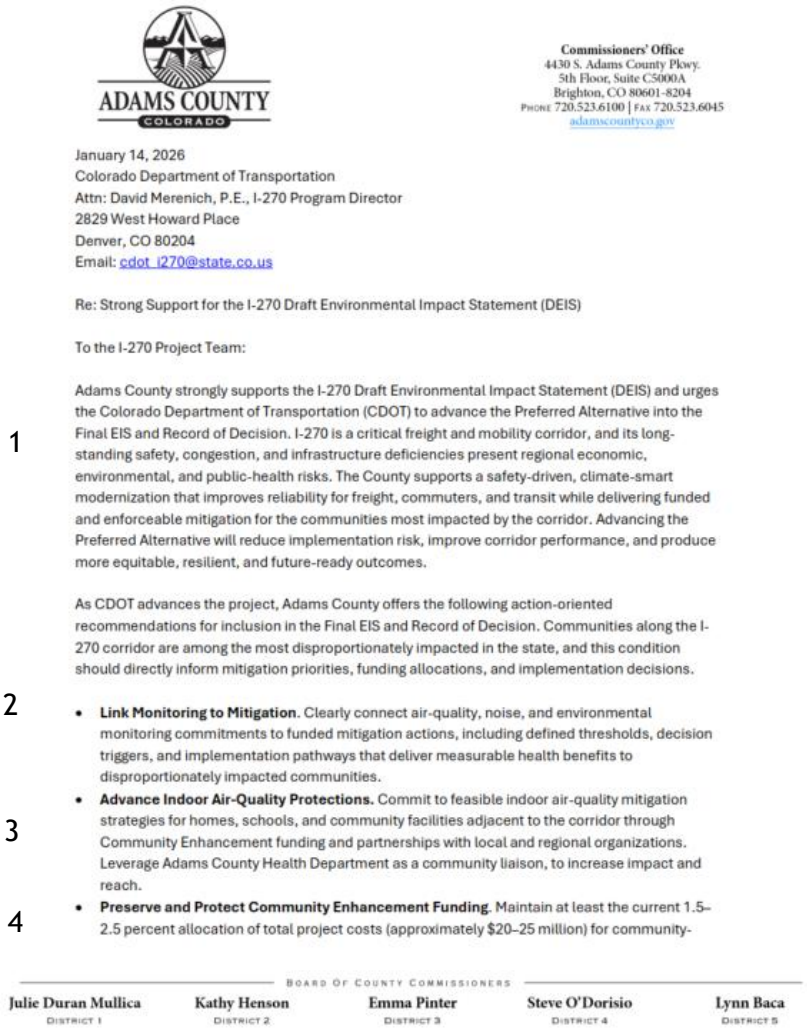
Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the ROD.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website. CDOT will continue to coordinate with Adams County on the community improvements throughout the remainder of the project implementation process.

Response to Comment 11

Comments noted.



ADAMS COUNTY
COLORADO

Commissioners' Office
4430 S. Adams County Pkwy.
5th Floor, Suite C5000A
Brighton, CO 80601-8204
Phone 720.523.6100 | Fax 720.523.6045
adamscountyco.gov

January 14, 2026
Colorado Department of Transportation
Attn: David Merenich, P.E., I-270 Program Director
2829 West Howard Place
Denver, CO 80204
Email: cdot_i270@state.co.us

Re: Strong Support for the I-270 Draft Environmental Impact Statement (DEIS)

To the I-270 Project Team:

1 Adams County strongly supports the I-270 Draft Environmental Impact Statement (DEIS) and urges the Colorado Department of Transportation (CDOT) to advance the Preferred Alternative into the Final EIS and Record of Decision. I-270 is a critical freight and mobility corridor, and its long-standing safety, congestion, and infrastructure deficiencies present regional economic, environmental, and public-health risks. The County supports a safety-driven, climate-smart modernization that improves reliability for freight, commuters, and transit while delivering funded and enforceable mitigation for the communities most impacted by the corridor. Advancing the Preferred Alternative will reduce implementation risk, improve corridor performance, and produce more equitable, resilient, and future-ready outcomes.

As CDOT advances the project, Adams County offers the following action-oriented recommendations for inclusion in the Final EIS and Record of Decision. Communities along the I-270 corridor are among the most disproportionately impacted in the state, and this condition should directly inform mitigation priorities, funding allocations, and implementation decisions.

2
- **Link Monitoring to Mitigation**. Clearly connect air-quality, noise, and environmental monitoring commitments to funded mitigation actions, including defined thresholds, decision triggers, and implementation pathways that deliver measurable health benefits to disproportionately impacted communities.

3
- **Advance Indoor Air-Quality Protections.** Commit to feasible indoor air-quality mitigation strategies for homes, schools, and community facilities adjacent to the corridor through Community Enhancement funding and partnerships with local and regional organizations. Leverage Adams County Health Department as a community liaison, to increase impact and reach.

4
- **Preserve and Protect Community Enhancement Funding**. Maintain at least the current 1.5–2.5 percent allocation of total project costs (approximately $20–25 million) for community-

Board Of County Commissioners

Julie Duran Mullica, District 1 | Kathy Henson, District 2 | Emma Pinter, District 3 | Steve O'Dorisio, District 4 | Lynn Baca, District 5

Response to Comment 1

Comments noted.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines

per federal regulations at 23 Code of Federal Regulations 772. Noise mitigation was evaluated for areas with noise levels at sensitive receptors that meet or exceed the thresholds for the specific land use. Mitigation must be reasonable and feasible to be recommended for implementation. The evaluation identified one noise wall that is recommended to be implemented as a part of the project near the South Rose Hill neighborhood. See Section 5.4.4, IMP4, of the Final EIS for additional information on the noise analysis and mitigation.

Based on the analysis results summarized in Appendix E3, Air Quality Technical Report, of the Draft EIS, the project is not expected to cause substantial adverse effects on air quality, and the project meets transportation conformity requirements. Therefore, permanent air quality mitigation is not warranted.

See Section 5.4.4, IMP1, IMP2, and IMP7, of the Final EIS for additional information on the EOs, what constitutes federal mitigation, noise mitigation, and air quality mitigation.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Response to Comment 4

See Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as federal mitigation.

Additional community improvements as part of the disproportionately impacted communities analysis required by SB 21-260 codified in CRS 43-1-128, including the percentage of project funding committed to those improvements, are discussed in the State Community Analysis Technical Report, which is available on the project website.

recommended enhancements and expand this allocation where feasible. Prioritize additional Community Enhancement budget if additional grant funding is obtained and alleviates other project costs.

- **Elaborate on the Air-Quality Monitoring Approach**. Provide an opportunity for stakeholders and the public to comment on an air monitoring approach, including which pollutants are being monitored and when for the interim, pre-, during, and post-construction. Ensure the air monitoring approach has a clear strategy for communicating real-time air quality information with the public. Pursue grant funding and formal collaborations with local governments, regional agencies, and academic partners to increase pollutant coverage, monitoring duration, and geographic representation before, during and post- construction. Evaluate concentration trends in pollutants throughout the project phases, including how long any transient construction-related shifts, lasts.
- **Strength Transit Coordination and Continuity**. Share transit-related community input and analysis with RTD to inform its Comprehensive Operational Analysis, while committing to improved bus stop amenities and sustained microtransit service during construction.
- **Maximize Stormwater and Environmental Benefits**. Pursue additional state and external funding to enhance stormwater and water-quality improvements and extend benefits beyond the project footprint into surrounding neighborhoods and waterways.
- **Commit to Low-Maintenance Landscaping and Aesthetic Enhancements**. Implement landscaping consistent with state water-conservation policies and community enhancement commitments, particularly outside the right-of-way.
- **Communicate Commitments Clearly**. Proactively communicate community-recommended enhancements and mitigation actions to corridor residents to demonstrate that community input is shaping outcomes beyond roadway capacity improvements.
- **Acknowledge Health Impacts from Construction**: Work and support Adams County Health Department as a liaison to the community, community partners, and to potential public health programming to mitigate negative mental and physical health outcomes from exposure to prolonged construction.

Adams County supports advancing the Preferred Alternative and encourages CDOT to use the Final EIS to translate community engagement and technical analysis into enforceable commitments. These actions will strengthen the project and ensure that I-270 modernization delivers measurable safety, environmental, and equity benefits for the communities and industries that depend on this corridor.

Sincerely,

Julie Duran Mullica, Chair
Adams County Board of Commissioners

5 6 7 8 9 10 11

Response to Comment 5

Air quality monitoring during preconstruction and during construction is required by state regulation CRS 43-1-128 for this project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the Record of Decision (ROD). Air quality monitoring will be completed in compliance with state regulation and related guidance. Refer to the State Air Quality and Community Analysis Technical Reports for additional information on air monitoring for the project, which is available on the project website.

Response to Comment 6

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding Flatiron Flyer 5 buses and stops. Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

See Section 5.4.3, ALT6, of the Final EIS for additional information on transit and RTD coordination.

Response to Comment 7

Typical water quality mitigation is included in the project, such as detention basins to comply with Municipal Separate Storm Sewer System permit requirements and Section 402 stormwater permitting during construction, but additional mitigation is not required. See Chapter 5.0 of the ROD for more information on water quality mitigation.

See Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as mitigation.

Additional water quality improvements that the state is committed to implement as part of the project based on the state analysis of disproportionately impacted communities as a result of SB 21-260, codified in CRS 43-1-128, are discussed in the State Community Analysis Technical Report, which is available on the project website.

Response to Comment 8

Typical landscaping mitigation, such as using native trees and shrubs, is included but additional mitigation is not required. See Chapter 5.0 of the ROD for more information on landscaping-related mitigation.

See Section 5.4.4, IMP2, of the Final EIS for information on what is classified as mitigation.

Response to Comment 9

The community-recommended improvements from the disproportionately impacted communities analysis required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Community Analysis Technical Report. Community involvement around these improvements is also discussed in that technical report, which is available on the project website.

Response to Comment 10

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the ROD.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website. CDOT will continue to coordinate with Adams County on the community improvements throughout the remainder of the project implementation process.

Response to Comment 11

Comments noted.

Outlook

[cdot_i270] Fwd: I-270 Discussion Today

From Merenich - CDOT, David <david.merenich@state.co.us>
Date Fri 1/16/2026 11:33 AM
To CDOT - I-270 <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Can we please log this potential development as a DEIS comment?

---------- Forwarded message ---------
From: **Steve O'Dorisio** <SODorisio@adamscountyco.gov>
Date: Mon, Jan 5, 2026 at 4:47 PM
Subject: Re: I-270 Discussion Today
To: Merenich - CDOT, David <david.merenich@state.co.us>
Cc: Jessica Myklebust - CDOT <jessica.myklebust@state.co.us>, norma.frank@cli-services.com <norma.frank@cli-services.com>

Boyers:
https://maikerhp.org/affordable-apartments-could-rise-from-ashes-of-former-boyers-coffee-plant/

See also...
PRC2025-00012 Maiker Boyers Final Development Plan & Subdivision

Case Manager: Greg Barnes

Final Development Plan to establish the Maiker Boyers Planned Unit Development;
Final Plat for Minor Subdivision for the Second Amended Boyers Coffee Subdivision to create one lot and two tracts on approximately 2.1 acres within the Maiker Boyers Planned Unit Development zone district.

https://adamscountyco.gov/our-county/community-economic-development/planning-development/current-land-use-cases/

Best Regards,
Steve O'Dorisio
County Commissioner, *District 4*
ADAMS COUNTY, COLORADO

Response to Comment 1

CDOT has reached out to Adams County Planning Department, and this development is not imminent. CDOT will continue to monitor this development throughout the project development process.

4430 S. Adams County Parkway, W5700
Brighton, CO 80601
720.333.1117 m | sodorisio@adamscountyco.gov | www.adamscountyco.gov

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I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 12/5/2025 10:50 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
Adams County York Street Phase III Comments - from Adams County Public Works.
Provide your comment below:
As discussed previously with Adams County, please continue to consider the following recommendations from Adams County Public Works to better align the York Street Bridge w/ Adams County York Street Phase III project: • 10-foot shared-use path on the southeast side of York Street Bridge, to be extended to the CDOT right-of-way • The center turn lane should be 16 feet wide. • Can you provide a 7' sidewalk (5' sidewalk + 2' shy distance) on the west side of the bridge Thank you and the County looks forward to continuing to work with CDOT on aligning the two projects!
Name (first and last)
Michele Riccio (Adams County Public Works)
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

CDOT and Adams County are coordinating design footprints between the two projects.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 3:35 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Business and Commerce , Bicycle and Pedestrian Resources, Community and Socioeconomics , Express Lanes, Freight, Purpose and Need, Safety, Transit
If you selected "Other", please specify
Provide your comment below:

1 On behalf of the Adams County Regional Economic Partnership (AC-REP), thank you for the opportunity to comment on the I-270 Draft Environmental Impact Study (DEIS). AC-REP is the regional chamber of commerce and economic development organization representing more than 80 primary employers across Adams County, many of whom rely on I-270 every day for workforce access, freight movement, and regional connectivity. We are also board members of the North Area Transportation Alliance and Smart Commute, two leading voices for transportation in the Greater Adams County region. AC-REP strongly supports advancing the Draft EIS toward a Final EIS and Record of Decision, so this long-planned, critical corridor can move forward toward funding and implementation. Our region has often been last in receiving funding or improvements to transportation systems, but we can no longer wait for additional studies or meetings to address the concerns with I-270. Its performance is essential not only to Adams County, but to the economic competitiveness of the entire Front Range. The corridor supports an estimated $80–$100 billion in annual goods movement and carries freight volumes that exceed many comparable metropolitan corridors. Persistent congestion, unreliable travel times, and a high crash rate undermine safety, workforce reliability, and supply-chain performance. For employers, these conditions translate directly into lost productivity, recruitment challenges, and increased operational risk. For workers, they represent daily safety hazards and barriers to accessing jobs—particularly in one of Colorado's fastest-growing regions with a young workforce and some of the most attainable housing in the metro area. Daily commuters depend on I-270 to reach Denver International Airport, the Fitzsimons Innovation Campus, and many large employers directly adjacent to the highway. In addition, we know that many of our students, educators, and first responders also need to either navigate this critical highway connection to get to the CU Anschutz campus, Children's Hospital, or several of our school districts that serve this area. AC-REP supports a safety-driven, climate-smart modernization of I-270 that improves reliability for freight, commuters, and transit users while avoiding unmanaged expansion. We appreciate the DEIS's evaluation of managed lanes and operational improvements that prioritize safety, reduce stop-and-go conditions, and improve overall system performance. We also support the inclusion of multimodal improvements that

Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the I-270 Corridor Improvements project website (https://www.codot.gov/projects/studies/i270study).

strengthen transit reliability and close pedestrian and bicycle connectivity gaps, which are essential to equitable workforce access. We support the preliminarily identified Preferred Alternative of two general-purpose lanes and one Express Lane that accommodates transit. This approach offers a balanced strategy to improve safety and reliability, supports transit operations, and enhances freight movement. We also recognize that the Express Lane and tolling framework may provide an important revenue mechanism to support construction, operations, and long-term maintenance, strengthening the project's competitiveness for state and federal funding. Equally important, AC-REP supports reasonable mitigation efforts to address the environmental and health impacts experienced by communities adjacent to the corridor. We encourage CDOT to ensure the Final EIS clearly connects monitoring to funded mitigation measures that deliver measurable, long-term benefits, including air quality protections, stormwater and water quality improvements, noise mitigation, and community transparency. As the project advances, we respectfully request that the Final EIS and Record of Decision include clear commitments related to construction coordination and corridor operations, including maintaining freight access, continued business and community outreach, incident response planning, and safe, well-communicated detours for vehicles, transit, and trail users. In closing, AC-REP supports advancing the I-270 Draft EIS to a Final EIS and Record of Decision. This project is essential to improving safety, reliability, and economic vitality while addressing long-standing community impacts. Advancing the DEIS will position I-270 for funding and delivery and help ensure this corridor serves Adams County's citizens, businesses, and communities safely and equitably for decades to come. Thank you for your leadership and continued engagement with the business community.

Name (first and last)
Lisa Hough, AC-REP
Address
1870 W. 122nd Ave. Suite 300
City
Westminster
Neighborhood/ZIP Code
80234
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
lisa.hough@ac-rep.org

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

1

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/13/2026 1:00:31 PM

Which topic(s) does your comment relate to?
Construction , Hazardous Materials, Purpose and Need, Safety
If you selected "Other", please specify
Provide your comment below:
The existing shoulder widths and bridge widths are inadequate for emergency use, and our fire/ambulance apparatus and Commerce City police vehicles had been hit multiple times while mitigating emergency response calls on I-270. Creating costly repairs to our tax paying citizens because a majority of driver's that run into our apparatus do not have insurance. Creating shoulder widths of 10-12 feet along the entire length of I-270 is South Adams County Fire Protection District's number one priority. The shoulder widths of 10-12 feet will allow us to move traffic around the incident inside of shutting down all lanes of traffic causing drivers to try to force their way around the incident. Ensuring adequate emergency turn arounds for fire and ambulance apparatus is our second priority. Access onto I-270 has a few areas; Quebec Street, Vasquez Blvd., York Street, I-76 and I-25/Hwy 36. Quick access to an emergency is paramount for us to mitigate the incident. With the amount of traffic that is backed up on I-270 when an incident occurs and the current shoulder widths accessing the only emergency turnaround is extremely difficult. Having an emergency turnaround between Quebec St./Vasquez Blvd. and Vasquez Blvd./York Street would greatly improve our ability to access incidences on I-270. Our third priority is the condition of all the overpasses. South Adams County Fire Protection District would like to see all overpasses be torn down and built new during the construction phases of the project. The potholes and concrete falling from the overpasses causes significant safety issues for individuals traveling on I-270 and the local streets traveling underneath I-270.
Name (first and last)
Randall S. Weigum, Deputy Fire Chief
Address
6050 Syracuse Street
City
Commerce City
Neighborhood/ZIP Code
80022
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
rweigum@sacfd.org

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative includes widening shoulders to meet current design standards, which generally provide full-width inside and outside shoulders intended to support emergency response, disabled vehicles, and traffic incident management. Providing wider shoulders is specifically intended to reduce the need for full lane closures during incidents and to improve responder safety.

The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane. Improvements to the I-25/I-270 system interchange, including the flyover ramps to northbound I-25, are acknowledged as critical to corridor performance; however, those facilities are being addressed through separate, previously approved projects on I-25 and US 36 and have been assumed in the I-270 analysis but are not redesigned as part of this Environmental Impact Statement. The Preferred Alternative does include restriping the westbound I-270 to northbound I-25 ramp to provide two lanes.

The Preferred Alternative also addresses congestion, safety, and outdated interchange design at Vasquez Boulevard. The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

The Preferred Alternative also includes consideration of emergency turnouts and turnarounds along the corridor to improve incident access and reduce response times. The specific spacing and location of these facilities, including between Quebec Street and Vasquez Boulevard and between Vasquez Boulevard and York Street, will be refined during final design in coordination with South Adams County Fire Protection District, Commerce City Police, and other response agencies.

DENVER
THE MILE HIGH CITY

CITY AND COUNTY OF DENVER

Department of Transportation and Infrastructure (DOTI)

Date: January 14th, 2026

To: Colorado Department of Transportation (CDOT)
Re: Department of Transportation and Infrastructure (DOTI), City and County of Denver Comments on I-270 Corridor Improvements Study

Dear CDOT Leadership,

1 On behalf of the City and County of Denver's Department of Transportation and Infrastructure (DOTI), I am writing to provide our support for the *Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit Alternative* recommended in the I-270 Corridor Improvements Study. We recognize the importance of this facility to regional mobility and appreciate the opportunity to comment on how this project intersects with Denver's transportation priorities to enhance regional mobility, safety and environmental sustainability.

2 **Safety.** The I-270 corridor experiences operational challenges that impact safety for all road users – and represents a critical regional corridor for freight travel and multimodal travel, including both the highway and Sand Creek Regional Greenway for much of the corridor length. Traveler Safety to be improved through the preliminary preferred alternative (PPA) needs to remain the highest priority. The proposed on-corridor modernization of shoulders, interchange ramps, and restoration of state of good repair for the road and bridges throughout are needed design and resultant infrastructure improvements. We recognize the need for and support critical safety enhancements to improve bicycle and pedestrian connectivity along and across the corridor serving adjacent neighborhoods.

3 **Air Quality.** The City and County of Denver has committed to reducing greenhouse gas emissions 65% by 2030. In addition to the demonstrated need to address existing infrastructure and best manage congestion and growth in vehicle miles traveled along the corridor, the project should prioritize transit and high-occupancy vehicle priority treatments, designing in flexibility to accommodate future zero-emission transit technologies, shifting trips to lower emission forms of travel. We encourage CDOT commit to monitoring post-construction emissions to ensure climate goals are not compromised.

4 **Bridge and Regional Connectivity.** The existing I-270 corridor includes aging bridges and structural elements requiring attention. This project provides a critical opportunity to replace 12 structurally deficient bridges and overpasses, upgrade drainage systems to handle current and future stormwater climate conditions while bringing the entire corridor up to current engineering and safety standards. The proposed interchange reconstruction at Vasquez Boulevard is anticipated to improve our Denver Connector transit service operations which is used to transport North Denver residents to grocery stores north of I-270.

5 Additionally, the Sand Creek Regional Greenway exists within the corridor, which is a critical link between Denver and the region's world class multimodal trail system, connecting the Platte River Trail and Clear Creek Trail on the west

Department of Transportation & Infrastructure (DOTI)
201 W. Colfax Avenue | Denver, CO 80202
Department of Transportation and Infrastructure - City and County of Denver

311 | DENVERGOV.ORG | DENVER 8 TV

Response to Comment 1

Comments noted.

Response to Comment 2

Comments noted.

Response to Comment 3

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

Response to Comment 4

Comments noted.

Response to Comment 5

The Preferred Alternative includes the following bicycle and pedestrian improvements related to trail connectivity throughout the corridor:

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

For more information on bicycle and pedestrian improvements in the alternatives development and evaluation process, see Appendix B, Alternatives Development Technical Report, in the Draft Environmental Impact Statement (EIS).

and numerous trails on the east. Many sections of this trail within the highway corridor are sub-standard, too narrow to allow safe passing, with underpasses which have poor site lines and steep grades – representing safety and access deficiencies. Trailheads within the corridor are difficult to access due to substandard or missing bicycle and pedestrian connections across I-270. As the roadway is widened – the project should focus on upgrading this critical trail and underpasses to standard where deficiencies exist, enhancing access to trailheads, and providing more frequent trailheads. Reducing roadway noise for trail users should also be paramount, through the application of proper sound walls. Improved trail amenities – wayfinding, resting stations, should also be considered. While these improvements may exist outside the City and County of Denver – they will facilitate regional multimodal trips and support Denver's climate, safety, and mode shift goals. The US 36 Improvements CDOT led represent a prime example of how major infrastructure projects can improve regional multimodal access – successes that can be replicated here.

Resiliency and Economic Development. Addressing these substandard conditions is essential for the long-term resilience of our regional multimodal transportation network. These improvements should be pursued in a manner that minimizes environmental impacts and provides opportunities for green infrastructure integration.

Aligning with DOTI values which extend beyond our borders, this project will deliver significant benefits to the broader metropolitan area, including improved freight mobility in a corridor where upwards of 1 in 8 vehicles traveling along it are moving goods. The opportunity for enhanced economic activity and reduced travel times for commuters accessing Denver's employment centers are worthwhile outcomes of the PPA.

Collaboration and Community Engagement. The City and County of Denver requests continued collaboration with CDOT on the I-270 Corridor Improvements Study. We are committed to supporting its successful implementation and ensuring it delivers maximum benefit for our community and region.

As the project progresses into NEPA, we request that CDOT work closely with our agency and community stakeholders to ensure:

- Meaningful investment in multimodal connections and infrastructure serving adjacent communities
- Comprehensive community engagement, particularly with environmental justice communities
- Coordination with Denver's Vision Zero and multimodal network plans
- Mitigation measures for any induced demand or air quality impacts

We appreciate CDOT's partnership and look forward to continued dialogue throughout the planning and implementation process to ensure this project serves the best interests of Denver residents and our regional transportation goals.

Sincerely,

Ford, Amy - DOTI HE3258 Manager Department of Transportation a

Amy Ford, Executive Director

Department of Transportation and Infrastructure
City and County of Denver

Response to Comment 6

Comments noted.

Response to Comment 7

CDOT will continue working with and coordinating with the Denver Department of Transportation and Infrastructure throughout the project development process.

Reviewer	Dept/Division	Document	Page #	Comment
Krutsinger	DOTI / Planning	Executive Summary	6	Was the Federal Railroad Administration consulted, given the rare crossing of two class-one railroads underneath I-270 at Sand Creek junction?
Krutsinger	DOTI / Planning	Executive Summary	6	Freight operations on the corridor and to/from the corridor
Krutsinger	DOTI / Planning	Executive Summary	14	Why did CDOT not consider braided ramps to provide a full-access interchange at York Street? York Street could/should be considered as at least a secondary/backup freight access route to Denver via York & Brighton Blvd. It is also an important exit point if there is an accident further east, to not be stuck in miles of traffic jams with no exit off the highway.
Krutsinger	DOTI / Planning	Executive Summary	14	Fully support the reconstruction of the Vasquez interchange. This is a critical part of access to and egress from north Denver. This will become more critical as Park Hill Golf Course becomes a regional park, and Colorado Blvd becomes a BRT/enhanced bus corridor.
Krutsinger	DOTI / Planning	Executive Summary	14	This map should show the two class one railroad lines on it. This map should also show where the N-Line crosses over I-270. All of these are important to this project from approvals/coordination and vertical-clearances perspectives.
Krutsinger	DOTI / Planning	Executive Summary	15	ES. 10.5 Freight operations on the corridor and to/from the corridor
Krutsinger	DOTI / Planning	Executive Summary	20	Need a new section 12.2 inserted and current 12.2 becomes 12.3. The new 12.2 should cover the delivery schedule question with and without the CTIO/tolling revenues.
Krutsinger	DOTI / Planning	Chapter 5	4	There is no mention of Amtrak mitigation. This will be needed, alongside the BNSF and Union Pacific coordination.
Krutsinger	DOTI / Planning	Chapter 6	1	There is no mention of any railroad involvement. Both BNSF Railway and Union Pacific need to be strongly involved for the replacement of the bridge over the Sand Creek Junction of the two railroads. This is is a "long pole in the tent" from a schedule and approvals standpoint. Amtrak's California Zephyr travels on the BNSF Railway tracks. How are you going to reconstruct the bridge without shutting down both railroads and Amtrak service?
Krutsinger	DOTI / Planning	Appendix C	6	Exhibit 5: 2 GP + 1 Managed Lane...Any other interchange options to remove the slow cloverleaf on-ramps in both directions?
Krutsinger	DOTI / Planning	Appendix C	14	Exhibit 5: 3 GP Lanes...Any other interchange options to remove the slow cloverleaf on-ramps in both directions?
	DOTI/TME	All	All	TME has reviewed the study and is supportive of the preferred alternative.

Response to Comment 8

The Alternatives Development Technical Report evaluated interchange configurations at York Street and documented that York Street functions today as a partial interchange, primarily serving local access rather than a full system interchange. During alternatives development, options to expand York Street to a full-access interchange were considered at a planning level but were not advanced. See Appendix B of the Draft EIS for more information on the analysis.

Existing Vasquez Interchange cloverleaf ramp geometries were evaluated through the alternatives development and screening process. See Appendix B of the Draft EIS for more information on the analysis.

Railroad coordination has been initiated and will continue through project development. See Table 2-1 of Chapter 2.0, E-023, of the Final EIS for the updated railroad coordination mitigation that now includes Amtrak per your suggestion.

See Section 2.1.2, Figure 2-2, of the Final EIS for the locations of the N Line and the two class one railroad lines.

From: felicia.michael=state.co.us@cdot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Date: Thursday, January 15, 2026 3:43:54 PM

Which topic(s) does your comment relate to?
Air Quality, Business and Commerce , Construction , Express Lanes, Purpose and Need, Safety
If you selected "Other", please specify
Provide your comment below:

1 On behalf of the Colorado Contractors Association, we strongly support the advancement of the Environmental Impact Statement (EIS) for the I 270 Corridor Improvements Project. This critical step will enable the state to deliver a safer, more efficient, and more sustainable corridor that meets the needs of both the traveling public and nearby communities. The proposed improvements – including adding a new general purpose lane in each direction, updating interchanges, replacing aging bridges, and modernizing on and off ramps – are designed to improve traffic flow, reduce bottlenecks, and enhance freight mobility across the corridor. We also appreciate the extensive public input gathered through meetings, surveys, and local engagement efforts, which has helped ensure the EIS process reflects the perspectives and priorities of those most directly affected. As you know, I 270 remains one of Colorado's most critical yet overburdened transportation corridors. Each day, more than 100,000 vehicles travel a highway that was never built to accommodate today's commuter and freight demands. The corridor experiences roughly 42 crashes per mile each year – nearly 40 percent higher than comparable four lane freeways elsewhere in the state. These incidents lead to unpredictable delays and compound congestion already caused by traffic volumes that exceed the roadway's capacity, creating growing safety, reliability, and environmental concerns for families, businesses, and truckers alike. I 270 is a backbone of commerce and connectivity for the Front Range, linking major employment centers, freight routes, and Denver International Airport. Each year of delay only increases costs, congestion, and lost opportunities for the people and businesses that depend on this corridor. business interests in the region, as well as commuters and residents. We support CDOT and its EIS process to maintain momentum toward construction. Launching this work will turn years of planning and collaboration into visible, meaningful improvements that enhance safety, mobility, and economic vitality across the region. Thank you for your leadership and continued commitment to modernizing one of Colorado's most important transportation corridors.

Name (first and last)
Tony Milo
Address
6018 Beeler Court
City
Denver
Neighborhood/ZIP Code
Central Park / 80238
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
tmilo@ccainfo.org

Response to Comment 1

Comments noted.

COLORADO MOTOR CARRIERS ASSOCIATION

January 19, 2026

Colorado Department of Transportation
Attn: David Merenich, P.E., I-270 Program Director
2829 West Howard Place
Denver, CO 80204

Re: Strong Support for the I-270 Draft Environmental Impact Statement (DEIS)

To Whom It May Concern:

On behalf of the Board of Directors of the Colorado Motor Carriers Association, I am writing to express our strong support for the I-270 Draft Environmental Impact Statement (DEIS) and for advancing the project toward a Final EIS and Record of Decision

Many of our companies are based in Adams County and collectively employ several thousand people who live and work in the county today. Adams County is not only the home for several hundred businesses involved in trucking and fuel distribution but the hub for manufacturing, warehousing, construction, and agriculture in Colorado. Those industries depend on reliable receipt and shipping of goods. I-270 is the key link that connects these companies to their workplaces, shippers, and customers and supports the region's economic vitality.

In regard to I-270 it is not only a key a corridor of travel for our trucks, it is also the primary route for many of our workers commuting to their jobs at all hours of the day.

Over the past ten years increased congestion has translated into higher costs, uncertainty in travel times and deliveries, and greater difficulty conducting daily operations—factors that have led some businesses to relocate and discouraged others from locating in the area.

Improvements on I-270 are Essential for Enhanced Safety
The Colorado Motor Carriers Association and Colorado-Wyoming Petroleum Marketers Association view safety as our highest priority. Unfortunately, as congestion has increased on I-270 we have seen conditions deteriorate, translating into an increase in overall crashes—some resulting in serious injury or death. Our members and their employees travel this corridor daily, and we want everyone to get home safely each night. The Preferred Alternative's reconstruction of bridges, improved shoulders, safer ramp geometry, and additional lanes will help greatly in addressing the conditions that contribute to crashes and will help achieve the shared goal of safer travel for all users of I-270.

The Preferred Alternative also directly addresses the corridor's most pressing issue, congestion. I-270 carries roughly 100,000 vehicles per day, including a high volume of freight, and experiences severe peak-hour congestion. The additional lanes will help in addressing the increased traffic volume that has evolved, improve travel-time reliability, and reduce the hours trucks and commuters spend idling in traffic. Predictable freight movement along this connector between I-25 and I-70 is critical for local businesses and the regional economy.

Response to Comment 1

Comments noted.

Key to Economic Development Benefiting the Region and State
Beyond safety and mobility, I-270 is vital to economic development for Adams County, the Denver region, and the State of Colorado. Improvements to the corridor will reduce operating costs for businesses, increase reliability for freight and workforce commutes, and strengthen the region's competitiveness for new investment. Upgrading I-270 lifts the corridor economically and supports broader state economic growth by preserving jobs, attracting new employers, and ensuring that Colorado's manufacturing, warehousing, construction, and agricultural sectors can move goods efficiently to market.

For the above-noted reasons, we respectfully urge CDOT and FHWA to advance the Preferred Alternative in the final Environmental Impact Statement and to move forward with construction as soon as possible.

Thank you for your consideration and for the opportunity to provide input.

Sincerely,

Gregory D. Fulton

Gregory Fulton
President
Colorado Motor Carriers Association
greg@cmca.com
303-433-3375

CoPIRG Foundation

Comments on I-270 Draft Environmental Impact Statement and State Environmental Reports, Federal Project No. STU 2706-046, CDOT Project Code 25611, ID No. FHWA-CO-EIS-24-001

On behalf of the CoPIRG Foundation, I'm urging the Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) to pursue a Supplemental Draft Environmental Impact Statement that fully analyzes a No-Widening Alternative.

We must consider a scenario that does not bring more cars to this already congested interstate, in this already congested part of our state.

America spends more than a quarter-trillion dollars each year maintaining and expanding our system of highways. Roughly half of that money does not come from gas taxes or other charges paid by drivers, but rather from ordinary taxpayers.

Here in Colorado, state and local governments face difficult choices in the years ahead. We have limited dollars and we must invest them in ways that support travel habits that leave us with less pollution, safer and more pleasant communities and more transportation choices. That is our best bang for the buck.

We have studied investments in highway widening across the country through our series of Highway Boondoggle reports, and we have found that highway construction and expansion projects don't solve congestion or improve safety – instead they harm the environment while contributing to lasting financial and health burdens for the public.

Expanding a highway sets off a chain reaction of societal decisions that ultimately leads to the highway becoming congested again – often in only a short time. Since 1980, the U.S. has added well over 986,000 lane-miles of highway – paving more than 1,868 square miles, an area larger than the state of Rhode Island – and yet, traffic congestion in many American cities remains severe.

We are particularly worried about the congestion impacts of a widening project in the middle of our urban core, such as I-270, fueling additional congestion on other major interstates like I-70 and I-25. Too often, when transportation departments try to address time and reliability issues with additional lanes, the result is additional vehicles that contribute to congestion not just on the immediate corridor but on neighboring networks. It also means additional drivers, which can increase the chances of crashes, which is another major contributor of congestion not to mention possible injuries or fatalities from the crash.

There are other impacts when new lanes are added to highways.

Response to Comment 1

The Draft Environmental Impact Statement (EIS) analyzes the No Action Alternative, which is a true no widening alternative, and discloses impacts. No other alternatives with less than one additional lane of capacity passed through the alternatives screening process, including the Minimal Build Alternative or Two Express Lanes that Accommodate Transit Alternative, to warrant completion of a full analysis. See Section 5.4.3, ALT3 and ALT4, of the Final EIS for information on the evaluation of the Minimal Build and Two Express Lanes that Accommodate Transit Alternative and why they were eliminated from consideration under this EIS.

Response to Comment 2

The team identified the Denver Regional Council of Governments' (DRCOG) Focus version 2.3.2 Travel Demand Model to generate long-range travel forecasts that comply with the federal mandate under 23 Code of Federal Regulations 450 for a 20-year transportation planning horizon. As the standard regional model, DRCOG's Focus model accurately reflects both passenger and commercial vehicle interactions in the Denver metropolitan area. By aligning with the 2050 Regional Transportation Plan, the model also ensures compliance with federal air quality and transportation planning requirements, making it the most suitable tool for forecasting long-term traffic impacts in the I-270 corridor.

For the Draft EIS, DRCOG's model was used to generate 2050 traffic forecasts consistent with the adopted regional plan. The model provided projected daily and peak-period volumes for each alternative. These forecasts reflect regional population and employment growth, anticipated network improvements, and changes in travel behavior under each scenario.

The regional model provides systemwide forecasts but does not capture detailed, lane-by-lane operational behavior. To evaluate corridor operations in greater detail, microsimulation models were

developed using regional model outputs as baseline traffic inputs. Microsimulation models replicate individual vehicle movements along the corridor, including merging, weaving, lane changing, acceleration, and queue formation. These models incorporate geometric design features, such as ramp lengths, auxiliary lanes, and interchange configurations.

A minimal improvement or no-build scenario would not eliminate travel demand in the corridor. I-270 serves as a regional connector between I-25 and I-70 and as a designated oversized/overweight load for hazardous materials and Strategic Highway Network (STRAHNET) route. Regional growth projections indicate continued increases in travel demand, regardless of whether capacity is added to this segment. Without improvements, the corridor would continue to experience high crash rates, substandard merge distances, aging bridge deficiencies, and prolonged stop-and-go conditions. Congestion-related emissions and unreliable travel times would persist or worsen under projected 2050 volumes.

See Section 5.4.6, TRANS1 and TRANS2, of the Final EIS for additional information related to the traffic modeling that was completed for this project.

Highway expansion fuels additional driving that contributes to climate change, a leading contributor to greenhouse gas emissions in Colorado. Air pollution from vehicles also causes tens of thousands of deaths in the U.S. each year and makes us more vulnerable to a range of health problems, including asthma, impaired lung function, coronary heart disease and strokes.

Here in the Denver metro area, we have some of the worst ozone pollution in the country and earned an "F" around particular matter, both of which is fueled by tailpipe emissions.

Highway expansion can cause irreparable harm to communities – forcing the relocation of homes and businesses, widening "dead zones" alongside highways, and reducing cities' base of taxable property and overall community.

Building new roads diverts hundreds of millions of taxpayer dollars from repairing existing ones at a time when Colorado has too many roadways in "poor" condition and many bridges in need of repair or replacement. With limited dollars, we need to avoid major projects that add new lanes from syphoning dollars away from maintenance and safety projects across the state.

Ultimately, CoPIRG Foundation is advocating for state and local governments to invest in transportation solutions that reduce our dependence on automobile travel. We need to focus dollars toward projects that expand transportation choices, prioritize repair and rehabilitation and reduce vehicle-miles traveled. Investments in public transportation, cycling and pedestrian infrastructure, transport demand management and other measures reduce the pressure on congested highways, as well as delivering significant public health and environmental benefits.

A key strategy is fix-it-first. We should reorient transportation funding away from highway expansion and toward repair of existing roads and investment in other transportation options. This is particularly true along I-270, which needs major safety improvements. A no-widening alternative could provide a more robust vision of how dollars could be invested in safety if they weren't siphoned away for additional lanes.

One assumption that seems to often fuel the need for additional lanes is the assumption that we will have more and more driving. But less driving is possible. And can lead to a better quality of life.

Residents in several states and cities have broken with the decades-long trend of more and more driving, and have driven fewer miles on average in recent years. A mix of reasons may have caused driving to decline in these various locations. One factor is a growing population in compact neighborhoods where residents don't need to drive as far or as often. Another factor is demographic change, such as when more people retire and no longer have a daily commute. A third contributing factor may be investments in infrastructure that supports walking, biking or riding transit, allowing residents to drive less.

Response to Comment 3

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 4

Residents and businesses located in the project area are served by Regional Transportation District (RTD) local, limited, and regional buses. One RTD commuter rail line, the N line, intersects the study area at the Burlington Ditch. The Flatiron Flyer 5 (FF5) bus route travels on I-270, regionally connecting Boulder to the Anschutz Medical Campus in Aurora. However, frequent congestion and variable travel speeds on I-270 have resulted in RTD publishing an official route deviation to this service, at the discretion of the bus operator; the deviation uses I-70 and I-25 instead of I-270. There are multiple local and limited bus routes that operate within the community that don't use I-270.

Throughout the EIS process, CDOT has coordinated with RTD on the potential of adding FF5 buses and stops. During the stakeholder workshop on May 27, 2025, RTD indicated that adding a stop at the

Central Park location would add 12 minutes to the FF5 route, which may draw pushback from existing customers. The FF5 bus route was originally designed to serve students traveling between Boulder and the Anschutz Medical Campus. Adjustments to its route would require a broader regional planning study. In addition, ridership data does not support adding a stop in Commerce City. While this project does not include a new FF5 stop, it would add four new local stops to better serve nearby routes, two on Quebec Street and two on Sandcreek Drive.

Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder.

When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The Bicycle, Pedestrian, and Transit Enhancements Alternative was developed in response to comments received throughout the project development process to focus on non-vehicle alternatives. The alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

For additional information on increasing transit, bicycling, and pedestrian infrastructure in order to reduce dependence on automobile travel, please see Section 5.4.3, ALT6 and ALT7, of the Final EIS.

Whatever the cause, the decline in per-capita driving – especially in a few leading cities and states – suggests that our current levels of car travel are not inevitable. Travel habits can change, leaving us with less pollution, safer and more pleasant communities, and, often, more choices than before.

Vehicle Miles Traveled (VMT) per capita has fallen more in Washington state than in any other state over the past 27 years. Contributing factors in this decline may include the state's decades-long program to reduce drive-alone trips to work, as well as reduced driving in Seattle, the state's largest city.

In 1996, Washington ranked 38th overall for per capita VMT, with residents driving an average of nearly 9,000 miles per year. By 2023, per capita VMT in Washington had dropped to 7,655 miles per year and the state was ranked 47th for per capita driving. In 2023, the average Washington resident drove 1,215 fewer miles annually compared to 1996. In contrast, the average American drove an additional 475 more miles in 2023 compared to 1996. In 2019, the year before the pandemic, the average Washington resident drove 660 fewer miles compared to 1996 while the average American drove 700 more miles compared to 1996.

One reason that VMT has fallen more in Washington than in other states may lie in Washington's efforts to reduce the number of people who drive alone to work. Washington adopted a commute-trip reduction law in 1991 that requires worksites with 100 or more full-time employees who must start their work day between 6 and 9 a.m. to provide employees with tools and incentives to help make it easier for them to get to work without driving, or to work from home. The law has significantly reduced commuting. Approximately half of the 600,000 employees who are covered by the Commute Trip Reduction Program drove alone to work in 2019/2020, versus 71% for other Washington employees. Nationally, 76% of employees drove to work alone.

Another reason for declining per capita VMT in Washington is that per capita VMT in Seattle, the largest city in the state, has declined.

Seattle's per capita VMT has declined for more than a decade, dropping from approximately 7,400 miles per resident in 2005 to 6,150 miles in 2018, and even further to around 5,500 miles in 2022. (Total VMT in that period increased, however, because the city's population increased more rapidly than per capita VMT declined. Had these new residents not moved to Seattle, they may have lived in areas that required more driving.)

Few people who work in Seattle drive to work alone. Before the COVID-19 pandemic, fewer and fewer workers in Seattle commuted to work by car by themselves. In 2019, 26% of workers in Seattle drove to work alone, down from 35% in 2009. Rates of driving alone fell further in 2022, when many people worked from home, but increased to 27% in 2024.

However, commuting trips represent only a fraction of the total trips that Seattle residents take, and most non-work trips still involve driving alone. Around 70% of grocery store and school pick-up and drop-off trips are completed by driving alone.

Several investments have helped Seattle achieve relatively low rates of car-based commuting and provide residents with more options for non-work trips.

- Seattle-area voters approved funding in 1996 to create a regional transit system, and additional funding in 2008 to add 36 miles of light rail. Another voter-approved funding measure has enabled the system to continue expanding with two new stations opening in May, and another, carrying passengers across Lake Washington to connect the east and west sides of the metro area, expected to open in 2026.
- In 2015, Seattle voters approved funding to improve the frequency and reach of bus service. When the ballot measure passed, only 25% of Seattle households lived within a 10-minute walk of bus service that operated on a frequency of 10 minutes or less. By 2019, bus service improvements meant that 70% of households were within a 10-minute walk of a route that had buses at least six times an hour. This figure was within 2 percentage points of the city's 2025 goal of 72% of households, for which data has not yet been published. (Since the pandemic, a shortage of drivers has forced service reductions at times and threatened the system's ability to expand service.)
- That 2015 ballot measure also provided funding to make walking and biking safer and more comfortable, such as with protected bike lanes and more signalized crosswalks.

Seattle is not the only city where development patterns and transportation investments have helped to reduce per capita VMT. The Portland-Vancouver region, Washington, D.C., and Minneapolis have all experienced sustained declines in per capita VMT, in part a response to efforts to lower vehicle usage.

In Minneapolis, from 2007 to 2017, average daily miles driven fell approximately four miles per person, declining from nearly 20 miles per person per day in 2007 to just under 16 miles per person per day in 2017. Because 35,000 more people lived in the city, total miles traveled remained the same.

Residents drove to work less often, replacing some commute trips with walking or cycling. Driving accounted for a slightly smaller share of commute trips over 11 years, while the share of commute trips completed by walking or biking increased. By 2017, walking and biking together accounted for 12% of commute trips, while driving accounted for 70%.

Walking and biking also increased for other kinds of trips. At key intersections and points within the city's walking and biking network, the city counted 21% more people walking and 53% more people biking in 2017 compared to 2007.

Minneapolis has made a number of investments and policy changes that have helped reduce driving by giving residents more travel choices and by supporting development that puts more homes, jobs and shops within walking or biking distance.

- The city has invested in a network of routes and paths to make biking easier and safer. Starting with 80 miles of bikeways in 1997, Minneapolis had added 45 miles by 2007 and another 119 miles by 2017. Subsequently, the largest increase in biking has occurred in

portions of the network where people walking and biking have greater distance or protection from people who are driving.

- The city has also expanded transit options, opening its first light rail line in 2004 and adding additional rail and bus rapid transit through the 2010s. This helped increase overall transit ridership. Ridership fell sharply at the outset of the pandemic and though it has risen each year since 2021 it remains far below pre-pandemic levels.
- Apartments and townhomes, rather than single-family homes, accounted for a large share of development from 2010 to 2016. This more compact style of development can shorten the distance between destinations, making leaving the car at home easier.

The investments reflect goals Minneapolis has adopted to reduce climate pollution; enable people in every neighborhood to meet their daily needs via walking, biking and public transit; and increase bicycling's share of commute work trips, among other goals.

The success of Minneapolis, Seattle and Washington state in reducing per capita VMT demonstrates that ever-increasing driving does not have to be our fate. Planning and policy decisions and changing economic and demographic realities can cause per capita VMT to decline, and transportation planning and investments should reflect that.

We believe these examples provide evidence that it is possible to achieve better outcomes for the I-270 corridor, both for the people who live there and the people who travel through there, with a no-widening alternative.

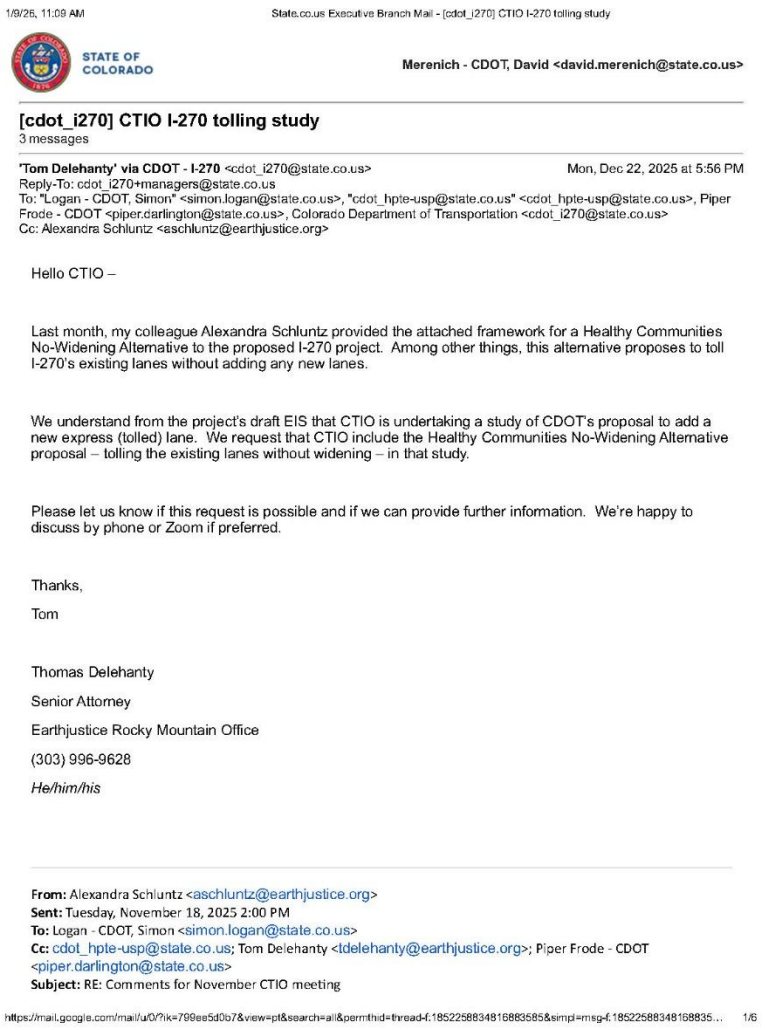
Key strategies that should be part of the no-widening alternative include ways to fix the safety challenges without adding new cars, increasing local transit service, supporting the adoption of zero-emission trucks and vehicles that make frequent trips in and around the corridor, increasing safe walking and biking options and increasing regional transit service based on a robust understanding and analysis of where vehicles who travel I-270 begin and end their trips.

To conclude, we are requesting a no-widening alternative receive the same level of analysis and consideration as the multiple widening alternatives being considered for further evaluation.

Thank you for your consideration.

Danny Katz
Executive Director, CoPIRG Foundation

1543 Wazee St
Denver, CO 80202



1/9/26, 11:09 AM State.co.us Executive Branch Mail - [cdot_i270] CTIO I-270 tolling study

STATE OF COLORADO

Merenich - CDOT, David <david.merenich@state.co.us>

[cdot_i270] CTIO I-270 tolling study
3 messages

'Tom Delehanty' via CDOT - I-270 <cdot_i270@state.co.us> Mon, Dec 22, 2025 at 5:56 PM
Reply-To: cdot_i270+managers@state.co.us
To: "Logan - CDOT, Simon" <simon.logan@state.co.us>, "cdot_hpte-usp@state.co.us" <cdot_hpte-usp@state.co.us>, Piper Frode - CDOT <piper.darlington@state.co.us>, Colorado Department of Transportation <cdot_i270@state.co.us>
Cc: Alexandra Schluntz <aschluntz@earthjustice.org>

Hello CTIO –

Last month, my colleague Alexandra Schluntz provided the attached framework for a Healthy Communities No-Widening Alternative to the proposed I-270 project. Among other things, this alternative proposes to toll I-270's existing lanes without adding any new lanes.

1 We understand from the project's draft EIS that CTIO is undertaking a study of CDOT's proposal to add a new express (tolled) lane. We request that CTIO include the Healthy Communities No-Widening Alternative proposal – tolling the existing lanes without widening – in that study.

Please let us know if this request is possible and if we can provide further information. We're happy to discuss by phone or Zoom if preferred.

Thanks,

Tom

Thomas Delehanty

Senior Attorney

Earthjustice Rocky Mountain Office

(303) 996-9628

He/him/his

From: Alexandra Schluntz <aschluntz@earthjustice.org>
Sent: Tuesday, November 18, 2025 2:00 PM
To: Logan - CDOT, Simon <simon.logan@state.co.us>
Cc: cdot_hpte-usp@state.co.us; Tom Delehanty <tdelehanty@earthjustice.org>; Piper Frode - CDOT <piper.darlington@state.co.us>
Subject: RE: Comments for November CTIO meeting

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Response to Comment 1

The Healthy Communities No-Widening Alternative, called the Two Express Lanes that Accommodate Transit Alternative in the Final Environmental Impact Statement (EIS), was eliminated from full evaluation in the EIS. Therefore, it will not be included in the Tolling and Revenue Study that the Colorado Transportation Investment Office will be conducting. For information on the evaluation, please see Section 5.4.3, ALT4, of the Final EIS.

Thanks much, appreciate it.

From: Logan - CDOT, Simon <simon.logan@state.co.us>
Sent: Tuesday, November 18, 2025 1:52 PM
To: Alexandra Schluntz <aschluntz@earthjustice.org>
Cc: cdot_hpte-usp@state.co.us; Tom Delehanty <tdelehanty@earthjustice.org>; Piper Frode - CDOT <piper.darlington@state.co.us>
Subject: Re: Comments for November CTIO meeting

External Sender

Hi Alexandra,

Thanks for letting me know that you would like to provide public comment for tomorrow's board meeting. I've copied the Zoom call-in information below. Public comment will begin at 10 am and has a 3-minute time limit per person.

Our meeting will start at 9 am, but we will be going straight into an executive session, which is closed to the public. Public comment will be the first item on the agenda once we exit the executive session.

Let me know if you have any questions

Best,

Simon

Zoom Call-In information

CTIO - Colorado Transportation Investment Office is inviting you to a scheduled Zoom meeting.

Topic: Colorado Transportation Investment Office (CTIO) Board of Directors Meeting (November 19, 2025)
Time: Nov 19, 2025 10:00 AM Mountain Time (US and Canada)
Join Zoom Meeting
https://cdot.zoom.us/j/82431432898?pwd=LZcPPqQsG0bS5TyiPT9OvA34acLnYM.1

Meeting ID: 824 3143 2898
Passcode: 281902

1/9/26, 11:09 AM State.co.us Executive Branch Mail - [cdot_i270] CTIO I-270 tolling study

One tap mobile
+17193594580,,82431432898#,,,,*281902# US
+13462487799,,82431432898#,,,,*281902# US (Houston)

Join instructions
https://cdot.zoom.us/meetings/82431432898/invitations?signature=3AEtEbs8bgjKt06dGXSVWC5XG28NcwmwFfXq9m0hs4s

Simon

Simon Logan | Special Projects Lead & Policy Analyst | Phone: 303-757-9380

COLORADO
CTIO Transportation Investment Office

2829 W. Howard Place, Denver, CO 80204

On Tue, Nov 18, 2025 at 12:31 PM Alexandra Schluntz <aschluntz@earthjustice.org> wrote:

> Hi Simon,
>
> Could I also please sign up for public comment at the CTIO meeting tomorrow morning?
>
> Best,
>
> Alex
>
> **From:** Logan - CDOT, Simon <simon.logan@state.co.us>
> **Sent:** Monday, November 17, 2025 2:58 PM
> **To:** Alexandra Schluntz <aschluntz@earthjustice.org>
> **Cc:** cdot_hpte-usp@state.co.us; Tom Delehanty <tdelehanty@earthjustice.org>; Ean Tafoya <eantafoya@greenlatinos.org>; Juan Madrid <juanmadrid@greenlatinos.org>; Jessica Herrera ESQ (LEGAL) <jessicaherrera@greenlatinos.org>; Piper Frode - CDOT <piper.darlington@state.co.us>
> **Subject:** Re: Comments for November CTIO meeting
>
> **External Sender**

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1/9/25, 11:09 AM State.co.us Executive Branch Mail - [cdot_i270] CTIO I-270 tolling study

Hi Alexandra,

Thank you for sharing this with me. I'll share this with the CTIO Board of Directors this afternoon.

Best,

Simon

Simon Logan | Special Projects Lead & Policy Analyst | Phone: 303-757-9380

COLORADO
CTIO Transportation Investment Office

2829 W. Howard Place, Denver, CO 80204

On Fri, Nov 14, 2025 at 11:12 AM Alexandra Schluntz <aschluntz@earthjustice.org> wrote:

> Hello,
>
> On behalf of GreenLatinos, please find attached comments on the proposed I-270 project to be distributed to the CTIO Board. The comments were originally submitted to CDOT and describe a Healthy Communities No-Widening Alternative for the I-270 corridor, and request that CDOT take the time to study that alternative before announcing CDOT's preferred alternative.
>
> Thank you,
>
> Alexandra O. Schluntz
> *she/hers*
> Senior Attorney
> Earthjustice, Rocky Mountain Office
> T: 303.996.9612
> F: 720.550.5757
> www.earthjustice.org
> *Admitted to Practice in CO*

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

1/9/26, 11:09 AM State.co.us Executive Branch Mail - [cdot_i270] CTIO I-270 tolling study

--------- Forwarded message ---------
From: Alexandra Schluntz <aschluntz@earthjustice.org>
To: "cdot_hpte-usp@state.co.us" <cdot_hpte-usp@state.co.us>
Cc: Tom Delehanty <tdelehanty@earthjustice.org>, Ean Tafoya <eantafoya@greenlatinos.org>, Juan Madrid <juanmadrid@greenlatinos.org>, "Jessica Herrera ESQ (LEGAL)" <jessicaherrera@greenlatinos.org>
Bcc:
Date: Fri, 14 Nov 2025 18:06:04 +0000
Subject: Comments for November CTIO meeting

Hello,

On behalf of GreenLatinos, please find attached comments on the proposed I-270 project to be distributed to the CTIO Board. The comments were originally submitted to CDOT and describe a Healthy Communities No-Widening Alternative for the I-270 corridor, and request that CDOT take the time to study that alternative before announcing CDOT's preferred alternative.

Thank you,

Alexandra O. Schluntz

she/hers

Senior Attorney

Earthjustice, Rocky Mountain Office

T: 303.996.9612

F: 720.550.5757

www.earthjustice.org

Admitted to Practice in CO

4 attachments

Attach. B CO DAT Report 11.09.25.pdf
27540K

Nov 2025 letter to CDOT w HCNWA & DAT report.pdf
187K

Attach. A HCNWA Alternative Summary.pdf
162K

Comments for November CTIO meeting.eml
38173K

Marsha Nelson
David Merenich
Colorado Department of Transportation
2829 W. Howard Pl.
Denver, CO 80204
marsha.nelson@state.co.us
david.merenich@state.co.us
cdot_i270@state.co.us

November 11, 2025

Dear Mr. Merenich and Ms. Nelson,

This letter transmits a Healthy Communities No-Widening Alternative to CDOT's proposed expansion of I-270. As you know, in August 2025 GreenLatinos hosted a volunteer Design Assistance Team ('DAT') from the Architects Foundation's "Communities by Design" program. The DAT met with community members to discuss the I-270 project and related issues affecting the Commerce City and North Denver communities. Based on those meetings, the DAT generated a report laying out ideas for improving the I-270 corridor and other elements of CCND. That report serves as the basis for the Healthy Communities No-Widening Alternative that we now propose.

Regrettably, CDOT "decline[d] GreenLatinos' invitation to attend one-on-one meetings with the DAT" during the August event. Letter from David Merenich to Juan Madrid, July 28, 2025. However, CDOT "accept[ed] GreenLatinos[']' request to incorporate the DAT alternative into the NEPA analysis" for the I-270 project and requested that the alternative be provided "preferably no later than December 2025." *Id.* We're therefore providing the alternative well within your requested timeframe.

1 Nonetheless, we understand that CDOT plans to proceed with releasing the DEIS on November 17. As previously explained, we believe that the NEPA process—and public engagement for the project as a whole—would be better served by delaying the DEIS release until 2026 so that CDOT can review our proposed alternative and avoid end-of-year holidays that make meaningful public engagement difficult. We received your October 28, 2025 letter denying our earlier request to postpone release of the DEIS but agreeing to add 15 days to the public comment period. We firmly disagree that a 60-day, rather than 45-day, comment period—during one of the busiest times of year—enables real, good-faith engagement with the affected community members. **We therefore formally renew our request to delay release of the DEIS until early 2026 at the soonest**. In the alternative, CDOT should expand the comment period to 120 days.

2 In any event, please consider the attached Healthy Communities No-Widening Alternative as part of your NEPA analysis. The DAT report, also attached, provides additional detail and context for these ideas. However, please note that the report is not expected "to be followed as verbatim, prescriptive advice" and is instead "a developmental tool" for local groups

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Response to Comment 1

The comment period for the Draft Environmental Impact Statement (EIS) was originally scheduled for 45 days; however, in response to requests for additional time submitted prior to the publication, the review period was extended by 15 days, for a total of 60 days. The comment period began on November 21, 2025, and ended on January 20, 2026. Extensive outreach was conducted to advertise the public comment period, public hearings, and virtual public meetings. Please see Section 5.4.1, GEN2, of the Final EIS for additional information regarding the public review period for the Draft EIS.

Response to Comment 2

For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments (DRCOG) indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code (USC) Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act (NEPA) process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

and communities to "expand and amend" in their advocacy—which we do via the Healthy Communities No-Widening Alternative. DAT Report at PDF p. 2.

Thank you in advance for giving meaningful consideration to these ideas. We believe they will help the CDOT's I-270 project serve, rather than burden, Commerce City, North Denver, and their communities.

Sincerely,

Ean Thomas Tafoya
GreenLatinos
Vice President of State Programs
Colorado State Director
eantafoya@greenlatinos.org
(720) 621-8985

Juan Roberto Madrid
GreenLatinos
Sustainable Communities Program Advocate
juanmadrid@greenlatinos.org
(970) 658-6369

I-270 HEALTHY COMMUNITIES NO-WIDENING ALTERNATIVE

Submitted by GreenLatinos and Informed by the 2025 Design Assistance Team ('DAT') Report

This Healthy Communities No-Widening Alternative is aimed at reducing congestion along I-270 through means other than adding new lanes[1] while *improving* conditions for the communities that live along the corridor. It has three parts: (1) a differential tolling program that prioritizes transit, trucks, and local residents; (2) increased transit capacity on and near I-270, in partnership with RTD and/or other agencies; and (3) public health and safety improvements, including green buffer spaces, air monitoring tools, and enhanced connectivity. These concepts are drawn from the 2025 DAT report.

I. Differential Tolling

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CDOT should employ differential tolling on all existing lanes. DAT Report at 18–19. Differential tolling would reduce congestion, keep freight trucks off residential streets, and prioritize transit, all while raising revenue and avoiding costs for nearby residents. CDOT has made clear that congestion reduction is a major goal for the I-270 improvement project, and Colorado has recently been contending with a significant budget shortfall. Automated differential tolling using automated license plate reader (ALPR) technology presents an effective solution: it can reduce congestion while raising revenue.

CDOT should implement a tolling system that distinguishes between users (including transit, trucks, residents, and high occupancy vehicles) and applies appropriate toll rates accordingly to manage congestion. The raised revenues should be directed toward beneficial projects in the community, including improved transit, safer streets, and new bicycle and pedestrian infrastructure. A differential tolling model along I-270 would facilitate transit vehicle and commercial truck movement and keep trucks on I-270 (rather than local streets) while reducing I-270 passenger vehicles and encouraging higher occupancy vehicles. The system should eliminate tolls for license plates registered to local neighborhoods to avoid impact on local residents.

This approach could be paired with complementary vehicle management technologies. Connected vehicle technology—specialized sensors and infrastructure—manages vehicle speeds to reduce speed differentials, provide advance notice of danger, decrease lane changing and friction in congested areas, and maintain closer vehicle spacing safely to create more road capacity without the need for added lanes. Similarly, automated enforcement ALPR technology can be used on the local street network for enforcement against trucks and commuter traffic looking for free alternative routes from the Interstate.

[1] This alternative includes proposed "safety improvements and interchange reconfigurations" as described in FHWA's Notice of Intent to prepare an EIS. 89 Fed. Reg. 67510, 67511 (Aug. 20, 2024). Those measures include critical bridge repairs as well as "widening shoulders and redesigning the I–76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and offramps to provide adequate acceleration and deceleration lanes to meet design standards." *Id.*

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Response to Comment 3

The Two Express Lanes that Accommodate Transit Alternative proposes using dynamic pricing; all alternatives, including Express Lanes, would use dynamic pricing strategies. Additional details for pricing will be evaluated and determined, following the EIS.

The Two Express Lanes that Accommodate Transit Alternative proposes toll exemptions for freight vehicles. Providing freight exemptions on I-270 would create a unique condition within Colorado's statewide Express Lane system. At approximately 6.5 miles long, I-270 would become the only Express Lane segment in the state where freight vehicles would be exempt from tolls, resulting in an isolated and inconsistent transition area within the broader Express Lane network. Such a condition could increase driver confusion and introduce safety risks associated with complex or changing signage and operational rules.

This alternative also proposes use of automated license plate reader technology on the local street network to enforce against trucks and commuter traffic seeking to avoid tolls by diverting from I-270. Implementation would require installation of infrastructure on local roadways outside the I-270 study area and beyond the jurisdiction of CDOT and FHWA. Local agencies retain authority over their respective roadways, and CDOT does not have the authority to restrict or penalize vehicles for using local streets as alternate routes. Even if such authority existed, it would not be practicable to distinguish between vehicles using local streets for legitimate local access and those using them as diversion routes, rendering enforcement infeasible.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

To implement this approach, CDOT should take advantage of federal programs that would allow tolling on I-270. These include the Value Pricing Pilot Program (VPPP) and Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP). "The VPPP in particular lends itself well to CDOT's stated goal of congestion reduction, including for I-270's existing lanes." DAT Report at 18–19.

II. Added Regional Transit Capacity

4 CDOT should partner closely with RTD (and other agencies, as needed) to significantly increase transit options on and close to I-270. DAT Report at 25. Currently, driving remains the primary mode of travel in the I-270 corridor, and only one RTD bus route uses the 270 corridor: the FF5, or Flatiron Flyer 5, connecting Boulder to Aurora along US-36. That bus route runs 7 times eastbound and 4 times westbound per day, and not at all on the weekends. Meanwhile, according to CDOT's 2022 Origin/Destination study, 44% of trips on I-270 are "long distance" between US-36 and Aurora, "which suggests high potential for additional transit serving that route." *Id.* For that reason and many others, Commerce City is "ready-made for significant and complementary investments in transit" along I-270. *Id.* CDOT and RTD should apply the origin destination study to develop additional transit routes that move people through the I-270 corridor without the need for passenger vehicles. Reliability and frequency should be the guiding tenets of these routes.

CDOT and RTD should design the I-270 transit build-out to support complementary infrastructure. This includes, for example, mobility hubs, micro-transit and/or on-demand transit, shared micro-mobility options, and enhanced bicycle and pedestrian infrastructure. DAT Report at 23–25.

III. Public Health and Safety Improvements

CDOT should use the I-270 project to enhance public health, safety, and mobility in spaces intersecting and adjacent to the corridor. While reducing congestion and moving people through the corridor are important goals, CDOT should also use the project to counteract—not add to—the health and safety burdens local communities bear. Among numerous possible improvements, CDOT should (a) add green spaces that mitigate pollution and noise; (b) install air quality monitoring systems in and around homes; and (C) increase connectivity near the freeway.

A. Green space

5 Green space can enhance quality of life while reducing noise and air pollution. CDOT should construct green buffers, also known as vegetative or riparian buffers, along I-270. DAT Report at 26–28. These areas can act as a natural barrier between the highway and residential neighborhoods, pedestrian scaled commercial zones, public infrastructure, or ecologically sensitive areas such as Sand Creek. Green buffers would help mitigate the flow and transmission of harmful pollutants by capturing and sequestering carbon and releasing oxygen to help mitigate greenhouse gases. They will also create useful separation, providing a sense of safety and adding aesthetic value to the community. Green buffers can also help reduce highway traffic noise, capture and absorb stormwater runoff and thus filter pollutants before they reach streams,

– 2 –

Response to Comment 4

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding Flatiron Flyer 5 (FF5) buses and stops. During the stakeholder workshop on May 27, 2025, RTD indicated that adding a stop at the Central Park location would add 12 minutes to the FF5 route, which may draw pushback from existing customers. The FF5 bus route was originally designed to serve students traveling between Boulder and the Anschutz Medical Campus. Adjustments to its route would require a broader regional planning study. In addition, ridership data does not support adding a stop in Commerce City. While this project does not include a new FF5 stop, it would add four new local stops to better serve nearby routes, two on Quebec Street and two on Sandcreek Drive.

Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder.

When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Please see Section 5.4.3, ALT6, of the Final EIS for additional information on increased transit options and services.

Response to Comment 5

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision (ROD). Please see Section 5.4.4, IMP2, of the Final EIS for additional information on what is considered federal mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill (SB) 21-260 and codified in Colorado Revised Statutes (CRS) 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

and stabilize slopes and prevent soil erosion. CDOT should further construct green buffers in other areas near I-270, between industrial and residential developments, as an additional commitment to impacted communities. These green spaces will serve to connect the area's existing green network, including parks, gardens, trails, and greenways (such as the Sand Creek area).

B. Air quality monitoring & remediation

CDOT should help minimize harmful effects from I-270 traffic by offering air quality monitoring and remediation in and near homes. DAT Report at 28. Underserved communities in CCND are in proximity to multiple air emissions sources, including industrial facilities and multiple major highways in addition to I-270. Air monitors would help evaluate air quality and determine if air is safe for human health and the environment. CDOT should therefore develop "a network of stationary and mobile low-cost, criteria air pollutant monitors that will continuously monitor air quality conditions in the communities with outdoor air quality risk." *Id.* These monitors should be available in shared community spaces as well as homes, for residents who want them. Remediation options, such as air filters and phytoremediation technologies, should also be deployed.

C. Connectivity

CDOT should use the I-270 project to improve connectivity and public safety near the corridor. Such improvements should include additional crossings and improved lighting for both vehicles and pedestrians, including at on- and off-ramp intersections. DAT Report at 30. The I-270 corridor has limited pedestrian and bicycle crossings, making it difficult for residents to safely access destinations on either side. "Increasing the number of pedestrian overpasses and designing them to be not only safe but green and aesthetically pleasing would be beneficial to the environment and the community." *Id.* Specifically, these crossings should be land bridges, which allow people, animals, and plants to cross, aiding the ecology around Sand Creek and providing much more pleasant pathways for residents.

To improve general connectivity, CDOT should also partner closely with RTD (and other agencies, as needed) to improve access to transit for the local community. For example, CDOT should consider the planned Bus Rapid Transit improvements on Colorado Boulevard and work with RTD to ensure that the community can access that line via transit or micromobility solutions.

Any additional opportunities that CDOT has to improve the corridor for nearby residents should be undertaken.

Conclusion

The framework above provides a much-needed alternative to highway widening. CDOT should focus its efforts on these elements, seeking continuous community input as it fleshes out details. By centering the project on these measures, instead of new, traffic-inducing lanes, CDOT can meet its goal of reducing congestion while avoiding—and even reversing—environmental injustice that has long plagued Commerce City and North Denver communities.

– 3 –

Response to Comment 6

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Air quality monitoring during preconstruction and during construction is required by state regulation CRS 43-1-128 for this project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the ROD. Air quality monitoring will be completed in compliance with state regulation and related guidance. Refer to the State Air Quality and Community Analysis Technical Reports for additional information on air monitoring for the project, which is available on the project website.

Please see Section 5.4.4, IMP1 and IMP7, of the Final EIS for additional information related to health, underserved communities, and air quality mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

Response to Comment 7

Throughout the EIS process, CDOT has coordinated with RTD on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds

for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

However, the project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Many bridges cross streams in the area and nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the project does not include new wildlife connectivity features across I-270.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS related to increased transit, bicycle, and pedestrian improvements. Please see Section 5.4.3, ALT4, and Section 5.4.4, IMP9, of the Final EIS for information related to wildlife crossings, or land bridges.

Response to Comment 8

Comments noted.

Bridging the Divide: Reclaiming Community in the Path of I-270

Communities by Design

Communities by Design

Disclaimer

Response to Comment 9

The DAT Report provided was reviewed by the project team and considered during the evaluation of the Two Express Lanes that Accommodate Transit Alternative. Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis. Please see Appendix D, Two Express Lanes that Accommodate Transit Technical Report, of the Final EIS for additional information about the evaluation conducted on the alternative.

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Introduction

The DAT Project

The current design assistance team effort began in May 2025, when a steering committee formed from members of the community and local advocacy groups as invited an application to the Architects Foundation' (DAF) "I-270 Community Air Quality and Transportation Improvement." The application was developed by these parties, and a small team completed an initial visit in June 2025 to understand the project scope and begin building a relationship with customized concepts for the project area.

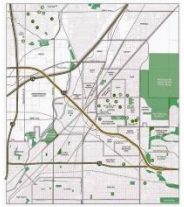
Purpose

A broad project scope was identified in the community's application to the Architects Foundation. As the application stated, the project goal was "to improve the environment, health, and well-being of largely low income, Latino, and Indigenous communities along the I-270 corridor. These communities include North Denver's Globeville and Elyria-Swansea neighborhoods as well as Commerce City, which together include roughly 50,000 people across 20 square miles." The area was colloquially referred to as "North Denver." As the application observed, "The North Denver

communities face a complex environmental burden from a range of sources. The region regularly receives ranked among air pollution and improvements to infrastructure (i.e., benefits, rather than burden, the communities have found."

CDOT I-270 Study

The ongoing CDOT study of I-270 was identified as a central focus and catalyst for the process. As the project application observed, "In 2020, CDOT and FHWA began a National Environmental Policy Act (NEPA) process for a proposed expansion of I-270 expansion, initially anticipating an Environmental Assessment (EA). After push-back from community and environmental groups, including Green Latinos, CDOT later determined that a more detailed environmental assessment, called and recognized as Environmental Impact Statement (EIS), be initiated. In August 2024, FHWA published a Notice of Intent (NOI) to complete an EIS, which began a two-year timeline to complete the NEPA process. A draft EIS is expected in late 2025. We want to remind CDOT a community-based alternative before the draft EIS is released. CDOT's planning process focuses on a 8.5-mile stretch of I-270, which runs from Adams County towards Boulder County in Commerce City and North



Denver. The highway is a segment of the east-west beltway and commuters – 70 and 25. Every day, more than 100,000 vehicles travel this highway with 6 to 10 percent of daily traffic coming from freight trucks. This corridor suffers from chronic congestion, poor air quality, and public transportation options for residents and businesses near the highway. The study area for the DAT project, however, is broader than CDOT's focus. Problems such as air pollution and congestion on the I-270 corridor will not be solved by looking only at the portion. These problems must be addressed "in the context of the transportation system for users – including local residents – through traffic. A broader look will allow us in addressing regional problems, such as residents' limited options for safe, affordable, and clean transportation."

Why I-270 & Why Now?

The Architects Foundation accepted the application for a design assistance team project with recent Pilsners in mind. In 2022, the Communities by Design program was approached by local Denver activists with concerns about the CDOT I-270 process. At the time, they reached out to national program staff to inquire about a potential design assistance team project to bring alternative thinking to that process. Our program staff contacted with local partners about the possibility, noting that given a history of bad environmental investment in the most impacted neighborhoods surrounding I-270, it was important to have intentional, early, visible, and robustly CDOT agrees to be open to considering the process outcomes in order to avoid being [unto public expectations for additional work] past that work, set to continue, thereby reinforcing historic injustices. In their outreach to CDOT, it was determined that this would not be possible, and the effort was abandoned. We can now look back and reflect upon what happened in the I-270 experience with lessons learned in mind. When the Foundation accepted the application for assistance surrounding the I-270 process, we did so with the knowledge that this process would need to be held

or an accepted scheme with imperfect circumstances given the existing CDOT timeline for release of a Draft Environmental Impact Statement by December of 2025. Therefore, an initial visit was scheduled immediately upon acceptance of the community's application in June, and the community process was scheduled for August.

On July 29, 2025, CDOT representatives responded to our invitation from Grant Latimer to participate in the process, confirming the invitation while maintaining that they would review the outcomes of the process.

"Thank you for your invitation to this upcoming meeting. We (CDOT's representatives offer CDOT respectfully declines Sarah Latimer's invitation to attend pre-arranged meetings with the DAT. The Green Latimer letter states that the DAT is prepared to discuss transportation and technical details. The technical details of the I-270 Corridor Improvements NEPA process will be transacted with the public via a Draft Environmental Impact Statement (DEIS) and associated reports that are open to public comment in fall 2025/winter 2026. The DEIS and associated reports will then be discussed in detail during a public hearing, also in fall 2025/winter 2026. The DEIS and associated reports will undergo an extensive review process before they are ready for publication. Simply stated, it is premature to discuss detailed technical analyses with any individual stakeholders prior to publishing the DEIS, the associated reports, and conducting the public hearing. CDOT would not share anything with the DAT that is not already publicly available on the I-270 Corridor Improvements website (https://www.codot.gov/projects/i-270-corridor). CDOT is continually open to feedback and ideas from community stakeholders and encourages Green Latimer to continue their DAT process. Although CDOT will not attend the DAT meetings, we accept Green Latimer's request to incorporate the DAT alternatives into the NEPA analysis."

The Role of the Design Assistance Team

While the I-270 study was a focus of the design assistance team's work, the intention of this process was to apply a much broader scope. Existing plans and recommendations for the important community context in which the CDOT project is taking place, as well as the surrounding cultural and dynamics and their impacts on communities. The design assistance team (see appendix for a team roster) is an interdisciplinary group of professionals from around the country that were assembled specifically for this process. They were collaboratively chosen from within the state of Colorado. They were not paid for their services to the community. They were not engaged in any way across development activities. This was important to note, that the design assistance team did not serve a client. They were not a private consultant team hired by a developer, institution or government agency. As a group of independent, outsiders, their efforts are all made in public service to the community and the recommendations offered in this report are done so "in the public interest." The basis for this process included the following key components:

- To access dozens of existing plans and background documents about the area.
- To observe conditions in the area and gain an understanding of the physical framework for the area, the issues facing the community and opportunities.
- To listen to and seek experts share their experience and knowledge about existing conditions, community values, priorities and aspirations for the future.
- Finally, to apply their best professional expertise in the public interest, using information learned through the process about community priorities in order to develop a set of strategies that respond directly to the needs, values and desires of the community.

Community Event and Process

From August 6–9, 2020, a community process was engaged with participation from City Tiger, residents and stakeholders. It included the following key elements:

- A view of the project area led by local housing committee members and neighborhood residents, which featured the Globeville and Elyria-Swansea neighborhoods in Commerce City and North Denver and the I-270 corridor.
- A series of meetings with key stakeholders about the area.
- A metric workshop.
- A community presentation to share initial findings, analysis and recommendations. The team worked to integrate information collected from these sessions to perform an analysis of existing conditions and potential scenarios and produce a series of recommendations, captured in this report.

Problem Statement

This initiative responds to the project application's central focus "to improve the environment, health, and well-being of large, low-income, Latino, and Indigenous communities along the I-270 corridor." To the extent of the I-270 corridor communities, there are several key problems that can be tackled, including the following:

- Long-standing transit improvements to reduce the congestion pressure on I-270.
- Providing reliable transportation alternatives to single-occupancy vehicle trips on I-270.
- Reducing pollutions and financial burdens of transportation in North Denver.
- Exploring complementary pedestrian and cycling alternatives and/or supplements to transit.

The Body of Evidence on Road Expansion

The transportation planning experience of the past several decades has demonstrated time and again a remarkable fact of roadway capacity projects. Capacity projects are often proposed as a solution to traffic congestion that will improve traffic efficiency and reduce greenhouse gas (GHG) emissions. However, research has consistently shows that adding capacity to roadways does not alleviate congestion over the long term and can exacerbate driving. In 2001, the Rocky Mountain Institute developed an induced travel calculator tool to measure the impact of Colorado's road expansion projects. According to their statewide study, "traffic will increase by a range of 2 to 6 million VMT [Vehicle Miles Traveled] ... longer for every new highway lane-mile added. In Colorado's urban road cases. More directly applicable issues with baseline exacerbate for the higher end of the range. Taking the 'skeptical' but conservatively represent a statewide network, each Colorado lane-mile added translates to about 400 more cars and SUVs on roads every year and generates an equivalent pollution equal to about 200,000 additional gallons of gasoline." These findings were consistent with similar studies elsewhere. For one example, see the National Center for Sustainable Transportation Policy Brief, there is plenty of additional research in the field that is comprehensively to these studies.

Source: Southwest Energy Efficiency Project, https://www.swenergy.org/how-to-improve-i-25-traffic-without-spending-big-bucks

In the Denver region, there is plenty of evidence to reinforce the conclusion that roadway expansion does not relieve congestion long-term. The T-REX, the Denver area's massive Interstate expansion on I-25, was a $1.2 billion project that took six years to complete, and it relieved congestion for only five years before traffic returned to pre-construction levels.

The Need to Overcome Policy Inertia

Despite ongoing research on the outcomes of roadway expansion projects and negative experience with past projects, the I-270 corridor community has once again presented with the possibility of a highway expansion. Unfortunately, this is not an uncommon condition across the country. Many transportation agencies are caught in a policy inertia whereby there is a tendency to perpetuate known-weak solutions or maintain established policies, even when circumstances have changed or evidence has demonstrated the inability to deliver the desired outcomes or desired goals. It is often further complicated by the complex requirements and constraints attached to funding mechanisms for such projects. However, this project certainly represents an opportunity to make an important change before it's too late, and detrimental impacts are locked in for the foreseeable future.

Beyond I-270 Expansion

CDOT's two proposed I-270 alternatives of no-build and diverse, where alternatives and two single-purpose lane and new express lanes, their implementation of these alternatives fail to address expressed community needs, which include the following:

- Making it safer for people and emergency services to get around locally.
- Incorporating alternative modes of transportation (bike, buses, micro-mobility).
- Reducing traffic and keeping trucks outside of neighborhoods.
- Reducing pollution in the air and water.

This process should also address:

- Flaws in the engagement and outreach.
- Displacement and gentrification pressures.
- Improving connectivity on local streets to help people get where they need to go.

The team has identified seven core areas of opportunity that should be pursued to best connect by needs:

- Engagement Framework
- Truck Congestion
- Street Network/Connectivity
- Alternative Modes
- Mitigation of Air and Water Pollution
- Built Safety
- Anti-Displacement
- Partnerships

This remainder of this report addresses these areas of opportunity in sequence.

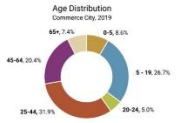
Community Snapshot

This section provides a overview of the existing community conditions in Commerce City. Historically, Commerce City has been known for its strong industrial footprint, cultural diversity and proximity to the largest land-based, urban wetland in the United States. The 2020 Census estimates its population at approximately 67,000. Nearly half of the population (32,500) identifies as Hispanic or Latino.

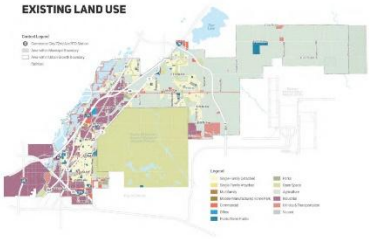
Commerce City has experienced considerable growth over the last twenty years, and it is projected to continue.

While the entire population has become older over time, there is a concentration of young professionals in the City. Approximately one third (33.3%) of the population is under the age of 19 and another third (36.9%) of the population is between 20-44.

In Commerce City, most (67.3%) of families are married couples with children. The racial and ethnic composition of residents in Commerce City is predominantly White (51.5%), followed by Hispanic/Latino (48.5%), Black/African American (4.2%), Asian/Pacific Islander (3.3%), and American Indian and Alaska Native (1.7%).



EXISTING LAND USE



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The median household income in Commerce City is $124,684. While there is a low percentage of people living in poverty (6.3%), significant disparities over within Commerce City, particularly in areas with older development in proximity to industrial land uses and Interstates 70, 25, and 270. Covering nearly 28 square miles, Commerce City contains a mix of residential, commercial, industrial, open space, public, and agricultural land.

The City land regional rapid growth signal an opportunity to powerfully shape and use decisions in ways that ready parallel all residents. Today, Commerce City is navigating the challenges of growth, from increased congestion and the threat of displacement for existing residents, to the direct impacts of poor air quality from mobile and stationary sources, which can cause respiratory and cardiovascular diseases, cancers, and premature death.

The people of Commerce City also recognize the importance of managing growth in ways that support safer access for all road users, improved infrastructure, and more efficient and reliable travel options. Community residents will directly benefit from the creation of healthy, safe, and sustainable transportation and infrastructure systems in Commerce City. While there are opportunities to be in on the ex-ability access the City areas with the older and denser development, can benefit from improved network connectivity, sidewalk amenities, and micro-mobility and micro-transit opportunities, which can boost transit ridership along major corridors.

As plans move forward for the expansion of I-270, now is that the for public agencies to lead with intention. This project presents a critical opportunity to build lasting community trust and strengthen public engagement through inclusive, transparent processes. We urge transportation and planning agencies at the City, County, Regional, and State levels to come together—collaboratively and intensively—to design solutions that enhance neighborhood connectivity and ensure equitable access for all Lee's aspects postal moment to deliver long-term benefits that reflect the needs and voices of the communities most impacted.

Engagement Framework

Civic Context

Current, limited low and community relationships can only be described as adversarial. Mistrust permeates the relationships, leading to poor communication, conflict, and controversy that drive continual cautious trust and lead to mutually passive, active relationships. While some officials have worked with and on behalf of the community (including Commerce City councilmembers Rarissa Chacon and Kevin Spaulding), failed prior efforts to resolve community conditions have damaged trust and built frustration across the neighborhoods' most respected, by environmental justice issues. Long-term

successes must be celebrated upon changing the status of lacking relationship to secure key trusted stakeholders and residents across the community at large. I-270 corridor. The state has often failed to credibly right history by aligning with corporate pollution against the interests of local communities.

The Reality of Mistrust

It is a reality that is deeply red and reinforced in both existing plans and a history of public interactions over the years. Repeated bad experiences have validated community mistrust of implementation effort that it has become integral to local identity. As the Colorado

City Sustainability Plan acknowledges, "an atmosphere of distrust, anger, and embroilment is pervasive among community members." Similarly, the RPS People's Survey: A Story of Displacement, offers this assessment: "The compelling story of the people of Globeville, Elyria and Swansea (GES) like many of our region's communities of color, is one of trauma of being stranded... we are living as communities apart as cities within, that reside at the current cusp of from the place they have embraced. The "go to" investments hailed as "improving the environment" are creating a climate of displacement. The report goes on to note that, "Our elected officials, who have continually chosen to ignore warnings from the community, now advocate for 'tolerance.' If they are sincere in their concern and care, our anti-displacement, considering the impacts of their projects, would be more than an afterthought – it is preventing displacement would be their biggest priority."

In locally reported news, the sentiments are also consistent. In 2021, a [CPR News story](#) on the I-270 project quoted a local resident as follows, "I don't feel that we've had people really looking out for us. People who should have seen it by keeping an eye on our community when it comes to the large city, when it comes to the water quality, when it comes to the noise. Don't just talk about it, but actually do something. Put in sound walls, put in, you know, trees and shrubs, treating us as a community." A separate Colorado Sun article quoted local leader Renso Chacon's observation that "Commerce City has been the sacrifice zone for corporations like Suncor for too long, the abuse to my community has been normalized and even expected to happen for Colorado's economy."

Addressing Conflict and Mistrust

Addressing the key components that are fostering continued conflict between communities who do not trust one another and institutions who control them will require substantial work to address the lack of trust, accountability and accountability that have permeated interactions with communities along the I-270 corridor. There are

See much smaller places to facilitate a dialogue through an intersectional equity framework for mutual understanding. However, such successful processes can serve as a building block toward greater trust that can ease the community with greater confidence over decision making and reasonable confidence that the outcomes reflect local values and community goals.

Closing out of community indicators that have formed and eroded community mistrust include the following:

- (April 2024) The Magellan Pipeline Company files a permit application for expanded tank farm operations and receives preliminary approval without any public input. It later withdrew the proposal. The Clark Elementary project across from the Dupont Elementary School is having community outrage.
- (2022) Suncor refinery disruptions led to a shutdown and several pollutant releases that were apparently above the levels allowed by state air permits. However, it resulted in no fines given regulatory oversight.
- (2019) When Suncor experienced an explosion, a class action that resulted in a pay-like deal covering the neighborhood. Suncor's response to the community was to offer free car washes.
- (2018) CDOT settled lawsuit on I-70 expansion with $600,000 in commitments, including for an independent health study for the Globeville, Elyria and Swansea neighborhoods as well as funds for air testing and monitoring and tree planting and landscaping.
- (2017) CDOT updates air quality analyses for I-70 expansion project with new projections that predict it will be less than one-fifth of their previous estimates, but does not share data sets publicly, causing widespread skepticism in the community. As a representative from the Sierra Club's Rocky Mountain Chapter [changed](#), "The process is so corrupt that they cannot be trusted to select a number they need no matter what the numbers are. They're coming in 54 percent, fewer, 10 percent, marginal. A little bit of that no impact, one percent, insignificant. How can that be?"
- (2017) When the plans for the National Western Center Authority board were initially announced, they included two commuter rail stations but only one of those had funding power, cementing a lesser status for community members until push-back led to the funding right being added.

In the face of ineffective public sector enforcement of environmental regulations, communities have been forced to be watchers and have needs tracked time and again to address community needs. They have often found themselves in the awkward position toward both industry and government agencies:

- In 2024, Earthjustice, representing Green...et not, Sierra Club, and 350 Colorado, was compelled to file suit against the Suncor Refinery for air pollution violations after years of the government failing to take the strongest action possible against the refinery. In 2023, Great Latinos, 350 Colorado

and Earthworks filed suit against the Colorado Air Quality Control Commission on July 10 for the commission's failure to strengthen its permitting rules under the state's Environmental Justice Disproportionate Impacted Community Act.

- In 2024, in the face of a "surprise" tank farm expansion proposal from Magellan Pipeline Company, local organizations rallied community forums with residents to oppose the refinery and organize opposition. As one representative of Colorado reportedly [said](#), "We're here to inform our community. No one else is going to do it. We know Magellan didn't, you know that the historic air pollution civil rights. And so our role is to inform the community, make sure their voices are heard."
- In 2023, Colorado was awarded $1.5 million from the 2020 Senate reluctance to perform independent air monitoring work from state agencies in Commerce City. They were using collected data at shorter rates than traditional systems, finding significantly different outcomes than official studies. The monitoring discovered high pollutant spikes missed by traditional monitors.
- Local organizations filed a lawsuit against CDOT's I-70 widening project, eventually winning concessions through a settlement, which included $550,000 for a community health study for GES neighborhoods. As one advocate [said](#) upon the settlement, "I was glad we asked for it in the very beginning. We asked for the study, and we were refused the study. Sadly we had to go to court in order to get this outcome."
- In 2018, the Globeville, Elyria-Swansea Coalition Organizing for Health and Housing, a group released its own study, Globeville Elyria-Swansea: The Peoples' Survey, A Story of Displacement, based on interviews with 500 residents, to highlight the inequities when facing the neighborhoods and to offer a series of key recommendations for independent of government agencies.

People Want a Greater Voice

"When it comes to protecting our air, we want all Coloradans to have a seat at the table." – Michael Ogletree, Director of the state's Air Pollution Control Division

The consensus setting at consulates that they should inform public process design. In communities where conflict and mistrust are present, temporary public participation methods are a necessary. Consulates have a low degree of influence on the process and no decision making at risk to invest in the process outcomes. Communities here are clearly demanding a greater role. As one CPR News headline reads, "Gridwork's Florin Sheppard Isn't Interested in 'Gen Z' Tactics. They Want Change On Their Terms". In fact, a quick search of public comments reveals that residents repeatedly express a desire for a greater voice in decision making.

- "I am concerned about the inequities that exist in CO. I'd like to see efforts supported in the lower and middle CO areas, led by residents of these areas with the history and lived experience to guide priorities." – Commerce City resident, quoted in the Sustainability Plan
- "How can we change these patterns of disinvestment, segregation, redlining, all of those things that have happened in the past? I hope we can start going to change without the existing impacted neighborhoods being involved. That's the main ways." – GIS resident, interviewed for a CPR News segment, 2019
- "We have a voice too. We matter too." – Commerce City resident taking the design assistance team process

Building an Informed Decision Through the EIS

An Environmental Impact Statement is a report required by the National Environmental Policy Act of 1969 (NEPA) to assess the potential impact of actions "significantly affecting the quality of the human environment." As the Council on Environmental Quality notes, "NEPA requires Federal agencies to consider the effects of their actions on the environment, including interrelated social, economic, and aesthetic effects. Citizens often possess helpful information about the potential environmental, social, and economic effects of proposed Federal actions they view as people, places, and resources." The creation of NEPA was fueled by community reaction to the destructive impacts of the Interstate Highway System that was built, to a certain extent, where citizens' views had been largely ignored in designing the routes.

The Physical Context for Decision Making Along I-270

The combined impacts of uncontrolled industrial activity, weak regulatory action, and regional terrain have produced a notorious designation for the area: one of the most polluted air places in America. Land, water, and air all bear chemical engrams and are often compromised by pollutants. In 2018, a nationwide study came to that conclusion after comparing localities across risk factors for exposure to cities, snow, fluids, pollutants and overall quality, the ROZIP zip code, which includes Globeville & Elyria-Swansea and portions of Commerce City, received last. The reality has profound consequences for public health and quality of life in the communities that call the area home. We is where industrial conditions are not the only contributing factors to the complex challenges residents face in forging their city lives, they are certainly important realities that need to be addressed. Local Health Impact Assessment reports across the country of addressing health concerns across the region, finding that residents of Globeville and Elyria-Swansea experience "higher instances of chronic health conditions such as cardiovascular diseases, diabetes, obesity, and asthma than other city neighborhoods. One local report called a study visit powered that between 2018 and 2017, "approximately one in 100 locals here hospitalized for asthma related conditions, a figure at least 75% higher than the state average." According to the Colorado Department of Health and Environment, life expectancy in Globeville is only 73.8 years, while it rises to a peak of 83.9 years in Littleton. Such is centered on gaps in life expectancy, high life cost data, "How can the community best address the conditions in which residents of this area are inhibited from living longer, or at least?" Indicators of legacies – and contemporary operations – have significant impacts on the environment through toxic project areas. According to one report, the PM2.5 Screening Environmental Indicators (SEEC) social flag is that Commerce City had experienced over 400 releases by 84 facilities.

The Air Quality Crisis. According to the Colorado Department of Public Health & Environment, the EPA has classified the Denver Metro/north Front Range area. In 2022 as a "severe" non-attainment area under the 2008 ozone standard. This represented a downgrade from its previous designation of "serious" non-attainment and includes a required deadline to meet the 2008 standard by July 20, 2027. Research upon 2024 ozone data. A 2024 study by the University of Washington's Institute for Health Metrics and Evaluation estimated that ozone pollution is responsible for 814 deaths annually in Colorado. "The Regional Air Quality Council, which monitors regional pollution levels, recorded concentrations of ozone exceeding by more. Range monitoring stations that exceeded EPA limits on 43 different days in 2024. This represents the highest number since 2022 and is worse than all but two years between over the last 11 years. Similarly, the 2025 "State of the Air" report from the American Lung Association found that, "People in the Denver metro area are breathing some of the most ozone-polluted air in the U.S." The region was classified as the 8th most-polluted in the nation, with the issue especially acute in regional ozone pattern, as automobile use and the gas industry. Denver's track exhibits a mixing, probably by that the state will miss its legally required targets. As Colorado Now" reported in 2024, "On an issue once court, certainly has seen such exceptions. Serving a mirror Colorado will certainly fail to meet EPA ozone standards for the foreseeable future, according to 2025, and thus failed to meet the for 2024."

The Climate Crisis. The State of Colorado has both GHG Reduction Targets, as set forth in state law and the Colorado Priority Climate Action Plan of 2024. Transportation is the sector that is on track to achieve its climate goal compliance as well. As with air quality struggles, climate goals are facing headwinds due to challenges with reducing emissions from the transportation sector. Through state law requires Colorado to cut its emissions 26 percent below 2005 levels by 2025, 50 percent by 2030, and 100 percent by 2050, an analysis from another special state task "IM, found that current policies only achieve 19 percent of the 2025 target and 34 percent of the 2030 target. While other major sectors such as buildings, industry and even oil and gas and electricity are on course to at least approach the interim markers, projects is for the transportation sector find that "will only achieve 6 percent of its 2025 goal and 11 percent of its 2030 target. According to Colorado Climate Active, "Transportation is the #1 source of Colorado's Greenhouse Gas (GHG) emissions." Colorado needs to reduce transportation-related emissions by about 17 million metric tons by 2030. Studies reveal that even with the mass adoption of electric vehicles, the state will need to reduce about two-thirds of the gas. Other interventions will be necessary to achieve success. It is clear that regional growth and land use policy are the resulting consequences for development have exacerbated automobile use and its impact on the environment.

Greenhouse Gas Transportation Planning Standards

In 2021, Colorado Transportation Commission approved new GHG Transportation Planning Standards to reduce emissions and improve air quality. Colorado becomes that it was "the first state in the country to address the role of transportation planning in providing more travel options that reduce greenhouse gas (GHG) emissions, improve air quality and reduce smog. The

Denver Climate Project

Do More. Do Less. Do Something.

GHG Transportation Planning Standards require CDOT and Metropolitan Planning Organizations (MPOs) to determine the total GHG emissions expected from future projects and to address instances that pose achieving set GHG emissions reduction targets. The goal is to reduce GHG emissions by 1.5 million metric tons by 2030. Officials estimate that this standard will result in over $6 billion by 2050 toward a suite of more climate-friendly investments, including transit, bike and pedestrian facilities. Since the standards were enacted, CDOT has cancelled plans for multiple other highway & road widening projects. There are additional pressures that could bring dollar-draining road projects moving forward, including several Senate bills in the state's GHG emissions modeling. There are some existing cuts points that are notably within key components of their mode. For instance, CDOT uses a 20% projection on zero-commuting rates nationally. In 2020, Colorado had the highest percentage of workers-home with 23% of workers reported to have one day a week from home. According to a 2024 national analysis of Census data, the Denver metro region had the third highest rate of fully remote workers in the country. Approximately 22.3% of the regional workforce works fully remote. However, the analysis also indicated that the rate had contracted by 9% between 2020-2023, a national trend that is likely to continue. This "illustration speaks to some potential built in role in the existing model. A separate study found that trend continued in 2024, with a 12.6% office building vacancy growth year-over-year from July 2023 to July 2024. This may have results in new focuses for current travel modeling. The "modeling a broader need to inform broad land use policies that result in far more compact communities that current practice suggests – another point of res-

CDOT Statement of Purpose & Need for I-270: An Acknowledgment of Impact

The Statement of Purpose and Need for the I-270 study is noteworthy in that it acknowledges the cumulative environmental burden that this project can exacerbate the reality that the project will result in further impacts to the community. In addition to describing the purpose to "modernize the I-270 corridor to accommodate existing and forecasted transportation demands," the Statement includes the following:

"In addition to addressing project needs, CDOT, the Federal Highway Administration (FHWA), and participating agencies have established a key project goal to 'minimize environmental and community impacts resulting from the project. The project planning and decision making process will consistently remain mindful of this over-arching goal."

Applying an Appropriate Standard in Contextual Realities

This statement in turn answers that the project carries forward many environmental realities, including that it is occurring now on with an EPA-classified severe non-attainment area under the 2008 ozone pollution standard, but within a project area that has the highest concentration of air pollutants in a region of severe non-attainment. Therefore, the project's contribution to negative air quality cannot be measured by a net-zero-being-equal-up effect on it must be assessed by its additional contribution to an environment that is already compromised. This knowledge comes with special burden of environmental care because even marginal negative contributions to a "quality have represented tipping points or "proof already-over" outside said residents, for otherwise minor contribution from the project must be considered. "Poverty grows in cities and

A Framework for Engagement: IAP2 Core Values for the Practice of Public Participation

- Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
- Public participation includes the promise that the public's contribution will influence the decision.
- Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.
- Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
- Public participation seeks input from participants in designing how they participate.
- Public participation provides participants with the information they need to participate in a meaningful way.
- Public participation communicates to participants how their input affected the decision.

A Credible Methodology

The IAP2 methodology represents a reputable framework that is utilized across the world. It is utilized in multiple Colorado jurisdictions already. It is cited by the EPA as guidance as well. Therefore, in the context of this process, it provides a credible Community Engagement Framework from which to assess work to date. The IAP2 Spectrum provides a nationally recognized tool for understanding various levels of public participation that can lead to specific public promises and corresponding actions. One of the main challenges in the Federal NEPA process is the gap between institutional preferences and public preferences, particularly in respect to scale. While the public prefers to work at the Collaborate or Empower level, institutions commonly have comfort at the Inform and Consult level, leading to civic frustration and conflict. High-visibility conversations about the role of public participation processes and more public influence over decision-making in order to achieve trust.

Colorado Law Requires Enhanced Planning, Modeling & Engagement

The NEPA mandate is not the only regulatory requirement that is relevant to the I-270 process, as Colorado Revised Statute (CRS) Section 43-1-128 (2) requires that "[t]o the extent the adverse environmental and health impacts of planned transportation capacity projects and options have not been addressed in the decisions of such projects, it is necessary, appropriate, and in the best interests of the state and all Coloradans to require the department and metropolitan planning organizations, which are the state's primary transportation planning entities with responsibility for selecting and funding transportation capacity projects, to engage in an enhanced level of planning, modeling, and other analysis, community engagement, and monitoring with respect to such projects as required by the section."

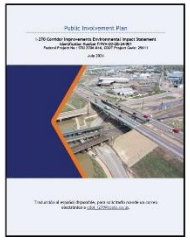
CDOT Public Involvement Plan

To their credit, CDOT has put a Public Involvement Plan for this project that includes a commitment to meet an "enhanced" standard. As the PIP declares, "Community goals each for the I-270 EIS will utilize a unique approach to increase inclusive and meaningful public involvement. The approach will focus on developing trusting relationships that historically do not see government agencies as credible, as well as clarifying and addressing barriers that may limit meaningful participation from these residents." The PIP also declares that "Individuals who are affected by but historically have been absent in efforts share environment projects, are few, if none, live, work, and/or have limited English proficiency or need other special accommodations to participate readily in the project will need proactive and innovative support, services and outreach techniques. Through that and unique tactics a goal to be met to address the impact of these "environmental justice communities." This public promise to the community infers that more robust methods than open houses or sessions will be necessary to achieve success. To eliminate this vague approach that will "increase inclusive and meaningful public involvement" and develop trust in neighborhoods that historically do not see government agencies as credible" it is an ambitious commitment that comes with expectations of a robust public process work that includes partners where community influence is enhanced. Furthermore, in section 1.5.3 of the PIP, CDOT commits to adjusting course in the event of low turnout, stating that "If participation is low, CDOT will work with its Region 1 community liaison, Environmental Justice and Equity Office, community advisors, and other community leaders to adjust or seeking new techniques to encourage meaningful participation." These public commitments represent established process standards by which to assess work to date.

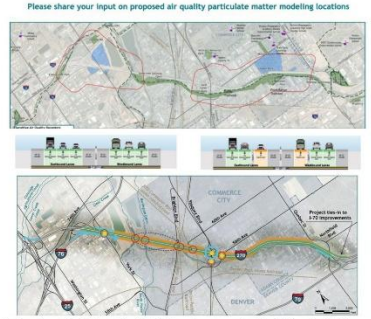
Assessing the I-270 Public Involvement to Date

As CDOT maintains in a July letter to representatives of Green Latinos,

"Since initiating the EIS process, CDOT has conducted extensive outreach and engagement to understand the needs of those most affected by the Project, including residents, businesses, and corridor users. CDOT stands firmly behind the outreach and engagement that it has conducted throughout the NEPA process. Since May 2023, CDOT has participated in nearly 500 community outreach activities, including, but not limited to, listening sessions, community office hours, attendance and participation in community fairs/festivals, public meetings, community presentations, Stakeholder Workshops, and local business networkers. These efforts have reached residents, businesses, corridor users, and advisory groups, many of whom have expressed strong support for timely improvements to I-270. Many people have expressed that this Project is long overdue. We have thoroughly recorded our outreach and engagement efforts and continue to host widely advertised public meetings that inform and benefit residents, businesses and motorists, and users of the corridor. All such efforts have been transparent and have resulted in hundreds of comment cards being filled out, among other forms of feedback. CDOT strongly believes its outreach efforts for this Project are very much in alignment with community needs, and we will continue to prioritize attending community-led events."



This statement and the aforementioned commitments in the PIP form a basis by which the process can be objectively assessed against work to date and as normative processes in the field.



The Importance of Data Informed Decision Making

Given the Colorado legislature's earlier mandated elevated planning, modeling and other analysis, community engagement, and monitoring, the team found it revealing that existing public information about exposures of the project is not consistent. For instance, air quality monitors for the project don't even answers the active corridor. While CDOT asserts as fact that it has used models to "predict outcomes environmental analyses that far exceed federal standards, especially related to Air Quality and Disproportionately Impacted Communities" the team suggests that more transparency in the collection of data is warranted given the history of controversies surrounding air quality monitoring data in the project area and the fact that it represents a hot spot in a severe non-attainment region. Commerce has requested models with official citation on air quality data for years and has contracted with third parties that have conducted more extensive modeling efforts that led to different conclusions, thus rendering dozens of data from agencies. In fact, a 2021 headline from CPR News highlighted the challenge: "CDOT Pledges To Track Air Quality As Part Of I-270 Rebuild, But Petition-Clicked Commerce City Task Force Asks For More." It is a critically important data set for the study and the team believes it deserves greater attention to the extent possible. In addition, some of the public information that has been shared over proposed solutions has led to confusion. For instance, some residents of alternative solutions' packet sections have indicated visibility issues in their comments and some have not, creating confusion about whether they are included in designs. It is important moving forward to ensure that widely released information is accurate, and to demonstrate representation to build and rebuild trust with the community.

Public Participation Needs an Upgrade

The team finds that there are both quantitative and qualitative concerns with the existing public process to date.

Quantitative Issues

As CDOT reports, the agency has collected "hundreds of comment cards" during the process thus far. In a project area that has approximately 500,000 residents and a highway segment that has over 300,000 drivers daily, this is insufficient data to inform any decision that might affect the entire community surrounding. CDOT also reports that it has conducted nearly 200 community outreach activities, reflecting significant inefficiency in its broader goal that 200 activities have yielded an average of less than 3 comment cards each – and likely closer to an average of two. While there are anecdotal interactions from the open house events via sticky note responses with maps, they were accurately from the beginning of data collection efforts rather than a way to leverage that in scope and to raise stakes of the ownership, particularly given the historic numbers of participants:

October 10, 2023, public meeting: 80 participants

Fall/Winter 2024, 8 community listening sessions: N/A

April 2024, 2 in-person public meetings, 77 participants

April 16, 2024, webinar: 41 participants

January 2025, 3 in-person public meetings, 113 participants

January-February 2025, 2 webinars, 51 participants

Even assuming that those were in-person participants above, the number only totals out at 314. Assuming a total participation of less than 1,500 comments, this is insufficient data. As CDOT states in its PIP, a key goal of the process is to work with community partners to "obtain comments from a broad cross section along the corridor." This is fair, there is a small sample of the population from which to gather data on community sentiment. It does not compare well to other public processes (see examples below). Especially in an environment of high interest, more engagement is a necessary precursor for decision-making.

Qualitative Issues

Public participation is not the responsibility of the community – it is CDOT's responsibility, as articulated in the Public Involvement Plan, and data collection from the public process should "meet the same technical rigor as the reproduction modeling, or as easily measurements.

This small data sample size by engagement to date raises potential concerns about representation bias and the possibility that underrepresented groups are producing skewed results that can be misinterpreted. This dynamic is well researched and documented in land use decision making, for instance. Relying on a small, less representative public can lead to decisions that do not

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reflect the truth or serve the public interest, thereby discounting community outputs as irrelevant inputs. Inefficiencies and leading responses to a decision that is perceived as illegitimate and lacking community influence. There remains credit to 'no' decisions by how data collection has occurred with open-ended comments (location or via narrative "closing" of priorities. For instance, meeting summaries report tallies such as "While we received a total of 94 different responses, the most common concerns included congestion and safety, and many we heard the outcome of forcing a false choice between "congestion" and "public health". In fact, the two issues are interlinked and should be considered together. Separating them as a binary from one another could lead to simplistic design solutions that ignore community realities. Integrating them as co-priorities changes the outcome, using a systems lens. When they are reframed as co-priorities, the question becomes "what design interventions can improve air quality and public health outcomes and improve mobility?" That yields different solutions than determining that "congestion" is a problem, which is best solved simply through the mechanism of solving for congestion. Assigning some importance to congestion and safety over actual consideration for other priorities can lead to community push back on preferred solutions because they don't reflect shared thinking. In addition, the prioritization of particular public over others contributes to the appearance that the agency is not engaged in authentic engagement but is pursuing a pre-determined agenda that aligns with its own preferences. In other words, it reinforces the mistrust dynamics cited by CDOT in its own Public Involvement Plan.

Using Deliberative Methods

Given the criteria for public participation represented in Colorado law and the CDOT Public Involvement Plan, the public promise and corresponding expectations from community are set quite high for this process. However, applying the 2P2 Core Values to participation in deliberative processes consistent. There is evidence that residents want a greater voice and more influence over decision-making (less existing levels of method, how used feedback mechanisms are not sufficient, or a sunk cost opinion. Other houses and surveys are insufficient – methods by themselves in an environment of mistrust. Many internet methods – especially those that include deliberative approaches – would be limited potential, video, shared screen, polling, and better as tool sets. Many quality public processes today are incorporating both broad engagement and data collection methods and representative deliberative processes to build a strong case for decision-making that is influenced by citizens.

Recommendations for CDOT

Based upon the team's assessment of current public involvement, we recommend that CDOT consider the following:

- Set up public participation efforts now to gather sufficient community data to inform the process. If the process needs more data, to have any credibility when the EIS is issued. The team believes that a relatively low 60-day effort could generate a wealth of data to give this process a credible "informed decision" framework, using hot spots as a basis, and CDOT risks forfeiting the legitimacy of the process without timely action.
- Increase community representation where decisions are being made so improve community outside ice in the process as to build trust in the final decisions by being more influence to community voices. This can be accomplished through deployment of a wide range of tech voices (i.e. "Mobilize" vs "Decide"). The team recommends Community Advisory Boards, each of nine as well as Critical Assembly models that use deliberation, which can help produce outcomes with widely shared agreement on project priorities and solutions.

Utilizing more robust methods such as Citizen Assemblies has been shown to produce successful community outcomes with broad support and legitimacy. The region has significant technical assistance resources present already, including organizations like The National Civic League and the CSU Center for Public Deliberation that could provide guidance to these methods.

Examples

DC Better Bus Network

The Better Bus Network Initiative in Washington, DC, provides one comparative example of how a transportation agency used deliberative engagement to address public concerns about declining ridership and equity impacts. The project, led by the District Department of Transportation (DDOT), aimed to redesign the city's bus network to improve reliability, speed, and access, particularly for transit-dependent communities. Rather than relying solely on traditional public meetings or online surveys, DDOT partnered with the nonprofit organization Transportation for America to convene a Community Advisory Group (CAG) composed of residents, bus riders, and representatives from neighborhood associations, labor groups, and disability advocates.

The CAG met over a period of several months and was tasked with evaluating trade-offs between different network design options, such as prioritizing frequency versus coverage or balancing the needs of commuters with those of local riders. Facilitators used structured deliberation techniques, including small group discussions, expert briefings, and scenario exercises, to help participants understand the implications of each option. The group's recommendations were then presented to DDOT leadership and the DC Council, and many of the CAG's suggestions were incorporated into the final network plan.

This approach was notable because it moved beyond simply collecting public input to actively engaging residents in the decision-making process. By giving participants the time, information, and space to deliberate, DDOT was able to build greater trust in the outcome and reduce opposition during implementation. The process also helped surface equity concerns that might not have been identified through traditional outreach methods, leading to changes that improved service for historically underserved neighborhoods.

The other observations of data regards how they conducted engagement to reach members of different. The national campaign engagement teams to targeted locations across the bus network to ensure they were "meeting the community where they are" and collecting input from a geographic spectrum across the system and a range of locations, including "on board buses, at transit, in community spaces, and more." They used a range of formats and also as well, including townhalls, pop up events, surveys, web and digital tools and others. The initiative employed a Community Connections Committee to assess things a diverse range of communities to help "elevate the voices of our community engagement" as well, and produced a Digital Communications Toolkit that offered templates to help engagement implementation and broad tools. This helped generate over 600,000 social media impressions during the initiative and brought over 40,000 unique users to the website.

Boulder Comprehensive Plan

Colorado is no stranger to quality public process work. In fact, a short drive up I-270 to Boulder provides a great regional example of an ongoing public process that is focused on achieving both quantitative and qualitative outcomes to inform future decisions. Boulder is currently updating the city's comprehensive plan with a multi-faceted initiative that combines broad engagement, data collection, and high-quality deliberative practice. From October 2024 – April 2025, the community engagement included 31 activities that generated over 4300 data points across a broad spectrum of outcome. However, they are also implementing a Community Assembly model made up of a random selection of representative community members who will participate in deliberative

sessions, was set to provide the initiative with a set of diverse, prioritized recommendations that complement their broader engagement work. This method, arrives representation and demonstrates areas of broad agreement in the community, which in creates action with more traditional engagement methods provides a sound basis for decision making that will have popular support.

What Can Communities Do?

Given the NEPA timeline, CDOT has little incentive to change course unless the agency believes that the state's own approach will overwhelmingly contain any challenges. Honest values, the community should be able to hold CDOT accountable for recommitments as represented by the PIP, and leverage these statements against week-to-date to request a course correction, including the following:

- Public Participation is CDOT's responsibility, not the community's responsibility. Low participation rates are not reflective of CDOT's commitment to a "run up approach to increase inclusive and meaningful public involvement or "special accommodations for participants equitably" with "thoughtful and robust techniques". It is their responsibility to be both rigorous in stated commitments and demonstrate how community voices have influenced selection of alternatives and the project's design.
- Require meaningful public participation as a precondition or intermediate meeting. Demand greater community influence in the process and more robust public participation techniques that can build public confidence in the outcomes.
- Push back against artificial timelines being imposed. For instance, there is clearly enough time to merge public participation and collect more public input before a draft EIS is released, and failure to do so adds risk for potential supplemental EIS processes. Most of the community is not conscious about the process and decision. What would CDOT be forced to do if the community's body of comments against the draft EIS outweighed any public input in the process by a factor of two or three? It is far safer to commit to more robust participation today to collect enough data to produce more confidence in the community's influence over the direction of the process.
- Remember, it's NEVER too late to improve the process. In fact, there are many NEPA success stories where information collected from broad approaches prior to the abandonment of mega-bad projects. That is the purpose of the NEPA process – to ensure that the full extent of environmental impact is understood before any action is taken.

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Refinery Recommendation: Create a Community Advisory Board with Broad Representation

While the refinery operations present in the area were not a cow focus of this study, it is worth noting that the lack of community dialogue – and accountability to the community – are contributing to deep mistrust of present refinery operations. Ditto is not too lead in the field to build in community engagement and representation is a Community Advisory Board. While the Colorado Department of Health & Environment maintains an Environmental Justice Advisory Board, its purview is too broad to serve as an effective mechanism for a single site. Since the high-stakes and deep-rooted present regarding the Suncor refinery site, our team believes that a Community Advisory Board represents an important first step in creating structured dialogue that can improve relationships and lead to coordinated actions for addressing community issues. Community Advisory Boards are a common tool used to build institutional and community relationships in the industry. For example, consider Eastman (formerly Eastman Kodak, a chemical company that is now a specialty materials company) which boasts the following commitment:

"We regularly engage with Community Advisory Panels (CAPs) in the communities where we operate to connect on and address topics of shared interest like public health and safety and to form long-term, meaningful relationships. What we learn from active engagement with our CAPs helps Eastman determine how to best leverage our resources – both human and financial – to affect greater good in the communities. By forming and holding regularly scheduled meetings with 10 CAPs at our largest global manufacturing sites, our leaders continuously engage in open dialogue with a diverse set of community stakeholders and neighbors around the world. CAPs help mobilize a better understanding industry issues and help us understand community concerns. Ultimately, the purpose of a CAP is to look after the communities' interests and build trust."

Community Advisory Boards are also regularly utilized by the refinery industry. Consider the Pine Bend Refinery in Minnesota, which created a Community Advisory Council in 1998 that "provides community members with an opportunity to discuss and make recommendations to the company regarding environmental, safety and other issues of concern to the citizens living near the refinery. Counting independently of Pine Hills Resources, the CAC serves as a community voice when Pine Bend seeks direct feedback regarding refinery operations and plans. The CAC consists of 20 community members, two voting members and one non-voting member from the Pine Bend refinery and a non-voting member from the Minnesota Pollution Control Agency. Members serve three year terms." The Sanadia Refinery in California has a similar mechanism called a Community Advisory Panel, whose mission statement is as follows:

- The mission of the CAP is to provide an independent advisory committee dedicated to establishing and maintaining an ongoing means of communication between the community, civic leaders and the Valero Benicia Refinery.
- In a way that actively identifies and addresses activities and issues of concern and interest regarding the protection of health and safety of the community and sale operation of the Valero Benicia refinery.
- So that the citizens of the community and the city will be informed and confident that Valero Benicia refinery operates its business in a manner that protects the health and safety of the community and surrounding businesses including Valero.

These mechanisms are part-and-parcel of standard operating procedures for the industry.

In fact, our team found evidence that Suncor representatives have even participated in Community Advisory Board processes in Canada. A company representative of Enbridge (an energy transport company) noted that process had exceeded their company's expectations, observing that, "Our purpose was in bring people together to have a chance to ask questions, understand about who we are and what the project is about. It really is driven by the communities and what we get to learn is what concerns them so we can help address those."

This mechanism also has history in the community. The infamous Rocky Mountain Arsenal site utilized a Citizens' Advisory Group to respond to citizen health concerns during the remediation management, communicating regularly about work on site as it transitioned to a wildlife refuge.

Improving the Network

Truck Congestion

Trucks are a major contributor to the interstate congestion, travel delay and emissions and of "Colfax," safety and neighborhood quality of life. Improving mobility for freight movement is a major concern and an opportunity. Facilitating freight operations on the highway benefits the state, region and community and is a top priority. This can be substantially improved through the following actions:

- Prioritizing I-270 for freight (freight-only or highly managed)
- Effective use of technology for priority operations on the highway and enforcement
- Incentives for transition to low/zero-emission trucks and infrastructure investments to enable this transition
- Clear smart modal hierarchy to facilitate trucks where they belong, and prioritize other road users elsewhere

I-270 Freight Prioritization

There's no doubt that the goods movement economy is foundational to U.S. economic performance. However, heavy-duty vehicles can have high impacts on local communities when congestion forces them to use local streets. According to available data, 1 in 5 vehicles using I-270 are freight trucks. This represents a significant proportion of overall traffic. One potential solution to current congestion could be to designate the highway for freight traffic and emergency vehicles prior to corridor passage, charging other users with policy based tolling that targets a volume reduction of at least 25 percent to regain no additional road capacity. CDOT may be able to do this as a pilot project prior to processing with the design of any alternative. This approach would be consistent with the goals expressed in CDOT's Statement of Purpose and Need. CDOT should take advantage of federal programs that would allow tolling on I-270, including the Interstate System Reconstruction and Rehabilitation Pilot Program (23 USC 119(e)) and the Value Pricing Pilot Program (23 USC 524). The MPNP in particular is "designed to test innovative ways to address congestion and manage demand on highways, including through the use of tolling and pricing strategies." Both of these programs could be leveraged to help fund the I-270 improvements.

existing lanes. Construction of the I-25 Corridor Congestion Relief Study provides one example of this approach.

Other high traffic regions in the goods movement economy are already investing in innovative approaches. The Georgia Department of Transportation (GDOT) is including the nation's first long-haul truck-only lanes along a nearly 40-mile stretch of I-75 from just north of Macon until just south of Atlanta. The US Department of Transportation (US DOT) is supporting the study of dedicated truck lanes along I-70 from the Interstate 435 beltway on the eastern part of Kansas City, Missouri to the Bridgeport, Ohio/Wheeling, West Virginia border. CDOT could invest in a similar initiative with tolling for other users.

MODAL PRIORITY

Interstate Highway Network

Deploying Technology for Priority Operations & Enforcement

The construction timelines involved in adding roadway capacity on I-270 will be significant. Given the already evolving innovations in transportation technology, it would be prudent for CDOT to consider deploying technology to establish a connected vehicle corridor with appropriate infrastructure to create smart freight corridors.

Strategy: Create a Connected Corridor

Connected vehicle technology, via sensors and infrastructure, can enable smarter freight corridors that improve safety, travel times and emissions reductions. Connected technology manages vehicle speeds to reduce speed differentials, provide advance notice of danger, decrease lane changing and "rubber-banding" in congested areas, and maintain closer vehicle spacing safely to create more road capacity without the need for added lanes. Other regions with significant goods movement corridors are investing in connected corridors. For instance, [ADOT is building a smart, freight corridor](#) around Austin, TX while CDOT is installing smart technology as SB 267 to the Port of Savannah in anticipation of increasingly automated vehicles. Approximately 50 million tons of goods move through the Denver metropolitan area annually. Connected technologies will improve both safety and efficiency with benefits for everyone. Making these critical, tech investment a new will a new Denver normal is competitive in the goods movement economy without compromising its commitment to climate and air quality goals.

Strategy: Automated Differential Tolling

Automated License Plate Reader (ALPR) technology has been around for years. CDOT could implement an automated differential tolling system on the Interstate that distinguishes between users (trucks, transit, residents and HOV) and applies appropriate toll rates accordingly to manage congestion and raise public funds. That can be invested in transit and related mobility needs. The linkage of a differential tolling model along I-270 would be to facilitate commercial truck movement and keep trucks on I-270 rather than local streets while reducing I-270 passenger vehicles and encouraging higher occupancy vehicles. The system could also mitigate impacts on local residents by charging tolls that would discourage single passenger vehicles from out of area vehicles (vehicles registered to zones within the area would travel for free.

Strategy: Automated Enforcement

ALPR technology can be deployed on the local street network for enforcement against trucks and commercial traffic looking for "free" alternative routes from the Interstate. Particular areas can be dedicated to local community improvements such as beautification and safety. For example, [San Diego, CA implemented AI B3 truck safety](#) cameras that verify weight, size and

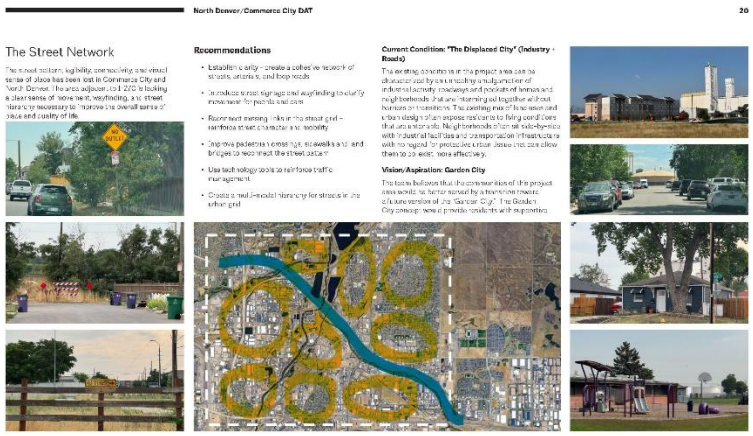
Strategy: Zero-Emission Truck Transition

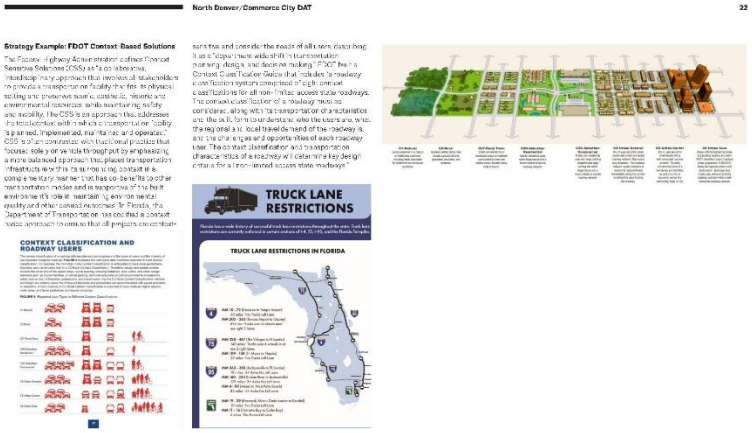
The zero-emission truck transition is occurring, but it takes significant infrastructure support such as electrical grid and production upgrades and hydrogen networks. As the transition to zero-emission trucks begins, the I-270 improvements must support opportunity to promote zero-emission infrastructure for a clean freight corridor.

Create Modal Hierarchy

By applying the above strategies across state and local partners, the area can create a modal hierarchy that maximizes desired reduction and system efficiency while facilitating safe mode shift. For the project area, highways would serve as freight priority, with a major shift of mode away from traffic, priority and local arterials would become transitway priority, and the grade-separated nature become free-pedestrian priority. The modal hierarchy will allow the full street system to operate at its most efficient level, leading to higher performance for all by using appropriate infrastructure to meet a variety of mobility needs and accommodate all of its users.

A sustainable, integrated approach to infrastructure development will also reduce the impacts of floods and droughts, improve water quality, and increase the efficiency of energy, waste, transportation, and telecommunications systems. Upgrading natural infrastructure – both underground and above – will also lay the groundwork for future phases of investment.


North Denver/Commerce City DAT
20
The Street Network
Recommendations
Current Condition: "The Displaced City" (Industry + Roads)
Vision/Aspiration: Garden City
North Denver/Commerce City DAT
21
SOUTH PLATTE RIVER TRAIL
Front Range Trail
DENVER URBAN GARDENS
COMING THIS SUMMER...
DENVER'S 4TH LARGEST PARK



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Strategy Example: FDOT Context-Based Solutions

The Federal Highway Administration defines Context Sensitive Solutions (CSS) as "a collaborative, interdisciplinary approach that involves all stakeholders to provide a transportation facility that fits its physical setting and preserves scenic, aesthetic, historic and environmental resources, while maintaining safety and mobility. The CSS is an approach that addresses the total process with a vision of transportation "Quality" is gained, implemented, maintained and operated." CSS is often considered with traditional practice that "focuses solely on vehicle throughput by emphasizing a more balanced approach that places transportation infrastructure within its surrounding context in a collaborative fashion that has co-benefits to other transportation modes and is responsive of the built environment's role in maintaining environmental quality and other shared resources." In Florida, the Department of Transportation has codified a context-based approach to ensure that all projects are coordinated

CONTEXT CLASSIFICATION AND ROADWAY USERS

serves and considers the needs of all users, including bicyclists, pedestrians, transit vehicles and riders, freight haulers, motorists, and adjacent land uses. Context Classification is the recommended first step in the project development process. It is a tool that helps practitioners understand existing and desired character and form of a transportation facility. Context Classification is the process of assigning a transportation facility to a context classification based on the land use and development characteristics surrounding the facility and the anticipated future character of the facility. Context Classification helps ensure that transportation facilities are planned, designed, operated, and maintained consistently with the surrounding natural and built environment and the community's desired character.

The Context Classification system is applied to all roadways, regardless of ownership, and includes six categories ranging from natural to urban. Each roadway is assigned a context classification based on the adjacent land use and development characteristics. Roadways may be assigned more than one context classification if they pass through different types of development patterns. Context Classification is the first step in the Complete Streets process. Once a roadway's context classification is established, the Complete Streets Handbook provides guidance on how to design a roadway that is appropriate for its context.

FIGURE 5. Required Cross Types in Different Context Classifications

TRUCK LANE RESTRICTIONS

TRUCK LANE RESTRICTIONS IN FLORIDA

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Alternative Modes

North Denver and Commerce City are committed to creating safe, livable, and welcoming environments for people of all ages and abilities—whether they walk, bike, drive, or use public transit. Strategic investments in sidewalks and bike facilities will enhance mobility for all residents, especially youth and those without access to cars. These improvements will also help achieve commercial areas and support healthier, more vibrant communities.

Collaboration with local transportation agencies will improve transit service and reduce inefficiency, making transit a more reliable and attractive option. Currently, driving remains the primary mode of travel in the I-270 corridor due to a lack of safe and convenient alternatives. Gaps in pedestrian and bicycle networks discourage active transportation and limit travel choices. North Denver and Commerce City will improve transportation safety through better street and intersection design, clearly marked crosswalks, and expanded sidewalk connections. Traffic-calming street designs, especially near schools and in residential neighborhoods, will help reduce vehicle speeds and improve safety. Enhanced bicycle infrastructure will provide residents with safer, better alternatives for getting around.

The following sections detail types of strategies that can improve bicycle infrastructure, in addition to:

- Supporting first- and last-mile connections to transit and key destinations
- Increasing bus reliability and frequency
- Ensuring bicycle connectivity within neighborhoods
- Improving walkability and adding street trees
- Embracing emerging mobility options

What is the "First and Last Mile"?

When someone takes a trip, whether to work, school, or anywhere else, it usually involves more than one trip. Even if you ride the bus or train for most of your journey, you still have to get to and from the station. That first part of the trip (getting to the station) is the first part (getting from the train to your destination) is called the "first and last mile."

People might walk, bike, drive, or use a scooter to cover those parts of the trip. Even though the distance isn't always exactly a mile, the term "first and last mile" is used to describe the beginning and end of a transit journey.

While public transit agencies focus on buses and trains, they don't always control the streets, sidewalks, or bike paths that help people reach transit stops. But those connections are just as important. If it's hard or unsafe to reach a bus or train, people are less likely to use it.

The easier it is to get to and from transit, the more likely people are to choose it. That's why improving first and last mile connections, like better sidewalks, bike lanes, lighting, and signage, is a key part of making public transportation work for everyone.

Strategy: Mobility Hubs

Mobility hubs make it easier for people to get where they need to go by bringing different transportation options together in one convenient, safe, and comfortable place. These hubs are designed to help travelers easily switch between walking, biking, public transit, shared rides, and even electric vehicle—all in one location.

A mobility hub may include:

- Bus stops or train stations
- Bike and scooter share stations
- Roadside pick-up and drop-off areas
- Electric vehicle charging stations
- Package lockers, small retail or vending machines
- Places to sit, get out of the sun or rain, and charge your phone

Mobility hubs are especially useful for making short connections—like getting from a bus stop to a bike share station or parking a scooter to reach your final destination. They often include real-time travel information, Wi-Fi, and other modern tech features to improve your travel experience.

These hubs are typically located near key transportation points like rail stations or major bus stops, and they help reduce car trips by making it easier and more appealing to use cleaner, more sustainable ways to travel.

In Commerce City, there's a chance to pilot a mobility hub near important transit and rail stations. By identifying key locations and investing in placemaking—such as adding comfortable seating, good lighting, and pedestrian-friendly streetscapes—the city can improve travel options for residents and visitors alike.

Strategy: Micro-transit/On-demand transit

Transit agencies are increasingly adopting innovative solutions to enhance the rider experience by offering new, more convenient transportation services. These services can operate along fixed routes and schedules or use flexible routing with on-demand scheduling, providing a more responsive and convenient alternative to traditional transit. Additionally, micro-transit services can supplement and connect riders to provide first- and last-mile connections.

For example, an on-demand rideshare service could operate within designated zones in North Denver and Commerce City and throughout the region. Unlike conventional transit options, micro-transit typically uses smaller vehicles, such as shuttles or minivans, and relies on smartphone apps or similar technology platforms for ride requests, routing, and scheduling. These fleets are designed to be more agile, offering service in areas that may not be well-served by fixed-route transit.

Micro-transit is especially effective as a first-mile/last-mile solution, helping people connect to bus and rail lines or move within neighborhoods where traditional transit is limited. Many regions have already introduced on-demand services as supplements in high-density or sparse fixed-route systems in lower-density communities.

For instance, the City of Denver's collaboration with RTD on the Denver Connexion service also operates Globeville, Elyria, and Swansea. The program's Ten Two rides on demand with the service area and does not connect across I-270 into Commerce City. Additionally, DRCOG is currently undertaking a research effort (https://engage.drcog.org/rfta-area-study) to study the feasibility of a micro-transit service in the Thornton area.

Strategy: Shared Micro-mobility

Micromobility devices help bridge first- and last-mile gaps, expanding access to jobs, healthcare, and essential services. These lightweight transportation options—such as bicycles, e-bikes, electric scooters (e-scooters), and low-speed electric neighborhood vehicles—are ideal for short-distance travel. Powered and activity-based micromobility devices can offer increased mobility for older adults and individuals with disabilities, as they require less physical effort than traditional bikes or scooters.

While shared micromobility options are currently limited in North Denver and Commerce City, there is a strong opportunity to introduce bike- and e-scooter-sharing programs. These services can provide flexible, on-demand transportation for short trips and last-mile connections to transit or local destinations. Shared micromobility can also be beneficial for active transportation to people who may not own a bike or scooter.

Local governments and partners can support bike-share/e-bike/electric-shared mobility options to improve access, increase ridership, and raise public awareness and comfort, with these programs often focusing on micro-mobility as an extension of the transit system to maximize its role in a complete transportation network. Education and outreach programs—such as safe riding workshops and basic bike maintenance classes—can further boost participation and ensure safe use.

North Denver and Commerce City could also explore the Denver Connector that operates nearby in Globeville, Elyria, and Swansea. The program's Ten Two rides on demand with the service area but does not connect across I-270 into Commerce City. Additionally, DRCOG is currently undertaking a research effort (https://engage.drcog.org/rfta-area-study)

Strategy: Enhanced Bicycle and Pedestrian Infrastructure

Bicycle and pedestrian infrastructure are essential components of active transportation networks. When paired with traffic-calming features, such as curb extensions, speed bumps, pedestrian islands, raised crosswalks, and brightly colored pavement, these

networks offer safer, more comfortable travel for people walking and biking. These design elements encourage drivers to slow down and pay attention, protecting all road users, especially those outside of vehicles.

Active transportation infrastructure, including bike lanes, sidewalks, and multi-use trails, plays a critical role in building vibrant, connected communities. These networks provide safe, reliable, convenient, and affordable options for people to get to work, access parks, and essential services. They also support community health and cohesion by encouraging physical activity and offering low- or zero-emission alternatives to driving. An orderly transit trip begins and ends with walking or biking; active transportation is a key part of a complete transportation system.

When designed with all users in mind, active transportation networks can:

- Reduce congestion and traffic-related injuries and fatalities
- Improve access to jobs and services
- Promote healthier lifestyles through increased physical activity

- Strengthen communities and public spaces

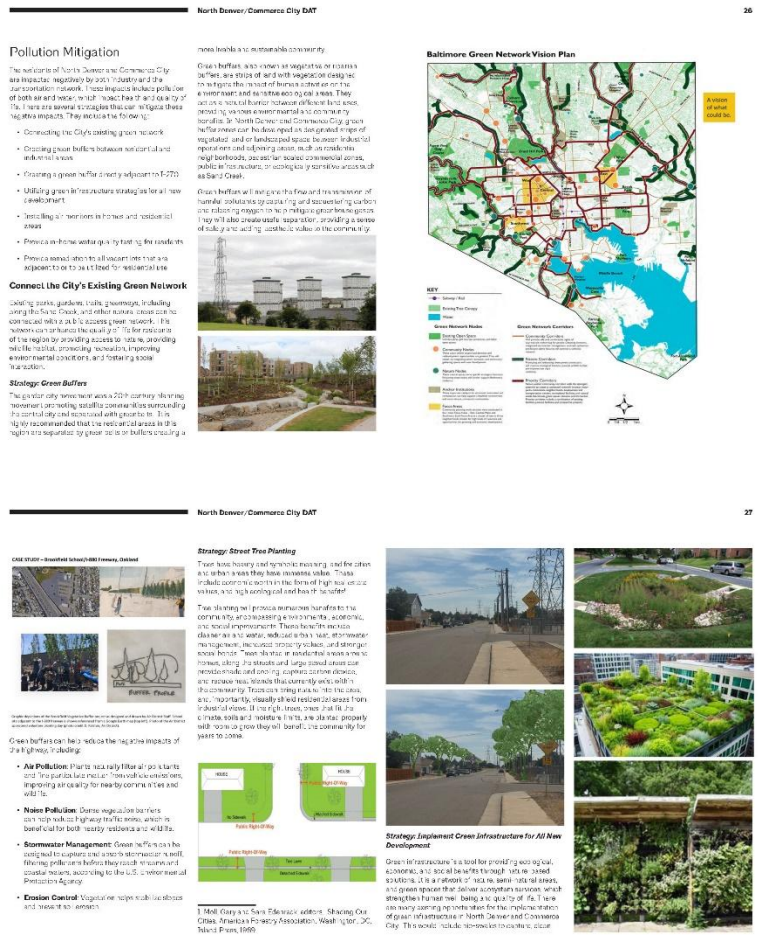
In North Denver and Commerce City, bicycle infrastructure is currently limited and fragmented. Few dedicated bike lanes exist, and many major roads lack physical separation from vehicle traffic, reducing safety and discouraging ridership.

To support active transportation, transportation planners and public officials can focus on developing safer, more convenient infrastructure—such as protected bike lanes, well-lit routes for evening travel, and clearly marked pedestrian paths. These changes can also help by installing bike racks, indoor rooms, showers, and repair stations, making it easier for employees to choose biking or walking as their commute mode.

Ultimately, cycling and walking infrastructure represent cost-effective, inclusive transportation options that expand mobility for a broader range of residents.

Expanding and Integrating Public Transit along the I-270 Corridor

While a series of state policy shifts in recent years have placed priority on developing efficient, multi-modal communities, participation in regional transit has been in decline. Recent studies report that RTD is plagued by low ridership, with 40 million fewer riders per year compared with six years ago. This condition reflects both national impacts on transit from the pandemic experience and local challenges to the region. At the same time, the I-270 corridor remains a significant opportunity because it is where the return on transit investments is poten[illegible] most powerful outside of the city core. The I-270 / Interstate is currently served by either an RTD bus route (the 112L or Flatiron Flyer FF6), connecting Boulder to Aurora along US-36. The current route is 61 miles and about 1 hour and 15 minutes with service only during weekday commuter hours. CDOT's 2022 Origin/Destination study found that 44% of trips on I-270 are "long distance" between US-36 and Aurora which suggests there is potential for additional trips leaving the area. Portions of the I-270 corridor are somewhat unique in the profile of a transit corridor. These areas typically exist where transit service connects to areas higher than existing public transportation service and are often characterized by accessibility challenges and barriers such as lengthy walking distances to reach facilities. While the majority of the project area currently lacks the housing densities needed to create transit accessibility, it does have a high number of residents who have greater comparative transit need than other areas as measured by census tract data. Therefore, transit investments in the project area can potentially capture both types of users and serve multiple goals. First, the opportunity cost cannot be ignored. Removing highway capacity without parallel investment in alternative modes will increase total vehicle miles traveled (VMT), offsetting any short-term congestion relief and undermining the state's greenhouse gas reduction goals under CDOT's GHG Pollution Reduction Planning Standard (2021). Second, improved transit services in this area not only facilitate future housing increases but reach transit dependent populations and they provide significant co-benefits in family economic success, economic mobility, health, affordability and other outcomes that are regional goals. Expanding transit options, such as regional BRT routes or express bus service connecting US-36, I-270, and I-70 would directly address mobility gaps while mitigating some environmental exposures in frontline neighborhoods like Globeville and Elyria-Swansea and south Commerce City residents, where asthma and cardiovascular disease rates remain among the highest in the region. Lastly, transit investments in this area can help create the infrastructure to encourage more compact land use over time and creating the needed densities to make transit a possibility. Commerce City remains one of the fastest growing municipalities in Colorado and was among the 5 municipalities to receive "most transformational community" designation across the state. Therefore, it must meet the state requirements of the Housing Opportunity Goal by adopting zoning capacity to allow for new construction of at least 3,800 new housing units by 2030. The area is ready-made for significant and complementary investments in transit to help absorb the realization of state goals. Conversely, absent investments in transit, the widening of I-270 would serve to undermine the 1-00 Commerce City Housing Opportunity Goal. Transit investments would also be consistent with the goals of CDOT's Statewide Transit Plan, which articulates the intent to provide "enhanced transit service for transit-dependent populations" and identified Adams County as a jurisdiction "particularly challenged by a lack of convenient transit for transit-dependent characteristics." It would serve the goals of the Draft Commerce City Transportation Master Plan, which notes that addressing barriers to mobility is a priority for Denver, Denver County and Adams County transit users indicate that the I-270 study area lacks weekend and road to rail connections. There are virtually no high-frequency regional routes serving the corridor, reinforcing the case for consistent CDOT–RTD action on transit solutions. Continued regional collaboration and coordination between CDOT, RTD, DRCOG and local jurisdictions could facilitate integrated service planning, focused capital investments, and eligibility for multimodal projects under existing funding programs such as the Multimodal Options Fund (MMOF) and the Transportation Alternatives Program (TAP).



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Pollution Mitigation

The residents of North Denver and Commerce City are impacted negatively by both industry and the transportation network. These impacts include pollution of both air and water, which impact health and quality of life. There are several strategies that can mitigate these negative impacts. They include the following:

- Connecting the City's existing green network
- Creating green buffers between residential and industrial areas
- Creating a green buffer directly adjacent to I-270
- Utilizing green infrastructure strategies for all new development
- Installing air monitors in homes and residential areas
- Provide in-home water quality testing for residents
- Provide sanitation to all vacant lots that are adjacent to or to be utilized for residential use

Connect the City's Existing Green Network

Existing parks, gardens, trails, greenways, including along the Sand Creek, and other natural areas can be connected with a public access green network. This network can enhance the quality of life for residents of the region by providing access to nature, providing wildlife habitat, promoting recreation, improving environmental conditions, and fostering social interaction.

Strategy: Green Buffers

The gardener city movement was a 20th century planning movement promoting satellite communities surrounding the central city and separated with green belts. It is highly recommended that the residential areas in this region are separated by green belts or buffers creating a more livable and sustainable community.

Green buffers, also known as vegetative or riparian buffers, are strips of land with vegetation designed to mitigate the impact of human activities on the environment and sensitive ecological areas. They act as a natural barrier between different land uses, providing various environmental and community benefits. In North Denver and Commerce City, green buffer zones can be developed as the grassed strips of vegetated land or landscaped space between industrial operations and adjoining areas, such as residential neighborhoods, pedestrian scaled commercial zones, public infrastructure, or ecologically sensitive areas such as Sand Creek.

Green buffers will mitigate the flow and transmission of harmful pollutants by capturing and sequestering carbon and reducing oxygen to help mitigate greenhouse gases. They will also create useful separation, providing a sense of safety and adding aesthetic value to the community.

Baltimore Green Network Vision Plan

A vision of what could be.

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CASE STUDY – Brookfield School/I-880 Freeway, Oakland

Green buffers can help reduce the negative impacts of the highway, including:

- **Air Pollution:** Plants naturally filter air pollutants and fine particulate matter from vehicle emissions, improving air quality for nearby communities and wildlife.
- **Noise Pollution:** Dense vegetation barriers can help reduce highway traffic noise, which is beneficial for both nearby residents and wildlife.
- **Stormwater Management:** Green buffers can be designed to capture and absorb stormwater runoff, filtering pollutants before they reach streams and coastal waters, according to the U.S. Environmental Protection Agency.
- **Erosion Control:** Vegetative ships stabilize slopes and prevent soil erosion.

Strategy: Street Tree Planting

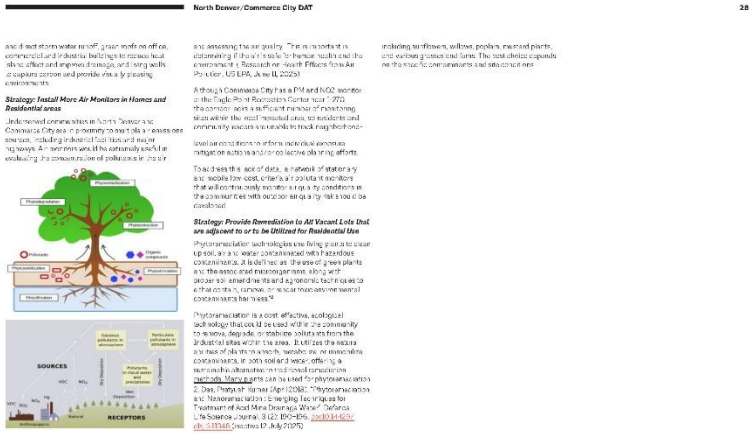
Trees have beauty and symbolic meaning, and for cities and urban areas they have immense value. These include economic worth in the form of high real estate values, and high ecological and health benefits.

Tree planting will provide numerous benefits to the community, encompassing environmental, economic, and social improvements. These benefits include cleaner air and water, reduced urban heat, stormwater management, increased property values, and stronger social bonds. Trees planted in residential areas are no homes, along the streets and large paved areas can provide shade and cooling, capture carbon dioxide, and reduce heat islands that currently exist within the community. Trees can bring nature into the area, and, importantly, visually shield residential areas from industrial views. If the right trees, ones that fit the climate, soils and moisture limits, are planted properly with room to grow they will benefit the community for years to come.

1. Moll, Gary and Sara Edelwack, editors. Sharing Our Cities. American Forestry Association, Washington, DC, Island Press, 1999.

Strategy: Implement Green Infrastructure for All New Development

Green infrastructure is a tool for providing ecological, economic, and social benefits through nature-based solutions. It is a network of natural, semi-natural areas, and green spaces that deliver ecosystem services, which strengthen human well-being and quality of life. There are many opening opportunities for the implementation of green infrastructure in North Denver and Commerce City. This would include tree-breaks to capture, clean



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and direct storm water runoff, green roofs on office, commercial and industrial buildings to reduce heat sink, offset and improve drainage, and living walls to capture carbon and provide visually pleasing environments.

Strategy: Install More Air Monitors in Homes and Residential areas

Underserved communities in North Denver and Commerce City are in proximity to multiple air emissions sources, including industrial facilities and major highways. Air monitors would be extremely useful in evaluating the concentration of pollutants in the air and assessing the air quality. This is important in determining if the air is safe for human health and the environment. (Research on Health Effects from Air Pollution, US EPA, June 11, 2025)

Although Commerce City has a PM and NO2 monitor at the Eagle Point Recreation Center near I-270, the corridor lacks a sufficient number of monitoring sites within the most impacted area, so residents and community leaders are unable to track neighborhood-level air conditions to inform individual exposure mitigation actions and/or collective advocacy efforts.

To address this lack of data, a network of stationary and mobile low-cost, other's air pollutant monitors that will continuously monitor air quality conditions in the communities with outdoor air quality risk should be developed.

Strategy: Provide Remediation to All Vacant Lots that are adjacent to or to be Utilized for Residential Use

Phytoremediation technologies use living plants to clean up soil, air and water contaminated with hazardous contaminants. It is defined as the use of green plants and the associated microorganisms, along with proper soil amendments and agronomic techniques to either contain, remove, or render more environmental contaminants harmless.[3]

Phytoremediation is a cost effective, ecological technology that could be used within the community to remove, degrade, or stabilize pollutants from the industrial sites within the area. It utilizes the natural ability of plants to absorb, metabolize, or immobilize contaminants, in both soil and water, offering a sustainable alternative to traditional remediation methods. Many plants can be used for phytoremediation. 2. Das, Prabhat Kumar (April 2026). "Phytoremediation and Nanoremediation: Emerging Techniques for Treatment of Acid Mine Drainage Water" Defence Life Sciences Journal, 3 (2): 105–106, doi:10.14429/dls.3.11346 (Inactive 12 July 2025)

Including sunflowers, willows, poplars, mustard plants, and various grasses and ferns. The best choice depends on the specific contaminants and site conditions.

Connecting Community

Public Safety

Public safety improvements in North Denver and Commerce City would assist in the prevention of and protection from events that could endanger the public, impact residents from significant danger or physical harm. These improvements are often made by the local jurisdiction or the state government to ensure the protection of citizens, persons in their territory, organizations, and institutions against threats to the r well-being, survival, and stability.

Various projects are an example of an element of transportation infrastructure that includes safe space for pedestrians and bike paths for crossing, increasing exposure to traffic risks. Improvements that address the issue could include:

- Pedestrian crossings
- Land bridges
- Green Corridor crossings
- Lighting
- Safe Routes to Schools

Public safety improvements in the region could significantly contribute to the enhancement of a location, the broadening of its scope, and hence the overall success of the economy.

Strategy: Safe Route to Schools

Denver's Safe Routes to School program serves school communities to create safe, equitable environments for traveling to and from school while creating opportunities that enable physical activity and lower the obesity rate and risk for children and their families who engage in. Like CDOT's Safe Routes to School (SRTS) toolkit.

1 Maritime Domain Awareness is the Canadian Safety and Security Program (CSP). December 2018. Archived from the original (PDF) on 2018-05-04.

sidewalk extensions, better crossings, and air-quality-conscious design features.

Strategy: Pedestrian Overpasses

The I-270 corridor has limited pedestrian and bicycle crossings, leading to difficulties for residents to safely access destinations on either side. Increasing the number of pedestrian overpasses in North Denver and Commerce City and designing these to be not only safe, but green and aesthetically pleasing would be beneficial to the environment and the community.

CDOT should consider designing a land bridge crossing to accommodate the movement of both animals and pedestrians on the corridor. A land bridge would provide a few options to develop solutions and solutions for safe crossing and a sound or visual buffer from the highway.

Anti-Displacement & Community Stabilization Strategies

The proposed I-270 expansion threatens to accelerate existing inequities in North Denver and Commerce City, where frontline communities already face cumulative burdens from pollution, industrial land use, and disinvestment. Without intentional strategies, highway expansion risks fueling land speculation, raising property values, and displacing long-time residents and small businesses. This chapter outlines anti-displacement strategies grounded in tools identified during the design assistance process, national best practices, and local precedents.

Why Anti-Displacement Matters

- Environmental Justice Context: Elyria-Swansea, Globeville, and Commerce City have been historically designated as Disproportionately Impacted Communities (DIC) under Colorado's HB 21H-1266 Environmental Justice Act. Residents already face higher asthma rates and shorter life expectancy compared to the rest of Denver.
- Market Pressures: Past highway projects, such as the I-70 Central Corridor, demonstrated how infrastructure projects can accelerate speculative development and displacement.
- Policy Misalignment: Colorado's Greenhouse Gas Reduction Roadmap and CDOT's 10 Yr Planning Standard call for reducing VMT and aligning transportation investments with equity outcomes, which highway expansion alone cannot achieve.

Strategy: Community Land Trusts (CLTs)

CLTs hold land in perpetual community ownership, ensuring affordability of homes, parks, and community assets. In the I-270 corridor, CLTs could:

- Acquire vulnerable parcels adjacent to industrial zones to create permanent green buffer zones.
- Preserve affordable housing near transit nodes, such as the RTD 72nd Avenue Station.
- Protect homeowners and parks from industrial encroachment by placing them under trust ownership.

Case Example: The Elevation Community Land Trust in Denver has successfully maintained long-term housing affordability across nine Colorado neighborhoods, demonstrating the stability of CLTs as anti-displacement tools.

Strategy: Neighborhood Stabilization Programs

Modeled on HUD's national NSP, Colorado's program funds property acquisition, rehabilitation, and new affordable construction in vulnerable areas.

- Rehab of existing homes could include health-focused upgrades such as filtration, insulation, and noise mitigation for homes along I-270.
- Vacant parcels could be developed for mixed-income housing or community facilities rather than logistics or warehousing.
- Commercial stabilization supports legacy small businesses through low-interest loans or shared commercial spaces.

Case Example: In Minneapolis, NSP investments were used to acquire and rehabilitate foreclosed homes in Environmental Justice neighborhoods, preserving affordability while reducing blight.

Strategy: Equitable Redevelopment Incentives

Local governments can tie redevelopment incentives to community-serving outcomes.

- Denver's Expanding Housing Affordability ordinance requires mixed-income housing in new projects.
- Commerce City could establish zoning overlays that prohibit new heavy industry near residential parcels while incentivizing mixed-use TOD near the 72nd Avenue station.

Case Example: The Atlanta BeltLine Eastside TAD Strategy aligns inclusionary zoning with public land banking, ensuring TAD investments do not displace low-income residents.

Strategy: Partnerships and Funding Alignment

A strategic alignment approach requires the following:

- Access County Open Space Sales Tax could fund parcel acquisition for buffers.
- CDOT's Transportation Alternatives Program (TAP) and Safe Routes to School funds could improve pedestrian connections while reducing displacement pressures.
- Community Benefits Agreements (CBAs) can hold developers accountable to provide affordable housing, green space, or workforce training.

Case Example: Pittsburgh's Hill District Master Plan established a framework for CBAs and structural measures like covenants to development-certified existing residents.

Lessons from National and Local Precedents

- Rochester, NY – Inner Loop East Removal: Highway removal allowed land to be redeveloped into affordable housing and parks, reversing decades of disinvestment.
- Syracuse, NY – I-81 Viaduct: State DOT committed to replacing a downtown viaduct with a community-first design, with housing and equity strategies baked into implementation.
- San Francisco – Central Freeway Removal: Replacement lots were reconnected into mixed-income housing and walkable streets, proving that highway alternatives can enhance affordability and equity.
- Denver – West Area Plan (2020): Introduced an Equitable Development Art – Displacement Toolkit, recommending tools like CLTs, renter protections, and public land banking.

Recommendations for I-270 Corridor

- Establish an I-270 Corridor Land Trust Consortium with Elevation CLT, Urban Land Conservancy, and local governments to secure at-risk parcels.
- Adopt Anti-Displacement Zoning Overlays near RTD stations and residential areas to prevent new polluting uses.
- Leverage Funding Tools: Combine NSP funds, Adams County open space tax, CDOT TAP, and philanthropic support (e.g., Colorado Health Foundation) for coordinated impact.
- Implement CBAs for any new corridor-adjacent development, guaranteeing affordable housing, green buffers, and local hiring.
- Pilot Health-Focused Housing Tahoe for freeway-adjacent residents, hardwired to reduce pollution exposure while preserving affordability.

Partnerships

The Colorado Department of Transportation's case framework identifies a wide set of partners as essential to transportation planning. These partnerships should not only exist as part of early outreach, they must be actively engaged throughout the process to shape solutions that address each organization's environmental, economic, and community impacts.

The partnership needs illustrates that each strategy of a strategies identified in the I-270 corridor requires active participation from multiple entities, with CDOT as one partner playing many rather than the sole decision-maker. The Regional Transportation District (RTD) is an essential partner as a lot CDOT's work in metro area. Much of the state's policy strategies around climate change and air quality are dependent upon establishing more connected mobility infrastructure that provides choices for citizens and decreases car dependency. Significant investments in transit infrastructure and an integrated approach to land-use and mobility will be critical to success.

Truck congestion solutions such as freight only lanes or priority rolling room in CDOT's leadership in design and enforcement, but also DRCOG's regional freight planning partnership and community input on balancing freight efficiency with local health and safety. Zero-emission truck incentives add a further layer of partnership with CDPHE, local businesses, and local health departments to monitor emissions and guide discussions regarding charging.

Smart network and connectivity improvements, including grid removal on traffic calming, and new transit corridors, require direct alignment between CDOT's corridor-level designs and local governments' land use, zoning, and complete streets programs, coordinated through DRCOG's regional transportation planning. Community partners are essential to ensure that these infrastructure investments rather than further divide neighborhoods.

CDOT's diagram of its Transportation Planning Partners included in its Transportation Planning in Colorado: CDOT Planning Manual (pg. 66)

A terminal mode strategies, including mobility hubs, shared micro-mobility, and enhanced bike/pedestrian infrastructure, depend on city governments (Denver and Commerce City) to implement land use and zoning changes. CDOT to integrate these elements into the right-way design. 3-1CDG for regional transit coordination, and direct, community engagement to assess fixed-line west rail mobility needs.

Air and water pollution mitigation requires the broadest set of actors. Green Buffer development and network considerations demand local governments, Adams County open space programs, and community groups for land acquisition and stewardship. CDOT's role is critical along the highway right-of-way while CDPHE, west and existing and rule-making air quality restrictions. Vacant or remediation requires coordination across local jurisdictions, counties, and the community to repurpose sites for housing, parks, or green infrastructure.

Public safety improvements such as pedestrian crossings, bike bridges, corridor crossings, lighting, and Safe Routes to Schools highlight the multi-modular nature of responsibility. CDOT controls highway right-of-way improvements, but local governments must define the neighborhood street and school safety context, with health organizations and community groups ensuring designs are aligned with different health and safety access priorities.

Finally, non-enforcement strategies are perhaps the hardest. From CDOT's institutional perspective, they are indispensable. For infrastructure projects are to meet Colorado's statutory requirements for scoping. The I-70 Central experience through Elyria-Swansea and Globeville is critical that a clear precedent, after years of legal challenges and community advocacy, CDOT was required to provide direct funding for neighborhood stabilization, affordable housing, and health interventions as part of the settlement agreement. The history demonstrates that transportation projects which impose severe environmental impacts on vulnerable communities inevitably require compensatory investment in housing, health, and anti-displacement measures.

For I-270, the same principle applies. Community land trusts, neighborhood stabilization programs, and equity-based policies must be considered as potential sources CDOT's scope. They must be considered in partnership with economic development agencies, city and county governments, and community stakeholder organizations to ensure that the benefits of infrastructure are not captured solely by speculative market actors. Failure to plan proactively for anti-displacement risks repeating the I-70 conditions of reactive settlements that only partially repair harm

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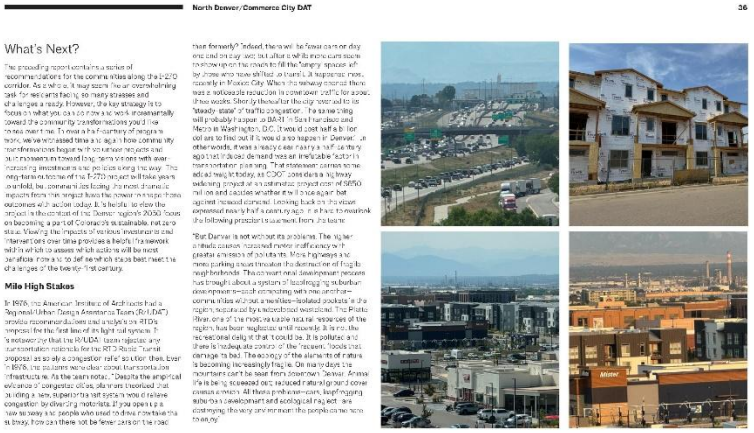
rather than embedding activity and community protection into the project, from the start.

Taken together, the table demonstrates that the I-270 corridor cannot be treated as a standalone highway project. Every identified subcategory of improvement requires multi-sector, multi-year partnerships that extend well beyond CDOT's traditional highway scope. A holistic approach that values partnership not just in project outreach, but in design, implementation, and long-term stewardship is essential. Without this, project-level decisions will concentrate existing inequities rather than addressing the systemic regional issues of pollution, displacement, and limited mobility options that frontline communities face.

Opportunity Subcategory	Community members (residents)	City of Denver	City of Commerce City	CDOT	Adams County	Health Depts (CDPHE, Local)	DRCOG/Regional	Economic Development Agencies
Truck Congestion								
Freight only lanes	X			X			X	
Freight priority tolling				X			X	
Automated enforcement	X	X	X	X				
Zero-emission truck transition	X			X		X		
Street Network & Connectivity								
Street grid improvements	X	X	X	X	X		X	
Traffic calming measures	X	X	X		X			
Multi-modal corridors	X	X	X	X			X	X
Alternative Modes								
Mobility hubs	X	X	X	X			X	
Shared micro-mobility	X	X	X					X
Enhanced bike/ped infrastructure	X	X	X	X				X
Mitigation of Air & Water Pollution								
Green network connections	X	X	X	X	X			
Green buffers (general)	X	X	X		X			
Green buffers along I-270	X			X		X		
Green infrastructure (new Development)	X	X	X		X			X
Air quality monitors	X			X		X		
Vacant lot remediation								X
Public Safety								
Pedestrian crossings	X	X	X	X				
Land bridges	X	X		X				
Green corridor crossings	X	X	X		X			
Lighting	X	X	X					
Safe Routes to Schools	X	X	X					
Anti-Displacement								
Community Land Trusts (CLTs)	X	X	X		X			X
Neighborhood Stabilization Program	X	X			X			
Legacy small business support	X	X	X					X

Moving Forward



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What's Next?

The preceding report contains a series of recommendations for the communities along the I-270 corridor. As a whole, it may seem like an overwhelming task for residents facing so many stresses and challenges already. However, the key strategy is to focus on what you can control or work incrementally toward the community considerations you'd like to see over time. To steal a half-courtesy of programs leader, we've witnessed time and again how community transformations begin with volunteer projects and public investments toward long-term visions with even-increasing momentum as one builds upon the next. The long-term outcome of the I-270 project will take years to unfold, but connected decisions today can set dramatic impacts from that project have the power to shape those outcomes with action today. It's helpful to view the project as the context of the Denver region's 2050 focus on becoming a part of Colorado's sustainable, resilient future. Viewing the impacts of various investments and intervention over time provides a helpful framework with which to assess which actions will be most beneficial now as to define which steps best meet the challenges of the twenty-first century.

Mile High Stakes

In 1978, the American Institute of Architects had a "Regional/Urban Design Assistance Team (R/UDAT)" provide recommendations and insights on RTD's proposal for the first line of its light rail system. It's between by that the R/UDAT team rejected any transportation rationale for the RTD Plan. Transit proposal as simply a congestion relief solution. Then, even in 1978, the planners were clear about the limits of infrastructure. As the team noted, "Despite the empirical evidence of congested cities, planners theorized that building a new, expensive rail system would relieve congestion by diverting motorists. If you open up a new subway line, people who used to drive or take the bus will stay, how can there not be fewer cars on the road than formerly? Indeed, there will be fewer cars per day and on any given day, but after a while more cars move in to open up the roads to fill the 'empty' spaces left by those who have shifted or burned. It happened most recently in Mexico City. When the subway opened there was a noticeable reduction in downtown traffic for about three weeks. Shortly thereafter the city reverted to its 'steady state' of traffic congestion. The same thing will probably happen as BART in San Francisco and Metro in Washington, D.C. It would cost half a billion dollars to find out if it was a one-time happen in Denver." In other words, it was already clear nearly a half century ago that if drive-demand was an irrefutable factor in transportation planning. That statement comes somewhat ironic today, as CDOT considers a highway widening project at an estimated projection of $850 million and counts whether it will pay off again but against increased demand. Looking back on the vision expressed nearly half a century ago, it is hard to overlook the following prediction statement from the team:

"But Denver is not without its problems. The higher altitude causes increased motor inefficiency with greater emissions of pollutants. More highways and more parking have resulted in the destruction of fragile neighborhoods. The continued development pressures has brought about a system of bulldozing suburban development—each connecting with and another—communities without a meaningful—isolated pockets in the region, separated by undeveloped wasteland. The Platte River, one of the most remarkable natural resources of the region, has been neglected until recently. It is not the recreational delight that it could be. It is polluted and there is inadequate control of the recent floods that carnage is bad. The ecology of the alluvial soils of nature is becoming increasingly fragile. On many days the mountains can't be seen from downtown Denver. Animal life is being screened out, reduced natural ground cover creates a mess. All these problems—and, leapfrogging suburban development and ecological neglect are destroying the very environment the people come here to enjoy."

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Regional Growth Patterns: Taming Sprawl

In fact, regional growth patterns are the core of the [illegible] of the challenges the area now faces. As the team observed almost 50 years ago, the region was then – and is now – experiencing rapid growth. The pattern of development, [illegible] automobile-dependency and highly inefficient [illegible]. And, if it is not brought under control quickly, it will [illegible] the state's attempts to [illegible] and revitalize [illegible]. Given projected growth, sprawl poses a major regional challenge. The current population of the Denver metro region is estimated at over 3 million people, with projections that it will grow by over a million residents by 2040. Commerce City is a big part of that growth. In 2000, the city population was just over 22,000. Today, it has swelled to over 20,000 and Commerce City is listed as the fourth fastest growing [illegible] in the state. These growth trends have dramatic implications for communities. The Housing To Transit Oriented Communities Act represents Colorado's initial steps toward directing more affordable growth, but it is not sufficient alone. It will require new scales of regional collaboration across jurisdictions to begin to plan the kind of development patterns that will lead to success.

Fortunately, the region has dramatic success stories around community transformation and environmental homegrown that spark optimism for the future area.

Arsenal National Wildlife Refuge

The history of the Arsenal National Wildlife Refuge speaks to the industrial legacies of the region.

[illegible] 1942. In the wake of Pearl Harbor, the U.S. Army purchased nearly 20,000 acres – an area roughly the size of Manhattan – to construct the Arsenal for the purposes of producing biological and chemical weapons. After World War II, the Army leased the property to private companies, who manufactured agricultural chemicals and pesticides. Cold War tensions reactivated the Arsenal, during which time [illegible] a highly toxic nerve agent was produced.

A though the Army and Shell lead associated waste disposal practices of the time, contamination of the soil, structures and groundwater [illegible] occurred. To 1962, environmentalist Rachel Carson's Silent Spring [illegible] possible effects of [illegible] on human health that had been apparent as early as 1954. In 1983, the EPA listed the Arsenal as a Superfund Cleanup site, identifying nearly 900 different [illegible] hot spots.

The refuge represents [illegible] 5,000 acres of open space real estate, making it one of the largest urban refuges in the country.

It is also a model for similar [illegible] transformations of the future. As former Secretary of [illegible] Williams Cohen observed, [illegible] of telling the story of the Rocky Mountain Arsenal is a story about partnership. It's a story about a national model [illegible] how different [illegible] can be brought about by close cooperation between the private sector and the public sector. One can imagine a similar level of partnership uniting over 200 corridor communities to build great infrastructure and protect communities.

South Platte River

The South Platte River represents another inspiring story of leveraging [illegible] to affect environmental change. The [illegible] legacy [illegible] the reservoirs led to the months that the river was [illegible] to a drink, too thick to [illegible] to grow. Over 50 percent of Denver's water supply comes from the South Platte River. As a 2020 report on the health of the river noted, "As for the South Platte River, recreation in it is encouraged by DDPHE. In addition to frequently elevated E. coli levels, which can make people sick, industrial salt in the water can be high due to the location. According to the Colorado Department of Public Health and Environment (CDPHE), the [illegible] elevated levels of arsenic, running from the outfall of Chatfield Reservoir to the Burlington Ditch diversion in Denver, and increased nitrate, sulfate, and ammonia loss from Burlington Ditch to Big Dry Creek." However, a model

Case Studies

Case Studies

The Commercial by Design program has worked in other communities with similarities to North Denver and Commerce City over the years. The following case studies offer illustrative evidence that communities can reverse course on poor infrastructure decisions and achieve powerful transformations.

San Francisco, CA: The Embarcadero

The history of San Francisco's Embarcadero reflects the transformative change that can occur as a result of successful public processes. In 1953, the city began building the Embarcadero Freeway with the intention to connect the Bay Bridge in Oakland with the Golden Gate Bridge in Marin County. However, neighborhood opposition by the freeway construction organized successfully to block completion of the freeway, presenting a petition signed by 30,000 residents. The Board of Supervisors voted to cancel seven of the completed freeways throughout the city, including the 5.5-mile Embarcadero Freeway. A 1.2-mile length of the freeway had been constructed, and remained in place for decades. By the 1950s, the freeway carried about 70,000–100,000 vehicles daily through that area of the city, making its closure a divisive and controversial subject.

In 1984, a study / assistance task was organized to study South of Market, in San Francisco. As the report noted, "The Embarcadero is south of Market is about to undergo a major transformation, a transformation that will change the quality and the perception of this part of the waterfront for the foreseeable future. The shipping activities along the waterfront have left in ruins today, and despite the best intentions of the Port Authority, will continue to decline as they have in every other similar city. The change in the area, and the emotional turmoil of the railroads, have left behind a large piece of vacant or underused parcels on the landward side of the Embarcadero. Major projects are proposed for this area, and a new baseball stadium fronting the bay. The Embarcadero has remained an important demonstration case since.

Santa Rosa, CA: The Southeast Greenway

The Santa Rosa story provides a powerful example of what community-based organizations can do by rallying residents to fight for alternatives to a highway expansion. The history dates back to the 1960s, when Caltrans acquired a 41-mile strip of land to extend Highway 12. In 1989, the community won its first battle over the highway when Caltrans removed a bridge across Spring Lake from the Highway 12 plan after strong community opposition. In the 1990s, they won another battle when the City of Santa Rosa removed the freeway extension from its General Plan. In 2005, they launched the Southeast Greenway Campaign, an initiative to push for an alternative vision for the spur becoming a greenway. In 2010, they had the UC Berkeley Graduate Urban Design Studio produce ideas for the future greenway and conducted community engagement all over the city about the initiative. In 2011, they brought an AIA design assistance team to help build a community-based vision for the greenway. In 2013, the Santa Rosa City Council added the Southeast Greenway to its strategic goals and Caltrans issued a draft Highway 12 Transportation Concept Report, stating that the land is no longer needed for a freeway extension. The work has continued for the past 12 years and has included incremental land use and zoning, fundraising, for and acquisition and other key steps. Last year, Caltrans formally transferred title for the Greenway to the City of Santa Rosa. All of this work is driven by the Southeast Greenway Campaign vision, which states, "The Santa Rosa Southeast Greenway is that we will transform a two-mile vacant corridor (the former Highway 12 High-of-Way) into a new, 47-acre urban greenway park, one open space in the largest style in Sonoma County. Providing amenities for all, the Greenway can become the City's own "Central Park," with paths for cyclists and pedestrians, public areas,

community gardens, pocket parks, and civic plays, and new commercial for outdoor play and recreation. It will serve as a strategic link in ever regional non-motorized transportation system, connecting Spring Lake Park with Sonoma Way to the east and to SMART, downtown, and to the Prince Memorial Greenway and West Cotati trails." The Santa Rosa case demonstrates that community groups that engage in public and rally support, over the long-term can win these battles and achieve their associations for transforming sector.

Savannah, Georgia

In 2022, a design / assistance team worked with the communities of West Savannah on a strategy for equitable development and economic benefits. The communities faced a number of connectivity barriers such as rail systems, highway infrastructure, and railway infrastructure that severed it. One of the main concerns in the area was the adjacent port. Industrial activity and truck traffic traveling through neighborhoods. Local leaders were able to leverage these conversations to bring in several federal grants that addressed neighborhood issues by making investments in road and rail that provided more efficient port operations and improved neighborhood connectivity. While achieving community goals while addressing community needs.

Portland, Oregon: The Pearl District

In Portland, Oregon, a parallel warehouse corridor with railroad switching and rail yard was transformed during the last two decades of the 20th century into the "Pearl" District, a neighborhood now worldwide for its vibrant, unique character. One recent reflection captures the area's transformation:

"Close your eyes, your eyes and I dare to imagine something that's only in your head? That's how it was for those

of us who looked over this 40 yards a no-man's-land expanse of rail yard. Portland some 20 years ago. Shadowy and dilapidated. It was a sight that even the best of us again and had to be overcoming. And yet, slowly, a legacy began to emerge of Portland's post-industrial era icon of living unlike anything the country had ever seen. A unique blend of views and vibrancy, with more than a passing nod to Portland's own pioneering brand of original frenzy, the Pearl District has earned a world-wide reputation for urban renaissance. Diverse, eclectically significant, residential communities unfold here. Go ahead, rub shoulders with restaurants, shops, down to parks, and no one has to squint very hard to see the magic that's taken hold. The Pearl is the story of a vision come to life."

In the 1980s, the Pearl District was referred to as "an abandoned place". In 1983, the city brought an AIA design assistance team to work with the community on a vision for the future of the area. At the time, much of the processing through the future development of the area involved demolition of the existing fabric. The process completely changed that thinking. As one post-act recalls, the team "took a bold, even revolutionary step that was then unusual in what has become the Pearl District today. The central recommendation on that guided what unfolded was the distinctive unique historic fabric and building stock view of be preserved and leveraged rather than destroyed.

The recommendations about the public realm and public spaces were a key focus of efforts. As one post-act recalls, "Landscape architect Peter Walker laid out a plan for the three-provised park, connected by a wide, wood-planked boardwalk that no one would miss if a bridge over the railroad tracks to the upper stories of Commercial Mills, a rotting industrial relic that preservationists hoped to be a historic look at the Pearl's northern edge. Walker also designed the neighborhood's first park – Jamison Square – with a cascading fountain that, from its opening day in 2002, drew throngs of kids from all over the city. Across the street, next to the streetcar, one of the earliest new buildings took shape – the Fred Court, with 189 units of affordable housing." In addition, "In the Early Pearl, some "streets" became landscaped pedestrian corridors through several adjacent residential buildings. Every investment became a commitment to place. As they write, "[In lieu of paving the area's potential roads in new asphalt, city crews replaced their some streets' original cobblestones."

A warning on alteration between city leaders and developers guided the neighborhood's evolution. As Ross describes, "What acts as a guide to scale, was more a hands-and-gloves collaboration between "innovative, but hardened, realists." They describe the development of a "three- part pact to steer the creation of a new urban neighborhood that would become the envied... in the region and the envy of developers, mayors, and urban planning wonks worldwide." The "first move: the city would tear down the Lovejoy Ramp, regarded as a barrier dividing the future neighborhood. For that, the developers agreed to build at a minimum of 87 housing units per acre through the district. Third, the city built a streetcar. The developers would name the route. "[$]5 units per acre. That new entry-parks would set at least 150 units per acre." Thirty percent of the housing, the developers and city pledged, would be affordable."

In the early 2000s, the former Foothills Rifle Whitehead Brewery was transformed with the neighborhood's first redevelopment, its first Gold-certified building, and its first LEED Gold condo tower in the country. The opening 1998 Jamison Square became the district's first LEED Platinum theatre and its most successful "Pearl" was the early period" results. At Solheim, often called the "Father of the Pearl": "Everyone was local. The developers, investors, architects, and contractors were in the street, figuring it out, building by building. We were competing. But we were also reinforcing." Today, the results are remarkable. The Pearl District is a global model for post-industrial design efforts in places as far away as London. The area is consistently rated as among the highest neighborhoods in the country. The case is a

great deal more than of how land use and transportation policy can integrate effectively to redevelop place. This focus emphasis on creating pedestrian areas and connectivity across public spaces is illustrative of the kind of intersection that can be achieved through the I-270 Corridor Improvements across a broader area using green bike and nature based solutions.

Team Roster & Acknowledgments

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Cesar Arturo Vasquez Del Mercado, AIA

Arturo has accomplished architect, urban designer, and educator with extensive experience in practice. Arturo brings a high-level design vision and a collaborative, team-based working style. He has over thirty-five years of experience merging design practice, master planning, and urban design, leading complex mixed-use programs in mixed-use, transit-oriented development, multifamily, healthcare, and education. Arturo has worked with private and public-sector entities, developers, institutions, community-based organizations, and city-regional agencies leading teams on projects that involve a variety of alternative delivery methods including Design-Build, P3, Design Assist, and Big Room JPD.

Throughout his career, Arturo's design work, built projects, and design competitions have received numerous national and international honors and awards recognition. A life-long educator and mentor, he has taught, lectured and assisted at prominent colleges and universities in the US and abroad. Arturo is a registered architect in New York State and NCARB Certified.

Diane Jones Allen, D. Eng., RLA, FASLA, FCELA

Dr. Diane Jones Allen has enriched a national reputation by bridging practice and research in the areas that cross over deeply about transportation, access, sustainability, and environmental justice. These interests have led to a research and creative output that is remarkable for the natural integration of academic productivity with successful and meaningful practice.

As Principal Landscape Architect with Design Jones LLC, she has become elevated to Fellow in the American Society of Landscape Architects in 2018. Design Jones LLC also received the 2018 American Society of Landscape Architects (ASLA) Community Service Award under her leadership. Diane is Council of Landscape Architectural Registration Boards (CLARB) certified landscape architect, licensed in Texas, Louisiana, Missouri, Ohio, Mississippi and Maryland.

In 2007 she became Program Director for Landscape Architecture, College of Architecture, Planning, and Public Affairs, at the University of Texas at Arlington (UTA), where she assisted the program in achieving accreditation in 2008, developing its strategic plan, increasing its enrollment and also starting a new undergraduate program, the Bachelor of Science in Environmental Design. Diane was elevated to full professor in 2020. She introduced new courses to the curriculum, including Design and Human Behavior and also instituted the Design Thesis as additional option to the Master thesis, that is a degree requirement for the Master of Landscape Architecture at UTA.

Diane served on the ASLA Blue Ribbon Panel on Climate Change and Resiliency in 2007 and has received her research and service in this area. Diane also served on the Board of the Landscape Architecture Foundation (LAF), serving as Vice Chair on Education in 2021. As a result of this service and her commitment, she was awarded an LAF papers on Increasing Black Faculty presence for journal publications. Diane is also part of one of two cross-disciplinary teams that won the 2020 Siliconix Owens and Morrill (SOM) Foundation Research Prize focused on promoting social justice in urban landscapes. Her team is working with a Fourteen Towns along the Trinity River to combat the impacts of urban sprawl and gentrification. Her research and practice are guided by the intersection of environmental justice, identity, and sustainability in cultural landscapes, including "Nomadic" responses to "Transit Deserts," places of increasing transportation demand and limited access, as depicted in her book "Lost in a Transit Desert: Race, Transit Access, and Suburban Form" published by Routledge Press in 2017.

Monica Guerra, PhD.

Monica Guerra brings 12+ years experience driving development and implementation of policies to advance transportation equity, accessibility, and innovation. Most recently she served as the Community Solutions Technical Assistance Lead at the US Department of Transportation, overseeing technical assistance and capacity building programs serving over 200 communities across the country. She brings an assumptive background in leading the development of long-range planning documents and advising local governments on opportunities to align housing, public health, environmental, and economic factors or strategies to advance community investments and priorities. She holds a PhD in City and Regional Planning from the University of California, Berkeley.

Karina Ricks

Karina Ricks is a Partner at Citylfi, where she draws on her international, city, federal, and private sector experience to run equitable, community, and consensus-driven engagements. Her recent projects in transportation, mobility, infrastructure, urban design, and economic development

Karina's previous roles include Associate Administrator for Innovative at the Federal Transit Administration, founding Director of Pittsburg's Department of Mobility and Infrastructure, and Director of Transportation Planning for Washington, DC. She has led initiatives like Universal Basic Mobility, integrated mobility payment systems, and the nation's first Mobility as a Service system, MoveRGH. Karina has led both systems and organizational transformations in mobility, innovative, pedestrian projects and develop strategic roadmaps for planning, capacity building, and project funding. She is an experienced policymaker at both the municipal and federal levels. She brings an unmatched track record of leverage public private partnerships for the public good.

Karina is rooted in a commitment to authentic collaboration, human centered design, and continuous learning. Karina is a Fulbright Scholar, holds a Master's Degree in City and Regional Planning from Cornell University and a pre-law degree from the James Madison College of Michigan State University. She has served as a strategic advisor to the World Bank and International observer with the Organization for Security and Cooperation in Europe (OSCE).

Amruta Sakalker, Ph.D.

Amruta Sakalker, Ph.D. is an urban policy strategist with a background in real estate and public sector advisory, including work at HR&A Advisors. She has contributed to inclusive infrastructure and workforce strategies across California, supporting community benefits design, land use planning, and policy implementation. Her doctoral research focused on interjurisdictional governance and community stewardship, with published work on service coordination, environmental justice, and adaptive infrastructure. Amruta brings a cross-disciplinary approach to advancing equitable development, grounded in both applied practice and collaborative research.

Paola Capo

Paola Capo is Senior Manager of Disaster and Community Assistance for AIA. She strives to provide architects and communities with the resources they need to create healthier, more sustainable and equitable built environments. In her current role, she builds partnerships between managing the Disaster Assistance Program (assisting architects and AIA chapters before and after disaster events occur) and supports Communities by Design, a program of the Architects Foundation that facilitates collaboration with interdisciplinary consultants to solve community aspirations. In her time at AIA, Paola has supported various other portfolios related to sustainability and climate action, including the 2030 Commitment program, the Materials Pledge, and the Committee on the Environment, with a focus on building robust programs and resources. In 2020 she completed AIA's Fellowship in Public Participation Programs, and in 2022 she participated in UC Berkeley's UNCP program to expand on her knowledge in urban design. She graduated from Georgetown University in 2017 with a degree in Science, Technology, and International Affairs, focusing in Energy and the Environment, a degree inspired by the many places she lived growing up as an Army brat.

Joel Mills

Joel Mills is Senior Director of the Architect Foundation's Communities by Design program. The program has catalyzed thousands of skilled, sustainable development across the United States, helping to create some of the most vibrant places in America today. Joel's 25-year career has been focused on strengthening civic capacity, public processes, and civic institutions. This work has helped millions of people participate in ownership processes, visioning efforts, and community planning initiatives. He has delivered presentations, training content, workshops, and public processes in every climate and time zone across 5 continents. In the United States, Joel has provided pro bono services to hundreds of communities, leading participatory processes in the pursuit to move 100 communities across 35 states. His work has been featured in over 1,000 media stories. Joel has served on dozens of expert working groups, boards, juries, and panels focused on civic discourse and participation, sustainability, and placemaking. He was a founding Board Member of the International Advocate for Public Participation's United States Chapter. He has spoken at numerous international events and conferences covering developed urbanism and the role of democracy in community success, including serving as the Co-Convenor of the Remaking Cities Congress in 2018. Joel is an Academician of the Academy of Urbanism in London, U.K. He is the author of numerous articles on the relationship between democracy, civic capacity, and ownership.

Acknowledgments

The team would like to express its gratitude to all the community residents who took the time to share their thoughts about the future of the area by participating in the process. Your voices were critical to us. Your lived experiences and aspirations helped shape our analysis, understanding of the area as well as our recommendations. The team is also thankful to the elected officials that shared their valuable insights about planning work to date and important local and regional considerations. The team would like to extend a special thanks to the following local partners for their support of the process:

GreenLatinos

Earthjustice

AIA Colorado

Colorado Department of Transportation

The Regional Transportation District

Commerce City Mayor Steve Douglas

Commerce City Council Members Reneé M. Chacon and Kristi Douglas

Civic leader Lucy Molina

Steering Committee Member Briana Marquardt

Bridging the Divide: Reclaiming Community in the Path of I-270
Facilitated by Communities by Design
Communities by Design
an Architects Foundation program

Attachment C – Appendix A.

Elimination of I-270/I-76 Reroute Alternative

Response to Comment 10

This attachment to the DAT Report provided was reviewed by the project team and considered during the evaluation of the Two Express Lanes that Accommodate Transit Alternative. Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis. Please see Appendix D, Two Express Lanes that Accommodate Transit Technical Report, of the Final EIS for additional information about the evaluation conducted on the alternative.

I-70 EAST
ENVIRONMENTAL IMPACT STATEMENT

Technical Memorandum

To: CDOT and FHWA Management

From: I-70 Project Team

Date: June 2012 – Updated August 2015

Subject: Elimination of I-270/I-76 Reroute Alternative

Due to the intense public interest regarding the I-270/I-76 reroute alternative, the I-70 Project Team prepared this memorandum to explain in detail why this alternative is not reasonable given the purpose and need for the project and will not be fully evaluated in the range of alternatives for the I-70 East project.

1.0 BACKGROUND

Currently, I-70 between I-25 and Tower Road is one of the most heavily traveled and congested highway corridors in the region and state. The corridor provides a number of important transportation functions including interstate and intrastate travel along I-70; regional access from downtown Denver and the metropolitan area to Denver International Airport; linkage as an inner beltway between I-225 and I-270; and access to adjacent employment areas, neighborhoods, and new development centers. In July 2003, Colorado Department of Transportation (CDOT) initiated a study to improve transportation along the I-70 highway corridor from I-25 to Tower Road. Using input from scoping, data gathering, and technical analysis, the project purpose and need was developed.

The purpose of the project is to implement a transportation solution that improves safety, access, and mobility and addresses congestion on I-70 in the project area. The need for this project results from the following issues:

- Transportation infrastructure deficiencies
- Increased transportation demand
- Limited transportation capacity
- Safety concerns

Several alternatives for the project were developed based on input from the community at corridor-wide meetings, through involvement with affected agencies at scoping and committee meetings, and from previous studies and new concepts developed by the project team.

One of the alternatives initially considered would reroute I-70 along I-270 and I-76 (shown in Figure 1). The existing viaduct between Brighton Boulevard and Colorado Boulevard would be removed leaving 46th Avenue in place, and the remaining portion of I-70 from Colorado Boulevard to I-270 would be converted to a city street. This alternative also would require the reconstruction of the I-76/I-25 interchange and major widening of I-25, I-270, and I-76 (currently 4 lanes each) for approximately 12 miles to accommodate relocated traffic.

Figure 1
I-270/I-76 Reroute Alternative

After identifying the initial alternatives, the project team performed a four-level screening process to refine and evaluate the alternatives using more detailed goals and objectives that were developed based on the project's purpose and need. CDOT and Federal Highway Administration (FHWA) eliminated the I-270/I-76 reroute alternative from consideration as part of the first level of this screening process as documented in the 2008 Draft EIS.

After the 2008 Draft EIS was published, based on requests and comments received from the public, the project team reexamined the I-270/I-76 reroute alternative as part of a comprehensive review of past decisions. The intent of this reexamination was to ensure that past decisions and assumptions were still valid given new information and community feedback.

The additional analysis confirmed the earlier decision to remove the I-270/I-76 reroute alternative from consideration. Described below are the primary reasons for not advancing this alternative as a result of the additional analysis.

2.0 REASONS FOR ELIMINATION OF THE I-270/I-76 REROUTE

The main reason for the elimination of this alternative is that it does not meet the project's purpose and need, which is to implement a transportation solution that improves safety, access, and mobility and addresses congestion on I-70. Specifically, CDOT examined the following issues to make this determination.

2.1 Does not improve congestion and safety conditions

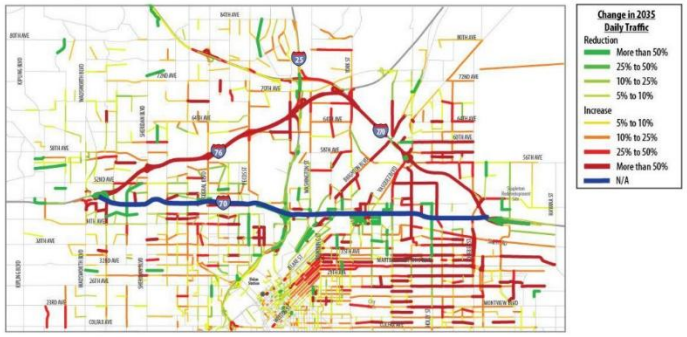
The I-270/I-76 reroute does not meet the project's purpose and need because it would add safety and congestion problems rather than improving those that exist today. While, in sense, removing I-70 would "eliminate" the current congestion and safety problems the project seeks to remedy (as there would no longer be an I-70 on that alignment), after the its removal, traffic volumes on local streets will increase and transfer the safety and mobility problems from I-70 to the local network. In essence, as explained further below, the same issues that underlay the present need for the project would only be duplicated and compounded in the same location, albeit on different infrastructure, by the removal and reroute of I-70.

A travel analysis was performed using the Denver Regional Council of Governments (DRCOG) 2035 Regional Travel Demand Model, which simulated the rerouting of I-70 between Wadsworth and Central Park Boulevards on the I-270 and I-76 corridors in conjunction with a new 46th Avenue/48th Avenue arterial. I-270 and I-76 would be widened to 6-lanes in each direction, and the new 46th/48th Avenue would be either 4 or 6 lanes. For more information regarding the reroute modeling efforts and assumptions please refer to the "FEIS_2035_ReRoute Scenario Travel Demand Summary_2_13_15" memo that can be found in the appendix of this document.

Currently there are 684 businesses within the quarter-mile buffer on each side of I-70 between I-25 and I-270 with approximately 11,408 employees that would lose highway access with rerouting I-70 and will be forced to use surface streets. Rerouting I-70 while leaving 46th Avenue at its current location encourages highway users needing to access these locations to use 46th Avenue to reach their destinations rather than staying on I-70. Rerouting I-70 will also force delivery trucks and other large vehicles to use 46th Avenue frequently to reach the industrial areas and businesses that located near the existing I-70. The resulting high traffic volumes and the truck traffic on 46th Avenue could degrade the quality of the neighborhood and cause safety concerns for neighborhoods, pedestrians, bicyclists, and motorists.

Figure 2 shows the potential effect on daily traffic on arterial roadways (4-lane 46th/48th Avenue scenario) if I-70 were rerouted. Roadways that are shown in green would attract lower traffic levels if I-70 was re-routed while those in orange and red would carry higher levels of traffic. As shown in the figure, some arterials close to the I-70 alignment are relieved, while some arterials close to the expanded I-270/I-76 corridor realize increases in traffic. The arterial grid connecting downtown to the east corridor encounters high levels of traffic volumes. An additional scenario, with a 6-lane principal arterial (Figure 3) for 46th Avenue, was also modeled for a comparison.

Figure 2
Change in daily traffic with 46th Avenue as a 4-lane arterial



AtkinsRéalis - Baseline / Référence

Figure 3
Change in daily traffic with 46th Avenue as a 6-lane principal arterial

As seen in Figure 2 and Figure 3, the analysis shows that the traffic on the arterials west of I-25 is reduced with the I-270/I-76 reroute; however, this reduction results in major traffic increase in the arterials east of I-25. The local street networks east of I-25 do not have the capacity to hold the forecasted traffic volumes; therefore, the increase in the local street traffic will result in safety issues and major delays. The responsibility for improving these problems would then fall on the local jurisdictions.

Table 1 shows the increased traffic on 46th/48th Avenue. The average daily traffic for both Reroute scenarios (4-lane and 6-lane 46th/48th Avenue), ranges from 30,000 to 60,000 (as 4-lane) and from 40,000 to 75,000 vehicles a day (as 6-lane) in 2035, resulting in congested conditions. The 6-lane scenario processes higher volumes in comparison to the 4-lane scenario resulting in a reduction in the amount of additional traffic on other arterials in the traffic impact analysis area. The traffic volumes on 46th/48th Avenue in the re-route analysis are typically 4-6 times higher than the traffic volumes in the Partial Covered Lowered Alternative and 10 to 15 times higher than on the levels on 46th Avenue in 2012.

Table 1
46th/48th Avenue 2035 traffic volumes

46th/48th Ave Section Between	2035 Average Daily Traffic			
	Existing* (2012)	Partial Cover Lowered Alternative**	Reroute 4-Lanes 46th Ave	Reroute 6-Lanes 46th Ave
I-270 Ramps & Quebec St.	-	-	57,800	75,175
Quebec St. & Monaco St.	-	24,100	55,200	73,800
Monaco St. & Ivy St.	-	8,100	40,150	55,400
Ivy St. & Holly St.	-	8,400	39,500	55,200
Holly St. & Dahlia St.	-	11,100	40,100	54,150
Dahlia St. & Colorado Blvd.	-	10,200	33,900	47,450
Colorado Blvd. & Steele St.	2,800	23,250	34,900	49,750
Steele St. & Clayton St.	7,000	7,050	47,000	62,400
Clayton St. & Josephine St.	6,500	11,050	47,100	63,900
Josephine St. & York St.	5,900	13,800	47,050	63,500
York St. & Brighton Blvd.	2,900	13,200	45,800	62,000
Brighton Blvd. & E 47th Ave.	3,800	14,800	36,200	49,000
E 47th Ave. & Washington St.	-	-	36,400	49,000
Washington St. & Lincoln St.	-	-	59,400	75,500
Lincoln St. & I-25 Ramps	-	-	62,800	77,600
Pecos St. & I-25 Ramps	-	-	37,650	43,750
Pecos St. & Zuni St.	-	-	33,600	40,200
Zuni St. & Federal Blvd.	-	-	32,050	39,050
Federal Blvd. & Lowell Blvd.	-	-	40,000	49,100
Lowell Blvd. & Tennyson St.	-	-	38,500	48,050
Tennyson St. & Sheridan Blvd.	-	-	39,700	48,750
Sheridan Blvd. & Harlan St.	-	-	38,050	45,500
Harlan St. & I-76 Ramps	-	-	37,900	42,700

** The existing conditions daily traffic volumes were estimated based on the available 2012 peak traffic counts.*
***46th Avenue volumes are forecasted with a split diamond interchange at Colorado and Vasquez/Steele Boulevard and 46th Avenue is configured as two lane one way frontage roads on either side of I-70. Note that there is no arterial similar to 46th/48th Avenues west of I-25*

As these projections demonstrate, the increase in 46th/48th Avenue traffic introduces safety, access, and mobility issues in the surrounding neighborhoods and therefore fails to address the project's purpose and need.

2.2 Negatively affects Mobility

There would be an increase in out-of-direction travel, causing mobility issues. Of the traffic heading west on I-70, approximately 50 percent continues past I-25, staying on I-70. The Reroute Alternative adds two miles of out-of-direction travel for these vehicles. Thirty-five percent of the traffic heading west on I-70 exits to southbound I-25. This alternative adds four miles of out-of-direction travel for these vehicles resulting in additional travel times.

2.3 Eliminates Emergency Access and redundancy, reducing Safety

The 2008 Draft EIS did not fully describe the importance of I-270 serving as the alternate route to I-70 for emergency access during major incidents or extreme congestion. I-70 and I-270 serve as reliever routes when one highway or the other becomes congested or closed due to accidents. With the reroute, the redundancy of the highway network, which is important for emergency response in the area, is limited. If I-70 was rerouted to combine with I-270, there would be no alternate highway connecting the Denver neighborhoods to the rest of the region.

2.4 Financial Feasibility

This alternative requires more than 12 miles (5.5 miles of which are east of I-25) of major highway widening along I-270 and I-76 to accommodate the relocated traffic and is estimated to cost approximately $4 billion. This would increase the project construction cost twice as much as the alternatives on the current alignment removing the chances of near-term funding for the project. This estimate was prepared by the project team and verified by City and County of Denver staff for accuracy.

This estimate is a high-level cost analysis based on typical construction costs for bridge and highway construction per lane mile and average right-of-way costs. However, it is likely to be a conservative estimate because it does not include the cost of converting the current I-70 and 46th Avenue to a major arterial. Estimates also do not include improvements to I-25 between I-76/I-270 and existing I-70 to accommodate traffic traveling south on I-25 towards downtown Denver. Further, this estimate does not account for possible contaminants in this heavy manufacturing and warehousing area, or the cost of mitigating impacts to other important environmental resources and communities.

2.5 Additional Considerations

CDOT has invested nearly a decade seeking public input on this project; particularly from the adjacent neighborhoods and the communities most impacted by the project alternatives. The Preferred Alternative Collaborative Team (PACT), consisting of community, business, and stakeholder agency representatives, was initiated after the publication of the Draft EIS in 2008 to identify the preferred alternative for the project. Based on additional analysis and community input, the group reached a consensus to keep I-70 at its current location. The PACT determined that keeping I-70 at its current location rather than rerouting or realigning it is the most beneficial to the surrounding communities, businesses, and the transportation system, because of the amount of traffic that would be on 46th Avenue if the highway was moved.

In addition, CDOT continues to receive statements from Commerce City, the North Area Transportation Alliance, and Colorado Motor Carriers Association restating their opposition to rerouting I-70 from its current location. Commerce City has expressed continued opposition to any reroute of I-70, citing the decision of the PACT and concern with the impact to the city's planned economic development along I-270. In addition to Commerce City, the I-270/I-76 reroute would affect several additional communities including Adams County, Jefferson County, and Arvada. A letter from Commissioner Eva Henry of Adams County; Mayor Michael Hancock of Denver; and Mayor Sean Ford of Commerce City was received on June 6th expressing Adams County, City and County of Denver, and Commerce City's opposition to move the highway from its current location. Based on input received to date, support for the I-270/I-76 reroute primarily comes from neighborhoods outside of the impacted area.

This alternative also creates new impacts to Clear Creek and the South Platte River by crossing Clear Creek multiple times and the South Platte River once.

3.0 CONCLUSION

Based on the reasons discussed earlier in this memorandum, the project team eliminated the I-270/I-76 reroute in early stages of the alternatives screening process. The I-270/I-76 reroute alternative was reexamined and reevaluated based on the most recent available data during the Supplemental Draft EIS analysis process. The additional analysis confirmed that this alternative does not address the project's purpose and need (safety, mobility, access) and therefore is not considered a reasonable and viable alternative

January 20, 2026

Bill Schiebel, P.E.
Federal Highway Administration
12300 West Dakota Avenue, Suite 180
Lakewood, CO 80228

David Merenich, P.E.
Colorado Department of Transportation
4670 Holly Street
Denver, CO 80216

Submitted via electronic mail to cdot_i270@state.co.us

RE: Comments on I-270 Draft Environmental Impact Statement and State Environmental Reports, Federal Project No. STU 2706-046, CDOT Project Code 25611, ID No. FHWA-CO-EIS-24-001

GreenLatinos and the undersigned organizations write to urge the Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) to reconsider their plans to widen I-270 and issue a Supplemental Draft Environmental Impact Statement (SDEIS) that considers a full range of reasonable alternatives, remedies significant modeling errors, and selects a Preferred Alternative that will improve conditions for the local communities, rather than adding to pollution and health harms in an already-overburdened area.

CDOT and FHWA (together, the Agencies) must consider the Healthy Communities No-Widening Alternative (HCNWA), which would manage congestion by tolling the existing corridor, promote the project goals of supporting transit and freight traffic by exempting transit and freight vehicles from the tolls, and promote equity by exempting local residents from the tolls. The HCNWA would also require additional build-out of transit solutions both on and around the I-270 corridor along with community-focused public health and safety improvements. Expert reports, attached to these comments, conclude that the HCNWA would serve the project's purpose and need better than the Agencies' Preferred Alternative of adding a managed lane in each direction, while minimizing environmental impacts. The SDEIS should study this option in full, including with detailed modeling.

That modeling, however, must be greatly improved from the modeling offered in the Draft Environmental Impact Statement (DEIS). The attached expert reports describe in detail how the DEIS relies on erroneous assumptions and outdated and inaccurate methods, leading to vastly skewed results that obscure the true impacts of the Preferred Alternative. For example, the models inflate baseline traffic under the No Action Alternative to levels that are physically impossible, and the models do not account for the additional traffic (and accompanying pollution) that will arise as a result of adding new lanes to I-270. Modeling that addresses these and other deficiencies shows that the Preferred Alternative will lead to large increases in air pollution without improving overall travel times or congestion—and will reduce access to jobs for residents of the Denver metro area. In other words, the Agencies propose to spend over a

1

Response to Comment 1

See responses to detailed comments below.

billion dollars to build new express lanes and ramps that will leave residents worse off. The SDEIS must remedy these errors.

The DEIS is rife with other critical deficiencies. For example, the Agencies' stated purpose and needs for the project—and the alternatives considered in pursuit of them—are improperly constrained, reflecting the Agencies' myopic focus on choosing only between widening the freeway or doing nothing. Moreover, the DEIS outright refuses to consider environmental justice, the project's contributions to climate change, or CDOT's own modeling showing that the Preferred Alternative will cause violations of federal air quality standards at two parks near I-270. The Agencies cannot simply ignore unfavorable aspects of the project. The DEIS also fails to assess the full range of possible air emissions impacts in light of recent federal actions, thereby significantly underestimating potential pollution. As discussed below, numerous other deficiencies abound—many of which stem from these errors in the Agencies' modeling, narrow purpose and alternatives considered, and refusal to consider key effects of the project.

Finally, the Agencies have not considered the full range of necessary and appropriate mitigation measures across a wide swath of expected impacts. The Agencies should commit to including all mitigation measures that were offered as benefits to Denver residents during the recent I-70 project—Adams County residents deserve no less. The Agencies should also adopt specific measures that improve transit, both regionally and locally; reduce emissions by deploying electric construction equipment; avoid or minimize the harmful effects of construction-related noise, light, and vibration; support the deployment of electric freight vehicles that will utilize the highway; and ensure complete transparency via public alerts and reports concerning construction, air pollution, and outcomes from the project. These measures should amount to at least 10% of the total project cost, in order to begin to offset harms caused to the local community.

This project presents a critical opportunity to address long-standing environmental injustices and work toward a better transportation system that offers safe, affordable, and reliable options for all residents. The Agencies must not squander the chance by moving forward with the outdated, unsupported belief that they can widen their way to a better transportation system.

The following documents are submitted with this comment letter in several volumes, with an index:

- Four expert reports:
    - Norman Marshall, President, Smart Mobility, Inc., *Review of I-270 Corridor Improvements Draft Environmental Impact Statement* at 27 (Jan. 2026) (Expert Report prepared for Earthjustice, on behalf of GreenLatinos) (hereinafter "Marshall Report").
    - Michael Replogle, *Expert Opinion on Healthy Communities No-Widening Alternative and I-270 DEIS and State Environmental Reports* at 32–33 (Jan. 16, 2026) (Expert Report prepared for Earthjustice, on behalf of GreenLatinos) (hereinafter "Replogle Report").

- Ives Street Planning Analytics, *Moving the Bottleneck? An Independent Technical Analysis of Two Scenarios for I-270 in Colorado* (Jan. 18, 2026) (Expert Report prepared for Earthjustice, on behalf of GreenLatinos) (hereinafter "Ives Street Report")
- Paul Minett, Trip Convergence Ltd, *PASTE for I-270 in Colorado* (Jan. 20, 2026) (Expert Report prepared for Earthjustice, on behalf of GreenLatinos) (hereinafter "Minett Report").

- Documents related to the HCNWA and related recommendations:
  - GreenLatinos, I-270 Healthy Communities No-Widening Alternative (the HCNWA, submitted to CDOT by email on Nov. 11, 2025)
  - Communities by Design, *Bridging the Divide: Reclaiming Community in the Path of I-270* (Sept, 2025) (hereinafter "DAT Report")
  - Greater Denver Transit, I-270 Transit Alternatives (Jan. 19, 2026) (hereinafter "GDT Recommendations")
- Numerous additional exhibits that provide the documents cited in this letter and the expert reports above.

Sincerely,

Alexandra Schluntz
Thomas Delehanty
Earthjustice
1125 17th St., Suite 1010
Denver, CO 80202
On behalf of GreenLatinos

Ean Thomas Tafoya
Vice President of State Programs
GreenLatinos

Becky English
Colorado Sierra Club Transportation Chair
Sierra Club

Matt Muir
Policy Director
Coalition 4 Cyclists (C4C)

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Discussion

2 **I. Environmental justice considerations**

The transportation system, including I-270 and nearby freeways, disproportionately and unjustly harms low-income communities and communities of color. I-270 runs through south Commerce City and north Denver, an area that endures heavy traffic and the resulting pollution from intersecting highways I-70, I-25, and I-270. These communities qualify as Disproportionately Impacted Communities under Colorado law, which also recognizes that certain communities "historically have been forced to bear a disproportionate burden of adverse human health or environmental effects," specifically, "communities with residents who are Black, Indigenous, Latino, or people of color."[1] Colorado lawmakers have specifically declared that "[s]tate action to correct environmental injustice is imperative," including by "right[ing] past wrongs and mov[ing] toward environmental justice."[2] These efforts must focus on disproportionately impacted communities, including those in the area of I-270, which include the most polluted areas in Colorado.[3]

Historic disinvestment in these neighborhoods has led to poor transit infrastructure that results in limited mobility: roads are disconnected due to intersecting railroad tracks, making it challenging to travel around the neighborhood by walking; sidewalks are few and far between; bike infrastructure is lacking; and many public bus stops do not have benches or places to wait safely.[4] These deficiencies in public health and mobility collectively impact the wellbeing of residents who report delays in transit due to train and truck traffic, concerns about persistent and excessive pollution exposure, and a constant presence of noise and construction.[5] The Colorado General Assembly has recognized these injustices, finding that "[t]ransportation capacity projects that are intended to alleviate congestion . . . by increasing the capacity of highways in major transportation corridors," such as the I-270 project, "can cause adverse environmental impacts," and in particular, "[t]hese impacts fall most heavily" on disproportionately impacted communities."[6]

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[1] Colo. House Bill 21-1266, Section 2(1)(a); Colo. Rev. Stat. 24-4-109(2)(b)(II) (signed into law July 2, 2021); *see also* State Community Analysis Tech. Report at 6.

[2] Colo. House Bill 21-1266, Section 2(1)(b).

[3] State Community Analysis Tech. Report at 8–9 (noting a tract in the 100% percentile of Colorado's EnviroScreen scores, which means those tracts are more impacted than any other in the state); *see also id.* at Attachment A. pg. A-1 (visual representation of extremely high EnviroScreen scores).

[4] Gretchen Armijo & Gene C. Hook, *How Neighborhood Planning Affects. Health in Globeville and Elyria Swansea,* Denver Dep't of Env't Health 39 (2014), https://www.denvergov.org/content/dam/denvergov/Portals/746/documents/HIA/HIA%20Composite%20Report_9-18-14.pdf.

[5] *Id.* at 7.

[6] Colo. Rev. Stat. § 43-1-128.

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Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

The communities most impacted by the transportation sector already endure disproportionate harms from other sources of air pollution. South Commerce City and north Denver suffer from some of the greatest environmental health risks in the country.[7] For example, the Suncor oil refinery contributes significantly to pollution in south Commerce City and north Denver with its long history of permit noncompliance that has resulted in accidents so significant that schools and residents have had to shelter in place to avoid toxic ash.[8] These routine "upsets" fill the air with pollutants that cause respiratory problems and heart disease. As a result of the cumulative harms from transportation, industry, superfund sites, and other sources of pollution, residents in the area suffer some of the highest rates of cardiovascular disease, diabetes, and asthma in the metro area.[9] Yet these same residents also have more limited access to health care, further compounding these harms.[10]

Transportation harms also have far-reaching consequences that extend beyond air pollution impacts. The transportation sector contributes to noise pollution; congestion and stress; limited mobility and inaccessibility to public transit; and traffic accidents. Once again, disproportionately impacted communities like those in north Denver bear the brunt of these harms.[11]

Decades of racist and classist planning decisions, which continue today, are responsible for these harms. The manifest disparities in today's transportation system are rooted in planning decisions that have favored high-income and white communities over low-income and minority

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[7] The Denver zip code 80216, which includes Elyria-Swansea and Globeville, carries the highest environmental hazard housing risk in the county. To conduct the report, ATTOM Data Solutions evaluated 8,665 U.S. zip codes for four environmental risk factors: superfund sites, brownfields, polluters and poor air quality. *Home Prices in Highest-Risk Zips for Environmental Hazards Increased at Faster Pace Than U.S. Average Over Past Decade,* ATTOM Data Solutions (Feb. 22, 2018), https://www.attomdata.com/news/risk/2017-environmental-hazard-housing-risk-index/.

[8] *See* CDPHE, *Enforcement Actions Against Suncor*, https://cdphe.colorado.gov/enforcement-actions-against-suncor (last visited Jan. 19, 2026); Bruce Finley, *Suncor oil refinery's release of clay-like "catalyst" triggers alarm, prompts air tests north of Denver,* Denver Post, (Dec. 11, 2019), https://www.denverpost.com/2019/12/11/suncor-refinery-emissions-alarm/; *see also* Photo from South Rose Hill neighborhood, taken by Ean Tafoya, GreenLatinos (Dec. 13, 2025) (showing protest sign against Suncor's air pollution, from community organization Cultivando).

[9] Gretchen Armijo & Gene C. Hook, *How Neighborhood Planning Affects Health in Globeville and Elyria Swansea,* Denver Dep't of Env't Health 5 (2014), https://www.denvergov.org/content/dam/denvergov/Portals/746/documents/HIA/HIA%20Composite%20Report_9-18-14.pdf.

[10] *Id.* at 6.

[11] See, *e.g.*, Hiroko Tabuchi and Nadja Popovich, *People of Color Breathe More Hazardous Air. The Sources Are Everywhere*, THE NEW YORK TIMES, April 28, 2021, https://www.nytimes.com/2021/04/28/climate/air-pollution-minorities.html.

communities.[12] For example, when first constructing the country's interstate highway system, agencies frequently sited projects in low-income communities as part of so-called "slum clearance" and "urban renewal."[13] These highways "displaced or physically divided entire communities."[14] Disproportionately impacted communities have been permanently harmed by the resulting segregation and by the loss of homes, churches, and schools that were razed to make way for traffic.[15] Ultimately, our transportation system has "contributed to today's intense racial segregation and concentrated racialized poverty, and has created physical, psychological, and economic trauma that persist to this day."[16]

These same dynamics arose in Colorado. Constructing I-70 and I-270 "required large-scale relocations," *i.e.*, demolishing homes and pushing out residents of largely low-income Latinos neighborhoods.[17] Denver's I-70 "ravaged the largely Latin[o] neighborhoods in its path" when it was first completed in 1964.[18] Homes were destroyed by the elevated viaduct, and "[t]hose who

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[12] *See, e.g.*, Thomas W. Sanchez, Rich Stolz, & Jacinta S. Ma, *Moving to Equity: Addressing Inequitable Effects of Transportation Policies on Minorities*, The Civ. Rts. Project Harvard Univ. VII at 3 (2003), https://civilrightsproject.ucla.edu/reports/moving-to-equity-addressing-inequitable-effects-of-transportation-policies-on-minorities/ ("Post-World War II surface transportation policies were not favorable to minority and low-income communities.").

[13] *Id.* at 3; *see also* Noel King, *A Brief History Of How Racism Shaped Interstate Highways*, NPR (Apr. 7, 2021), https://www.npr.org/2021/04/07/984784455/a-brief-history-of-how-racism-shaped-interstate-highways.

[14] Thomas W. Sanchez, Rich Stolz, & Jacinta S. Ma, *Moving to Equity: Addressing Inequitable Effects of Transportation Policies on Minorities*, The Civ. Rts. Project Harvard Univ. VII at 3 (2003), https://civilrightsproject.ucla.edu/reports/moving-to-equity-addressing-inequitable-effects-of-transportation-policies-on-minorities/.

[15] Noel King, *A Brief History*, https://www.npr.org/2021/04/07/984784455/a-brief-history-of-how-racism-shaped-interstate-highways.

[16] Deborah N. Archer, *Transportation Policy and the Underdevelopment of Black Communities*, 106 Iowa L. Rev. 2125, 2136 (2021), https://ilr.law.uiowa.edu/sites/ilr.law.uiowa.edu/files/2023-02/Archer.pdf.

[17] *See* CDOT, I-70 Final Environmental Impact Statement at 6-13 (Jan. 2016).

[18] *Building Roads to a Just & Equitable Future: Highway Advocacy Toolkit*, Center on Race, Inequality, & the Law, NYU School of Law 17 (2020), https://www.law.nyu.edu/sites/default/files/Highway%20Advocacy%20Toolkit%20v2_508_0.pdf; *see also* Andrew R. Goetz & E. Eric Boschmann, *Metropolitan Denver: Growth and Change in the Mile High City* 138 (2018), https://muse.jhu.edu/pub/17/article/807735/pdf.

stayed saw their neighbors replaced by dangerous exhaust fumes and roaring traffic."[19] For these communities, I-70's construction was "not just destructive—it was deadly."[20]

More recently, Colorado intensified I-70's harmful impacts with construction from 2019 to 2023 to widen the freeway through Globeville, Elyria, and Swansea in north Denver.[21] Instead of selecting a tree-lined boulevard that would cater to local traffic and public transit options, as well as create a green community space, CDOT chose to further degrade the air quality for the residents of these neighborhoods by rebuilding and expanding the highway.[22] The project displaced five percent of people in the neighborhood, demolished a local elementary school playground, and increased the number of residents living within unhealthy proximity to the highway.[23] That planning process is intimately connected to the one at hand: during the I-70 process, some proposed alternatives involved diverting traffic away from I-70 to I-270, and during this process, CDOT has asserted that some I-70 traffic belongs on I-270.[24] And the same communities are impacted by both projects.

Today, transportation planning continues to disproportionately harm low-income and minority communities. For instance, Denver's light rail serves low-ridership and whiter suburban routes, while high-ridership transit routes that serve more minorities are stuck with buses in slow-moving mixed traffic.[25] These disparities also contribute to inequitable economic conditions.

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[19] *Building Roads to a Just & Equitable Future: Highway Advocacy Toolkit*, Center on Race, Inequality, & the Law, NYU School of Law 17 (2020), https://www.law.nyu.edu/sites/default/files/Highway%20Advocacy%20Toolkit%20v2_508_0.pdf.

[20] *Id.*

[21] *Central 70 Project*, CDOT, https://www.codot.gov/projects/i70east (last visited Jan. 20, 2026).

[22] Ben Crowther, *Ditch the ditch: Citizens respond to I-70 expansion*, Cong. for the New Urbanism (Apr. 8, 2019), https://www.cnu.org/publicsquare/2019/04/08/ditch-ditch-citizens-respond-i-70-expansion.

[23] Cong. for the New Urbanism, *Freeways Without Futures 2019*, at 22–23 (2019), https://www.cnu.org/sites/default/files/FreewaysWithoutFutures_2019.pdf.

[24] State GHG Tech. Report at 36 ("Some of this modeled increase in VMT reflects the reassignment of the No Action Alternative vehicle trips that use other routes to avoid congestion on I-270, including longer and more circuitous route choices on I-70 and I-25 as well as trips through local neighborhoods. The corridor level operational emissions analysis and results within this report do not account for the potential reductions in VMT and associated emissions on those other roadways, particularly I-70 and I-25, as drivers would elect to travel on less congested and more direct routes on I-270 under either build alternative.").

[25] Christof Spieler, *Racism has shaped public transit, and it's riddled with inequities*, Rice Univ. Kinder Inst. for Urb. Rsch. (Aug. 24, 2020), https://kinder.rice.edu/urbanedge/2020/08/24/transportation-racism-has-shaped-public-transit-america-inequalities.

Public transportation users are disproportionately made up of minorities with low to moderate incomes.[26] In Denver, over one third of public transit riders earn less than $25,000 per year.[27] These households that rely on public transit are forced to spend a larger share of their income on transportation than middle- and higher-income families.[28] Yet poor public transit offerings make it more difficult for low-income and minority households to access affordable housing, jobs, and services. In contrast, wealthier communities contribute more to congestion during peak hours, and thus are the primary constituency for roadway widenings. The highest income group makes 35.4% of the total peak-hour auto trips and 32.4% of non-peak-hour auto trips, while the lowest income group makes only 14.1% of peak-hour auto trips and 16.3% of non-peak-hour auto trips.[29]

In light of these realities, studies have concluded that "roadway capacity expansions of any type disproportionately burden people of color and lower-income people, while their benefits (if any . . .) are more likely to accrue to white and higher-income people."[30] This is also true of managed lanes.[31] People living in "freeway dominated" areas are disproportionately lower-income households and people of color, and these residents tend to drive less, especially during the morning peak period.[32] As a result, any benefits from purportedly faster traffic flows during rush hour accrue disproportionately to higher-income people, even as local residents suffer from increased air pollution, noise, and lower property values.[33]

Disparities in infrastructure placement lead to disparities in health. Neighborhoods within 1,500 feet of a highway suffer the greatest impacts for air pollution—and marginalized communities are more likely to live within 500 feet of a major road.[34] These impacts hit home in Elyria-

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[26] Thomas W. Sanchez, Rich Stolz, & Jacinta S. Ma, *Moving to Equity: Addressing Inequitable Effects of Transportation Policies on Minorities*, The Civ. Rts. Project Harvard Univ. VII (2003), https://civilrightsproject.ucla.edu/reports/moving-to-equity-addressing-inequitable-effects-of-transportation-policies-on-minorities/; Replogle Report at 32–33.

[27] Shelly Tan et al., *Amid the pandemic, public transit is highlighting inequalities in cities*, Wash. Post (May 15, 2020), https://www.washingtonpost.com/nation/2020/05/15/amid-pandemic-public-transit-is-highlighting-inequalities-cities/.

[28] In 2014, lower-income households spent 16 percent of their income on transportation, whereas high-income households spent only 8 percent of their income. *Household Expenditures and Income*, The Pew Charitable Tr. (Mar. 30, 2016), https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2016/03/household-expenditures-and-income.

[29] Replogle Report at 32.

[30] Jamey Volker, *Managed Lanes*, California Air Resources Board, (Apr. 2025) at 1.

[31] *Id.*

[32] *Id.* at 6–7.

[33] *Id.* at 6.

[34] Courtnee Melton, *How Transportation Impacts Public Health*, The Sycamore Inst. 2 (Feb. 21, 2017), https://sycamoretn.org/transportation-impacts-public-health/.

Swansea, which is bisected by I-70 and is near both I-25 and I-270, and is one of the most polluted neighborhoods in the country.[35] Children who live near I-70 are hospitalized for asthma almost 40% more frequently than the rest of Denver.[36] Heart disease is more prevalent in the area, as well.[37]

The I-270 corridor is specifically used to route transportation system pollution and risks away from some communities and towards others. Nuclear, hazardous, and oversize loads are prohibited from using I-70 or I-25 routes. As a result, more than 30% of oversize and overweight trips in Colorado travel on I-270.[38] In addition, more than 60% of fuel freight trips originate from locations near I-270,[39] and freight makes up between 8 to 17% of traffic on the corridor (varying by segment).[40] These characteristics place additional burdens on the surrounding communities and only serve to elevate the importance of examining the environmental impacts of widening the corridor.

These facts are highly salient to the I-270 planning process, yet the DEIS "does not consider public comments regarding . . . environmental justice."[41] This is despite the fact that Colorado's General Assembly has specifically declared its intention to move towards a transportation system that "[a]ddresses inequities in transportation access and the increased exposure to transportation-related air pollution for communities, including disproportionately impacted communities."[42] In other words, Colorado has recognized the importance of environmental justice as it relates to transportation planning—yet the DEIS willfully ignores this important piece of the problem. The Agencies cannot properly assess the "key project goal" to "minimize environmental and community impacts" without considering environmental justice.[43] For example, the DEIS baldly asserts that the "project is not anticipated to adversely affect community cohesion."[44] This claim ignores the history and reality of the surrounding area, where neighborhoods have been systematically bisected by freeway projects, resulting in low overall connectivity. Widening the

[35] Julie Turkewitz, *Colorado Aims to Expand a Main Artery, but Beleaguered Neighbors Balk*, New York Times (Feb. 19, 2017), https://www.nytimes.com/2017/02/19/us/denver-interstate-70-expansion.html.

[36] Gretchen Armijo & Gene C. Hook, *How Neighborhood Planning Affects. Health in Globeville and Elyria Swansea,* Denver Dep't of Env't Health 16 (2014), https://www.denvergov.org/content/dam/denvergov/Portals/746/documents/HIA/HIA%20Composite%20Report_9-18-14.pdf.

[37] *Id.* at 16, Fig. 6.

[38] DEIS at 2-17; DEIS App'x E1 at 2.

[39] DEIS at 2-17.

[40] DEIS App'x E1 at 1.

[41] DEIS at 1-4.

[42] Colorado Senate Bill 260 at Section 1(1)(b)(IV) (signed into law July 17, 2021).

[43] DEIS at 2-1 (defining project needs).

[44] DEIS at 4-55.

corridor will only exacerbate those effects. The DEIS also describes the naturally occurring Sand Creek and accompanying flora and fauna as "an anomaly in the industrial setting."[45] According to the Agencies, the area is a "discordant setting" with "no integrity of composition" that is not "intact or unified" with "inharmonious" landscape.[46] And additional light from vehicles is unimportant, the public is told, because the lights are "negligible compared to existing conditions and the surrounding industrial environment."[47] These assertions reflect an attitude that this community is a "sacrifice zone." The Agencies use this mentality of industrial supremacy to justify further environmental degradation in the area: because historic and continuing environmental injustices have already been imposed on the community, additional pollution and harm is viewed as insignificant.

This is precisely the opposite conclusion that should apply: here, there are "special burdens of environmental care because even marginal negative contributions . . . represent tipping points on top of already over-burdened residents."[48] In other words, this project "must be assessed by its additional contribution to an environment that is already compromised."[49]

In addition, the Agencies cannot properly assess whether the Preferred Alternative fulfills the project goal, nor can they meaningfully understand the overall impact of the project, without examining cumulative effects.[50] The Agencies cannot meaningfully assess the full impact of the project without examining the effects in aggregation. These include both the additive harms of multiple impacts present at a single point in time (such as the current traffic-related pollution on top of excess emissions from the Suncor refinery) in addition to the compound impacts over time (such as the continued emissions from vehicles on I-270).

II. Public process failings

3 Public participation is the cornerstone of the NEPA process. One of NEPA's two core goals is to promote informed public participation in government decisions.[51] To meet those goals, NEPA requires that Agencies "consider every significant aspect of the environmental impact of a proposed action" and inform the public of those impacts.[52] Colorado law also requires an "enhanced level of planning, modeling and other analysis, community engagement, and monitoring" for projects (including this one), recognizing the need to "minimize the adverse environmental and health impacts of planned transportation capacity projects and address

[45] *Id.* at 4-82.

[46] *Id.*

[47] *Id.* at 4-83.

[48] DAT Report at 11.

[49] *Id.*

[50] *See* DEIS at 1-4 ("no analysis of cumulative effects is included in this DEIS").

[51] *Balt. Gas & Elect. Co. v. NRDC*, 462 U.S. 87, 97 (1983).

[52] *Id.* (internal citation omitted).

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Response to Comment 3

A Public Involvement Plan was developed and implemented when the EIS was initiated in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development.

The Notice of Intent for the EIS was issued on August 20, 2024, after one year of substantial public involvement that was incorporated into the information provided in the Notice of Intent documentation. It was discussed at Stakeholder Working Group meetings and was advertised through the Federal Public Register process.

The referenced DAT process only included a few community members and was mostly conducted by members who live out-of-state or outside of the community.

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS.

inequitable distribution of the burdens of such projects."[53] Meaningful public participation is "based on the belief that those who are affected by a decision have a right to be involved in the decisionmaking process."[54]

The Agencies' public engagement process has prioritized box-checking over meaningful, high-quality participation and suffered fatal flaws from the outset. First, FHWA solicited comments on its notice of intent (NOI) to prepare this DEIS without either FHWA or CDOT conducting any public outreach. These deficiencies are documented in GreenLatinos comments on the NOI.[55] In its comments, GreenLatinos also requested that FHWA reopen the comment period, revise the purpose and need statement, and ensure that the forthcoming EIS fully analyzed an improved no-widening option.[56] FHWA never responded to any of those comments and requests.

An independent Design Assistance Team (DAT) from the Architects Foundation's "Communities by Design" program identified numerous deficiencies with the Agencies' public engagement. First, despite the Agencies' attempts to plan and attend various events, the DAT explains that those efforts have yielded minimal results in terms of actual participation—indicating inadequate planning and execution.[57] The DAT concludes that the Agencies have gathered "insufficient data" from the public, falling short of the Agencies' own plans to "obtain comments from a broad cross-section along the corridor."[58] The DAT further points to examples of successful public outreach efforts by Agencies that successfully gathered orders of magnitude more input over a

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[53] Colo. Rev. Stat. § 43-1-128(c)

[54] DAT Report at 11 (citing IAP2 core values).

[55] GreenLatinos, *Comments on Notice of Intent to Prepare an Environmental Impact Statement for a Proposed Highway Project; Adams and Denver Counties, Colorado (Identification Number FHWA-CO-EIS-24-001) (Docket ID FHWA-2024-0057)* (Oct. 11, 2024). The comments were submitted after the comment period closed, due to the Agencies' lack of outreach—GreenLatinos, despite having engaged on the I-270 project for years, was not aware of the comment period until after it had closed. FHWA representatives nonetheless assured GreenLatinos that the comments would be included in the record. However, FHWA refused to post GreenLatinos' comment publicly or to share other comment letters with GreenLatinos, inhibiting GreenLatinos' ability to engage with other stakeholders. E-mail chain beginning Oct. 11, 2024 at 1:27 p.m., and ending January 30, 2025 at 2:16 p.m., between Alexandra Schluntz, Senior Attorney, Earthjustice and Chris Horn, Senior Area Engineer, FHWA , Records Request Officer, CDOT, and Alexandra Schluntz, with Subject: GreenLatinos comment re FHWA-2024-0057.

[56] GreenLatinos, *Comments on Notice of Intent to Prepare an Environmental Impact Statement for a Proposed Highway Project; Adams and Denver Counties, Colorado (Identification Number FHWA-CO-EIS-24-001) (Docket ID FHWA-2024-0057)* at 1 (Oct. 11, 2024).

[57] *See* DAT Report at 13.

[58] *Id.*

shorter time period than the Agencies have done here.[59] Second, the DAT raised concerns that the Agencies' mechanisms for gathering input could "produc[e] skewed input that can be misinterpreted."[60] For example, the Agencies' methods of presenting project options at public meetings may have "forc[ed] a false choice between 'congestion' and 'public health.'"[61] The DAT recommended deploying a wider range of techniques to foster collaboration, and recommended utilizing Citizen Assemblies to produce successful outcomes.[62]

After the DAT Report's publication, the Agencies' public engagement record has only worsened. First, both Agencies have failed to timely produce records that are critical to provide meaningful comment on the DEIS. GreenLatinos submitted a Freedom of Information Act (FOIA) request to FHWA on December 1, 2025. As of this filing, GreenLatinos has received no responsive records. Instead, after the 20-working-day period had already passed, FHWA requested clarification on January 7, 2026, on one portion of GreenLatinos' request. FHWA did not provide records or otherwise respond to the other four portions of GreenLatinos' request. GreenLatinos responded with the requested clarification on January 8, 2026, and has received no further correspondence from FHWA.[63] Similarly, GreenLatinos submitted a Colorado Open Records Act (CORA) request to CDOT for records pertaining to I-270 on October 17, 2025.[64] Colorado state law requires making the documents available within three working days, absent extenuating circumstances.[65] CDOT initially informed GreenLatinos that it would make the documents available on a rolling basis, with all documents provided by December 12, 2025.[66] As of January 20, 2026, CDOT still has not produced *any* of the requested documents. The unwarranted delay significantly impeded GreenLatinos' ability to comment on the DEIS. For example, GreenLatinos and its experts have been unable to review the origin/destination data for I-270, collected by CDOT in 2022.[67] That information would have supported GreenLatinos' ability to

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[59] *Id.* at 14.

[60] *Id.* at 13.

[61] *Id.* at 14.

[62] *Id.*

[63] E-mail from Sandi Wilmoth, FHWA, to Ava Farouche, Earthjustice (Jan. 7, 2025 at 9:44 a.m.), with Attachment, Letter from John M. Cater, P.E., Division Administrator, USDOT (Dec. 15, 2025). E-mail from Ava Farouche, Earthjustice, to Sandi Wilmoth, FHWA (Jan. 8, 2026, 3:57 p.m.), with Attachment, Letter to John Martin Cater, FHWA, from Alexandra Schluntz, Senior Attorney, Earthjustice (Jan. 8, 2025).

[64] CDOT Confirmation of Receipt of CORA Request (Oct. 17, 2025).

[65] Colo. Rev. Stat. § 24-72-203.

[66] E-mail chain beginning Oct. 22, 2025 at 3:38 p.m., and ending Nov. 7, 2025 at 11:17 p.m., between Andrew Hogle, Records Request Officer, CDOT, and Alexandra Schluntz, with Subject: Dialog case #161843 – CORA Request: Alexandra Schluntz.

[67] In response to requests by GreenLatinos and other groups, CDOT conducted an origin/destination study using StreetLight Data to assess the kind of trips that pass through I-270. That study found that more than 44% of trips in the corridor are long-distance between US-36

Response to Comment 4

Colorado Open Records Act (CORA) requests are not part of the NEPA process. However, the items that were requested as part of the Draft EIS comment period were provided within 24 hours of the request. The remainder of the items were provided within one month of the request. See Section 5.4.1, GEN3, of the Final EIS for specific dates associated with the CORA request.

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make specific recommendations about regional transit options that should be included within the project. As another example, GreenLatinos requested records on how CDOT chose which people and groups to invite—and which not to invite—to stakeholder meetings. Without those records, GreenLatinos is unable to comment on the inclusivity of CDOT's efforts and whether or not key stakeholders were purposefully excluded from the table.

Compounding these problems is the Agencies' insistence on holding a time-limited public comment period during an untenable time of year for meaningful engagement. The 60-day comment period launched less than one week before Thanksgiving and concluded on January 20, running through the Thanksgiving, Hannukah, Christmas, Kwanzaa, New Year, and Martin Luther King Jr. holidays. Scheduling the DEIS public comment period during this holiday period undermines the communities' ability to participate meaningfully and contributes to greater mistrust between the public and CDOT. This dynamic is well understood among practitioners. As one scholar has noted, "[h]osting an EIS public comment period . . . around religious and cultural holidays has become controversial across many different EIS processes."[68] Despite these concerns, the Agencies granted only a 15-day extension (extending from January 5 to January 20, the day after a federal holiday).[69] The Agencies have refused to even acknowledge further requests for delay.[70] Community trust is only further degraded by the Agencies' flat refusal to consider known effects such as induced demand.[71]

The Agencies' process for public comment meetings was similarly deficient. The agency did not announce the dates or times for the public hearings until December 17, 2025—just three weeks before the first meeting would take place (January 7, 2026).[72] And those three weeks encompassed the holiday period, when many community members may have been focused on other priorities. Such poor planning and outreach violates the spirit of both Colorado's Environmental Justice Act—which considers thirty days as the minimum for meaningful notice

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and Aurora, originating and ending in various suburbs. CDOT, *Project Update & Origin and Destination Webinar I-270* at 17:10 (Dec. 22, 2022) (https://www.youtube.com/live/SkQi8KuWmzI?themeRefresh=1.

[68] Erica Morrell, *Public Comment Periods and Federal Environmental Impact Statements: Potentials and Pitfalls from the American Experience*, Mich. J. Sustainability, Vol. 1 (Fall 2013), https://quod.lib.umich.edu/m/mjs/12333712.0001.008?view=text;rgn=main.

[69] Authors and GreenLatinos to CDOT, *Request for delay of Interstate 270 (I-270) Draft Environmental Impact Statement (DEIS) release* (Oct. 23, 2025); *see also* Schluntz, A., *Request for delay of I-270 DEIS publication* email message to CDOT, October 23rd 2025.

[70] E-mail from Juan Madrid, GreenLatinos, to CDOT, David Merenich and Marsha Nelson (Nov. 11, 2025 at 11:43 a.m.), with three attachments: Letter from Ean Thomas Tafoya and Juan Roberto Madrid, GreenLatinos (Nov. 11, 2025), I-270 Healthy Communities No-Widening Alternative, and DAT Report; E-mail from Tom Delehanty to CDOT, David Merenich and Marsha Nelson (Dec. 22, 2025 at 6:02 p.m.).

[71] *See* Section V.B., below.

[72] CDOT, *Project Update* – I-270 Corridor Improvements Project (Dec. 17, 2025).

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Response to Comment 5

The comment period for the Draft EIS was originally scheduled for 45 days; however, in response to requests for additional time submitted prior to the publication, the review period was extended by 15 days, for a total of 60 days. The comment period began on November 21, 2025, and ended on January 20, 2026. Extensive outreach was conducted to advertise the public comment period, public hearings, and virtual public meetings. Please see Section 5.4.1, GEN2, of the Final EIS for additional information regarding the public review period and extensive advertising that was conducted for the Draft EIS.

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand

model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

See Section 5.4.6, TRANS2, for additional information about induced demand in the project's traffic modeling.

of public hearings[73]—as well as the state's requirement for enhanced public engagement for highway capacity projects.

6 Finally, the Agencies have seriously undermined the NEPA public process by refusing to participate in the DAT process or consider a meaningful delay of the DEIS publication and comment period in order to consider the DAT recommendations. Although GreenLatinos invited CDOT to participate in the DAT process, CDOT declined to engage in dialogue with the DAT, stating only that "it is premature to discuss detailed technical analysis . . . prior to publishing the DEIS."[74] Worse yet, CDOT has reneged on its commitment, expressed in July 2025, that it would "incorporate the DAT alternative into the NEPA analysis" so long as the DAT recommendations were provided no later than December 2025.[75] GreenLatinos submitted the DAT recommendations—and the HCNWA, derived from the recommendations—in November 2025,[76] but the Agencies have refused to incorporate analysis of the alternative into the DEIS. To the extent that the Agencies plan to do so in the FEIS, that approach would deprive the public of the opportunity to comment on CDOT's analysis of the DAT recommendations and the HCNWA.

All of these failings undermine the effectiveness and legitimacy of the NEPA process. Despite significant opposition, the Agencies have still not answered key questions and, instead of engaging in public debate, the Agencies have refused to discuss the project in any amount of detail until publishing the DEIS, effectively cutting off meaningful dialogue. The public process deficiencies are also intertwined with the DEIS's other deficiencies, including, for example, the failure to consider environmental justice and a reasonable range of alternatives, as well as the inclusion of modeling that is "worse than useless."[77] Omissions of relevant information, as well as the inclusion of inaccurate and misleading data, severely hampers the public's ability to engage and give meaningful input. The Agencies should remedy these deficiencies in a supplemental DEIS and conduct meaningful public engagement, in line with the DAT's recommendations and Colorado's requirements for enhanced community engagement.

III. The DEIS's purpose and need statement is deficient.

7 The DEIS purpose and need statement is deficient in several ways: the statement of purpose elevates a fundamental misunderstanding of the relationship between highway capacity and use;

[73] Colo. Rev. Stat. § 24-4-109(3)(b)(II).

[74] Merenich, David (CDOT) to Madrid, Juan (GreenLatinos), *RE: I-270 Expansion Project a new perspective,* July 28th 2025. Of course, that means that all of CDOT's public engagement prior to publication of the DEIS did *not* include any of the details that would necessarily form the basis of public input, and the public was left with just 60 days to digest thousands of pages of information about the project.

[75] *Id.*

[76] GreenLatinos, Letter to M. Nelson and D. Merenich, CDOT (Nov. 11, 2025); GreenLatinos, *I-270 Healthy Communities No-Widening Alternative.*

[77] Marshall Report at 27.

16

Response to Comment 6

The DAT alternative, called the Two Express Lanes that Accommodate Transit Alternative by CDOT, has been incorporated into the NEPA process as part of the Final EIS. Please see Section 5.4.3, ALT4, of the Final EIS for information on the evaluation of this alternative.

Response to Comment 7

The purpose and need for a transportation project focuses on the underlying reasons for proposing the transportation project, and, typically, those reasons are based on meeting a transportation need. The purpose and need of a project is essential in establishing a basis for the development of the reasonable range of alternatives required in an EIS and assists with the identification and eventual selection of a preferred alternative. According to FHWA's guidance in Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the concept of purpose and need that was established by the CEQ does not substantively change. SAFETEA-LU requires a clear statement of identified objectives that the proposed project is intended to achieve for improving transportation conditions.

The project's Purpose and Need was developed and presented in draft form for review and input at public meetings in October 2023, April 2024, and January and February 2025. It was also reviewed and discussed during agency coordination meetings in June 2023 and November 2023.

Please see Section 5.4.1, GEN1, of the Final EIS for additional information on Purpose and Need.

the list of stated needs is unduly narrow, deprioritizing local communities; and some of the stated needs are too narrowly defined.

First, the statement of purpose—which lays the foundation for the rest of the DEIS analysis—misconstrues the relationship between highway infrastructure and traveler decisions. The DEIS provides: "The purpose of the project is to implement transportation solutions that modernize the Interstate 270 (I-270) corridor *to accommodate existing and forecasted transportation demands.*"[78] This statement falsely suggests that demand for highway capacity exists separate and apart from highway infrastructure and capacity. In other words, it suggests that, irrespective of what the Agencies choose to do with I-270, there will be a set amount of "demand" for I-270, both now and in the future, that must be addressed in some way.

That suggestion is wrong because it fails to recognize the dual-direction causal relationship between transportation capacity and demand, each of which can cause the other. As discussed in depth below and in the expert reports submitted with these comments,[79] "demand" for highway capacity does not exist in a vacuum: it depends in significant part on what transportation options are available to travelers, including the physical features of a highway, how the highway is managed, and the availability of alternatives to driving. Failure to recognize that effect results, time and again, in projected traffic increases that are not borne out in reality.[80]

Thus, the Agencies err by framing the purpose of this project as responding to some inevitable, ambient transportation demand that must be addressed. As discussed more below, that central framing corrupts the Agencies' traffic modeling and much of its analysis throughout the DEIS, heavily biasing the decisionmaking process in favor of widening. The erroneous statement of purpose caused the Agencies to consider an improperly narrow set of alternatives[81] and fundamentally undermines much of the DEIS analysis.

A more suitable statement of purpose might say something like: "The purpose of the project is to implement transportation solutions that modernize the Interstate 270 (I-270) corridor *to maximize the corridor's effectiveness and efficiency as a link within the regional transportation matrix* while advancing local residents' quality of life." That statement (or something similar) better recognizes that transportation demand is not a static, independent force to respond to, but rather *depends on* the decisions made through the DEIS.

One example of a more realistic and clear-eyed purpose and need statement comes from the New York State Department of Transportation's environmental analysis for the I-81 Viaduct Project, which stated:

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[78] DEIS at 2-1 (emphasis added).

[79] *See* Section V.B, below; *see generally* Replogle Report; Marshall Report; Ives Street Report; Minett Report.

[80] *See* Ives Street Report at 7 (first figure in "ambient increases in traffic").

[81] *See* Section IV, below.

17

Response to Comment 8

Comments noted.

1.1 PROJECT GOALS AND OBJECTIVES

NYSDOT is pursuing the I-81 Viaduct Project based on the needs identified in the following sections. While it is important that the highway fulfill its primary charge of moving people and goods safely and efficiently, it is also important to consider the extent to which the transportation system can enhance economic growth and vitality within the City of Syracuse. With the project needs and local plans in mind, NYSDOT has developed the following goals for the I-81 Viaduct Project:

- Improve safety and create an efficient regional and local transportation system within and through greater Syracuse; and
- Provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.

The objectives of the Project are to:

- Address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features within the project limits along I-81 and I-690.
- Address vehicular, pedestrian, and bicycle geometric and operational deficiencies within the project limits.
- Maintain or enhance vehicle access to the interstate highway network and key destinations (*i.e.*, business districts, hospitals, and institutions) within neighborhoods within and near Downtown Syracuse.
- Maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within the project limits in and near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations.
- Maintain access to existing local bus service and enhance transit amenities within the project limits in and near Downtown Syracuse.[82]

That statement captures many appropriate objectives that CDOT should prioritize, without pre-determining the outcome of the DEIS analysis to guarantee widening.

9 ***Second***, the list of project needs improperly omits key considerations and thereby unduly restricts the range of alternatives considered. The DEIS lists five purposes for the I-270 project:

[82] New York State Department of Transportation, I-81 Viaduct Project Draft EIS (July 2021), https://parsonsecmpublic.s3.amazonaws.com/I-81-DEIS/07-2021/01%20Introduction_July%202021.pdf.

18

Response to Comment 9

Comments noted.

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.[83] However, this list of needs unreasonably limits the range of alternatives that can improve the I-270 corridor, thereby artificially limiting the scope of the discussion to marginally different approaches for widening the highway. The purpose and need statement should instead consider the myriad ways that the I-270 corridor impacts the community, including its air pollution, noise, division of communities, and contribution to localized dangers (such as accidents at hazardous intersections near the freeway, not just on the highway itself). The Agencies should tailor the I-270 project to deliver safe, affordable, and efficient transportation options to local residents.

Problematically, the purpose and need statement does not identify the critical community need to reduce air pollution and improve health outcomes. As discussed above, the communities surrounding I-270 face numerous forms of environmental injustice and have long been harmed by the industrial facilities, freeways, and railroads that are pervasive throughout the community. Highway expansions have added, and will continue to add, to the area's already-high pollution levels.[84]

Yet despite these known health harms and the recent context of the I-70 expansion, the DEIS indicates a project "goal"—not a "need" that's included in the purpose and need statement—of "minimiz[ing]" environmental and community impacts resulting from the project.[85] This approach demotes community needs, making them secondary to the project's other needs. And the focus on minimizing new, additional harms caused by the project suggests that any additional environmental and health harms to this community are acceptable. They are not. The project should prioritize avoiding *any* additional air pollution impacts and environmental impacts and, in fact, should aim to reduce those harms.

As proposed, the purpose and need statement fails to envision a transportation project that actually improves outcomes for the local community. An improved purpose and need statement would center the community's need for reduced air pollution and improved health outcomes.

Third, two of the needs should be better defined to fully encompass the priorities and values they embody. The DEIS notes the need for "transit on the corridor" and "bicycle and pedestrian connectivity across I-270."[86] GreenLatinos supports a robust, 360-degree approach to improving transit, bicycle, and pedestrian options both in the local community and to serve drivers who traverse the community—but the DEIS's description of these needs falls short. Transit "*on* the corridor" reflects a narrow view that ignores the need to examine transit options *around* the corridor (to serve the local community) and connecting to the corridor (to serve drivers who use I-270 as part of a much longer trip). And "bicycle and pedestrian connectivity *across* I-270" similarly presents far too narrow a view of the possibilities for this project. Local residents need

[83] DEIS at 2-1.

[84] *See* Section I, above.

[85] DEIS at 2-1.

[86] *Id.*

Response to Comment 10

Comments noted.

a network of bicycle and pedestrian options, with safe intersections, for those transportation modes to be viable. The project needs to address bicycle and pedestrian connectivity *in and around the corridor*, accounting for local residents' expertise about the improvements needed.

IV. The DEIS does not consider a reasonable range of alternatives.

11 "The heart of an EIS is its exploration of possible alternatives to the action an agency wishes to pursue."[87] NEPA therefore requires agencies to rigorously explore and objectively evaluate all "reasonable" alternatives—meaning those that "fall[] within the agency's statutory mandate" and fulfill the "agency's objectives for a particular project"—and to give them a fair comparative analysis.[88] "The existence of a viable but unexamined alternative renders an environmental impact statement inadequate."[89] Courts often find that agencies err by collapsing a decision into a false binary rather than evaluating a true middle-ground alternative.[90]

Despite these legal requirements, the DEIS ultimately carries forward only two build options for full analysis, each of which proposes to widen I-270, alongside the No Action Alternative baseline. That narrow framing deprives decisionmakers and the public of a genuine middle-ground choice that would modernize the corridor and address safety, reliability, transit access, and community impacts without adding lanes.

Instead of that incomplete and unreasonable approach, the Agencies should give serious consideration to a no-widening option that carries forward non-widening elements of the Build Alternatives while addressing congestion. Specifically, the Agencies should consider, through a supplemental DEIS, the HCNWA, which proposes to reduce congestion on I-270 by managing the existing lanes through tolling and without widening, while simultaneously advancing transit, safety measures, and other community-focused benefits.

A. The DEIS evaluates only two options—do nothing or widen—while improperly rejecting middle ground alternatives.

Two Build Alternatives were advanced for full EIS evaluation: the Three General-Purpose Lanes Alternative and the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative.[91] Both propose to add a new lane in each direction and differ only in how that lane is managed: as a general purpose lane versus an express lane tolled for non-transit and non-HOV vehicles, respectively. The No Action Alternative is retained only as a baseline for

[87] *New Mexico ex rel. Richardson v. U.S. Bureau of Land Mgmt.*, 565 F.3d 683, 708 (10th Cir. 2009) (internal quotation marks omitted).

[88] *Id.* at 709–10 (holding EIS unlawful for failing to consider a reasonable alternative).

[89] *Westlands Water Dist. v. U.S. Dep't of Interior*, 376 F.3d 853, 868 (9th Cir. 2004).

[90] *See, e.g.*, *High Country Conservation Advocs. v. U.S Forest Serv.*, 951 F.3d 1217, 1224 (10th Cir. 2020); *Davis v. Mineta*, 302 F.3d 1104, 1122 (10th Cir. 2002) (faulting FHWA for dismissing plaintiffs' proposed alternatives and considering only a build or no-build option).

[91] DEIS at 3-1.

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Response to Comment 11

The reasonable range of alternatives developed included a No Action Alternative, two alternatives that didn't add capacity (Minimal Build and Bicycle, Pedestrian, and Transit Improvements Alternatives), alternatives that add one lane of capacity with different uses of the lane, and alternatives that add two lanes of capacity with different uses of the lane. Only the Three General-Purpose Lanes and Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternatives passed through the screening process in addition to the No Action Alternative.

Under NEPA, only alternatives that are technically and economically feasible and meet the purpose and need are required to be analyzed (43 United States Code Section 4332(c)(iii)). The Purpose and Need for this project is discussed in Section 5.4.1, GEN1, of the Final EIS and in Chapter 2, Purpose and Need, of the Draft EIS. The alternatives screening process for I-270 eliminated alternatives that were not technically and economically feasible and did not meet the Purpose and Need using a multi-step evaluation process. The first step started with high-level criteria, such as an alternative's ability to meet the project's Purpose and Need. Each successive step provided more detailed analysis until the remaining alternatives, including the Preferred Alternative, were advanced for additional consideration. See Draft EIS Chapter 3, Alternatives Considered, and Appendix B, Alternatives Development Technical Report, for more information on the alternative's development and analysis process. This is why not every alternative received the same level of analysis as others—if an alternative did not meet the screening criteria, it was eliminated from further consideration. Please see Section 5.4.3, ALT1, of the Final EIS for additional information on the development of and determination of the reasonable range of alternatives.

comparison.[92] As a result, widening is the only approach the Agencies propose for addressing the project goal of improving reliability and travel time on the corridor (*i.e.*, to reduce congestion). That approach is flawed for at least three reasons.

First, the selection process to bring these alternatives forward foreclosed consideration of any tools besides widening to address congestion. The alternatives included in the Agencies' step-one screening did not include *any* ideas for managing congestion other than widening.[93] For example, no alternative proposed to reduce congestion by imposing tolls on I-270's existing lanes or by implementing Active Traffic Management (ATM) tools like adaptive ramp metering, dynamic speed limits, queue warnings, *etc*. And both the Minimal Build and Bicycle, Pedestrian, and Transit Alternatives were formulated as focusing on issues other than congestion. Thus, given the stated need to improve travel time and reliability on the corridor, the winnowing process was flawed from the start, proposing only to widen (to varying degrees) or not to widen, with the latter option doomed to flunk the Agencies' screening criteria. The process suggests that the Agencies knew from the start that they would choose to widen I-270—the opposite of NEPA's reasoned decisionmaking mandate.

Second, the alternative selection process resulted in benefits like safety improvements being impossible to implement without also adding a lane. That structure caused the only two non-widening options to be eliminated simply because they were not widening proposals. The Minimal Build Alternative passed Level 1 screening as "address[ing] the project needs"[94] but was eliminated at Level 2—not because it failed to address safety or connectivity needs categorically, but because it scored "low" relative to capacity-adding options on congestion-reduction metrics.[95] Similarly, the Bicycle, Pedestrian, and Transit Enhancements Alternative was eliminated even earlier as a standalone option, with selected elements folded into the widening concepts.[96] By designing screening criteria that privilege added lane capacity, and by discarding non-widening configurations before detailed analysis, the DEIS foreclosed a reasonable middle path that NEPA requires be rigorously evaluated.

NEPA's requirement for rigorous exploration and objective evaluation of all reasonable alternatives cannot be met by functionally reducing the range to a choice between the No Action baseline and two variants of widening. Furthermore, as discussed elsewhere in these comments, widening is an ineffective means of addressing congestion, while other solutions (like tolling existing lanes) can be highly effective at reducing congestion. By improperly focusing exclusively on widening as the only means of solving congestion, the Agencies blinded themselves to the full suite of congestion-management options and impaired their ultimate decisionmaking.

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[92] *Id.* at 3-2.

[93] DEIS App'x B at 55.

[94] *Id.*

[95] *Id.* at 63.

[96] *Id.* at 55.

Response to Comment 12

Comments noted.

Response to Comment 13

Comments noted.

14 ***Third***, to the extent the Agencies rejected non-widening alternatives on the basis that they would only partly satisfy the stated purpose and need, that was error. An EIS "must consider such alternatives to the proposed action as may *partially or* completely meet the proposal's goal and it must evaluate their comparative merits."[97] For example, the Agencies should have, but did not, fully analyze and model the Minimal Build Alternative to assess how geometry fixes and other upgrades would address most or all project needs, cutting this option from analysis even though the Agencies found that it would "address[] the project needs" during Level 1 screening.[98]

This concept—the need to assess alternatives that partially satisfy project needs—is all the more applicable here because the Build Alternatives themselves only partially satisfy the stated purpose and needs. Once induced travel is accounted for, they do very little, if anything, to improve travel time and reliability on and around the corridor, and they would similarly only partly satisfy (at most) each of the stated project needs.[99] Thus, if the Agencies are willing to consider those incomplete (at best) solutions in detail, they should also consider non-widening options, including the Minimal Build Alternative and HCNWA, which, as discussed below, far more effectively meets the project's stated purpose and need.

B. The Agencies should consider the HCNWA in a supplemental DEIS.

15 Rather than the false binary presented in the DEIS, the Agencies should consider a viable middle-ground alternative. Several of the Agencies' own findings in the DEIS show that non-widening options should be on the table.

16 ***First***, the DEIS acknowledges that crucial safety, reliability, and multimodal problems on I-270 can be addressed with targeted geometric and operational solutions that do not require new continuous through lanes. For example, the Agencies included plans to lengthen acceleration and deceleration lanes, separate and consolidate problem ramps, reconstruct the Vasquez Boulevard interchange, provide auxiliary lanes between I-76/York Street and Vasquez, widen shoulders, and add emergency turnouts and turnarounds in both the Minimal Build and both Build Alternatives because they directly target the corridor's documented crash patterns and operational deficiencies.[100] The Agencies recognized that these upgrades—even in the Minimal Build Alternative, *i.e.*, without widening—"address[] the project needs" during Level 1 screening.[101]

17 ***Second***, the DEIS repeatedly acknowledges countervailing safety and environmental downsides of higher lane counts. Eight-lane configurations were rejected at Level 2 screening due in part to

[97] *Natural Resources Defense Council, Inc. v. Callaway*, 524 F.2d 79 (2d Cir. 1975) (emphasis added); *Natural Resources Defense Council, Inc. v. Morton*, 458 F.2d 827, 836 (D.C. Cir. 1972) ("Nor is it appropriate . . . to disregard alternatives merely because they do not offer a complete solution to the problem.").

[98] DEIS App'x B at 55.

[99] *See generally* Ives Street Report.

[100] DEIS at 3-4 to 3-6; DEIS App'x B at 42–43.

[101] DEIS App'x B at 55.

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Response to Comment 14

Comments noted.

Response to Comment 15

FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with DRCOG indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 USC Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 NEPA process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 16

Comments noted.

Response to Comment 17

Comments noted.

"safety concerns due to higher lane count," which corresponds to "increased merge complexity[] and speed differentials."[102] That logic—that adding lanes can increase conflict points and crash risk—is equally relevant when considering whether a six-lane facility is necessary to meet purpose and need, or whether a non-widening package that addresses geometry, manages demand, and invests in transit could better balance safety and community impacts.

18 ***Third***, the Agencies' stated rationale in support of the Preferred Alternative emphasizes the value of managed operations, rather than brute capacity, in delivering safety and reliability. The DEIS explains that dynamic pricing in the Express Lane maintains steady speeds and restricts entry and exit to designated points, reducing weaving and crash risks.[103] It further states that the Express Lane "manages traffic volumes"[104] and that a managed lane will help traffic "by managing demand."[105] Those statements concede that safety and reliability gains under the Preferred Alternative derive from management and access control through, *e.g.*, pricing—tools that can be applied without widening through lanes by adopting corridor-wide demand management and enforcement strategies. But the underlying model assumes a large amount of static demand through 2050, independent of whether and how the capacity is added.[106]

19 ***Fourth***, while the managed nature of the express lane contemplated in the Preferred Alternative could help address congestion for users of that lane, it would not solve congestion for the general-purpose lanes. In fact,

> The express lane system plan implicitly acknowledges that the region cannot build its way of congestion and instead substitutes a sort of golden ticket for those who can afford it. The only reason that express lane users would pay tolls is to avoid congestion. Therefore, permanent congestion in the general purpose lanes is an underlying assumption in the express lanes program.[107]

20 ***Fifth***, the DEIS acknowledges that improved transit services "may entice more users to use transit rather than vehicles," and that enticement would "further improv[e] congestion on I-270."[108] Yet the Agencies dismissed out of hand, without further study, options that would have utilized improved transit, not road widening, to address congestion.

The statements above align with well-accepted realities about traffic infrastructure and management. As the expert reports submitted with this comment letter discuss in detail, tools like

[102] DEIS at 3-22.

[103] *Id.* at 3-9.

[104] *Id.* at 3-11.

[105] *Id.* at 4-7.

[106] *See* Sections V.B and V.C, below.

[107] Marshall Report at 30–31.

[108] DEIS App'x D at 39.

Response to Comment 18

Comments noted.

Response to Comment 19

Comments noted.

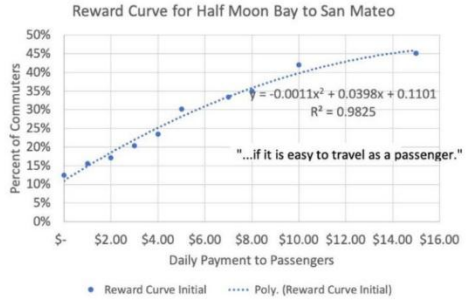
Response to Comment 20

Comments noted.

pricing are far more effective at addressing congestion (and otherwise improving transportation goals) than adding new lanes. For example, the Replogle Report explains that

> Just as electric utilities increase the price of power to some users during peak hours to manage demand, the price signal of dynamic differential road pricing can shift vehicular demand to other routes, times, destinations, or modes when effective capacity of a part of the network is likely to be exceeded. Road user charges can be adjusted with a goal of preventing a breakdown of flow, saving time for everyone using the facility.
>
> Converting existing motorway lanes to managed lanes substitutes smarter operation and management for costly new road construction and requires far less time to implement than adding new lanes.[109]

Similarly, the Minett Report explains that a large subset of travelers will readily adjust their behavior by driving less in response to appropriate pricing, in the form of avoiding costs and/or accepting payment. This behavior change can follow a predictable curve:[110]



In short, tolling and other congestion-management options—in lieu of adding new lanes—are viable, effective strategies that must be considered.

1. Summary of the HCNWA

The HCNWA is precisely such a reasonable middle-ground option that would leverage tolling and other tools to improve I-270. In August 2025, GreenLatinos hosted the DAT, which met with

[109] Replogle Report at 11.

[110] Minett Report at 4–5.

community members to discuss the I-270 project and related issues affecting the Commerce City and North Denver communities. Based on those meetings, the DAT generated the DAT Report, laying out ideas for improving the I-270 corridor and other elements of Commerce City and North Denver. That report serves as the basis for the HCNWA.

The HCNWA is aimed at reducing congestion along I-270 through means other than adding new lanes, while improving conditions for the communities that live along the corridor. It has three core components:

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1. **Differential tolling on all existing lanes**. The purpose of the toll would be to reduce congestion, keep freight trucks off residential streets, and prioritize transit, all while raising revenue and avoiding costs for nearby residents. CDOT could employ automated differential tolling using automated license plate reader (ALPR) technology to apply appropriate tolls for various user types—prioritizing transit, trucks, local residents, and high occupancy vehicles—to manage congestion. This approach could be paired with complementary vehicle management technologies like dynamic speed limits, advance queue warnings, *etc*. ALPR technology can be used on the local street network for enforcement against trucks and commuter traffic looking for free alternative routes from the interstate. CDOT could receive federal approval to toll existing lanes under programs like the Value Pricing Pilot Program ("VPPP")—especially given that FHWA, the lead agency under NEPA, would be the one to grant such approval.[111] The tolls collected should be used to fund ride-share incentives, improved transit infrastructure, and/or other beneficial programs.

22

2. **Added Local and Regional Transit Capacity**. CDOT should partner closely with RTD (and other agencies, as needed) to significantly increase transit options on and close to I-270. Currently, only one RTD bus route uses the I-270 corridor: the FF5, or Flatiron Flyer 5, connecting Boulder to Aurora along US-36, which runs 7 times eastbound and 5 times westbound per day, and not at all on the weekends. CDOT and RTD should apply findings from the I-270 origin-destination study presented on December 16, 2022[112] to develop additional transit routes that move people through the I-270 corridor without the need for passenger vehicles. This buildout should be supported by mobility hubs, micro-transit and/or on-demand transit, shared micro-mobility options, and enhanced bicycle and pedestrian infrastructure. More specific options for transit improvements are

[111] *See Metro. Transp. Auth. v. Duffy*, 784 F. Supp. 3d 624, 637–38, 641 (S.D.N.Y. 2025) (discussing the VPPP as applied to New York City's congestion pricing program and explaining that the program "require[d] approval from the FHWA"); *id.* at 642 (noting that "FHWA has found that congestion pricing can be very effective for reducing traffic, improving roadway capacity, and providing reliable trips for automobiles as well as commercial vehicles and transit vehicles").

[112] CDOT, Project Update and Origin and Destination Webinar I-270, December 16, 2022, https://www.youtube.com/live/SkQi8KuWmzI. Inexplicably, the results of this study were not included in the DEIS. *See* Minett Report at 7–11 (noting the study's exclusion from the DIES and discussing other commuter data).

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Response to Comment 21

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with DRCOG indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 USC Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the ISRRPP and the VPPP; however, neither program can be implemented solely through the I-270 NEPA process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 22

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

However, the project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS related to increased transit, bicycle, and pedestrian improvements.

discussed in Sections XIII.A and XIII.B, below. Those concepts should be considered under the HCNWA (and considered as mitigation measures if the HCNWA is rejected).

23

3. **Public Health and Safety Improvements**. CDOT should use the I-270 project to enhance public health, safety, and mobility in spaces intersecting and adjacent to the corridor. While reducing congestion and moving people through the corridor are important goals, CDOT should also use the project to counteract—not add to—the health and safety burdens that local communities bear. Among numerous possible improvements, CDOT should (a) add green spaces that mitigate pollution and noise; (b) provide nearby residents with storm windows and free portable or window-mounted air conditioning units with air filtration; (c) install air quality and noise monitoring systems in and around homes, schools, and places of worship; (d) create and maintain real-time communication systems to measure air quality and noise, featuring real-time opt-in alerts for smartphones and internet-connected devices when thresholds are exceeded, along with periodic public reports; and (e) increase connectivity near the freeway. Any additional opportunities that CDOT has to improve the corridor for nearby residents should be undertaken.

As discussed below, this alternative meets the Agencies' stated purpose and need even better than the Preferred Alternative does, and it provides numerous additional benefits to the communities around I-270 as well.

24

2. The HCNWA meets the purpose and needs.

The Replogle Report explains in detail how the HCNWA meets the project's stated purpose and need—and does so better than the Agencies' Preferred Alternative. In Mr. Replogle's expert opinion,

> the Healthy Communities No Widening Alternative would score better than the Preferred Alternative in the dimensions of Minimizing Environmental and Community Impacts and Freight Operations while providing equal scores on other dimensions. The Healthy Communities Alternative would also better meet the State's objectives for minimizing greenhouse gas emissions, reducing air pollution and environmental justice issues, and reducing growth in vehicle miles of travel.[113]

It further meets the purpose and need in the following ways.

(i) Safety

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The DEIS and Appendix B identify discrete geometric and operational deficiencies—including short weave and merge segments, deficient lane separation, closely spaced ramps, insufficient

[113] Replogle Report at 6–9 (providing table of scores and explaining conclusions with respect to each element of the purpose and need statement).

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Response to Comment 23

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Federal mitigation and commitments are included in Chapter 5.0 of the ROD. Please see Section 5.4.4, IMP2, of the Final EIS for additional information on what is considered federal mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website. Many of the improvements listed are included in the State Community Analysis Technical Report.

The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Response to Comment 24

The Two Express Lanes that Accommodate Transit Alternative proposes using dynamic pricing; all alternatives, including Express Lanes would use dynamic pricing strategies. Additional details for pricing will be evaluated and determined, following the EIS.

The Two Express Lanes that Accommodate Transit Alternative proposes toll exemptions for freight vehicles. Providing freight exemptions on I-270 would create a unique condition within

Colorado's statewide Express Lane system. At approximately 6.5 miles long, I-270 would become the only Express Lane segment in the state where freight vehicles would be exempt from tolls, resulting in an isolated and inconsistent transition area within the broader Express Lane network. Such a condition could increase driver confusion and introduce safety risks associated with complex or changing signage and operational rules.

This alternative also proposes use of automated license plate reader technology on the local street network to enforce against trucks and commuter traffic seeking to avoid tolls by diverting from I-270. Implementation would require installation of infrastructure on local roadways outside the I-270 study area and beyond the jurisdiction of CDOT and FHWA. Local agencies retain authority over their respective roadways, and CDOT does not have the authority to restrict or penalize vehicles for using local streets as alternate routes. Even if such authority existed, it would not be practicable to distinguish between vehicles using local streets for legitimate local access and those using them as diversion routes, rendering enforcement infeasible.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 25

Comments noted.

shoulders, and lack of emergency turnouts—that correlate with crashes.[114] The Build Alternatives propose a toolbox of non-widening solutions to address those issues, and the HCNWA proposes to implement those same measures. And, recognizing the safety and efficiency benefits that the Agencies tout, the HCNWA also includes an auxiliary lane as described in the Build Alternatives. The HCNWA should therefore be evaluated on equal footing as the Build Alternatives in those respects.

In other respects, the HCNWA would significantly increase safety relative to the Preferred Alternative. As noted, the DEIS rejected alternatives with eight-lane configurations at Level 2 screening due in part to "safety concerns due to higher lane count."[115] And the DEIS's safety performance functions (SPFs) for different lane configurations show that the maximum number of crashes on a 4-lane highway is much lower than for a 6-lane highway, simply because a 4-lane facility has more limited capacity: the curve maxes out at ~115,000 AADT and less than 50 crashes per mile per year.[116] The HCNWA avoids these lane-correlated safety issues by retaining I-270's existing 4-lane configuration.

The DEIS also finds that the Build Alternatives, and especially the Preferred Alternative's express lane, will "reduce volume in the general-purpose lanes and improve flow—particularly during peak travel hours. These reductions in congestion are expected to address the root causes of the LOSS IV safety conditions observed on most segments of the corridor."[117] As discussed below and in other sections of this comment letter, the Build Alternatives would do very little to reduce congestion across the system in light of induced demand, and actually increases congestion in other areas—yet the DEIS fails to examine the impacts of those increases in congestion and concurrent safety impacts, instead myopically focusing on the highway. In contrast, the HCNWA would significantly reduce congestion by managing traffic through pricing, without causing major congestion in other areas. Thus, any safety benefits from reduced congestion would be greater with the HCNWA than with the Build Alternatives.

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[114] *See, e.g.*, DEIS App'x A at 22 ("Design interventions, such as lengthening merging lanes, adding clearer lane separation, and improving traffic flow at bottleneck points, could help mitigate the crash risks associated with congestion."); *id.* at 30–31 (explaining that a set of crashes "were attributed to congestion, high speed differentials, and complex merging and weaving sections" and that "reduced crash frequencies" were explained by "the reconstruction of the eastbound I-270 bridge over I-70," which "improved safety performance between the Quebec Street and I-70 interchanges by addressing key design deficiencies, including better lane separation and improved merging areas"); *id.* at 33–34, 37 (noting that crashes are often linked to "short acceleration and deceleration lanes" and "narrow shoulders").

[115] DEIS at 3-21 to 3-22.

[116] DEIS App'x A at 43–44; *see also* Section VII, below; Pranab Kar et al., *Assessing the crash risk of mixed traffic on multilane rural highways using a proactive safety approach*, 188 Accident Analysis & Prevention 107099 (Aug. 2023), https://www.sciencedirect.com/science/article/pii/S000145752300146X.

[117] DEIS App'x A at 46.

(ii) Travel time and reliability

The HCNWA enhances travel time and reliability needs through traffic management rather than infrastructure expansion. Many of the Preferred Alternative's stated benefits in the DEIS arise from actively managed operations, including dynamic pricing.[118] This observation is consistent with the DEIS's own recognition that traffic volumes are elastic and can be managed. In explaining the Express Lane's advantages over a third general-purpose lane, the DEIS emphasizes that the Express Lane "manages traffic volumes" and keeps at least one lane flowing during peaks.[119] That assertion is a tacit admission that volumes and speeds can be shaped by policy and pricing, not just by added capacity. A corridor-wide pricing program on existing lanes—which HCNWA proposes—would implement that approach for the entire corridor while avoiding induced demand associated with new capacity.

Indeed, the Ives Street Report evaluates the DEIS's Preferred Alternative and the HCNWA side by side, assessing how each one affects overall traffic congestion, measured in vehicle-hours of delay and resulting changes in total volumes of vehicle-miles traveled. The report explains:

> [W]e establish a high-resolution geospatial model of the greater Denver region, including all roadways, pedestrian and bicycle infrastructure and public transit service, as well as demographic and employment data at the level of census tracts. Using telemetry data, we populate the roadways with free-flow and peak-hour speeds as well as peak-hour traffic volumes. We calibrate Bureau of Public Roads (BPR)-style volume-delay functions for each segment of roadway.
>
> . . . [W]e [then] examine the effects that each scenario might have on traffic volumes on I-270 and other roadways and we estimate the potential implications for congestion and delay. For the CDOT Widening Scenario, this phase is mostly concerned with the way that widening I-270 will reduce congestion on that highway even as induced travel increases traffic and congestion on connecting roadways; for the Healthy Communities No-Widening Scenario scenarios, this phase is mostly concerned with reduction of traffic and redistribution from I-270 to alternative/parallel roadways.[120]

Critically, and unlike the DEIS's fundamentally flawed traffic model,[121] the Ives Street model accounts for induced travel, relying on the Rocky Mountain Institute's State Highway Induced Frequency of Travel (SHIFT) calculator. "SHIFT is a peer-reviewed, elasticity-based tool designed for evaluating induced travel from highway capacity expansions. It incorporates empirical evidence from decades of U.S. roadway expansions and provides conservative, policy-appropriate estimates of long-run changes in vehicle miles traveled (VMT) attributable to added

[118] *See, e.g.*, DEIS at 4-7 (finding the Preferred Alternative's express lane would "provide the greatest travel-time reliability by managing demand through dynamic pricing").

[119] DEIS at 3-11.

[120] Ives Street Report at 12.

[121] *See* Section V, below.

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Response to Comment 26

Comments noted.

capacity."[122] Importantly, the Ives Street model does not include time-of-day shifts (other than by selecting a K-factor—the percent of induced travel that occurs during the modeled morning peak hour—of 0.12, rather than a lower value), meaning that its "analytical results are conservative: they *underestimate* the volume of traffic that will ply I-270 after a widening, and they *overestimate* post-widening speeds."[123]

The Ives Street Report finds that, with induced travel accounted for, "[t]he CDOT Widening Scenario will not provide any overall improvement to traffic congestion in the Denver region. Improvements in traffic flow on I-270 will be balanced by worsened congestion in other parts of the network, especially I-70 to the east and I-25 to the north."[124] Yet, without improving congestion, the Preferred Alternative will nonetheless result in an increase in VMT of 100,000,000 vehicle-miles per year.[125] In contrast, modeling for the HCNWA shows that it will cause "a statistically significant, but relatively minor, net reduction in traffic delay from congestion in the Denver region," specifically a reduction of 300 vehicle-hours during the morning peak period.[126] The HCNWA would lead to an increase of 20,000,000 new vehicle-miles per year (due to the auxiliary lane), one-fifth the volume of the Preferred Alternative.[127]

[122] Ives Street Report at 21–22.

[123] *Id.* at 23 (emphasis added).

[124] *Id.* at 30.

[125] *Id.* at 28 Tbl. 6.

[126] *Id.* at 28 Tbl. 6, 31–32.

[127] Ives Street Report at 28 Tbl. 6; *id.* at 31–32 (map images).

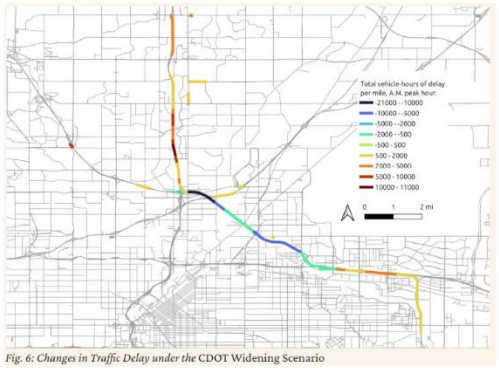

Fig. 6: Changes in Traffic Delay under the CDOT Widening Scenario

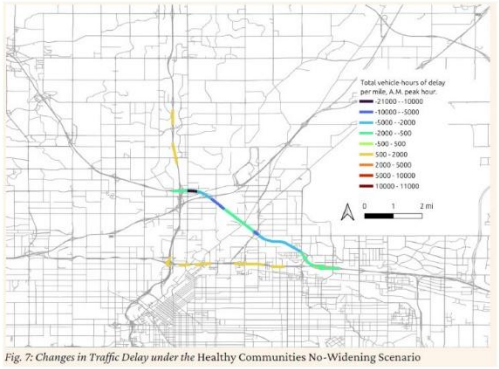

Fig. 7: Changes in Traffic Delay under the Healthy Communities No-Widening Scenario

As discussed further below, these changes in travel time and VMT also mean that access to jobs under the HCNWA is much better than under the Preferred Alternative.

The Minett Report evaluates pricing scenarios for the HCNWA and concludes that "it is highly likely the excess traffic on the existing two-lanes each direction on I-270 could be removed by a

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combination of tolls and passenger incentives."[128] This conclusion supports the Ives Street Report showing that the HCNWA can provide significant congestion relief both on I-270 and, critically, on connecting roadways.

This modeling, which accounts for the very real and well-established phenomenon of induced travel in a way that the DEIS's modeling does not, demonstrates that the HCNWA meets the stated need of travel time and reliability—and, in fact, does so far better than the Preferred Alternative.

(iii) Transit

27 The HCNWA would improve transit far more than the Preferred Alternatives would. The only true "transit improvements" in the Preferred Alternative are "[a]dding 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" and allowing buses to use the new express lane.[129]

In contrast, the HCNWA not only prioritizes transit through differential tolling and reliability measures on all existing lanes but would also require CDOT to work with RTD to develop and implement new, additional transit routes along the corridor. While the specific benefits are difficult to quantify or assess without further detail, CDOT has significant authority and flexibility to generate a robust set of transit options.[130]

(iv) Bicycle and pedestrian connectivity

28 The HCNWA would retain and adopt the bike and pedestrian connectivity package common to the Build Alternatives, without the downsides of widening. Additionally, the HCNWA expressly calls for robust buildout of bike, pedestrian, and similar forms of connectivity near the corridor. Such improvements would include additional crossings and improved lighting for both vehicles and pedestrians, including at on- and off-ramp intersections.[131] I-270 bisects Commerce City, leaving limited pedestrian and bicycle crossings and making it difficult for residents to safely access destinations on either side. "Increasing the number of pedestrian overpasses and designing them to be not only safe but green and aesthetically pleasing would be beneficial to the environment and the community."[132] Specifically, these crossings should be land bridges, which allow people, animals, and plants to cross, aiding the ecology around Sand Creek and providing much more pleasant pathways for residents.

[128] Minett Report at 3.

[129] DEIS at 3-6.

[130] *See* Sections XIII.A and XIII.B, below.

[131] HCNWA Summary at 3; DAT Report at 30.

[132] DAT Report at 30.

31

Response to Comment 27

Comments noted.

Response to Comment 28

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

However, wildlife or "land bridge" crossings were not carried forward due to the absence of documented wildlife crash patterns on the corridor, the corridor's exclusion from CDOT's prioritized wildlife crossing list, and the substantial right-of-way and cost implications.

Because the HCNWA calls for both the improvements contained in the Build Alternatives and additional measures, it will serve bicycle and pedestrian connectivity more than the Preferred Alternative.

(v) Freight operations

29 The HCNWA squarely addresses the DEIS's freight concerns. Appendix B documents freight stakeholder feedback emphasizing the need for, among other things, longer acceleration/deceleration lanes, improved loop-ramp radii, shoulder width, pavement condition, and construction phasing. The improvements addressing those concerns in the Preferred Alternative are included in the HCNWA. Another significant concern for freight—congestion—would be better addressed through the HCNWA, as discussed elsewhere.

Furthermore, the HCNWA expressly calls for freight trucks to be exempted from the tolls imposed on general users of the corridor. This prioritization would help keep trucks off nearby residential roads while also benefiting commercial enterprises that rely on trucking goods via I-270, including local businesses. This benefit exceeds that of the Preferred Alternative, which would allow freight trucks to take advantage of just a single express lane on I-270 for a fee, as opposed to all lanes (for free) under the HCNWA.

(vi) Environmental and community impacts

30 HCNWA better aligns with the project goal to minimize environmental and community impacts because the alternative would avoid or reduce many of the harmful effects associated with the Build Alternatives discussed elsewhere in these comments. These advantages include:

- Air quality and climate benefits. The HCNWA alternative would yield better air quality because of reduced regional congestion and lower overall VMT, with corresponding reductions in numerous air pollutants, including greenhouse gases (GHGs).[133] Additionally, prioritizing a build-out of new transit infrastructure and routes, including potentially through new toll revenue, would bring similar benefits in air pollution and GHG reduction.
- Reduced noise pollution. The Build Alternatives would result in significant, detectable increases in noise pollution due to increased traffic, and they would also cause largely unmitigated nighttime construction noise.[134] The HCNWA would avoid the vast majority of nighttime construction noise and likely reduce overall traffic noise by reducing VMT.
- Reduced harm to biological resources. The Build Alternatives would destroy over 20 acres of wildlife habitat due to the highway's increased footprint, and the increase in traffic would cause inadequately mitigated harm to wildlife through, among other things,

[133] Ives Street Report at 28 Tbl. 6; *see* Section VI, below.

[134] *See* Section VIII, below.

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Response to Comment 29

The project includes geometric improvements and improving safety-related operational characteristics that support freight movement, such as adding an auxiliary lane that will help with acceleration, improved ramps, and standard shoulder widths. Freight toll exemptions were not included because they would be inconsistent with Colorado's statewide Express Lane policies where freight would be subject to tolls, resulting in an isolated transition area within the broader Express Lane network. While the Colorado Transportation Investment Office (CTIO) acknowledged that implementing an exemption could be feasible, it would require corridor-specific tolling and administrative systems.

See Section 5.4.3, ALT4, of the Final EIS and Appendix D, Two Express Lanes that Accommodate Transit Alternative Technical Report, of the Final EIS for additional information.

Response to Comment 30

Comments noted.

bird strikes and air pollution.[135] Those habitat destruction effects would be almost entirely avoided through the HCNWA, which would not require new acreage. Other effects like bird strikes and air pollution would likely be reduced due to lower VMT.

- Reduced water impacts. The Preferred Alternative would likely increase certain forms of water pollution associated with vehicle travel that gets collected in surface runoff, including the extraordinarily toxic compound 6PPD-quinone.[136] The HCNWA would ameliorate some of these effects by reducing VMT. And, contrary to the Agencies' treatment of a new, modernized drainage system as inextricably linked to widening, the non-widening features of the Build Alternatives adopted into the HCNWA include an updated drainage system, capturing those benefits—and further enhancing them, if the systems includes bioswales or other green infrastructure.

- Improved social and economic impacts. One of the most significant differences between the HCNWA and the Preferred Alternative is the resulting access to jobs and other destinations across the region, with the HCNWA performing much better.

  The Ives Street Report modeled how the Preferred Alternative and HCNWA change Denver-area residents' access to jobs. Applying its high-resolution geospatial model, the Ives Street analysis "identif[ies] the most convenient mode and route for each individual to reach each potential job location" and calculates "a measure of 'generalized access', [meaning] the value that each individual derives from their ability to reach various jobs locations," then "aggregate[s] that measure geographically and demographically" and "compare[s] the various scenarios to assess which one would provide Coloradans with the greatest overall improvement in access to jobs."[137]

  According to that analysis, the DEIS's Preferred Alternative would *reduce* access to jobs by 0.5% and decrease by 10,000 the number of jobs reachable in a 45-minute trip for the average Denver-area resident.[138] In contrast, the HCNWA would *increase* access to jobs by 0.6% and increase reachable jobs by 14,000.[139] In general, the Preferred Alternative's reduction in access to jobs—which is due to increased congestion and travel times along specific sections of road—most significantly harms residents of Adams County along I-25 north of I-270, "with people in regions like Northglenn and Thornecreek losing up to 10% of their ability to conveniently reach places of employment":[140]

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[135] *See* Section IX.B, below.

[136] *See* Section X, below.

[137] Ives Street Report at 12.

[138] *Id.* at 28 Tbl. 6.

[139] *Id.*

[140] *See id.* at 31, 33–34.

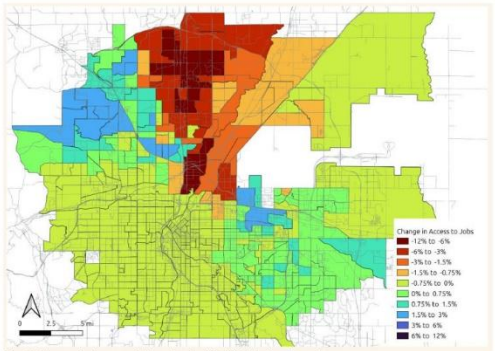

Fig. 8: Changes in Access-to-Jobs under the CDOT Widening Scenario

In contrast, the HCNWA would cause "an increase of 0.6% in [Denver-area residents'] ability to conveniently reach job locations":[141]

[141] *Id.* at 34–35.

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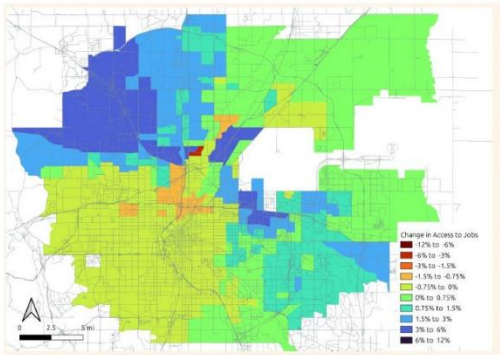

Fig. 9: Changes in Access-to-Jobs under the Healthy Communities No-Widening Scenario

The HCNWA also addresses or avoids many of the harmful effects from the Preferred Alternative noted in Section XI, below, including reduced community cohesion due to localized land use conversion that will cement the corridor as a transportation-first, community-second area.

- Budget impacts. The HCNWA would be cheaper to build than the Build Alternatives and increase the state of Colorado's earnings through toll revenue. The exact difference in cost is unclear due to the DEIS's failure to disclose any results of the Colorado Transportation Investment Office's (CTIO) "toll and revenue study for the I-270 corridor to determine the level of contribution Express Lane revenues could make toward construction, operation, and maintenance of the corridor"[142] and due to the need for CTIO to study the HCNWA in a similar way. However, the Preferred Alternative is estimated to cost $806 million, with likely only a fraction of that cost to be recouped through toll revenue,[143] whereas the HCNWA would avoid the enormous costs associated with adding a third lane.

  The cost implications are even more clear when considering the related cost of the express lane connections projects. The DEIS asserts that these connections will undergo separate review. But the Agencies have impermissibly segmented these projects from the

[142] DEIS at 3-14.

[143] DEIS at ES-20; Replogle Report at 21 (discussing the Maryland Inter-County Connector, which cost $2.5 billion for a new toll road and recouped "at best one-third of the cost of construction").

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proposed I-270 widening.[144] The express lane connections and the proposed widening are each dependent on the other, and there is no justification for considering them separately. The express lane connections project—which would tie existing managed lanes on I-70, I-25, and US 36 to the proposed new managed lanes on I-270[145]—is only feasible if the proposed managed lanes are, in fact, built.[146] The connection projects are therefore entirely dependent on the outcome of the project at hand. Likewise, the DEIS avers that the project at hand will be much more useful if the new managed lanes are connected to existing ones on adjacent highways.[147] Indeed, CDOT originally considered the direct connects to be within the scope of this project's alternatives, not as a separate project.[148] These projects' impacts—including the cost—should therefore be considered together. DRCOG estimates an additional cost of $300 million dollars for the direct connects projects.[149] This expense places the total cost of the Agencies' Preferred Alternative at over one *billion* dollars.

Because the HCNWA advances each of the projects stated needs and goals, it should be given full analysis and consideration in a supplemental DEIS.[150] Importantly, the "two-year timeline to

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[144] *See Kleppe v. Sierra Club*, 427 U.S. 390 (1976); *Del. Riverkeeper v. FERC*, 753 F.3d 1304 (D.C. Cir. 2014); *Village of Los Ranchos de Albuquerque v. Barnhart*, 906 F.2d 1477, 1483 (explaining that, generally, "segmentation of highway projects is improper," but segmentation may be proper if the projects "have substantial independent utility" and "do not foreclose the opportunity to consider alternatives" (quoting *Piedmont Heights Civic Club, Inc. v. Moreland*, 637 F.2d 430, 439 (5th Cir. 1981).

[145] *See* DEIS at 3-2.

[146] DEIS App'x E1 at 10 ("Under the No Action Alternative, these direct connect ramps would feed into an unimproved I-270 corridor that remains constrained with two general-purpose lanes in each direction. As a result, the benefits of the new direct connections would be limited.").

[147] DEIS App'x E2 at 94 ("[T]he ability of the I-270 Express Lanes to flow seamless into the I-25 and US-36 Direct Connect ramps helps reduce friction in this highly active system-to-system interchange area.").

[148] CDOT, *Draft for Internal Review: Environmental Assessment: I-270 Corridor Improvements Project* at 20 Tbl. 3-1 (Dec. 2022).

[149] DRCOG, *2050 Metro Vision Regional Transportation Plan*, at 51 (May 2024), https://drcog.org/sites/default/files/acc/TPO-RP-50MVRTP-EN-ACC-17x11-24-06-04-V1.pdf.

[150] If the Agencies refuse to consider the HCNWA, they should study implementing the core elements of the HCNWA—including tolling *all* lanes, building out transit options, and investing in significant public health and safety benefits for the community—as part of a widening alternative; and/or consider all those elements as mitigation.

complete the NEPA process as required by 40 CFR 1501.10"[151] no longer applies because § 1501.10 is part of the CEQ regulations that were recently rescinded.[152]

C. Conclusion on range of alternatives

The DEIS's alternatives analysis, as currently presented, does not provide a reasonable range of choices. The analysis effectively asks the public to choose between doing nothing and widening the highway, even though CDOT's own technical record demonstrates that a targeted set of safety, interchange, and operational improvements—combined with active management and pricing—could address the corridor's needs with substantially less footprint, cost, and community impact. The Agencies should give the HCNWA full and fair consideration in a supplemental DEIS.

V. The DEIS's traffic modeling is deeply flawed and underestimates the negative impacts of the project while overestimating the purported benefits of adding new lanes.

A. The DEIS modeling is inscrutable for the public to understand due to inconsistent and missing information.

The DEIS is replete with internal inconsistencies concerning the core information: projected travel times and speed for each alternative. The DEIS provides conflicting numbers without adequate justification for the inconsistencies. The shifting and contradictory discussion of traffic impacts makes it difficult—if not impossible—for the public to understand and comment on the alternatives.

For example, Appendix E1 of the DEIS reports 2050 average speeds (across both eastbound and westbound) as follows:[153]

Table 2. Comparison of Network Performance Metrics - 2050 Average Speed (mph)

Alternative	a.m. Peak Hour	p.m. Peak Hour
No Action Alternative	25 to 30	13 to 18
Three General-Purpose Lanes Alternative	29 to 34	15 to 20
Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative	27 to 32	21 to 26

However, Appendix E2 reports 2050 average speeds for westbound and eastbound as follows:[154]

[151] DEIS at 1-5.

[152] *See* 90 Fed. Reg. 10610 (Feb. 25, 2025).

[153] DEIS App'x E1 at 16 Tbl. 2.

[154] DEIS App'x E2 at 72–73 Tbls 14 & 15.

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Response to Comment 31

Comments noted.

Response to Comment 32

A few revisions were needed to the Draft EIS documentation related to traffic and are included in the Errata. See Table 2-1 of Chapter 2.0, E-049 through E-057, of the Final EIS for those revisions.

Table 14. Westbound I-270 Average Travel Speed (mph) - From I-70/Central Park Boulevard to Westbound US 36/Northbound I-25

Alternative	GPL Passenger Vehicles (a.m.)	GPL Passenger Vehicles (p.m.)	Freight Vehicles (a.m.)	Freight Vehicles (p.m.)	Express Lane Vehicles (a.m.)	Express Lane Vehicles (p.m.)
No Action Alternative	13.60	11.98	12.29	9.80	N/A	N/A
Three General-Purpose Lanes Alternative	55.65	10.97	53.90	9.86	N/A	N/A
Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative	54.71	18.49	53.90	17.72	56.97	40.55

GPL - general-purpose lane

Table 15. Eastbound I-270 Average Travel Speed (mph) - From Eastbound US 36/Southbound I-25 to I-70/Central Park Boulevard

Alternative	GPL Passenger Vehicles (a.m.)	GPL Passenger Vehicles (p.m.)	Freight Vehicles (a.m.)	Freight Vehicles (p.m.)	Express Lane Vehicles (a.m.)	Express Lane Vehicles (p.m.)
No Action Alternative	7.99	7.35	7.31	6.35	N/A	N/A
Three General-Purpose Lanes Alternative	35.58	9.85	34.72	8.94	N/A	N/A
Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative	28.85	15.52	28.28	14.94	34.62	28.89

GPL - general-purpose lane

Take the three general-purpose lanes alternative, for example. Appendix E2 reports the average speeds during the a.m. peak hour as roughly 35 mph eastbound, and roughly 54 mph westbound (when examining both passenger vehicles and freight vehicles). But Appendix E1 reports average speeds in the morning peak hour between 29 to 34 mph. Appendix E2 thus offers a far rosier picture, at least for westbound traffic, than does Appendix E1. Commenters are left struggling to understand which estimates are correct. To the extent that there is some distinction between the two sets of data, the DEIS does not explain it.

Additional inconsistencies are abundant:

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Ex.	Appendix B	Appendix E1	Appendix E2
1	"[V]ehicles in the Express Lane maintain average speeds between 29 and 41 mph during peak periods, while general-purpose lanes experience much lower speeds, ranging from 9 to 15 mph."[155]		Average express lane speeds during the peak hours range from 28.89 mph to 56.97 mph. Average general-purpose lane speeds range from 15.52 mph to 54.71 mph.[156]
2	"In the eastbound direction, average a.m. peak travel time for transit is approximately 26 minutes under the Three General-Purpose Lanes Alternative, compared to nearly 18 minutes for the Preferred Alternative."[157]	Eastbound transit vehicles will have an A.M. travel time of 7 min under both the Three General-Purpose Lanes Alternative and the Preferred Alternative.[158] "Using the Express Lanes, the FF5 could anticipate a 6 to 9-minute trip through the corridor, *independent of time of day and direction of travel*, reflecting more consistent corridor-wide transit times."[159]	
3	"During the p.m. peak, the same eastbound transit trip takes 41 minutes under the Three General-Purpose Lanes Alternative versus 25 minutes in the Preferred Alternative, resulting in a transit travel time savings of approximately 16 minutes."[160]	Eastbound transit vehicles will have a P.M. travel time of 8 minutes under the Three General-Purpose Lanes Alternative and 6 minutes under the Preferred Alternative.[161] "Using the Express Lanes, the FF5 could anticipate a 6 to 9-minute trip through the corridor, *independent of time of day and direction of*	

[155] DEIS App'x B at 79.

[156] DEIS App'x E2 at 72 Tbl. 14, 73 Tbl. 15.

[157] DEIS App'x B at 79.

[158] DEIS App'x E1 at 19 Tbl. 4.

[159] *Id.* at 18 (emphasis added).

[160] DEIS App'x B at 79.

[161] *Id.* at 19 Tbl. 4.

		travel, reflecting more consistent corridor-wide transit times."[162]	
4	"In the westbound direction, a.m. peak transit travel time is projected to be approximately 31 minutes under the Three General-Purpose Lanes Alternative, while Preferred Alternative transit travel time is projected at 20 minutes, saving nearly 11 minutes."[163]	Westbound transit vehicles will have an A.M. travel time of 7 minutes under the Three General-Purpose Lanes Alternative and 6 minutes under the Preferred Alternative.[164] "Furthermore, the Express Lane," which transit would use, "is projected to provide a 6-minute and 9-minute westbound corridor-wide trip in the a.m. and p.m. peak hours, respectively, consistently providing a reliable westbound trip through the corridor."[165]	
5	For the p.m. peak, westbound transit travel time is estimated at 29 minutes in the Three General-Purpose Lanes Alternative compared to 18 minutes in the Preferred Alternative, yielding a savings of approximately 11 minutes.[166]	Eastbound transit vehicles will have a P.M. travel time of 37 minutes under the Three General-Purpose Lanes Alternative and 9 minutes under the Preferred Alternative.[167] "Furthermore, the Express Lane," which transit would use, "is projected to provide a 6-minute and 9-minute westbound corridor-wide trip in the a.m. and p.m. peak hours, respectively, consistently providing a reliable westbound trip through the corridor."[168]	
6		Eastbound freight vehicles will have a P.M. travel time of 27	Eastbound freight vehicles will have a

[162] DEIS App'x E1 at 18 (emphasis added).

[163] DEIS App'x B at 80.

[164] DEIS App'x E1 at 19 Tbl. 4.

[165] *Id.* at 15–16.

[166] DEIS App'x B at 80.

[167] DEIS App'x E1 at 19 Tbl. 4.

[168] *Id.* at 15–16.

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		minutes under the No Action Alternative.[169]	P.M. travel time of 57 minutes under the No Action Alternative.[170]
7	"[D]uring the p.m. peak hour, eastbound truck travel time drops from 41 minutes (Three General-Purpose Lanes Alternative) to 25 minutes (Express Lane Alternative), reflecting a freight travel time savings of 16 minutes."[171]	Eastbound freight trips during the P.M. will take 8 minutes under the Three General-Purpose Lanes Alternative and 7 minutes under the Preferred Alternative.[172]	
8	"[V]ehicles in the Express Lane maintain average speeds between 29 and 41 mph during peak periods."[173]		"[T]he express lane provides . . . projected speeds of 57 mph in the a.m. and 40 mph in the p.m. peak hours."[174]

Table 1. Illustrating inconsistencies across DEIS appendices.

The above table offers just a sampling of inconsistencies. The varied formats of presenting information between each Appendix stymies direct comparison and is not accessible to the public. To the extent that any of the above discrepancies are attributed to "peak hour" versus "peak period" estimates, that difference is not elucidated anywhere, and would not make practical sense. It would stand to reason that peak hour speeds would be lower than peak period speeds, as the peak period encompasses time on either side of the peak hour, and the peak hour is when congestion is most acute. Yet at various points, the DEIS reports slower speeds during the peak period than in the peak hour.[175] The presented data is thus inscrutable, inhibits meaningful public engagement, and undermines the legitimacy of the Agencies' analysis.

[169] *Id.* at 17 Tbl. 3.

[170] DEIS App'x E2 at 71 Tbl. 13.

[171] DEIS App'x B at 81.

[172] DEIS App'x E1 at 17 Tbl. 3.

[173] DEIS App'x B at 79.

[174] DEIS App'x E2 at 72–73.

[175] *See, e.g.*, Example 8 in Tbl. 1, above.

Making matters worse, the DEIS does not present any information on what tolls might be charged for the Express Lanes or how much revenue would be gathered. This information is critical for the public to understand the impacts of the proposal, including the impact on equity and environmental justice. The public does not know, at this critical stage, who will be able to afford the toll, what revenues will be used for, and how much revenue to expect. The Agencies acknowledge that the general-purpose lanes will still be congested and leave the Express Lanes as the only option to provide reliable travel times. But the lack of information on the tolls makes it impossible for the public to understand how this proposal will impact *their* lives, invalidating the public comment process. The Agencies must conduct the tolling study (for both the Preferred Alternative and the HCNWA) and include that study in a supplemental DEIS for public input.

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B. The DEIS modeling is inherently flawed and cannot be relied upon for reasoned decisionmaking.

The DEIS modeling suffers from major flaws that render the entire analysis invalid. These errors are thoroughly documented in the attached Marshall Report, Replogle Report, and Ives Street Report. Some of the most egregious errors include:

- The model forecasts impossibly high traffic growth in the region, based on imaginary and theoretical ambient demand, as well as impossibly high traffic throughput (vehicles per lane per hour) on I-270 and other corridors in the region.
- The model fails to include the effect of induced demand caused by adding lanes to I-270, a well-established phenomenon that the Agencies reject out of hand and without supporting evidence.
- The model examines impacts in a very narrow study, thereby failing to analyze reasonably foreseeable impacts, including (a) increases in VMT and pollution that will occur outside of the study area; and (b) congestion impacts outside of the study area, including impacts immediately outside of the study area that are fully foreseeable.

As a result of these errors, the DEIS reports "false benefits" that amount to "misinformation."[176] The DEIS uses this information to "justify road capacity expansion as the only possible option for action."[177] The DEIS overstates the performance of the express lanes while failing to explain that the primary outcome of the Build Alternatives would be to simply push congestion around, leading to overall *worse* congestion for travelers and resulting in more air and climate pollution. Tools that address these defects are readily available, and the Agencies must implement those tools in their modeling to examine the Build Alternatives as well as the HCNWA, including both tolling and comprehensive ramp metering.

[176] Marshall Report at 36.

[177] Replogle Report at 2.

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Response to Comment 33

DRCOG, as the federally designated Metropolitan Planning Organization for the Denver region, develops and maintains the region's travel demand model. The model is updated on a regular cycle to support the adopted long-range RTP. It is built using regional demographic and employment forecasts, adopted land use plans from local jurisdictions, roadway and transit network characteristics, and observed travel behavior data. These inputs are combined using established transportation modeling practices to estimate how people travel across the region by time of day, mode, and route.

The model relies on multiple data sources, including US Census and American Community Survey data, regional household travel surveys, traffic counts, transit ridership data, land use plans from cities and counties, and state demographic forecasts. Local governments, transit agencies, CDOT, and other stakeholders participate in the regional planning process that establishes socioeconomic forecasts and network assumptions used in the model.

The DRCOG regional travel demand model is calibrated and validated to reflect observed real-world travel behavior before it is used for forecasting. Calibration involves adjusting model parameters so that modeled traffic volumes, speeds, trip lengths, and mode shares reasonably replicate observed base-year conditions. This process uses traffic count data, travel time data, transit ridership information, and household travel survey results. Validation compares modeled outputs to independent observed datasets to confirm that the model reproduces regional travel patterns within accepted industry standards. Only after the model demonstrates an acceptable match to existing conditions is it applied to future-year scenarios using adopted population, employment, and network assumptions.

Similarly to the travel demand model, the corridor-level microsimulation model developed for the Draft EIS was first

calibrated to existing traffic operations. Observed traffic volumes, lane utilization patterns, travel times, queue lengths, and merging behavior were used to adjust model parameters so that simulated conditions closely matched current field conditions. This calibration ensures that the model accurately represents how vehicles interact with specific geometry and constraints of the corridor. Once the existing conditions model reliably replicated observed operations, projected 2050 traffic volumes from the regional travel demand model were applied to the calibrated microsimulation network. This approach allows the future-year analysis to build directly on a validated representation of current operations, providing a realistic basis for comparing how each alternative is expected to perform under long-term demand.

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using DRCOG's federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS1 and TRANS2, of the Final EIS for additional information on how the traffic modeling was completed and induced demand.

The following section highlights portions of the Marshall, Replogle, and Ives Street Reports, and discusses additional deficiencies. This section does not supplant those reports, which identify additional defects in the model and discuss the defects in greater detail.

1. The DEIS drastically overestimates future-year VMT for the No Action Alternative, creating an inflated baseline for comparison.

One major flaw in the DEIS modeling efforts is that the modeling allows for unconstrained increases in demand, resulting in a model that has a much higher throughput (vehicles/lane/mile) than is possible in reality. This fundamental flaw leads to results that similarly defy reality, including major increases in VMT on the corridor even in the No Action Alternative. This inaccuracy, in turn, inflates every baseline that CDOT uses to compare the Build Alternatives to the No Action Alternative, including traffic and air pollution. The Marshall Report explains the underlying flawed assumptions, and resulting impacts on the modeling, in detail.[178] In brief, the DEIS model does not take into account the fact that maximum throughput is physically constrained: once throughput reaches a certain level, speeds reduce, which in turn necessarily reduces flow rate. This phenomenon is well-established in the literature and is evident on I-270, as described in the Marshall Report.

Throughput on I-270 is therefore generally constrained to between roughly 1400 and 1600 vehicles per lane per hour, depending on the precise location. While maximum throughput can be increased with less turbulence (*e.g.*, through aggressive ramp metering, improved on-ramps, and the like), a maximum throughput level will still exist. The DEIS model, though, does not cap throughput on either I-270 or other corridors. Instead, the DEIS model extends throughput rates beyond practical possibility. For example, it "translates a volume of 1400 vehicles per lane per hour, the *highest observed volume in this location*, to a speed of 65 mph. An impossible volume of 2000 vehicles per lane per hour is modeled at 47 mph, and even a truly ridiculous volume of 3000 vehicles per lane per hour is modeled at 13 mph."[179]

In reality, I-270 throughput never reaches 2000, let alone 3000, vehicles per lane per hour. The Agencies partially recognized this flaw and attempted to address the model's 40% overestimate of I-270 traffic in the base year by limiting I-270 segment capacities and reducing free-flow speeds. But the Agencies did not actually constrain capacity; the model still allowed unrealistically high throughputs.[180] And because the model allows these high throughput values, it projects staggeringly high increases in VMT on the corridor by 2050 even under the No Action Alternative. Those incredibly high traffic volumes are modeled at extremely low speeds, resulting in numbers such as 47.80 average minutes of delay for an average *3.2 mile trip*.

This approach generates results that are, to their core, fatally flawed and utterly divorced from reality. The Agencies therefore err by relying on them. That is true even to the extent that the

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[178] Marshall Report; *see also* Replogle Report at 24–27 (explaining laminar and turbulent flow).

[179] Marshall Report at 9 (emphasis added).

[180] *Id.* at 20 Fig. 20, 21 Fig. 21.

Response to Comment 34

Comments noted.

Agencies intended the model results to show merely the *difference* between the No Action and Build Alternative results, as "[t]here is no basis for assuming that the difference between two incorrect numbers means anything in the real world."[181]

In addition to leaving lane throughput unconstrained on I-270, the Agencies did not even attempt to constrain throughput for non-I-270 segments in the model. The underlying model allows throughput exceeding 2000 vehicles per lane per hour on dozens of links, in both the base year and the 2050 modeling, but even the *express* lanes on non-I-270 links are bound by the same reality, with maximum throughputs far lower than 2000 v/l/h observed on express lanes on I-70.[182] By leaving those links unconstrained, the model artificially boosts traffic and demand, leading to large, imaginary numbers of vehicles 'queueing' for I-270 along with slow speeds and large delays.[183]

With such unrealistic outputs, the Agencies should have—but failed to—compare the results to high-level expected results for validation (in other words, perform even a very rudimentary 'gut-check'). Such a comparison would have shown that the modeled results are unreliable and cannot support the DEIS. For example, the DEIS estimates that in the no build scenario, by 2050, between 125,000 vehicles and 150,000 vehicles per day will use I-270.[184] This is an increase of 56% after 2023,[185] with the model showing steady increases between now and then.[186] But this estimate conflicts with both historic data and with statewide planning expectations.[187] Data from I-270 shows that in the six years between 2019 and 2025, total traffic on I-270 increased by only 3.29%.[188] Yet the model predicts that in the six years between 2025 and 2031, traffic on I-270

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[181] *Id.* at 23.

[182] *Id.* at 31.

[183] The errors stemming from the model's unconstrained traffic flows also infect the modeling for the Build Alternatives modeling. However, the Build Alternatives fail to account for induced demand, as discussed in the following section. To correct these major flaws, the Agencies need to first model the proper baseline, and then properly estimate the Build Alternatives, accounting for induced demand.

[184] DEIS App'x B at Alt. Dev. Tech. Report at 65.

[185] *See* State Air Q. Tech. Report at 22 Tbl. 3 (systemwide, 1,443,023 daily VMT under No Action Alternative in 2050, compared to 2023 existing of 926,995).

[186] State GHG Tech. Report, App'x B at B-1 Tbl. A2.

[187] *See also* Section VII, below (describing caps on throughput recognized by safety-related documentation).

[188] Summary of Historic Traffic Counts on I-270 and I-70. This data was gathered from CDOT's website, at https://dtdapps.coloradodot.info/otis/trafficdata#ui/1/1/2/station/000511/criteria/070A/273.249/278.952/false/true/. The data for I-270 is from continuous monitor 000507 (located se/o York St), and the data for I-70 is from continuous monitor 000511 (located e/o Dahlia St). The raw data is provided for various days throughout a given year in primary and secondary directions. Excel

would increase by over three times that amount—11.88%.[189] This is despite the fact that demographic projections expect largely similar population growth over the two time periods.[190] The overestimates compound as the projections reach out further in time, and these issues pervade the DEIS analysis in addition to the state-only GHG report.[191]

The model effectively assumes that VMT will increase by large amounts no matter what, "reflecting anticipated regional population growth and employment growth incorporated into the model."[192] The DEIS thus erroneously assumes that this VMT growth will occur completely independent of capacity increases on roads in the region. For example, the Agencies explain that the DRCOG 2050 RTP includes new I-270 express lanes, so "taking [express lanes] out of the No Action Alternative for this project result in more traffic being pushed onto I-25 and I-70 in the modeling."[193] In other words, the model assumes that the same traffic will exist regardless of whether or not new lanes are actually built.

This assumption has "no grounding" and, in fact, "forecasts of increased vehicle travel have time and again failed to materialize."[194] Indeed, vehicle travel can decline as population and economic activity grows.[195] The DEIS appears steeped in the "'demand' fantasy," concerning a "hypothetical traffic volume that would exist if" roadways were wider.[196] When transportation planners point to theoretical "latent" or "suppressed" demand, what they mean is that trips currently not being made would be made if more capacity is available. In other words, widening the roadway will lead to more trips. Problematically, the modeling tools were "never intended or calibrated to predict 'demand'"; they were "developed and calibrated to match actual

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was used to calculate average traffic counts across the year, with the 2025 data ending on November 30, 2025.

[189] *See* State GHG Tech. Report at App'x B p. B-1, Tbl. A2.

[190] *See* MetroDenverEDC, *Historic & Projected Population* (providing population estimates), *available at* https://www.metrodenver.org/regional-data/demographics/population (download under "Related Files" – "Historic & Projected Population").

[191] State GHG Tech. Report at 18 ("As described in the *I-270 Corridor Improvements Environmental Impact Statement Traffic Technical Report* (CDOT 2025c), the Project team selected the DRCOG Focus version 2.3.2 TDM and TransModeler 6.1 microsimulation software as the primary tools for the I-270 traffic analysis. These tools provide accurate traffic forecasts and detailed simulations, meeting the technical requirements established by CDOT and FHWA. The analysis uses the 2023 base year and 2050 horizon year TDMs from Focus version 2.3.2 for the existing and future traffic condition analyses.").

[192] State GHG Tech. Report at 36; *see also* State Air Q. Tech. Report at 50.

[193] App'x E1 at 13.

[194] Ives Street Report at 7.

[195] *Id.*

[196] Marshall Report at 24.

throughput."[197] These models "require[] strange gymnastics" that ignore the reality of bottlenecks and constraints elsewhere in the system.[198] The DEIS' assumptions also defy the reality of constrained throughput, as discussed above, and the realities of induced demand, discussed in the following section.

Further, the model's output of extreme delays in the No Action Alternative assumes that people do not adjust their travel behavior in response to more congestion. In actuality, traffic congestion does not increase proportionally with demand; it reaches saturation points, which trigger behavior change.[199] Research shows that drivers are likely to retime their trips to avoid peak traffic, especially post-Covid with more flexible work schedules; forgo trips, consolidate multiple trips, or stay local for discretionary trips; mode shift to transit or carpool; and, where possible, choose to live closer to work.

The modeling results are also completely untethered from CDOT's own plans, which include reducing VMT per capita by 1% per year.[200] With current projected growth in the region, this would essentially keep total regional VMT flat.[201] Yet the modeling predicts a 56% increase in VMT under the No Action scenario, assuming a complete and utter failure by CDOT to come anywhere close to achieving its own targets. The modeling also conflicts with CDOT's official position in related matters. In CDOT's Greenhouse Gas Rule Cost-Benefit Analysis, finalized just five years ago, CDOT explains that induced demand applies to freeways and even specifies an elasticity of .67, meaning that a 10% increase in lane miles would result in a 6.7% increase in VMT in the area; and CDOT acknowledges that that value is at the *low* end of estimates.[202] CDOT's new position—that induced demand does not apply *at all* to this particular freeway—is an unjustified and unexplained change in the agency's own policy.

Another example of results untethered from reality is the model's estimates for travel times in 2050 under the Build Alternatives. According to the Agencies, the Build Alternatives will result in a 50% increase in road capacity (increasing 2 lanes to 3 lanes); and VMT will grow by 72–

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[197] *Id.* at 22–23.

[198] *Id.* at 23–24.

[199] *Id.* at 15, 31.

[200] CDOT, Policy Directive 14.0 (establishing VMT targets), https://www.codot.gov/performance/assets/a-pd-14-0-201cpolicy-guiding-statewide-transportation-plan-goals-and-performance-measures201d.pdf;

[201] DRCOG projects regional population growth of roughly 30% by 2050. *see* Denver Regional Council of Governments (2020). *2050 small-area forecast & scenario planning analysis* (Appendix F). In *2050 Metro Vision Regional Transportation Plan* https://drcog.org/sites/default/files/acc/TPO-RP-2050RTPAPPXF-EN-ACC-24-05-16-V1.pdf

[202] CDOT, *Cost-Benefit Analysis for Rules Governing Statewide Transportation Planning* (Aug. 31, 2021), https://www.codot.gov/programs/environmental/greenhousegas/assets/cdot-cost-benefit-analysis-for-ghg-rule-sept-2021.pdf; *see* Replogle Report at 30–31.

83% by 2050 for the Build Alternatives, thus outstripping the added capacity.[203] Yet travel times in the general purpose lanes under the Preferred Alternative will *decrease* by four to nine minutes compared to today, a decrease of 23 to 56%.[204] The three general purpose lanes alternative has even greater modeled travel time improvements in the morning, and suffers from worse traffic only in the westbound lanes in the evening.[205] The Agencies do not explain how this is possible. Modeling with such unrealistic and untethered outputs cannot support reasoned decisionmaking.

The model inflates the traffic under the No Action Alternative in other ways, as well. One example is the influence of the express lane direct connections. As explained above, these connections are impermissibly segmented from this project, despite being entirely dependent on this project.[206] Because the connections have been segmented, the Agencies exclude those ramps from both Build Alternatives.[207] (Note, however, another critical inconsistency: elsewhere, the Agencies' discussion appears to reflect the *inclusion* of the direct connect ramps in the Build Alternative modeling.[208] Again, these inconsistencies stymie public understanding and the ability to comment on the DEIS. Given the lack of clarity, we rely on the Agencies' explicit statements that the direct connects have been excluded from the Build Alternatives' modeling.) But the Agencies actually *include* the ramps in the no build modeling.[209] This is a nonsensical approach: if the express connects are part of the baseline, they should be carried forward in the modeling. To do otherwise is like taking I-25 out of the Build Alternatives, but leaving it in the no build model.

The Agencies assert that their approach is conservative because the lack of direct connections in the Build Alternatives results in modeled traffic moving more slowly through the corridor.[210] This is wrong for two reasons. First, the Agencies fail to explain how including the direct connections in the No Action Alternative is a conservative approach, when there are no express lanes to connect to the ramps. If the Agencies are simply modeling three lanes entering I-270—a

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[203] State Air Q. Tech. Report at 22 Tbl. 3.

[204] DEIS App'x E1 at 17 Tbl. 3.

[205] *Id.*

[206] *See* Section IV.B.vi, above.

[207] State GHG Tech Report at 37; DEIS App'x E3 at I-270 Air Quality Analysis Work Plan p.1 n.12.

[208] DEIS App'x E2 at 89, 93 (discussing modeling results, specifically results concerning how each build alternative interacts with the direct connect ramps).

[209] State GHG Tech. Report at 37.

[210] *See, e.g.*, State Air Q. Tech. Report at 56 ("For the project air quality analysis, traffic conditions were modeled under a scenario that assumed the Build Alternatives operate without the I-25/US 36 and I-70 Direct Connects projects in places, to represent a worst-case, more congested condition. This conservative assumption captures the highest potential congestion and idling levels that could occur if construction timing results in a temporary gap in regional Express Lane continuity . . . .").

two-lane facility under the No Action Alternative—this would lead to a bottleneck and slower speeds, thereby skewing the baseline and inflating congestion under the No Action Alternative. Indeed, elsewhere the Agencies acknowledge this reality: "Under the No Action Alternative, these direct connect ramps would feed into an unimproved I-270 corridor that remains constrained with two general-purpose lanes in each direction. As a result, the benefits of the new direct connections would be limited, as vehicles would still encounter bottlenecks, delays, and unreliable conditions on I-270."[211] Put simply: this is another example of artificially inflating demand/traffic in the No Action Alternative.[212]

Similarly, excluding the direct connects from the Build Alternatives means that only two lanes from I-25 and I-70 are entering a now-three lane corridor, which should lead to fewer vehicles entering the corridor during peak periods, easing any bottlenecks and leading to *faster* speeds on most of the corridor, until the vehicles reach the end of the corridor, where only two lanes are available to exit. It is unclear why the Agencies consider that to be a "conservative" approach.[213] If anything, excluding the express connects limits the traffic expected to travel on I-270 (because of the bottleneck of just two lanes entering the corridor), and thereby underreports total expected VMT caused by the Build Alternatives. If the Agencies had properly proposed these projects jointly instead of segmenting them, the No Action Alternative would *not* include the direct connects, and the Build Alternatives *would* include the direct connects, properly capturing the increases in traffic and VMT caused by the proposed project without artificially inflating the no-build baseline.

Other flaws pervade the model, as detailed in the Marshall Report. For example, the microsimulation area's extreme limitations to the narrow study area results in the model missing key impacts, such as bottlenecks that occur just outside of the study area (in addition to bottlenecks further away). As a result, increasing I-270's capacity would only serve to worsen those bottlenecks.[214] In other words, the Preferred Alternative would not solve congestion but rather simply push it around,[215] yet the Agencies failed to study these reasonably foreseeable impacts and the resulting pollution and delays. The Agencies cannot limit the project scope to obscure the full impacts of the proposed project. In addition, the DEIS overstates the

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[211] DEIS App'x E1 at 10.

[212] The Agencies assert that this approach is required under FHWA guidance, but do not identify the guidance or explain why it applies here. Further, guidance is non-binding, and the Agencies should not apply guidance where it would be illogical or otherwise skew the analysis.

[213] To the extent that the model fails to capture those impacts, it is because the model erroneously assigns the same traffic volumes to the corridor regardless of the Build Alternatives, ignoring how the build design itself actually impacts traffic volumes. This would therefore be yet another illustration of how that error affects the modeling results.

[214] Marshall Report at 31; *see also* Ives Street Report at 30–31.

[215] *See* Replogle Report at 16–18 (discussing examples of new express lanes pushing bottlenecks elsewhere, rather than eliminating them).

performance of the express lanes, which in turn overstates the benefits of the Preferred Alternative.[216]

Overall, the model's results not only "do not represent the real world;"[217] the results are also "misinformation" which "misleads decisionmakers and the general public, and provides false justifications for costly investments."[218] Such misinformation cannot support reasoned decisionmaking.

2. The DEIS fails to account for induced demand.

Compounding the problems, the DEIS also fails to account for induced demand.

Highway expansions are usually justified as a way to reduce congestion and improve travel times. But time and again, experience has shown that highway expansions ultimately result in more traffic, longer travel times, and more emissions. When highways are expanded, more drivers are drawn to that road, adding new trips that were previously avoided. Studies have shown that VMT increases in lockstep with the addition of new highway lane miles at a 1:1 ratio.[219] This phenomenon, known as induced demand, is well-documented and leads to any short-term congestion reductions evaporating within five to ten years—leaving communities worse off than before the construction projects.[220]

Nationwide, an increase in freeway lane-miles of 42% over two and a half decades has nevertheless resulted in a 144% increase in delay—despite population growth of only 32%.[221] Denver has seen even worse results. Over the same time period, population grew by 66%; freeway lane-miles grew by 51%; and delay grew a whopping 310%.[222] Boulder and Colorado Springs have suffered similar trends.[223] The lesson is clear: Colorado cannot pave its way out of congestion.

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[216] Marshall Report at 31.

[217] *Id.* at 27.

[218] *Id.*

[219] Kent Hymel, *If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas*, 76 Transp. Pol'y 57 (2019), https://doi.org/10.1016/j.tranpol.2018.12.006; *see also* Replogle Report at 33–59 (discussing in depth both induced demand and transportation agencies' frequent failure to account for it).

[220] Kent Hymel, *If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas*, 76 Transp. Pol'y 57 (2019), https://doi.org/10.1016/j.tranpol.2018.12.006.

[221] Rayla Bellis et al., *The Congestion Con: How more lanes and more money equals more traffic*, Transp. for Am. 9 (Mar. 2020), https://t4america.org/wp-content/uploads/2020/03/Congestion-Report-2020-FINAL.pdf.

[222] *Id.* at 12 Tbl. 1.

[223] *Id.*

Response to Comment 35

Comments noted.

As discussed above, these projects result in serious harm to communities both in the short and long terms.[224] In the short term, construction contributes to localized air pollution, noise, and disruption to the community. Construction demands from highway projects can also supercharge polluting industries like asphalt and cement plants, which in turn exacerbates air quality problems. And, in the long term, because of the impacts of induced demand, impacted communities are left worse off than before the expansion.

These lessons are readily apparent here in Colorado. The state widened I-25 in 2006 through Denver to the tune of 1.67 billion dollars.[225] Yet, within a mere five years, congestion was as bad as it was before the project.[226] Evidence from around the country further illustrates how widening urban corridors fails to relieve congestion and mostly serves longer distance trips, which induces sprawl development.[227] The Replogle Report details an example from a Maryland project, which similarly forecast impossible levels of transportation demand while ignoring the impacts of induced demand.[228] The Agencies fail to identify a meaningful distinguishing factor between I-270 and these other projects that failed to achieve stated goals.

For the proposed I-270 project, the Agencies reject these well-established principles. The underlying models are not designed to factor in all types of induced demand. Yet the Agencies look at the model results and claim that they show induced demand will not occur.[229] This circular thinking defies logic. For the limited amount of additional VMT that the Agencies' modeling estimates will occur under the Build Alternatives, CDOT claims that that *entire* amount will be offset by fewer trips taken on other roads.[230] In other words, CDOT claims that adding a lane will not result in *any* new traffic; it will *only* result in diversion of trips from other routes. There are several problems with this assertion. First, the Agencies fail to consider the second-order effects of moving some traffic off of alternative routes and onto I-270. This will result in less congestion on those alternative routes, leading to more drivers being drawn to those routes. The Agencies fail to even consider that type of induced demand.

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[224] *See* Section I, above.

[225] Evan Derby, *Colorado leaders must kick their road-widening addiction to enable a livable future*, Colo. Newsline (Apr. 27, 2021), https://coloradonewsline.com/2021/04/27/colorado-leaders-must-kick-their-road-widening-addiction-to-enable-a-livable-future/.

[226] *Id.*

[227] Replogle Report at 16–24.

[228] *Id.*

[229] The induced demand discussion occurs virtually entirely in the State-Only reports. To the extent that FHWA has not considered those reports and those reports are excluded from the DEIS, it is arbitrary and capricious for FHWA to not consider or discuss induced demand *at all* as part of its decisionmaking and represents a failure to examine all reasonably foreseeable impacts.

[230] State GHG Tech Report at 38–39.

In addition, the Agencies completely ignore other types of increased travel demand that results from adding a new lane. Attraction or diversion of traffic from other routes is only one source of increased travel demand. Another source that the Agencies do not account for is people taking longer or entirely new vehicle trips that would not have taken place if additional highway infrastructure had not been constructed and made available "for free" to motorists. If not for the added highway infrastructure, they would have walked, biked, taken transit, or simply not taken those particular trips at all. The nature of this "generated traffic" has been explained as follows:

> Traffic engineers often treat traffic as a liquid that must flow through the road system, but urban traffic often behaves more like a gas that expands to fill available space (Jacobsen 1997). Traffic congestion tends to maintain equilibrium: traffic volumes increase to the point that congestion delays discourage additional peak-period vehicle trips. Expanding congested roads attracts latent demand, trips from other routes, times and modes, and encourages longer and more frequent travel. This is called generated traffic, referring to additional peak-period vehicle traffic on a particular road. This consists in part of induced vehicle travel, which refers to absolute increases in vehicle miles travel (VMT) compared with what would otherwise occur (Hills 1996; Schneider 2018).
>
> Generated traffic reflects the "law of demand," which states that a good's consumption generally increases as its price declines. Roadway improvements that reduce the user costs (*i.e.*, the price) of driving encourage more vehicle travel. In the short-run generated traffic represents a shift along the demand curve; reduced congestion reduces travel time and vehicle operating costs. Over the long run it represents an outward shift in the demand curve as transport systems and land use patterns become more automobile dependent, so people must drive more to maintain a given level of accessibility to goods, services and activities (Deakin, et al. 2020).[231]

Numerous studies explain these effects: short-term reductions in congestion followed by increases in the number and length of vehicle trips, particularly during peak periods, that reduces or eliminates the initial congestion improvements.[232] The Colorado General Assembly has recognized these impacts, requiring CDOT to consider "the impact on emissions . . . of induced demand resulting from regionally significant transportation capacity projects."[233]

The Agencies discount these impacts. The Agencies consider only one aspect of induced demand—that of rerouting traffic from surrounding roads.[234] But the Agencies ignore all of the

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[231] Litman, *Generated Traffic and Induced Travel: Implications for Transport Planning*, Victoria Transport Policy Institute 3 (Dec. 24, 2025). https://www.vtpi.org/gentraf.pdf

[232] *Id.* at 6–11.

[233] Colo. Rev. Stat. § 43-1-128; *see also* Ives Street Report at 8.

[234] *See* Ives Street Report at 9.

other mechanisms of induced demand.[235] With respect to long-term mechanisms, the DEIS claims that land use along the corridor is fixed and therefore no induced demand is possible.[236] This is wrong in several ways. Land use around the corridor is certainly not fixed and development has not stopped. Commerce City's long-range land use plan specifically calls for additional housing and denser housing in neighborhoods just north of I-270.[237] In fact, Commerce City specifically calls for the expansion of I-270 in order to "draw in desirable development" and "promot[e] quality industrial and commercial development" in the I-270 area.[238] The Adams County Comprehensive Plan similarly envisions shifting patterns of land use and growth in the areas surrounding I-270.[239] The Agencies' assertion that land use in the corridor is somehow fixed is thus directly contradicted by Commerce City's own development plans.

Further, land use directly around the corridor is far from the only factor in induced demand.[240] The corridor serves many trips that begin and end miles from the corridor itself.[241] Land use patterns in far-flung suburbs is certainly not fixed or established today. In fact, "it is very likely that an I-270 widening might incentivize new development in places where it would not

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[235] *Id.*

[236] *See, e.g.*, State GHG Tech. Report at 39.

[237] Commerce City 2045, Comprehensive Plan (Sept.29, 2023), https://www.c3gov.com/files/assets/city/v/1/clerks/documents/city-charter-amp-master-plans/final-approved-commerce-city-comprehensive-plan.pdf at 138–139.

[238] *Id.* at 97, 99; *see also id.* at 102 ("There is an opportunity to plan for a desirable mix of industrial, employment, and commercial" uses); 103 ("Higher-density residential types should be promoted" near the South Rose Hill neighborhood, just north of I-270); 103 ("High quality commercial and office space should be promoted" in the I-270 corridor subarea).

[239] *See, e.g.*, Adams County, Advancing Adams, *Comprehensive Plan* (Sept. 27, 2022), https://adamscountyco.gov/wp-content/uploads/2025/08/Advancing-Adams-Comp-Plan_2022.09.27_highres.pdf at 83–85 (describes plans to rezone and encourage new development patterns throughout the Welby area on the west end of I-270); *see also id.* at 53 (discussing county's growth and plans for continued growth in a variety of sectors).

[240] To the extent the Agencies are specifically focused only on land use changes within one-quarter of a mile from I-270, as the Agencies do in other sections of the DEIS, that amounts to an even more absurdly narrow and limited view of potential land use changes. *See* DEIS at 4-45.

[241] In response to requests by GreenLatinos and other groups, CDOT conducted an origin/destination study using StreetLight Data to assess the kind of trips that pass through I-270. That study found that more than 44% of trips in the corridor are long-distance between US-36 and Aurora, originating and ending in various suburbs. CDOT, *Project Update & Origin and Destination Webinar I-270* at 17:10 (Dec. 22, 2022) (https://www.youtube.com/live/SkQi8KuWmzI?themeRefresh=1.

otherwise have taken place," including "in more distant peripheral" places.[242] That is why "[h]ighway expansion can stimulate sprawl (dispersed, automobile-dependent development) which further increas[es] per capita vehicle travel."[243] The Agencies have completely ignored this type of induced demand by myopically focusing on land use around the corridor.

That myopic focus has also impacted the overall VMT estimates, as the Agencies report only VMT increases along the corridor, even though many trips do not begin or end on the corridor. A proper accounting would examine VMT increases across the system caused by the Build Alternatives, resulting in higher VMT numbers. Similar to the discussion in the previous section, the Agencies should have—but failed to—assess the results based on real-world experience for validation in a basic 'gut-check.' Such a comparison would have shown that the modeled results are unreliable and cannot support the DEIS. Instead, the Agencies offer post-hoc rationalizations to bolster the model's results, for example by arguing—against available evidence—that there will be no land use changes, and concluding that "VMT is not predicted to increase in the region as a direct result of" adding a lane.[244] GHG report at 39. But the model does not show that regional demand will not increase because of adding a lane; the model simply made assumptions about total regional demand, which were not grounded in reality.[245] The Agencies' arguments are circular and do not support valid findings.

The Agencies' claims that any new traffic on the corridor is only traffic shifting from other routes is also undermined by the experience from the recent I-70 widening. I-70 represents one alternate route that travelers can use instead of I-270, and vice versa. For that reason, the Agencies posit that increasing capacity on I-270 will draw some trips away from I-70. Conversely, increasing capacity on I-70 would draw some trips away from I-270. Under this theory, when I-70 was under construction and capacity was reduced, there should have been less traffic on I-70 and some portion of that traffic would have diverted to I-270. After construction ended, traffic on I-70 would rise, and the traffic diverting to I-270 would return to the widened I-70. And, indeed, I-70 did experience a large drop in vehicle counts during construction (a 22.2% decrease between 2017 and 2022), and a rebound after construction ended in mid 2023 (55.11% increase between 2022 and 2025, which equates to a 20.72% increase over pre-construction 2017 traffic).[246] But over these same periods, traffic on I-270 *also* modestly decreased between 2017 to 2022 (a

[242] Ives Street Report at 9.

[243] Litman, *Generated Traffic and Induced Travel*.

[244] State GHG Tech. Report at 39; *see also id.* at 32, 24, 28.

[245] *See* Section V.B.1, above.

[246] Summary of Historic Traffic Counts on I-270 and I-70. This data was gathered from CDOT's website, at https://dtdapps.coloradodot.info/otis/trafficdata#ui/1/1/2/station/000511/criteria/070A/273.249/278.952/false/true/. The data for I-270 is from continuous monitor 000507 (located southeast of York St), and the data for I-70 is from continuous monitor 000511 (located east of Dahlia St). The raw data is provided for various days throughout a given year in primary and secondary directions. Excel was used to calculate average traffic counts across the year, with the 2025 data ending on November 30, 2025.

1.98% drop), and then increased from 2022 to 2025 (by 4.46%). In total, between 2017 and 2025, traffic on I-270 increased by 2.39%. These data suggest that any traffic-shifting relationship between I-70 and I-270 is less direct or obvious than the Agencies suggest. Without further study and explanation—backed by granular, real-world data—the Agencies cannot wave away induced travel on I-270 as mere rerouting from nearby roads.

3. A true accounting of the impacts from adding a lane shows that the Build Alternatives will result in higher VMT and overall worse congestion than the No Action Alternative.

The Ives Street Report establishes that the Preferred Alternative would not solve congestion, but only push it around, creating bottlenecks and slowing traffic speeds elsewhere on the system. Ives Street concluded that the average traveler would see no benefit in travel times from the Preferred Alternative.[247] In fact, the Ives Street analysis used a lower-traffic baseline and other conservative assumptions, so in fact those "results almost certainly underestimate traffic levels in the *CDOT Widening Scenario*."[248] On average, access to jobs would actually decrease by 0.5%, meaning the average resident in the metro region would be able to reach 10,000 fewer jobs within 45 minutes.[249]

Residents of Adams County would be hardest hit by this decrease, in some areas suffering a dramatic loss in job access of up to 12%.[250] For example, residents of Thorncreek in Adams County "will lose the equivalent of over 200,000 jobs 45 minutes away."[251] At the expense of these Adams County residents, those living near U.S. 36, toward Boulder, would benefit from increased job access, creating inequities, including potential environmental justice and racial inequities, that the Agencies have failed to assess or consider.[252] In addition to the jobs impacts, the Preferred Alternative would cause overall greenhouse gases to increase by 1.2 million additional metric tons.[253] The Agencies are thus on track to spend a billion dollars in order to keep travel times the same, worsen job access, and increase pollution. The Agencies must reconsider this boondoggle.

Ives Street's findings further underscore the need for the Agencies to revisit and redo the modeling for the Preferred Alternative, using Dynamic Traffic Assignment, accounting for induced demand, constraining throughput to reflect realistic volumes, and making other improvements as recommended in the Marshall Report and Replogle Report. In addition, as Ives

[247] Ives Street Report at 30 ("The *CDOT Widening Scenario* will not provide any overall improvement to traffic congestion in the Denver region.").

[248] *Id.* at 31.

[249] *Id.* at 33.

[250] *Id.* at 34 Fig. 8.

[251] *Id.* at 33.

[252] *Id.* at 34 Fig. 8.

[253] *Id.* at 36.

Response to Comment 36

Comments noted.

Street explains, legitimate modeling must "[n]ot include an assumed ambient growth in traffic volumes unless it is justified by induced travel caused by other projects that have already been fully approved and funded;" "[i]nclude an estimate of induced travel from the project . . . in line with the range found in the literature consensus;" and "[i]nclude the effects that such induced travel would have on traffic conditions throughout the region, including on facilities far away from I-270."[254]

* * *

The DEIS models present data that is tailored to support the Preferred Alternative but does not reflect reality. Among other deficiencies, the model does not properly account for the physical limits to capacity per lane, shifts made by travelers in response to congestion, and induced demand caused by the project.[255] Instead, it "forecasts impossibly high base year and future year freeway volumes"; "myopically focuses on a small area"; and "calculates false benefits within that small area."[256] Improvements are readily available that would address these problems and make the modeling useful for planning.[257] The Agencies should remedy these deficiencies in modeling for a Supplemental EIS, including modeling the HCNWA.[258]

37 **C. The DEIS modeling does not comport with CDOT's own standards and guidance.**

The DEIS modeling does not comply with CDOT's own guidance and does not explain why it departs from that guidance.

38 ***First***, CDOT's 2023 *Traffic Analysis Guidelines* (TAG) identify Average Vehicle Occupancy (the average number of persons per vehicle, including transit, on the transportation facility or system) and Mode Split (the percent of travelers using each travel mode (Single-Occupant Vehicle, High-Occupancy Vehicle, transit, bicycle, pedestrian, *etc.*) as Measures of Effectiveness for project

[254] *Id.* at 2 (emphasis added).

[255] Marshall Report at 1, 30–32; *see generally id.*

[256] *Id.* at 29.

[257] *Id.* ("With the computer hardware and software available today, these problems can and should be fixed as soon as possible. Then the traffic forecasting models would be a useful tool for planning.").

[258] The Agencies should also consider modeling just the non-widening aspects of the Build Alternatives. The Agencies discuss at length the benefits that will accrue from updating the interchanges, adding ramp metering, and the like, which will help ease bottlenecks and congestion on the corridor. Yet the Agencies did not assess how *much* benefit would accrue from those portions of the Build Alternatives, instead automatically attributed all of the modeled changes to the addition of a new lane. This approach obscures the available options and inhibits the public from giving detailed comment on the separate pieces of the proposed preferred alternative.

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Response to Comment 37

Attachments A through C of Appendix E2, Traffic Technical Report, of the Draft EIS explain how the methodologies for traffic data collection and modeling were determined for this project. The methodologies were developed in collaboration with the Traffic Working Group, which included technical experts from FHWA, CDOT, DRCOG, and the consultant team. In general, the project's traffic analysis following CDOT guidance and only deviated when the Traffic Working Group determined that a different approach would work best for this corridor.

Response to Comment 38

Comments noted.

evaluation.[259] But the DEIS does not report those measures and does not explain why CDOT apparently views those measures as unimportant for the I-270 project. In fact, those measures would shed light on many of the problems at hand, especially as they relate to gauging the effectiveness of the Preferred Alternative against the HCNWA.[260] The data would also help the Agencies assess possible mitigation measures around transit and carpooling.

39 ***Second***, the overly narrow study area discussed above also disregards CDOT's TAG. The TAG explains that for "over-saturated conditions," the study area should "include upstream queueing," potentially extending the study area by "several miles."[261] These conditions clearly apply here, where even CDOT's flawed modeling shows over-saturated conditions through 2050. But the Agencies arbitrarily ignored this clear guidance without explanation or rationale.[262]

40 ***Third***, a key flaw in the DEIS's modeling is its failure to use Dynamic Traffic Assignment (DTA) tools.[263] CDOT's TAG explains that DTA tools should be used when the "study area includes a congestion transportation facility as well as its parallel facilities (or parallel capacity)."[264] In particular, "it may inform how much traffic redistribution to expect from one facility to another."[265] It is also useful because it "allows for temporal spreading (peak-hour spreading)," and specifically is an appropriate tool to use when examining additional capacity and managed lanes.[266] These exact conditions apply here, yet the Agencies arbitrarily declined to apply this critical tool.

VI. Air quality & climate

41 In light of the significant defects with the DEIS traffic analysis, the Agencies must redo the air quality and greenhouse gas analyses after the traffic analysis is corrected. This section provides comments on additional defects with the air quality and climate sections of the DEIS.

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[259] Replogle Report at 49.

[260] *See generally* Minett Report.

[261] CDOT, *Traffic Analysis and Forecasting Guidelines* at 34 (Jan. 2023), https://www.codot.gov/safety/traffic-safety/assets/traffic_analysis_forecasting_guidelines/traffic_analysis_forecasting_guidelines

[262] *See* Replogle Report at 50 (concluding that the "DEIS microsimulation study area should have encompassed more of I-70 and I-25").

[263] *See* Marshall Report at 29; *see also* Replogle Report at 23, 42–45, 51–53.

[264] CDOT, *Traffic Analysis and Forecasting Guidelines* at 129 (Jan. 2023), https://www.codot.gov/safety/traffic-safety/assets/traffic_analysis_forecasting_guidelines/traffic_analysis_forecasting_guidelines

[265] *Id.*

[266] *Id.* at 50–51.

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Response to Comment 39

Comments noted.

Response to Comment 40

Comments noted.

Response to Comment 41

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Since the Draft EIS traffic analysis was not flawed, neither the federal air quality nor the state air quality and greenhouse gas analyses are required to be redone.

42

A. Background

Pollution from the transportation system—including from traffic and from construction impacts—causes asthma, lung cancer, heart disease, respiratory illnesses, and death. These health impacts are primarily caused by fine particular matter (PM), ground-level ozone precursors, nitrogen oxide, and carbon monoxide emitted from vehicles.[267] Localized pollution means that communities overburdened by traffic are most at risk. Living near major roads, particularly between roughly 150 to 5,000 feet, increases the risk of asthma and reduced lung function, the onset of childhood asthma, and cardiovascular death.[268]

PM is fine particulate matter that can be made up of hundreds of different chemicals and comes from many sources including vehicle exhaust, construction, fires, and more.[269] When this microscopic particulate material enters the lungs, serious health problems result. It causes premature death, asthma, aggravated asthma, decreased lung function, difficulty breathing and more.[270] PM also exacerbates severity of Covid-19 outcomes; even a "small increase in long-term exposure" to PM results in a "large increase" in deaths from Covid-19.[271] Smaller particulate matter—PM2.5—particularly diesel exhaust, penetrates deep into the lungs, triggering asthma attacks, bronchitis, and permanently impairing lung development in children.[272] Fine particulate matter is directly linked to heart attacks, strokes, and premature death.[273]

Ground-level ozone, caused in part by the transportation sector, has plagued Coloradans for decades. Ozone results from a chemical reaction between sunlight, heat, and a mix of pollutants

[267] Shireen Malekafzali, *Healthy, Equitable Transportation Policy Recommendations and Research*, PolicyLink Prevention Inst. Convergence P'ship 22 (last visited Jan. 16, 2026), https://www.preventioninstitute.org/sites/default/files/publications/Healthy%20Equitable%20Transportation%20Policy%20Recommendations%20and%20Research.pdf.

[268] Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects, Health Effects Inst. 3–4 (2010), https://www.healtheffects.org/system/files/SR17TrafficReview_Exec_Summary.pdf.

[269] EPA, *Particulate Matter (PM) Basics*, (last visited Jan. 18, 2026), https://www.epa.gov/pm-pollution/particulate-matter-pm-basics#PM.

[270] EPA, *Health and Environmental Effects of Particular Matter (PM)*, https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm (last visited on Jan. 16, 2026).

[271] X. Wu et al., *Air pollution and Covid-19 mortality in the United States: Strengths and limitations of an ecological regression analysis*, 6 Sci. Advances (2020), https://projects.iq.harvard.edu/covid-pm.

[272] American Lung Association, *Health Impact of Air Pollution*, https://www.lung.org/research/sota/health-risks.

[273] EPA, *Air Pollution and Cardiovascular Disease Basics*, https://www.epa.gov/air-research/air-pollution-and-cardiovascular-disease-basics.

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Response to Comment 42

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

such as nitrogen oxides and volatile organic compounds that are produced by industrial facilities, electric utilities, and motor vehicle exhaust.[274] Ozone pollution aggravates lung diseases such as asthma, and children and the elderly are particularly vulnerable. This asthma vulnerability compounds with the heightened health vulnerability that children living near high traffic areas and highways already face. As a result of ozone pollution, Coloradans are faced with unnecessary asthma attacks, missed days of school and work, and premature death.

This summer, Coloradans living on the Front Range suffered through 23 days above the federal ozone standards—despite "favorable meteorology" in 2025.[275] The Denver Metro/North Front Range area has been in nonattainment with federal ozone standards for well over a decade. It is currently designated as a "severe" nonattainment area for the 2008 75 parts per billion (ppb) ozone standard, and Colorado plans to request voluntary redesignation to "severe" status for the 2015 70 ppb standard, as the state's own modeling could not show future attainment for the nonattainment area.[276] Further ozone status downgrades are likely, as design values continue to exceed even the less-stringent 75 ppb standard.[277]

All of these health harms lead to higher expenses for individuals and for Colorado in the form of higher health care costs. Air pollution is documented to cause significant increases in health care costs.[278] For patients using Medicaid, Medicare, and other government-subsidized health plans, those expenses can translate directly to expenses for the government. Adams County, for example, has over one billion dollars in annual expenditures for Health First Colorado (the state's Medicaid program).[279]

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[274] EPA, *Ground-level Ozone Basics*, https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#formation (last visited on Jan. 16, 2026).

[275] RAQC, *2025 Ozone Season Data Shows Improvement From Favorable Meteorology, But Nonattainment Area Continues to Be Out of Compliance* (Oct. 9, 2025), https://raqc.org/2025-ozone-season-data/; M. Ogletree, CDPHE, Letter to Regional Air Quality Council Board (Mar. 28, 2025), https://wp-cpr.s3.amazonaws.com/uploads/2025/10/doc02103020251016091826.pdf

[276] Colorado Department of Public Health & Environment, *Federal ozone pollution standards and Colorado nonattainment areas* (last visited Jan. 18, 2026), https://cdphe.colorado.gov/nonattainment-federal-ozone-pollution-standards.

[277] RAQC, *Denver Metro/North Front Range Area – 2025 8-Hour Ozone Summary* (Sept. 28, 2025), https://raqc.egnyte.com/dl/CWRPkGpbJ9Gb

[278] *See, e.g.,* Howard G. Birnbaum et al., *Measuring the Impact of Air Pollution on Health Care Costs*, 39 Env't Health 2113 (Dec. 2020), https://www.healthaffairs.org/doi/epdf/10.1377/hlthaff.2020.00081.

[279] Colorado Department of Health Care Policy & Financing, *Adams County Fact Sheet: Fiscal Year 2025*, https://hcpf.colorado.gov/sites/hcpf/files/Adams%20County%20Fact%20Sheet%20FY25.pdf.

Beyond air pollution impacts, transportation also has an outsized effect on the climate crisis. In 2023, the transportation sector was the largest source of GHG emissions in Colorado.[280] The state's Air Pollution Control Division projects that transportation will remain the largest share of GHG emissions through 2050, and explains that "transportation remains the most challenging source to decarbonize."[281] These emissions are exacerbating the climate crisis, which is already hitting home with increased severe weather events. For example, 2020 was the state's most active fire season in recorded history, scorching over 700,000 acres.[282] Governor Polis has recognized that the size of these destructive fires is due to a "hotter, drier climate."[283] And eight of the ten warmest years on record for the state have occurred since 2012.[284] As the director of the Colorado Energy Office has noted, these severe impacts of climate change are "happening much earlier than expected."[285] Despite the urgency of the need to reduce emissions from the transportation sector, Colorado remains off track to comply with *any* of the statutory greenhouse gas emission reduction targets of 50% by 2030 (compared to 2005 levels), 65% by 2035, 75% by 2040, and 90% by 2050.[286] Even when accounting for planned-but-not-adopted actions, contemplated in the "near term action," or NTA, scenario, Colorado is off track for all future targets, with the gap widening beyond 2030.[287] Given the transportation sector's major contributions to this problem, it is critical that all planning—including for the I-270 project—take a hard and realistic look at the climate impacts.

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[280] Colorado Air Pollution Control Division, *2025 HB19-1261 GHG Emission Reduction Progress Report* at 4.

[281] *Id.* at 7.

[282] Wilson Beese, *Looking back at Colorado's historic 2020 wildfire season*, 9News (May 2, 2021), https://www.9news.com/article/news/local/wildfire/colorado-2020-historic-wildfire-season/73-c9458147-c945-45e6-bea9-a1d426cca102; Hillary Rosner, *Boulder, Colorado wakes up to the threat of worsening wildfires*, Nat'l Geographic (Oct. 26, 2020), https://www.nationalgeographic.com/environment/article/boulder-isnt-ready-to-evacuate-for-wildfires.

[283] John Fialka, *Colorado Contends with Record-Setting Wildfires*, Sci. Am. (Oct. 26, 2020), https://www.scientificamerican.com/article/colorado-contends-with-record-setting-wildfires1/.

[284] Tegan Wendland, *2025 was one of the warmest years on record for Colorado*, CPR News (Dec. 21, 2025), https://www.cpr.org/2025/12/21/2025-weather-one-of-colorados-warmest-years/.

[285] Bruce Finley, *As Colorado wildfires burn, fears that climate change is causing "multi-level emergency" mount*, Denver Post (Oct. 25, 2020), https://www.denverpost.com/2020/10/25/colorado-wildfires-climate-change/.

[286] Colo. Rev. Stat. § 25-7-102(2)(g) (establishing targets); Colorado Air Pollution Control Division, *2025 HB19-1261 GHG Emission Reduction Progress Report* at 9.

[287] Colorado Air Pollution Control Division, *2025 HB19-1261 GHG Emission Reduction Progress Report* at 9.

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B. The DEIS air analysis deliberately excludes pertinent information and contains other errors.

FHWA arbitrarily declined to include "greenhouse gas emissions and climate change analyses in the federal environmental review process."[288] FHWA's failure to analyze reasonably foreseeable impacts matters because "FHWA is the lead agency for this EIS process (42 USC 4336a(a)(1)(A)), which is the agency that has project approval or disapproval authority."[289]

Similarly, the DEIS must fully consider the information included in the state-only Air Quality Technical Report, as well as the criticisms described in this comment letter. For example, the DEIS ignores the hot-spot analyses included in the state-only air quality technical report, instead stating only that hot-spot analyses are not required.[290] The air quality analysis included in the state-only report is plainly an important aspect of the problem. FHWA cannot ignore information relevant to the environmental impacts of the proposed project.[291] It is obligated to consider all reasonably foreseeable impacts, which include impacts that the other agency on this project—CDOT—has identified. The DEIS instead only reports out expected levels of PM with no context or further explanation[292] and does not discuss the expected impacts and health harms of that pollution, from both construction and long-term use of the corridor, beyond two cursory and generalized sentences.[293] That discussion falls far short of NEPA's goal of ensuring that the public can understand the impacts of the project.

The DEIS also fails to adequately consider the impacts of ozone precursors. With respect to ozone precursors, the DEIS calculates emissions but otherwise does not discuss or consider how those pollutants will impact health in the region.[294] The DEIS instead relies on earlier conformity

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[288] DEIS at 4-10; *see also id.* at 1-3 (providing that greenhouse gas emissions and climate change impacts "will not be considered in the federal decision" and "no greenhouse gas emissions or climate change analyses are included in this Draft EIS" and "draft EIS does not consider public comments regarding greenhouse gases, climate change, or environmental justice").

[289] DEIS at 1-5. Although the state-level greenhouse gas analysis is excluded from the DEIS, the DEIS air quality analyses and the state-only greenhouse gas analysis utilize the same models, inputs, and approaches; therefore, except where noted, the errors identified in this section apply to both analyses. *Compare* State GHG Tech. Report at Greenhouse Gas Analysis: Work Plan *with* DEIS App'x E3 at I-270 Air Quality Analysis Work Plan (describing identical MOVES Runs approaches and inputs).

[290] DEIS App'x E3 at 21.

[291] This is especially true where, as here, FHWA was involved in the process that led to the results which it now ignores. *See, e.g.*, State Air Q. Tech. Report at App'x B p. B-2 (describing FHWA advising and giving input on the air quality work plan).

[292] DEIS App'x E3 at 24.

[293] *Id.* at 4.

[294] *Id.* at 24.

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Response to Comment 43

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

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determinations. But the possibility that the project will not impact conformity (a possibility thrown into doubt by changes in federal policy, discussed below) does not excuse the Agencies from examining the likely health impacts of increased ozone levels due to increased precursors. Any amount of additional ozone pollution can impact health. At minimum, the DEIS must examine the precursor impacts and compare them with Colorado's inventories of ozone precursors and analyses of ozone sensitivity to changes in the precursors in order to assess the potential impacts of the project on ozone. Given the longstanding and severe impacts of ozone pollution in the Denver metro area, the DEIS's complete failure to examine the potential ozone impacts beyond two sentences summarizing the health harms is completely inexcusable.[295]

Numerous additional flaws taint the air quality and greenhouse gas emissions modeling. For example, the modeling excludes heavy-duty vehicle emissions from the managed lanes. Throughout the DEIS, the Agencies assert that "travelers, including freight trucks, could pay a fee to use the new Express Lane."[296] The agencies tout this as a benefit that will help truck speeds. But the air modeling excludes buses and trucks from the Express Lanes, asserting that "the Express Lanes in the Build Alternatives . . . will only permit usage by light-duty vehicles and buses."[297] The Agencies therefore arbitrarily excluded both truck and bus emission from the express lanes. Alternatively, if the Agencies do not, in fact, intend to permit trucks to travel in the express lanes, then the DEIS is misleading, inaccurate, and does not serve to inform the public about the impacts of the proposed project.

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C. The state-only Air Quality Technical Report suffers from numerous flaws and, even still, shows that the Preferred Alternative will cause or contribute to new violations of the NAAQS.

The state-only air quality analysis models future violations of the NAAQS, which the DEIS completely ignores. The analysis is infected with many of the same flaws discussed elsewhere in these comments; remedying those flaws would likely result in even more significant NAAQS violations.

First, like the DEIS air analysis, the state-only analysis again focuses on a too-narrow impacted area.[298] But the Ives Street Report shows that congestion and bottlenecks will occur off the corridor, on I-25 and I-70, leading to additional vehicles and pollution.[299] The air analysis fails to examine these reasonably foreseeable impacts. In addition, like the DEIS air analysis, the state-only analysis presents modeled estimates from 2050 only.[300] But emissions will be higher in the near to medium term, due to lower fleet turnover and less efficient vehicles in that timeframe. By

[295] *See id.* at 4.

[296] *Id.* at 20.

[297] DEIS App'x E3 Air Q. Analysis Work Plan at 6; State GHG Tech. Report at 21.

[298] *See* State Air Q. Tech. Report at 13 n.8

[299] Ives Street Report at 30–31.

[300] *See* State Air Q. Tech Report at 22–24, Tbls. 4–7; 29 Tbls. 12–13; *see id.* at 30–31 (2050 is "the modeled design year").

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Response to Comment 44

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

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focusing only on 2050, the analysis obscures the higher impacts in, say, 2035, and fails to assess all reasonably foreseeable impacts. And, as described in the following section, the modeling contains the same faulty and overly optimistic assumptions as the DEIS's modeling regarding fuel efficiency and pollution per vehicle. Each of these problems would likely have a sizeable impact on the modeling results, resulting in a higher emissions burden for impacted communities.

The state-only air quality analysis also unreasonably excludes data from 2024 from the background concentration assessments, skewing the results. The background concentrations were derived using data from 2019, 2022, and 2023.[301] Although the DEIS was not published until November 2025, the analysis excluded data from 2024—data that showed much higher levels of PM10. Specifically, measured values of PM10 were over 50% higher than in 2023 for the Commerce City monitor, and over 45% higher at the Welby monitor.[302] In addition, CDOT states that the background concentrations "excluded days that were impacted by wildfire smoke."[303] But CDOT does not explain how those determinations were made and which days were excluded, or provide the underlying data, stymying the public's ability to assess the validity of those exclusions.

Excluding wildfire-impacted days when assessing NAAQS compliance is a formal process governed by EPA's Exceptional Events Rule (EER).[304] That process requires rigorous analysis. Only after data is excluded under the Exceptional Events Rule can it be "excluded from . . . selecting appropriate background concentrations for . . . transportation conformity hot spot analyses."[305] Even then, whether the data can be excluded from hot spot analyses is determined by EPA on a "case-by-case basis."[306] CDOT cannot circumvent the EER by simply asserting that data is excludable. It must follow the legal process for doing so. Short of that, the data must be included in the hot spot analysis. To the extent that CDOT artificially tries to create a distinction that it is conducting the hot spot analysis outside of the DEIS or outside of when such analyses are typically required, that distinction arbitrarily ignores the purpose of CDOT's modeling, which is to comply with Colorado's enhanced statutory requirements[307] and address community concerns about whether air quality conforms with the NAAQS. To address those concerns

[301] *Id.* at 26.

[302] *Id.* at 11 Tbl. 2.

[303] *Id.* at 26.

[304] *See* 42 U.S.C. § 7619(b).

[305] 81 Fed. Reg. 68229 (Oct. 3, 2016); *see also* 40 C.F.R. § 50.14 (enumerating the types of regulatory determinations that exceptional events data can be excluded from)

[306] 40 C.F.R. § 50.14(a)(1)(i)(F).

[307] Colo. Rev. Stat. § 43-1-128 requires the use of "federal environmental protection agency-approved models to determine air pollutant emission impacts," clearly establishing that any modeling performed must abide by federal standards.

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Response to Comment 45

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

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necessarily requires abiding by the federal requirements that apply to NAAQS determinations—a federal standard—including hot spot conformity analysis.

These deficiencies led to an absurd result: the background concentrations used for modeling are in some cases lower than the measured values over the past several years. For PM10, the selected background concentration used for modeling is just 92 µg/m3.[308] That value is lower than the maximum values reported by CDOT from two different monitors across five years.[309] For the 24-hour PM2.5 background concentration, the 'representative' concentration is 20 µg/m3—lower than all but one of the measured maximum values.[310] The annual PM2.5 "representative" background concentration is set at 8.1 µg/m3; the calculation of this value is similarly inscrutable, as it is lower than three of the five measured values reported by CDOT.[311] If CDOT believes the pollutant concentrations reported in Table 2 of the state air quality report are not the appropriate background levels to use for modeling, it must explain that choice and present the data that does form the basis of the appropriate background levels. And it must further explain how those lower values will allow for adequate modeling of the highest-emission days, which are represented in Table 2.

Even with all of these flaws, the state-only analysis goes on to report modeled values that exceed the NAAQS at multiple sensitive receptors. In the face of these alarming results, CDOT simply shrugs. CDOT does not explain how the project can continue in the face of expected violations of the NAAQS—nor can it. The analysis reports design values above 9.0 µg/m3 (the NAAQS) at three parks.[312] Even allowing for values under 9.5 to be rounded down and considered in attainment, two parks—Northfield Pond and Wetland—both exceed the NAAQS, with the highest modeled value being 11.1 µg/m3 at Northfield Pond under the Preferred Alternative.[313]

CDOT fails to discuss the implications of these findings or address how it can legally proceed when the modeling shows violations of the NAAQS.[314] In its conclusion, CDOT simply ignores the modeled violations.[315] To the extent that CDOT relies on high modeled values for the No

[308] State Air Q. Tech. Report at 27 Tbl. 10.

[309] *Id.* at 11 Tbl. 2 (lowest measured PM10 value since 2020 is 95 µg/m3, across two monitors).

[310] *Id.* (lowest measured 24-hour PM2.5 value since 2020 is 16.4 µg/m3, with the next-lowest value at 21.5 µg/m3, and the highest at 27.8 µg/m3).

[311] *Id.*

[312] *Id.* at 36 Tbl. 17.

[313] *Id.* Miraculously, the analysis also reports maximum 24-hour averages of PM10 more than 40% lower than measured values from 2024. *Id.* at 34 Tbl. 15. This anomalous result further underlines the critical nature of flaws described above.

[314] *See* 42 U.S.C. § 7506(c). Irrespective of whether CDOT believed it was required to do hotspot modeling, the fact that it did hotspot modeling and found NAAQS violations means the project will violate the Clean Air Act—an unacceptable result.

[315] *See* State Air Q. Tech. Report at 55–57.

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Response to Comment 46

This comment is not applicable to the Draft EIS. Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

Action Alternative as a comparison point, it is wrong to do so. First, the highest modeled exceedance occurs under the Preferred Alternative, not the No Action Alternative. In fact, both Northfield Pond Park and Wetland Park will suffer from higher design concentrations of annual PM2.5 under the Preferred Alternative than the No Action Alternative.[316] Further, CDOT's modeled estimates for the No Action Alternative are absurdly high, because they are based on traffic estimates that are physically impossible, as described above. CDOT cannot rely on its inflated No Action Alternative estimates to downplay the harmful impacts of the project.

Nor can it dismiss alarming findings on the basis that "all models have associated uncertainties and limitations."[317] While true, that does not grant an agency permission to ignore inconvenient results—especially as model uncertainties could mean that actual pollutant concentrations will be higher, not lower. In fact, it is precisely for that reason—avoiding underestimating effects—that EPA recommends use of the flat terrain AERMOD option, yet CDOT uses that recommendation to downplay the results of its findings.[318] Uncertainties in modeling tools—and recommended approaches stemming from that uncertainty—should compel CDOT to take a more conservative approach in its decisionmaking, not to disregard findings of harmful effects.

Most gallingly, CDOT dismisses the harms to nearby communities, claiming that that the project makes "minimal contributions" to PM pollution "relative to the background concentrations."[319] This statement highlights the embedded attitude toward south Commerce City and north Denver as sacrifice zones.[320] These communities currently suffer from elevated PM levels, but, fortunately, those levels are still below the NAAQS. CDOT's own modeling shows that in future years, those PM levels will push past the NAAQS health-based standards due to traffic on I-270, and the highest violations will occur under the Preferred Alternative. Yet CDOT believes these impacts are "minimal" because residents in the area are already burdened with high background levels of this harmful pollution. The community should not have to accept additional pollution simply because there is already pollution in their neighborhoods. To the contrary, the elevated levels of background concentrations heighten the need to *reduce* pollution, not add more. CDOT's attitude is unacceptable and reflects a failure to grapple with Colorado's environmental justice statutes and goals.

D. The Agencies fail to assess reasonably foreseeable impacts in light of federal regulatory and statutory changes.

47 The DEIS fails to examine the reasonably foreseeable impacts of the proposed project by failing to consider recent and impending regulatory changes. These changes threaten to greatly increase tailpipe emissions, including greenhouse gas emissions, NOx, PM, and criteria and other

[316] *See id.* at 36 Tbl. 17.

[317] *Id.* at 37.

[318] *Id.* (claiming that the complex terrain AERMOD option would have resulted in lower estimates for some receptors).

[319] *Id.* at 33.

[320] *See* Section I, above.

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Response to Comment 47

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

The federal air quality analysis and state air quality and greenhouse gas analyses use the best available information and model at the time that modeling was conducted, which is what FHWA requires for NEPA.

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pollutants. FHWA arbitrarily and capriciously ignores these regulatory changes, contradicting the federal government's position in other proceedings. At minimum, the Agencies must examine the full range of reasonably foreseeable impacts, which include assessing the impact on project emissions from both finalized and pending actions at the federal level.

The DEIS's projections rely heavily on vehicle emission standards and regulations to support its finding that air emissions will substantially decrease by 2050. For example, the DEIS asserts that criteria pollutant emissions will vastly decrease by 2050 due to "the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover."[321] Similarly, the air quality documents state that modeled MSAT emission decreases are "consistent with EPA's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050 (FHWA 2023a)."[322] In particular, the model relies on national trend data that "projects substantial overall reduction in MSAT emissions *due to stricter engine and fuel regulations issued by EPA*."[323] And with respect to diesel PM, the DEIS claims that "[t]he much larger decrease in estimated emissions of diesel PM between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050."[324] Likewise, the state-only GHG report relies on the same inputs, including data that reflects implementation of Colorado Clean Cars and Advanced Clean Truck Rules.[325]

The DEIS relies on the Moves4 model for its estimates of air emissions. That version of the model relies on inputs that are derived from numerous emissions regulations that are now under threat. First, the Moves 4.0.1 version is from August 2023,[326] which predates significant changes in federal tailpipe standards. Since that time, EPA has issued draft rules that would entirely revoke federal greenhouse gas standards for vehicles.[327] As of January 20, 2026, the final revocation rule is at the Office of Management and Budget for review—the final step before rule issuance, which is expected within a matter of weeks.[328]

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[321] DEIS at 4-14.

[322] DEIS App'x E3 at 25; State Air Q. Tech. Report at 24.

[323] State Air Q. Tech. Report at App'x F MSAT Disc. p. F-1; DEIS App'x E3 at I-270 Air Quality Analysis MSAT Disc. at 1.

[324] DEIS at 4-15; State Air Q. Tech. Report at 24; DEIS App'x E3 at Air Q. Tech. Report at 25.

[325] State GHG Tech. Report at Greenhouse Gas Analysis: Work Plan at 5.

[326] State GHG Tech. Report at 17 n.1; *id.* at Air Q Analysis Methods at 4 ("default parameters in MOVES").

[327] 90 Fed. Reg. 36288 (Aug. 1, 2025).

[328] Reginfo.gov, Dashboard, *Regulatory Actions Currently Under Review by Agency* (last visited Jan. 18, 2026), https://www.reginfo.gov/public/jsp/EO/eoDashboard.myjsp?agency_cd=0000&agency_nm=All&stage_cd=2&from_page=index.jsp&sub_index=0.

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Response to Comment 48

The federal air quality analysis and state air quality and greenhouse gas analyses use the best available information and model at the time that modeling was conducted, which is what FHWA requires for NEPA.

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These standards obviously affect assumptions about greenhouse gas emissions, and the standards also had significant co-benefits for other pollutants. For example, the revocation of the greenhouse gas standards will increase PM emissions, costing up to $4.2 billion dollars in health harms under the federal government's own estimates.[329] This is likely a severe underestimation of the true costs of the repeal: the Environmental Defense Fund estimates that the repeal of these standards would result in nationwide emissions of GHGs between 9.1 and 17.9 billion metric tons, NOx would increase between 2.4 and 4.7 million US tons, PM would increase between 68,000 and 169,000 US tons, and SOx would increase between 37,000 and 54,000 US tons.[330] The net costs due to PM 2.5-related health harms caused by emission increases from all vehicles would be up to $256 billion. Climate harms amount to up to another $3.9 trillion.[331] The Natural Resources Defense Council estimates that the additional air pollution caused by this action will be responsible for roughly 5,800 deaths and 3,500 hospital visits.[332] The Agencies cannot simply ignore the significant change that this new policy will wreak on vehicle emissions.

Legislation passed by Congress in 2025 has effectively gutted the Corporate Average Fuel Economy (CAFE) standards' effectiveness by setting fines for non-compliance at $0.[333] These standards require increasing fuel efficiency, leading to reduced emissions. The standards are now essentially unenforceable—but the DEIS fails to consider this or account for the resulting emissions impacts, which would be significant. In addition, the Department of Transportation has issued draft rules to weaken the underlying CAFE standards.[334] This rollback means that future model years will likely be less fuel-efficient, causing a greater amount of tailpipe emissions. Notably, when standards stay stagnant, fuel economy also does *not* improve in the real world.[335] In other words, the standards are, in fact, what drives fuel efficiency improvements. The Department of Transportation acknowledges in the rulemaking docket that the changes will

[329] EPA, *Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, Draft Regulatory Impact Analysis* (July, 2025), https://www.epa.gov/system/files/documents/2025-07/420d25003.pdf.

[330] Comments of Envt'l and Pub. Health Organizations to U.S. Envt'l Prot. Agency at 16 (Sept. 22, 2025), https://library.edf.org/AssetLink/p4j47orurd537p3vmaas230eywsm71x5.pdf?_gl=1*tbjoe9*_gel_au*MjAxODY1NDg0MC4xNzY1ODM3NDIz*_ga*NjEzNjM5NjIzLjE3NjU4Mzc0MjQ.*_ga_2B3856Y9QW*czE3Njg0NTQ4ODQkbzMkZzEkdDE3Njg0NTQ4OTIkajUyJGwwJGgw.

[331] *Id.*

[332] *Id.* at 18.

[333] H.R. 1, Section 40006 (July 4, 2025).

[334] 90 Fed. Reg. 56438 (Dec. 5, 2025).

[335] The Equation, *5 Reasons Trump's Fuel-Economy Standards Rollback Is a White Elephant Gift No One Wants*, Union of Concerned Scientists, (Dec. 18, 2025), https://blog.ucs.org/dave-cooke/5-reasons-trumps-fuel-economy-standards-rollback-is-a-white-elephant-gift-no-one-wants/

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Response to Comment 49

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

The federal air quality analysis and state air quality and greenhouse gas analyses use the best available information and model at the time that modeling was conducted, which is what FHWA requires for NEPA.

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impact emissions of carbon monoxide, VOCs, NOx, SOx, PM, CO2, methane, and nitrous oxide.[336]

50 In addition, EPA is considering weakening the federal standards for criteria pollutants, including NOx ,VOCs, and PM. Interagency review documents for EPA's proposal to rescind the 2009 endangerment finding and all vehicle GHG standards show that the White House Office of Management and Budget "urge[d] EPA to take separate action . . . to reconsider and replace . . . criteria pollutant emissions standards as well."[337] EPA separately announced in a March 2025 statement that the agency is reevaluating the 2022 standards, which reduce NOx emissions from heavy-duty vehicles.[338] Reuters likewise reported on December 11, 2024 that EPA is planning to delay enforcement of criteria pollution standards.[339] And EPA Assistant Administrator Aaron Szabo noted recently in The Hill that in 2026 "Americans can expect to see the reconsideration of two regulations—one pertaining to Model Year 2027 and Later Light-and Medium-Duty Vehicles, and the 2022 Heavy-Duty Engine and Vehicle NOx rule."[340] Such rollbacks would further increase tailpipe emissions, harming public health and undermining the validity of the DEIS' air quality analyses as well as the separate state-only GHG analysis.

51 Finally, the DEIS also relies on state-level regulations that, according to the federal administration, are no longer enforceable. A key input for the Moves model is the amount of fuel used. The DEIS states that, to project fuel usage, the Agencies adjusted MOVES using "Alternate Vehicle Fuel and Technology" (AVFT) data.[341] The AVFT data was intended "to reflect the future zero emission vehicle (ZEV) fleet resulting from the state's adoption of the Colorado Clean Cars and Advanced Clean Trucks rules."[342] The state-only GHG analysis also relies on this AFVT data, which contains information about zero-emission vehicle sales and fleet turnover "to reflect the future zero emission (ZEV) fleet resulting from the state's adoption of the Colorado Clean

[336] 90 Fed. Reg. at 56509 n.286.

[337] EPA, *Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards* (draft, annotated) https://subscriber.politicopro.com/eenews/f/eenews/?id=0000019a-368f-d346-affb-3faf063e0000 (see comment on pg 92); *see also* https://www.regulations.gov/document/EPA-HQ-OAR-2025-0194-0090.

[338] EPA, *EPA Announces Action to Implement POTUS's Termination of Biden-Harris Electric Vehicle Mandate* (Mar. 12, 2025), https://www.epa.gov/newsreleases/epa-announces-action-implement-potuss-termination-biden-harris-electric-vehicle.

[339] Shepardson, David. *US EPA Considering Two-Year Delay Enforcing Biden Vehicle Pollution Rule*, Reuters, (Dec. 11, 2024), https://www.reuters.com/sustainability/climate-energy/us-epa-considering-two-year-delay-enforcing-biden-vehicle-pollution-rule-2025-12-11/.

[340] Szabo, Aaron. *EPA will keep its foot on the gas in 2026, ending burdensome regulations,* The Hill (Dec. 19, 2025), https://thehill.com/opinion/energy-environment/5653704-epa-will-keep-its-foot-on-the-gas-in-2026-ending-burdensome-regulations/.

[341] *See, e.g.*, DEIS App'x E3 at *I-270 Air Quality Analysis: Work Plan* p. 5 Tbl. 2.

[342] *Id.* at 6.

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Response to Comment 50

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

The federal air quality analysis and state air quality and greenhouse gas analyses use the best available information and model at the time that modeling was conducted, which is what FHWA requires for NEPA.

Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

Response to Comment 51

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. The Draft EIS does not rely on state-level regulations and conducted the air quality analysis that is still required under NEPA. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

The federal air quality analysis and state air quality and greenhouse gas analyses use the best available information and model at the time that modeling was conducted, which is what FHWA requires for NEPA.

Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

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Cars and Advanced Clean Trucks rules."[343] Those rules are responsible for significant reductions in emissions as well as health-related savings.[344] But Congress has attempted to remove the authority for Colorado to enforce those regulations, by purporting to use the Congressional Review Act to revoke the underlying waivers.[345] Although litigation concerning the matter is pending, EPA is defending the Congressional action in court, and the federal administration's position is that the underlying rules are unenforceable.[346]

FHWA cannot have it both ways: it is arbitrary and capricious for the agency to simultaneously claim that these rules are not in effect while taking credit for substantial emission reductions resulting from the rules. The Agencies also overlook an important aspect of the problem by refusing to acknowledge or account for the potential regulatory impacts of the federal actions, and fail to examine reasonably foreseeable impacts on emissions caused by the project.

All of these flawed assumptions infect another aspect of the problem: the underlying conformity demonstrations for DRCOG's 2050 Metro Vision Regional Transportation Plan (2040) and 2024–2027 Transportation Improvement Plan (2025).[347] NEPA requires that agencies examine all reasonably foreseeable impacts of the project, including impact to ozone precursors that could jeopardize the Denver Metro/North Front Range's ability to attain the NAAQS. The Clean Air Act's separate conformity requirements do not absolve the Agencies of this requirement. The DEIS unreasonably relies on conformity analyses that are infected with the same flawed assumptions as the air quality modeling, as described above: the conformity analyses were conducted prior to federal rollbacks of emissions standards. Thus, in assessing the reasonably foreseeable impacts of the I-270 project, the Agencies must analyze the projected increases in ozone precursors and consider how the increases may affect ozone levels, including by considering the Colorado Regional Air Quality Council's inventories of precursors and related sensitivity analyses. And, as explained in these comments, that analysis must include not just 2050 but also the near-term years. The importance of this analysis is heightened by recent air

[343] State GHG Tech. Report at *Greenhouse Gas Analysis: Work Plan* p. 5.

[344] *See* CDPHE, Cost-Benefit Analysis, Regulation Number 20 (Apr. 7, 2023) (Advanced Clean Trucks benefits estimates); CDPHE, Cost-Benefit Analysis, Regulation Number 20 (Oct. 19–20, 2023) (Advanced Clean Cars II benefits estimates).

[345] *See* First Amended Complaint for Declaratory and Injunctive Relief, *State of California, et al. v. United States of America, et al.*, 4:25-34-04966-HSG, N.D. Cal. (Oct. 10. 2025). https://cdn.climatepolicyradar.org/navigator/USA/2025/california-v-united-states_36bef29ba6e74e78e24fdbb188aa0df8.pdf (complaint challenging Congressional action).

[346] *See, e.g.*, EPA, *EPA Administrator Zeldin Celebrates President Trump Officially Ending California's Vehicle Waivers, Delivering Another Major Blow to the EV Mandate* (Jun, 12, 2025), https://www.epa.gov/newsreleases/epa-administrator-zeldin-celebrates-president-trump-officially-ending-californias.

[347] *See* DEIS App'x E3 at 9.

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Response to Comment 52

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

The federal air quality analysis and state air quality and greenhouse gas analyses used assumptions consistent with federal and state laws and regulations as the time of commencement, which is what FHWA requires under NEPA.

Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

quality monitoring showing high levels of pollution concentrations, potentially exceeding the federal NAAQS and causing real harm to people.[348]

53 **E. The Agencies ignore state-level directives and known trends concerning the impact of emissions.**

In addition to underestimating likely emissions, as described above, the Agencies failed to consider an important aspect of the problem: state-level directives and trends concerning the known impacts of emissions on health and climate.

54 ***First***, the state-only greenhouse gas report presents data using various discount rates. CDOT asserts that "no consensus exists on the appropriate [discount] rate to use."[349] But state law requires CDOT to, "when estimating the social costs of greenhouse gas pollution, base [its] estimate . . . using a discount rate that is two and one-half percent or less."[350] The greenhouse gas report does not acknowledge this requirement. Instead, by presenting the lower social costs of carbon associated with a 5% and 3% discount rate, and not explaining that 2.5% is the "appropriate rate to use" per the requirements of the Colorado legislature, the GHG report inappropriately obscures and minimizes the full impact of the project's greenhouse gas emissions.

55 ***Second***, while the Agencies quantified MSAT emissions, they claim that "information is incomplete or unavailable to credibly predict the project-specific health impacts due to the changes in MSAT emissions," and therefore decline to assess the actual health impacts. But Colorado rulemaking authorities recently determined that a cancer risk level of one in one million is the appropriate value to use as a threshold for both benzene and formaldehyde.[351] Colorado also established health-protective benchmarks for both of these pollutants: 0.13 $\mu g/m^3$ for benzene, and 0.091 $\mu g/m^3$ for formaldehyde.[352] The DEIS does not discuss or consider this information, nor apply it to assess and explain foreseeable health impacts.

56 ***Third***, the state-level GHG report failed to consider Colorado's statewide greenhouse gas targets and the reality that the transportation sector is causing the state to miss its targets. Colorado most likely missed its 2025 greenhouse gas target, and the state is not on track to meet *any* of the

[348] DEIS App'x E3 at 12 Tbl. 2 (ozone concentrations at Welby monitoring site exceeding 70 ppb in 2021, 2022, and 2023). It is unclear whether the presented data is the highest reading in a given year or the fourth maximum reading for the year. In either scenario, the measured concentrations are concerning.

[349] State GHG Tech. Report at 24.

[350] Colo. Rev. Stat. § 24-38.5-111.

[351] 5 Colo. Code. Regs. 1001-34, Part C: Statement of Basis and Purpose, at p. 15–16, https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=12229&fileName=5%20CCR%201001-34.

[352] *Id.* at 20.

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Response to Comment 53

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

Response to Comment 54

This comment is not applicable to the Draft EIS. Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

Response to Comment 55

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

Response to Comment 56

This comment is not applicable to the Draft EIS. Please see the State Environmental Technical Reports and the I-270 Corridor Improvements Project State Reports Responses to Substantive Comments document for responses to comments on the state reports, which are available on the project website.

future-year targets.[353] Some sectors, however, are expected to meet or even exceed their sector-specific levels in the near term.[354] The transportation sector, though, is the highest contributor out of all sectors and is projected to remain in that spot through 2050.[355] Notably, those estimates rely on the assumption of continued efficacy of state and federal regulations aimed at reducing transportation emissions—assumptions that have been undermined by recent developments.[356] In addition, Colorado's history with transportation emissions should be instructive: the state logged a slight *increase* in transportation emissions between 2005 and 2023, yet predicts steady and strong declines for the next several decades.[357] This is because even as fuel efficiency has improved, VMT has remained stubbornly high—above CDOT's own targets of reducing VMT by 1% annually per capita.[358] Yet CDOT's analysis for I-270 breaks sharply from the historic trends, projecting steep decreases in GHG emissions—roughly a 42% decrease in emission between 2026 and 2050 for the Preferred Alternative, even as VMT almost doubles. CDOT has failed to consider these historic trends and state- and CDOT-level directives and targets in its analysis of greenhouse gas emissions.

Nor can CDOT rely on DRCOG's separate greenhouse gas compliance demonstration for DRCOG's 2050 RTP to avoid full consideration of the I-270 project's impact on greenhouse gases. First, the Greenhouse Gas Transportation Planning Standard, which applies to DRCOG's transportation plans, was not tailored to ensure that Colorado will meet the statutory greenhouse gas targets.[359] While the rule requires greenhouse gas emission reductions from transportation plans, those reductions will not ensure that the transportation sector, or the state as a whole,

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[353] Colorado Air Pollution Control Division, *2025 HB19-1261 GHG Emission Reduction Progress Report* at 9 Fig. 3.

[354] *Id.* at 11 Fig. 4 (oil and gas sector emissions projected to exceed statutory target), 13 Fig. 5 (industrial and manufacturing sector project to exceed 2030 statutory target);

[355] *Id.* at 7 Fig. 2.

[356] *See id.* at 3 (describing modeling as examining policies on-the-books as of 2023, prior to federal rollbacks, and noting the results "do not account for all federal rollbacks"); *see* Section VI.D, above, describing rollbacks.

[357] Colorado Air Pollution Control Division, *2025 HB19-1261 GHG Emission Reduction Progress Report* at 7 Fig. 2

[358] *See* CDOT, Policy Directive 14.0 (establishing VMT targets), https://www.codot.gov/performance/assets/a-pd-14-0-201cpolicy-guiding-statewide-transportation-plan-goals-and-performance-measures201d.pdf; CDOT Procedural Directive 14.1 Dashboard, at *Reliability and Congestion Performance* (showing VMT increases between 2018 and 2024), https://app.powerbigov.us/view?r=eyJrIjoiM2Q5OTU1ZjEtNTM3MC00ZWNkLWEzMmQtNmJiZWYyNWQ0YzczIiwidCI6IjBhZmU1OTQ3LWQ5OTQtNDk0ZS05ODA2LTQ2YWE2YWIwOGFhNyJ9.

[359] 2 Colo. Code Regs. 601-22 *et seq.*, https://www.coloradosos.gov/CCR/GenerateRulePdf.do?ruleVersionId=10428&fileName=2%20CCR%20601-22.

remains on track; nor were they ever intended to. Further, CDOT expressly disclaims a connection between DRCOG's separate greenhouse gas compliance demonstration for the 2050 RTP and CDOT's greenhouse gas analysis for the I-270 project.[360] But CDOT does not explain whether or how the two analyses reach different results. If the I-270 analysis uses different approaches or reaches different conclusions than the analysis that CDOT requires DRCOG to use to comply with CDOT's own rule, then the inconsistencies render CDOT's analysis here arbitrary and capricious. As one example of an arbitrary inconsistency, CDOT avers that "while DRCGO's 2050 RTP accounts for GHG emissions benefits" associated with land use changes that decrease single-occupancy vehicle use, these planned benefits are "not reflected within the associated travel behavior or emissions burden analysis under NEPA."[361] This is highly problematic because DRCOG's plans impact underlying assumptions about travel demand projected in the planning area. By refusing to consider those plans in the NEPA analysis, the Agencies have artificially inflated demand, and corresponding VMT, for the No Action Alternative. These errors directly relate to the errors discussed in Section V.A., above.

F. The Agencies fail to examine MSAT, criteria air pollutant, and ozone precursor emissions prior to 2050.

57

The Agencies provide estimates (flawed estimates, for the reasons described above) for criteria air pollutant, ozone precursor, and MSAT emissions in 2050.[362] But the Agencies do not offer estimates of emissions for any earlier years, or estimate cumulative emissions. Looking only at emission levels 2050 obscures the full impact of increased emissions, because expected improvements to fuel economy have a significant impact on emissions by 2050. But those improvements will not happen immediately. The impacts of increased traffic are expected to be more harmful in the near and medium term, immediately after construction is complete. These are reasonably foreseeable impacts that the Agencies must disclose in the EIS by providing emissions estimates for 2030, 2035, and 2040, at a minimum.

G. The study area for air emissions is too narrow to capture the full impacts of the project.

58

Similar to the deficiencies with the traffic study, discussed above, the study area for air emission impacts is too narrow to fully capture the project's impacts. The DEIS looks only at air emissions stemming directly from the I-270 corridor and roadways/intersections that are "impacted by the project."[363] But "impacted by the project" is limited to traffic links that both have substantial

[360] State GHG Tech. Report at 37 ("[T]his analysis . . . should not be considered a subset of DRCOG's direct GHG emissions analysis for the purposes of demonstrating compliance with the GHG Standard.").

[361] State GHG Tech. Report at 42.

[362] DEIS App'x 3 at 24–25, Tbls 4–7.

[363] DEIS App'x E3 at 13–14.

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Response to Comment 57

The modeled years were determined through consultation between FHWA, the United States Environmental Protection Agency (EPA), and CDOT during Work Plan development. The Work Plan states that modeling would be completed for the existing (2023) and horizon (2050) years, which was what was completed. The EPA's hotspot guidance was largely followed; however, this project's hotspot modeling was not being completed for conformity purposes.

Response to Comment 58

The study area was determined through consultation between FHWA, EPA, and CDOT and reflects a reasonable area of influence for the project's air quality analysis. The project corridor and surrounding roadway links and intersections that were determined to potentially be impacted by the Build Alternatives were included in the study area. EPA's guidance recommends placing receptors up to 100 meters from the modeled roadway; however, the project placed receptors 300 to 500 meters from the modeled traffic links and in some cases, further, to capture locations requested by the public.

increases in traffic and are within 100 meters of the project.[364] The I-270 project, as a connector link for many trips that travel miles beyond the corridor, will impact traffic much further out than 100 meters.[365] By looking myopically at the corridor and extremely close links, the DEIS ignores important air impacts.

59 **H. The record establishes uncertainties concerning whether the correct traffic data was used to calculate air emissions.**

Even setting aside the fundamental flaws with the DEIS's traffic estimates, substantial doubt exists as to whether the DEIS's air quality analysis is internally consistent. The DEIS explains that a major error infected the initial analysis, with traffic volumes in one time period being double counted.[366] That error was only caught because a working group participant noticed strange results.[367] The DEIS does not explain whether staff members conducted a thorough review to ensure there were no other errors. In fact, the DEIS itself describes conflicting traffic volumes.[368] There is considerable reason for concern that inconsistent traffic volume data or other errors have been introduced into the air quality analysis, yet the DEIS does not include the underlying data, calculations, and documentation, preventing thorough review.

60 **I. The DEIS's air quality mitigation measures are insufficient.**

The DEIS describes air quality mitigation measures for the construction period only.[369] The DEIS fails completely to provide any air quality mitigation measures for ongoing air quality harms caused by increased volumes of traffic. Appropriate mitigation could include supporting multimodal options, such as regional transit options for longer-distance trips that would reduce air pollution along the corridor, as well as local transit and bicycle and pedestrian upgrades to benefit the local community. These measures are discussed in more detail in Sections XIII.A and XIII.B, below.

The measures described for construction air pollution mitigation are also wholly inadequate. The DEIS ignores additional available measures to minimize and mitigate emissions. These measures are discussed in more detail in Sections XIII.C and XIII.F, below.

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[364] *Id.* at 14 n.8; *see also id.* at I-270 Air Quality Analysis Methods, p. 1 (requiring a 5 to 10% change in daily traffic or travel time to warrant inclusion in the study).

[365] *See* Ives Street Report at 30–31, 31 Fig. 6 (describing congestion impacts and increased VMT across a much broader study area).

[366] DEIS App'x E3 at 13.

[367] *Id.*

[368] *See* Section V.A, above.

[369] DEIS App'x E3 at 27–32.

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Response to Comment 59

The air quality consultant team conducted a thorough quality assurance/quality control process of model files throughout the process. In addition, air quality working group meetings were held with FHWA and EPA throughout the NEPA process. All data utilized in the emissions analysis underwent multiple rounds of agency review through the air quality working group at each step of the process, so any potential errors were identified and subsequently corrected prior to completing the next step in the modeling process ensuring a quality process. All modeling-related files were available by request throughout the public comment period.

Response to Comment 60

See Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as federal mitigation.

Based on the analysis results summarized in Appendix E3, Air Quality Technical Report, of the Draft EIS, the project is not expected to cause substantial adverse effects on air quality, and the project meets transportation conformity requirements. Therefore, permanent mitigation is not warranted for air quality.

Temporary effects to the local air quality are anticipated during construction because the proposed project would likely have localized diesel-emitting sources from construction equipment and vehicles traveling to and from the construction site. Therefore, the project will comply with CDOT's Standard Specifications for Road and Bridge Construction and the Air Quality Control Commission's Regulations 1 (5 Code of Colorado Regulations [CCR] 1001-3, Emission Control for Particulate Matter, Smoke, Carbon Monoxide, and Sulfur Oxides) and 3 (5 CCR 1001-5, Stationary Source Permitting and Air Pollutant Emission Notice Requirements) to ensure that appropriate control measures are implemented during construction to reduce emissions of most pollutants and control fugitive dust. In addition, CDOT will implement applicable air quality mitigation commitments identified in the Draft EIS in

Chapter 5, Preferred Alternative Mitigation Commitments, and carried forward into the ROD in Chapter 5.0, Measures to Minimize Harm and Environmental Commitments, including construction BMPs intended to further minimize emissions and protect local air quality during project construction. Please see Section 5.4.4, IMP7, of the Final EIS for information on air quality mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

61

VII. Safety

Predicting that the Build Alternatives will improve safety on the corridor overall,[370] the DEIS errs by giving contradicting and cherry-picked information regarding the relationship between the number of lanes and the frequency of crashes. On occasion, it acknowledges that adding lanes to a freeway may cause more accidents. For example, it rejects alternatives with eight-lane configurations at Level 2 screening due in part to "safety concerns due to higher lane count."[371]

This observation—that adding lanes can increase crash risk—is also reflected in the Agencies' safety performance functions (SPFs) for different lane configurations. The DEIS claims that "there are safety benefits that emerge with a six-lane facility compared to a four-lane facility at higher volumes," relying on functions that plot average annual daily traffic (AADT) against crashes per mile per year.[372] But, while those curves show that a 6-lane highway has fewer crashes than a 4-lane highway for AADT between roughly 60,000 and 110,000, they also show that the *maximum* number of crashes on a 4-lane highway is much lower than for a 6-lane highway.

As the DEIS observes, "[t]he four-lane facility safety performance function does not extend much past 100,000 vehicles per day, because 100,000 vehicles per day exceeds the typical carrying capacity of a four-lane facility."[373] Accordingly, the 4-lane curve maxes out at around 50 crashes/mi/yr, whereas the 6-lane curve maxes out at around 90 crashes/mi/yr. While the DEIS predicts that I-270 will have 125,000 AADT in 2050—a volume that falls exclusively within the 6-lane curve—that cannot be true if it remains a 4-lane highway. The highway can only reach the much higher crash volumes along the 6-lane curve if it is converted to a 6-lane road. So the Agencies invert the nature of capacity by claiming that I-270 must be converted to a higher crash volume 6-lane road to accommodate predicted AADT, ignoring that declining to do so would cap AADT and crash volume along with it.[374]

In assessing the SPFs, the Agencies also make a bizarre methodological maneuver by assuming that the crash frequency in 2050 under the No Action Alternative will increase proportionally relative to the crash frequency predicted by the SPF curve. In other words, the DEIS assumes that I-270's crash rate will remain the same percentage higher than the model curve in 2050, with an AADT of 125,000. This assumption is supported by no reasoning or evidence, and it makes no sense. Most importantly, the 4-lane SPF does not even extend to 125,000 AADT—as Appendix A

[370] DEIS App'x A at 42–46.

[371] DEIS at 3-21–22; *see also* DEIS App'x B at 65 (acknowledging that "expanding roadways can also introduce new safety risks" because "an increased number of lanes can make the roadway more complex to navigate, increasing driver decision points and the potential for errors"); Replogle Report at 9–10 (discussing how more lanes can create safety risks).

[372] DEIS App'x A at 43–44.

[373] *Id.* at 43.

[374] This is another example of how the DEIS ignores the reality of traffic constraints to grossly inflate traffic under the no action or baseline scenario. *See* Section V.B, above.

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Response to Comment 61

While the alternatives that add two lanes in each direction provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Safety impacts increased due to the higher number of and more complex weaving and merge points, particularly in interchange areas, and speed differentials between the lanes.

Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity.

Without any improvements such as in the Minimal Build or No Action Alternatives, the corridor would continue to experience high crash rates, substandard merge distances, aging bridge deficiencies, and prolonged stop-and-go conditions. Please see Appendix A, Safety Assessment Technical Report, Appendix B, Alternatives Technical Report, and Appendix E1, Transportation Impacts, of the Draft EIS for more information.

The methodology for safety was developed in collaboration with the Traffic Working Group who also reviewed all of the analyses completed and technical documentation.

states on page 43 and shows in Figure 34 but, tellingly, obscures in Figure 35—so the methodology is impossible on its face. And, intuitively, it seems unlikely that a road already experiencing higher-than-expected crash frequencies would maintain those higher-than-expected frequencies to the same degree as the predicted frequency grows. The DEIS is thus unsupported and illogical in claiming that, at an AADT of 125,000, the 6-lane Build Alternatives will experience crash frequencies lower than the 4-lane No Action Alternative.[375]

The DEIS also fails entirely to quantify construction-phase crash risk, including how that risk differs between alternatives. Those risks should be quantified and, as needed, mitigated.

VIII. Noise

62 The DEIS noise analysis contains multiple errors and deficiencies: (1) the description of non-mitigable noise conditions under the No Action Alternative is misleading; (2) the noise model relies on limited validation data that undermines the model's conclusions; (3) assumptions in the noise model likely mask real-world exposure; (4) the analysis of construction noise—which will largely occur at night—is incomplete and inadequate; and (5) proposed mitigation measures are inadequate.

A. The analysis of noise under the No Action Alternative is misleading.

63 The DEIS concludes that overall traffic noise conditions under the Build Alternatives (52.1 - 77.3 dBA) are similar to, but slightly higher than, the No Action Alternative (51.0 - 77.4 dBA) and existing conditions (51.2 to 76.7 dBA), with no "substantial noise increase of 10 dBA or more over the existing condition."[376] The DEIS therefore frames noise effects from the Build Alternatives as limited or de minimis.[377]

As an initial matter, noise effects under the No Action Alternative are fundamentally flawed because traffic modeling for the No Action Alternative itself is based on impossible assumptions.[378] As a result, modeled noise levels under the No Action Alternative are likely more similar to the baseline conditions than predicted in the DEIS.

The DEIS's suggestion that noise effects are minimal understates the practical significance of the noise impacts identified. Under the Build Alternatives, 38 receivers—including 22 residences and 16 recreational trail locations—would exceed the applicable Noise Abatement Criteria

[375] DEIS App'x A at 44 (predicting 49.6 crashes per mile under the No Action Alternative and 44.98 crashes per mile under the Three General-Purpose Lanes Alternative).

[376] DEIS at 4-20.

[377] That result is incongruous with CDOT's position that there are meaningful differences between the No Action and Build Alternatives. At minimum, more explanation is required.

[378] *See* Section V.B, above.

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Response to Comment 62

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 CFR 772). Thorough analysis was conducted for each alternative through the corridor.

The I-270 corridor contains both noise-sensitive and non-noise sensitive receptors. Portions of the land in the corridor, such as industrial areas, manufacturing, retail facilities, warehousing, and government-managed lands, amongst other land uses, are not considered sensitive to traffic noise. These areas are not evaluated for noise impacts and were therefore not considered for validation readings.

The original draft noise analysis performed under the previous Environmental Assessment (EA) process collected nine noise readings and was used as a basis of the analysis for the Draft EIS existing conditions model. These readings were collected in neighborhoods and recreational areas where noise impacts may occur. To validate the EA model for the Draft EIS analysis, an additional three noise readings were collected in residential and recreational areas, which validated the original analysis performed using the first nine points. Fifteen minutes is considered a sufficient reading duration per the CDOT NAAG because the noise meters obtained a steady-state reading.

The Draft EIS noise analysis does not imply there are minimal impacts to noise; it notes there are no substantial impacts to noise, which is defined as a greater than a 10 decibel (dB) increase in noise over existing conditions. Noise is expected to increase by 0.2 dB to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable.

A noise wall north of I-270 and south of North Sandcreek Drive near the South Rose Hill Neighborhood was both feasible and reasonable. This barrier was determined to meet the initial criteria to be considered for noise abatement and is recommended to be constructed.

Per the CDOT NAAG, construction noise is considered temporary and modeling construction noise is not required. Measures will be taken to minimize noise during construction. Construction noise mitigation measures can be found in FHWA's Highway Construction Noise Handbook. CDOT would require the developer to use BMPs, such as limiting vehicle idling, to reduce noise during construction.

Please see Section 5.4.4, IMP4, of the Final EIS for additional information on the noise modeling completed and proposed mitigation.

Response to Comment 63

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable.

A noise wall north of I-270 and south of North Sandcreek Drive near the South Rose Hill Neighborhood was both feasible and reasonable. This barrier was determined to meet the initial criteria to be considered for noise abatement and is recommended to be constructed.

Additional community improvements from the disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the Community Analysis Technical Report, which is available on the project website.

(NAC),[379] compared to 31 receivers under the No Action Alternative.[380] This increase in NAC exceedances indicates a significant effect on local sites, including residences.[381]

In addition to the NAC exceedances, which are a threshold-based binary categorization tool, the increased noise more generally will cause harm. The DEIS is wrong to suggest that non-NAC-exceeding noise increases from the Build Alternatives do not matter for public health and wellbeing. For example, while no receptor is found to experience a 10 dBA increase over existing conditions—a perceived *doubling* of sound—numerous receptors experience project-related increases of approximately 3–5 dBA on top of already elevated baseline conditions.[382] FHWA guidance recognizes that changes of this magnitude—which increase perceived loudness by around 20–40 percent—are readily perceptible to the human ear and can materially affect annoyance, speech interference, and use of outdoor spaces.[383] Peer-reviewed research further demonstrates that incremental increases in chronic transportation noise are associated with adverse health and quality-of-life outcomes even below the 10 dBA threshold commonly used in regulatory frameworks.[384]

These changes can matter immensely for specific locations. For example, the neighborhood shown in the image below, surrounding Leyden Park, sits immediately adjacent to I-270 and bears much of the harm from nearby traffic noise. The DEIS notes that multiple residences in this neighborhood will experience impacts attributable to the Build Alternatives due to NAC exceedances—at least one of which (R-81)—would not be an exceedance without the Build Alternatives. And many more residences, plus Leyden Park itself, will suffer noise increases that technically remain below the applicable NAC but are significantly higher than existing conditions. These effects—irrespective of NACs—should be mitigated, especially given the history of environmental injustice for the communities along the I-270 corridor.

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[379] *See* DEIS at 4-17 Tbl.4-4.

[380] DEIS at 4-20; DEIS App'x E4 at 24.

[381] *See, e.g.*, DEIS App'x E4 at 15 (listing residences that will experience NAC exceedances, including one (R-41) that would not experience such an exceedance under existing conditions or the No Action Alternative).

[382] *Id.* at Tbls. 9–10.

[383] FHWA, Highway Traffic Noise: Analysis and Abatement, FHWA-HEP-10-025 at 36 (2011), https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf.

[384] Thomas Münzel et al., *Environmental Noise and the Cardiovascular System*, 71 J. Am. College of Cardiology 688, 694 (Feb. 13, 2018) (noting multiple measurable health effects for every 5 dbA increase in noise), https://www.jacc.org/doi/epdf/10.1016/j.jacc.2017.12.015; Mathias Basner et al., *Auditory and non-auditory effects of noise on health*, 383 Lancet 1325, 1333 (Apr. 12, 2014) (noting 5 dbA noise increases causing delayed childhood reading), https://pmc.ncbi.nlm.nih.gov/articles/PMC3988259/pdf/nihms562938.pdf.

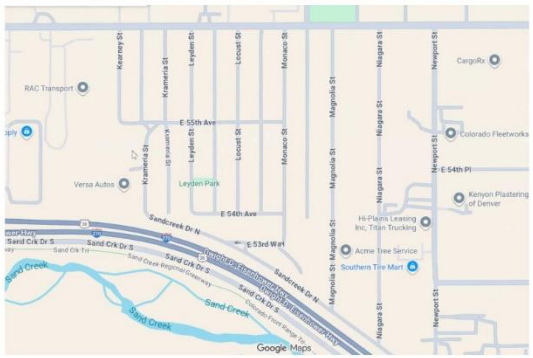

Figure 1. Neighborhood near Leyden Park that will suffer increased noise impacts due to widening.

B. The noise model is flawed.

The noise model used in the DEIS is flawed in at least two ways: it (1) relies on limited validation, and (2) makes assumptions that mask worst-case scenarios.

64 ***First***, the DEIS relies on a limited validation dataset for the existing-conditions model. The model was validated using only three 15-minute daytime measurements collected at selected locations, supplemented by reliance on a 2022 environmental assessment model.[385] For a corridor-scale EIS in a densely populated and topographically complex urban setting, this minimal temporal and spatial sampling is inadequate and meaningfully reduces the robustness of the modeled results. That is particularly true in light of peak and off-peak noise variability and the experience of receptors located near ramps, merges, and freight-intensive areas. The DEIS should validate the noise model using a greater number and variety of real-world data.

65 ***Second***, the model methodology risks masking peak effects by distributing traffic volumes for the "loudest hour" equally across lanes and directions and by failing to explicitly model directional splits.[386] This approach does not mirror reality, where certain vehicle types, like trucks, may preferentially use specific lanes, including at certain times of day, thus increasing noise at receptors closest to those lanes. The methodology also fails to specify how the auxiliary

[385] DEIS App'x E4 at 8–10, Tbl. 7.

[386] *Id.* at 11–12.

76

Response to Comment 64

The original draft noise analysis performed under the previous EA process collected nine noise readings and was used as a basis of the analysis for the Draft EIS existing conditions model. These readings were collected in neighborhoods and recreational areas where noise impacts may occur. To validate the EA model for the Draft EIS analysis, an additional three noise readings were collected in residential and recreational areas, which validated the original analysis performed using the first nine points. Fifteen minutes is considered a sufficient reading duration per the CDOT NAAG because the noise meters obtained a steady-state reading.

Response to Comment 65

Modeling the "loudest hour" was completed for existing (2023) and design year (2050) conditions and reflects the worst case of anticipated noise volumes. For the Preferred Alternative, trucks were assumed to rarely utilize the inner Express Lanes, which was accounted for in the models. Assessing a lane split for trucks in general-purpose lanes in 2050 is not feasible, as the traffic noise modeling does not quantify lane-by-lane usage of specific vehicle types.

Auxiliary lanes are included and accounted for on highways and ramps in the noise model.

Per FHWA and CDOT guidance, the loudest hour of noise is analyzed to determine noise impacts. Due to the anticipated additional congestion levels in 2050 without mitigation, the loudest hour in the No Action and Build Alternatives will occur midday when traffic is free-flowing in both directions.

lane is treated in terms of noise distribution.[387] That shortcoming is especially troubling given that the auxiliary lanes occupy the outermost lane position, closest to most receptors. The model should distribute noise realistically across lanes, by position, direction, and time, and clearly explain the methodology.

C. The analysis of construction noise is incomplete and inadequate.

66 The DEIS fails to disclose and analyze all effects related to nighttime construction noise. It anticipates the use of nighttime construction activities to minimize daytime traffic disruption but does not model or disclose receptor-specific construction noise levels or scenarios.[388] This failure is significant because even short-term nighttime construction noise can cause sleep disturbance and adverse health effects.[389] The noise analysis also fails to address the associated issue of vibration, an issue that plagues communities close to construction sites.[390]

The DEIS also fails to offer meaningful mitigation measures to the communities that will be living with nighttime jackhammers, trucks, and other machinery. While it identifies general best management practices—like notifications and coordination with local authorities—these measures lack enforceable performance standards or clear thresholds tied to sensitive nighttime receptors.[391] This failure continues a troubling trend of sacrificing Commerce City and North Denver residents' health and wellbeing to serve surrounding communities.

D. Proposed mitigation measures are inadequate.

67 Proposed noise mitigation is constrained and insufficient. Although the DEIS considers noise walls at three locations, only one wall is ultimately deemed both feasible and reasonable.[392] Many areas along the corridor—particularly Category C recreational trail locations—are excluded from barrier evaluation because they do not meet the threshold of three impacted receptors or fail the cost-benefit criterion of $34,000 per receptor.[393] These criteria

[387] *Id.* at 11 (stating simply that "[a]uxiliary lanes were modeled").

[388] DEIS at 4-20; Appx E4 at 40–42.

[389] *See generally* Mathias Basner et al., *Auditory and non-auditory effects of noise on health*, 383 Lancet 1325, 1333 (Apr. 12, 2014).

[390] Jon Murray, *Interstate 70 project in Denver gets noise variance renewal amid concerns about vibrations*, The Denver Post (Aug. 8, 2019), https://www.denverpost.com/2019/08/08/i-70-project-noise-variance-vibration; Danica Lee, Denver Public Health and Environment, *Research and Recommendations regarding Regulation of Vibrations in Denver* (Feb. 26, 2020), https://www.denvergov.org/files/assets/public/v/1/public-health-and-environment/documents/phi/vibrations_memo_2.20.pdf.

[391] DEIS App'x E4 at 41–42.

[392] DEIS at 4-21; DEIS App'x E4 at 24–39.

[393] DEIS App'x E4 at 25–26, 31–32.

77

Response to Comment 66

Per the CDOT NAAG, construction noise is considered temporary and modeling construction noise is not required. Measures will be taken to minimize noise during construction. Construction noise mitigation measures can be found in FHWA's Highway Construction Noise Handbook. CDOT would require the developer to use best management practices, such as limiting vehicle idling, to reduce noise during construction.

For the proposed construction mitigation and commitments, please see Chapter 5.0 of the ROD.

Response to Comment 67

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable.

A noise wall north of I-270 and south of North Sandcreek Drive near the South Rose Hill Neighborhood was both feasible and reasonable. This barrier was determined to meet the initial criteria to be considered for noise abatement and is recommended to be constructed.

See Chapter 5.0 of the ROD for a list of the federal mitigation and commitments associated with the noise analysis.

Additional community improvements from the disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the Community Analysis Technical Report, which is available on the project website.

disproportionately limit mitigation opportunities for linear resources in particular, like trails and greenways, where users experience noise cumulatively rather than at discrete receptor points. They also result in Section 4(f) sites being cut out of abatement consideration.[394] Given the history of environmental injustice around I-270, the Agencies should consider abatement when two (not three) receptors are affected.

The DEIS further dismisses non-barrier mitigation options—such as operational strategies, design refinements, or surface treatments—as generally infeasible, without providing project-specific analysis.[395] While FHWA regulations *require* consideration of noise barriers for all projects,[396] the regulations also expressly contemplate other feasible and reasonable measures, including modified vertical or horizontal alignments, traffic management measures, and speed controls.[397] It also fails to consider more natural and aesthetically pleasing barriers like tree plantings. These alternative solutions are important to consider for many reasons, including because sound barriers can increase pollutant concentrations under certain wind conditions—an effect partly mitigated by the presence of mature trees.[398] The DEIS errs by dismissing non-sound wall options out of hand, with no analysis.

IX. Biological resources

68 **A. Widening causes harm that a no-widening option would not.**

The DEIS identifies substantial permanent and temporary impacts to biological resources associated with the Build Alternatives, including widespread disturbance of prairie, grassland, and riparian habitats within an already fragmented urban corridor. Of particular concern is the acknowledged impact to approximately 21.7 acres of active black-tailed prairie dog colonies located in the southeastern portion of the study area.[399] Prairie dog colonies are ecologically significant, supporting associated species such as the state-threatened western burrowing owl and

[394] *See* Section XI, below.

[395] DEIS App'x E4 at 25 ("For this project, noise walls were the only abatement evaluated.").

[396] 23 C.F.R. § 772.13(c)

[397] *Id.* § 772.15(c)

[398] Baldauf R. et al., *Impact of Noise Barriers on Near-Road Air Quality*, 42 Atmospheric Env't 7502 (Oct. 2008), https://www.researchgate.net/profile/Richard-Baldauf/publication/232621204_Impacts_of_Noise_Barriers_on_Near-Road_Air_Quality/links/5f491dcca6fdcc14c5d8c4b1/Impacts-of-Noise-Barriers-on-Near-Road-Air-Quality.pdf.

[399] DEIS at 4-27; DEIS App'x E5 at 35.

78

Response to Comment 68

The Draft EIS analyzes the No Action Alternative, which is a true no widening alternative, Three General-Purpose Lanes Alternative, and Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative and discloses impacts for all three. No other alternatives with less than one additional lane of capacity passed through the alternatives screening process, including the Two Express Lanes that Accommodate Transit Alternative, to warrant completion of a biological analysis.

other grassland fauna.[400] Other species like the northern leopard frog will likewise experience habitat loss under the Build Alternatives.[401]

The DEIS does not explicitly acknowledge that these acreage-based habitat losses would be wholly avoided under a no-widening alternative. Being more explicit about that fact would underscore that the principal driver of biological impacts under the Build Alternatives is added roadway capacity rather than other improvements. The DEIS should more clearly acknowledge this contrast when disclosing the Build Alternatives' adverse effects on wildlife and shortgrass prairie resources.

B. The DEIS fails to analyze effects on wildlife from collisions and pollution.

The DEIS acknowledges that vehicle–bird collisions would likely increase as traffic volumes and roadway width expand under the Build Alternatives.[402] However, the analysis is cursory and qualitative, failing to quantify collision risk, identify high-risk locations (*e.g.*, bridges and riparian crossings), or evaluate feasible avoidance or minimization measures.

This is a notable gap given the presence of migratory birds, nesting swallows on bridges, and wildlife movement corridors associated with Sand Creek, Clear Creek, and the South Platte River in the area.[403] The DEIS should be supplemented to identify locations with elevated collision risk; quantify anticipated increases in wildlife mortality where feasible; and commit to mitigation measures such as bridge-level design modifications, shielding, or habitat-guided wildlife movement features.[404]

The DEIS also fails to evaluate effects from air pollution and noise, which cause numerous forms of harm to plants and wildlife across a wide range taxa.[405] While the DEIS evaluates air quality

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[400] DEIS App'x E5 at 26.

[401] *Id.* at 34.

[402] *Id.* at 33–34.

[403] *Id.* at 20, 33.

[404] *See* Scott Loss et al., *Estimation of bird-vehicle collision mortality on U.S. roads*, 78 J. Wildlife Mgmt. 763 (May 20, 2014), https://wildlife.onlinelibrary.wiley.com/doi/abs/10.1002/jwmg.721.

[405] Stephen Trombulak & Christopher Frissell, *Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities*, 14 Conservation Biology 18 (Dec. 24, 2001), https://conbio.onlinelibrary.wiley.com/doi/epdf/10.1046/j.1523-1739.2000.99084.x; Concepción Salaberria, *Physiological status of House Sparrows (Passer domesticus) along an ozone pollution gradient*, 32 Ecotoxicology 261 (Feb. 21, 2023), https://link.springer.com/article/10.1007/s10646-023-02632-z; Yuanning Liang et al., *Conservation cobenefits from air pollution regulation: Evidence from birds*, 117 Proc. Nat'l Academy of Science USA 30900, https://www.pnas.org/doi/pdf/10.1073/pnas.2013568117; S. Llacuna, *Effects of air pollution on passerine birds and small mammals*, 24 Archives Env't Contamination and Toxicology 59 (1993), https://link.springer.com/article/10.1007/BF01061089;

Response to Comment 69

There are no methodologies to analyze air pollution and noise on biological resources available; therefore, these analyses are not completed.

70

and noise impacts for human receptors, it does not analyze those effects on wildlife. This failure comes despite the acknowledged presence of amphibians, riparian birds, raptors, and pollinators in the study area, including many sensitive species. The DEIS should address these pathways explicitly and quantitatively and explain why such effects would or would not meaningfully affect plants and wildlife.

C. Proposed mitigation is inadequate.

Mitigation measures for the Build Alternatives' effects on biological resources are inadequate. For example, while the DEIS states that prairie dog impacts will be "avoided and minimized" during final design "to the extent practicable" and that relocation will be "evaluated" if impacts exceed 2 acres,[406] these commitments are vague, noncommittal, and nonspecific. The agencies should commit to site-specific assessments; enforceable seasonal construction restrictions; scientifically supported disturbance buffers; and clear contingency actions if relocation sites are unavailable. Absent such commitments, mitigation remains uncertain and defers key conservation decisions until design or construction, contrary to NEPA's goal of informed decision-making.

Similarly, the DEIS recognizes the potential for impacts to wetlands and aquatic habitats, including up to 1.9 acres of preferred northern leopard frog habitat and over 4 acres of wetlands and waters of the U.S.[407] While pre-construction surveys are proposed, there is no commitment to specific mitigation actions if sensitive species are detected. For example, the DEIS provides only that "[i]f northern leopard frogs are found, coordination with CPW will occur."[408] In lieu of such noncommittal, vague statements, the Agencies should commit to pre- and post-construction monitoring at in-channel and riparian work sites; reporting of monitoring results; and specific protective management that will be taken if northern leopard frogs or other sensitive aquatic species are observed.

Similar issues pervade the DEIS's proposed mitigation measures. Across the board, the Agencies should strengthen their mitigation commitments by committing to site-specific analysis and enforceable limitations on construction activities when potential effects thresholds are predicted.

Graeme Shannon et al., *A synthesis of two decades of research documenting the effects of noise on wildlife*, 91 Bio. Review 982 (2016), https://files.pca-cpa.org/pcadocs/2017-06/8.%20Ukraine%20-%20Reply%20-%20Exhibits/8.%20Ukraine%20-%20Reply%20-%20Exhibits/UA-732.pdf.

[406] DEIS App'x E5 at 40.

[407] *Id.* at 34, 36.

[408] *Id.* at 43.

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Response to Comment 70

The I-270 corridor is situated in a substantially different landscape compared to other highways where CDOT has constructed wildlife crossing structures in the state. Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Much of the natural wildlife habitat in the area surrounding I-270 has been replaced by commercial, residential, and industrial developments. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Although many bridges cross streams in the area, nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the design does not include new wildlife connectivity features across I-270.

Wildlife or "land bridge" crossings were not carried forward due to the absence of documented wildlife crash patterns on the corridor, the corridor's exclusion from CDOT's prioritized wildlife crossing list, and the substantial ROW and cost implications.

Please see Section 5.4.4, IMP9, of the Final EIS for information on wildlife crossing mitigation. Please see Chapter 5.0 of the ROD for additional information on mitigation, other environmental commitments, and permits related to biological resources.

The agencies should also consider a land bridge instead of or in addition to a pedestrian bridge to increase connectivity for wildlife whose migratory, hunting, foraging, and mating movements may be cut off by the freeway.[409]

71 **D. The DEIS fails to explain how the Agencies are protecting endangered species.**

The DEIS's discussion of effects to federally endangered species is incomplete, and the Agencies' Endangered Species Act (ESA) compliance is unclear at best.

The DEIS claims that the Build Alternatives would not jeopardize the continued existence of the monarch butterfly, pointing to a biological assessment completed in 2023 to update the list of species covered under the Shortgrass Prairie Initiative (SGPI).[410] It also states that "FHWA initiated a programmatic, formal consultation on July 18, 2022, regarding the monarch butterfly to determine the impact FHWA/CDOT actions may have on the butterfly. The conference opinion (issued December 28, 2022) concluded that these actions are not expected to jeopardize the monarch butterfly."[411]

However, neither the Dec 18, 2022 programmatic conference opinion nor Dec 29, 2023 letter is included in the DEIS documents. Likewise, effects on the piping plover, whooping crane, pallid sturgeon, and western prairie fringed orchid are purportedly "addressed through the Programmatic Biological Assessment prepared by FHWA as part of the South Platte Water Related Activities Program (FHWA 2012, extended through 2032)."[412] But that document, too, is provided nowhere in the DEIS (or appendices).

Additionally, it is not clear from the DEIS descriptions how or whether the SGPI provides compliance with ESA Section 7 for the proposed widening of I-270. Presumably, CDOT is relying on some form of mitigation contemplated in the SGPI, but that mitigation is unspecified, failing to comply with NEPA's mandate of transparent, informed decisionmaking. The DEIS

[409] Daniel J. Smith et al., *Wildlife Crossing Structures: and Effective Strategy to Restore or Maintain Wildlife Connectivity Across Roads*, Handbook of Road Ecology Ch. 21 (Apr. 1, 2015), https://www.researchgate.net/profile/Rodney-Van-Der-Ree/publication/305357998_Wildlife_Crossing_Structures_An_Effective_Strategy_to_Restore_or_Maintain_Wildlife_Connectivity_Across_Roads/links/617ccc680be8ec17a94a7eff/Wildlife-Crossing-Structures-An-Effective-Strategy-to-Restore-or-Maintain-Wildlife-Connectivity-Across-Roads.pdf; Rodney van der Ree & Edgar van der Grift, *Recreational Co-Use of Wildlife Crossing Structures*, Handbook of Road Ecology Ch. 21 (Apr. 1, 2015), https://www.researchgate.net/profile/Rodney-Van-Der-Ree/publication/280880758_Recreational_Co-Use_of_Wildlife_Crossing_Structures/links/68098111df0e3f544f47565f/Recreational-Co-Use-of-Wildlife-Crossing-Structures.pdf.

[410] DEIS at 4-27–28.

[411] DEIS App'x E5 at 28.

[412] DEIS at 4-25.

81

Response to Comment 71

Section 7(a)(1) of the federal Endangered Species Act (ESA) of 1973 (as amended) directs all federal agencies to participate in the conservation and recovery of threatened and endangered species for both plants and animals. Section 7(a)(2) of the ESA states that each federal agency shall consult with the United States Fish and Wildlife Service on terrestrial species and inland fish and with the National Marine Fisheries Service on marine species and anadromous fish to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modifications of designated critical habitat. This project followed the correct ESA process.

Please see Chapter 5.0 of the ROD for information on mitigation, environmental commitments, and permits related to endangered species. The documents referenced in the comment can be requested from CDOT and are included in the project file.

should explain what the program allows CDOT to do, what limits apply, and how this project's impacts fit within those limits. Without clearer disclosure, the public cannot evaluate whether SGPI mitigation adequately offsets the direct ecological losses within the I-270 corridor, particularly in an urban area where local habitat value may exceed that of off-site preservation.

X. Water

This section of our comments addresses Chapters 4.5, 4.6, and 4.7 of the DEIS and Appendices E6, E7, and E8, as some comments overlap all categories of issues.

72 As an overarching issue, the Agencies, through a supplemental DEIS, must evaluate how significant changes to both federal and state water protection laws—made after issuance of the DEIS—affect the analysis for the I-270 project. At the federal level, the U.S. Army Corps of Engineers and U.S. Environmental Protection Agency issued a proposed rule in November 2025 that redefines the term "waters of the United States" under the Clean Water Act.[413] Shortly after that proposed change, the Colorado Water Quality Control Commission voted to adopt Regulation 87, the framework for Colorado's new state-run dredge-and-fill permitting program.[414] Regulation 87 is expected to go into effect in February 2026.

These significant changes to federal and state regulatory frameworks bear directly on the DEIS's analysis of impacts to water resources and could dramatically alter the required analysis under NEPA (as well as substantive requirements on the project itself).[415] That updated analysis should be subject to public review and comment—not just added to a final EIS—so a supplemental DEIS is warranted.

The DEIS water analyses err in numerous other ways.

73 ***First***, the DEIS fails to analyze how the Build Alternatives will affect pollution loads to nearby waters. The DEIS finds that "[t]he Three General-Purpose Lanes Alternative would result in 128 acres of new impervious surface while the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative would result in 133 acres of new impervious surface."[416] The Build Alternatives will also increase overall VMT.[417] These changes are significant because traffic on I-270

[413] 90 Fed. Reg. 52498 (Nov. 20, 2025).

[414] Colorado Department of Public Health & Environment, *Colorado Water Quality Control Commission takes historic action to protect wetlands and streams, advancing state dredge-and-fill program* (Dec. 15, 2025), https://cdphe.colorado.gov/press-release/colorado-water-quality-control-commission-takes-historic-action-to-protect-wetlands.

[415] *See, e.g.*, DEIS at 4-29 (identifying jurisdictional waters as a threshold issue that determines further analysis)

[416] *Id.* at 4-37.

[417] *See* Sections IV.B.2.ii, V.B.3, above.

82

Response to Comment 72

Chapter 2.0 of the Final EIS includes changes since the Draft EIS and errata. Please see Table 2-1, E-016 and E-086 through E-090, for water quality-related updates.

Regulation 87 is related to wetlands and is captured in Section 2.1.3 of the Final EIS.

Response to Comment 73

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures.

Please see Section 5.4.4, IMP10, of the Final EIS for information on quantitative water quality modeling, water quality impacts, pollutants, and developing and locating water quality mitigation.

The total maximum daily load information is correct as written for each river, including the segment and pollutants, and is included in the Water Quality Technical Report. Some of the impairments listed will not be treated for by this project; for example, roadways and roadsides do not increase e-coli.

> generates surface water pollutants in the study area, which can include metals, such as iron, zinc, and copper from fuels, brake pads, and vehicle wear. In addition, oil or grease (petroleum hydrocarbons) deposited by vehicles on roadways and parking areas also contribute to contaminants in receiving waters of the study area. Surface water impairments within the study area include roadway pollutants of concern, which include cadmium and manganese. The application of deicers to paved surfaces during the winter months . . . may increase chloride levels and suspended solids in snowmelt, which in turn may enter the receiving waters."[418]

Similarly, the DEIS notes that "[a] reduction in congestion and collisions would also be expected to positively impact stormwater quality by reducing tire and brake wear, as well as vehicular fluids and debris entrained in stormwater runoff."[419] Setting aside the fact that the Build Alternatives will not reduce regional congestion or collisions,[420] this finding tacitly admits that things like increased tire wear can impair nearby waters and generally increase with more total vehicles on the road.

Despite acknowledging these many effects related to new impervious surface and additional vehicles on the corridor, the DEIS does not meaningfully evaluate how the additional traffic and lanes will increase pollution. It provides no quantitative analysis of, for example, pollutant loads, runoff volumes, treatment performance, or Total Maximum Daily Loads (TMDLs) compliance.[421] Nor does it quantify how much additional deicer will be required for the new lanes under the Build Alternatives or the amount of resulting chloride and suspended solids that will pollute surrounding waters. It also fails to analyze how already-impaired segments of Sand Creek, the South Platte River, and Clear Creek[422] will be affected by the added impervious area and modified outfalls.[423]

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[418] DEIS App'x E7 at 15.

[419] *Id.* at 23.

[420] *See* Sections IV.B.2, V.B, VII, above.

[421] DEIS at 4-37–38; DEIS App'x E7 at 19–24.

[422] DEIS at 4-34–37; DEIS App'x E7 at 13 (Tbl. 1) (noting cadmium and manganese as "pollutants of roadway concern"); *see* Y. Nazzal et al., *Assessment of metal pollution in urban road dusts from selected highways of the Greater Toronto Area in Canada*, 185 Env't Monit. Assess. 1847 (May 30, 2012), https://www.researchgate.net/profile/Yousef-Nazzal/publication/364344405_Assessment_of_metal_pollution_in_urban_road_dusts_from_selected_highways_of_the_Greater_Toronto_Area_in_Canada/links/634d2c329cb4fe44f32f4668/Assessment-of-metal-pollution-in-urban-road-dusts-from-selected-highways-of-the-Greater-Toronto-Area-in-Canada.pdf; Stuart M. Levit, The Nature Conservancy, *A Literature Review of Effects of Cadmium on Fish* (Nov. 2010), https://www.nature.org/content/dam/tnc/nature/en/documents/literature-review-cadmium.pdf;

[423] *See* DEIS App'x E7 at 13–16, 22–23.

Instead, the DEIS merely claims, qualitatively and without analysis, that "[t]he Build Alternatives would improve water quality conditions in the study area through modernization of the corridor's drainage infrastructure."[424] Similarly, for the impaired waters, the DEIS simply asserts without analysis that impairments "are not anticipated to be exacerbated" because more runoff will be "captured and treated."[425] But without modeled (or otherwise quantified) baseline versus post-project pollutant loads and BMP efficacy, these conclusions are speculative and do not satisfy NEPA.

The Agencies should therefore conduct a true analysis of these effects in a supplemental DEIS. The updated analysis of surface runoff effects should evaluate bioswales and green infrastructure for runoff, not traditional grey infrastructure.[426] And, importantly, discussion of the benefits of a modernized drainage system (green or otherwise) should be uncoupled from proposed widening, as runoff infrastructure can be modernized on existing roadways.

Second, the DEIS provides no quantification or modeling of construction groundwater dewatering discharges despite known groundwater contamination. It also offers no monitoring or adaptive management commitments tied to measurable outcomes.

Nearby groundwater is already contaminated with hydrocarbons, PFAS, and metals due to the area's high industrial use, and at least one Superfund plume intersects project work.[427] "Groundwater may be encountered during drilling activities necessary for pier installation and excavation activities, which would necessitate dewatering during construction and the potential for . . . transportation of pollutants."[428]

But the DEIS gives next to no analysis of the environmental effects of such dewatering and associated transportation of pollutants. It simply states that "water would require either treatment to meet those standards prior to discharge to state waters or would require off-site disposal."[429]

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[424] DEIS at 4-37.

[425] DEIS App'x E7 at 23.

[426] *See, e.g.*, Benjamin Bodus et al., *Green Infrastructure in Series to Treat Stormwater Runoff from a Highway Overpass*, 10 J. Sustainable Water in the Built Env't 04024008 (Aug. 12, 2024), https://static1.squarespace.com/static/558484f0e4b08aca3d0bb481/t/6848a8f6e9ca8c6f38a336df/1749592311138/bodus-et-al-green-infrastructure-in-series-to-treat-stormwater-runoff-from-a-highway-overpass+%281%29.pdf.

[427] DEIS at 4-36–37, 4-61; DEIS App'x E7 at 15; DEIS App'x E11 at 43 (noting relevance of PFAS to study area "[g]iven the historic land use surrounding the I-270 corridor"); Colorado PFAS Sample Results Map, https://www.arcgis.com/apps/instant/sidebar/index.html?appid=0406a49785c7401e906a479bb0784456d, accessed Jan. 20, 2026 (showing multiple PFAS groundwater samples near I-270).

[428] DEIS at 4-38; *see also* DEIS App'x E11 at 52 (finding "groundwater will likely be encountered during construction").

[429] DEIS at 4-61; *see also* DEIS App'x E11 at 54.

Response to Comment 74

Dewatering and pollutant containment consists of adaptive management during construction; there are treatment and disposal requirements as part of permitting and the stormwater management plan to safeguard ground and surface water. These are also final design items, not preliminary design items.

That statement is no substitute for robust analysis of *effects*, including whether the identified treatment and disposal requirements would adequately safeguard ground- and surface water.

75 ***Third***, the water quality analysis does not analyze localized outfall impacts through an environmental justice lens. Specific features of the local neighborhoods, trail corridors, parks, *etc*. will likely be more impacted than others. The Agencies should produce an environmental justice-focused outfall map with near-neighborhood receiving waters, plus mitigation prioritization where environmental justice communities bear higher exposure.

76 ***Fourth***, the Agencies avoid providing analysis of floodplain effects by speculatively presupposing future changes to floodplain boundaries. The DEIS relies heavily on a planned Letter of Map Revision (LOMR) process to update floodplain maps, claiming that once those maps are updated "prior to finalizing preliminary and final design," the floodplain impacts will be reduced.[430] But those changes have not been made, so the presumed reduction of effects is speculative. Furthermore, while the DEIS notes that, even without the LOMR changes, there will be "[s]ignificant encroachments" to certain floodplains, it claims that "[t]here are no practicable alternatives to reduce these significant impacts because widening I-270 is necessary to meet the project purpose and need."[431] As discussed elsewhere, that claim is false,[432] and the floodplain analysis should be revised accordingly. Furthermore, as major floods are becoming more common due to climate change, the major flood event estimates (*i.e.*, 100-year flood as defined in regulation) are not being updated quickly enough to keep up with the science: "the variables currently used . . . [m]ay not be modeling the future."[433]

77 ***Fifth***, the DEIS contains no analysis of 6PPD-quinone (6PPD-q). This chemical, found in and discharged by tires, is one of the most toxic substances to aquatic species ever assessed.[434] 6PPD is a tire additive that migrates or 'blooms' to the surface of the tire upon use. On the surface of tires, 6PPD reacts with ozone and oxygen, creating several transformation products, including 6PPD-q. As vehicles drive and park on hard surfaces such as streets, roads, highways, parking lots, and alleys, 6PPD and 6PPD-q is released onto the hard surfaces. During rain and snowmelt events, runoff transports 6PPD and 6PPD-q into aquatic environments from these hard surfaces. The presence of 6PPD-q in aquatic environments is profoundly harmful to a range of aquatic

[430] DEIS App'x E8 at 20–21.

[431] DEIS at 4-43–44.

[432] *See* Sections III, IV.A, IV.B, above.

[433] Kayt Sukel, *With the 100-year flood model seemingly obsolete, what now?*, American Society of Civil Engineers (Nov. 6, 2024), https://www.asce.org/publications-and-news/civil-engineering-source/article/2024/11/06/with-the-100-year-flood-model-seemingly-obsolete-what-now.

[434] Zhenyu Tian et al., *6PPD-Quinone: Revised Toxicity Assessment and Quantification with a Commercial Standard*, 9 Env't Sci. & Tech. Letters 140, 144 tbl. 1 (2022), https://par.nsf.gov/servlets/purl/10358145; Guodong Cao et al., *New Evidence of Rubber-Derived Quinones in Water, Air, and Soil*, 56 Env't Sci. & Tech. 4142 (2022), https://pubs.acs.org/doi/pdf/10.1021/acs.est.1c07376.

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Response to Comment 75

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final EIS for additional information on environmental justice.

Additional community improvements from the disproportionately impacted communities analysis required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the Community Analysis Technical Report, which is available on the project website.

Response to Comment 76

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final EIS for additional information on climate change. Floodplains analysis was completed using the most available information at the time of analysis.

Response to Comment 77

6PPD-q has quick degradation; the first flush of stormwater is the biggest problem for fish/aquatic life. Permanent water quality control measures capture the first flush of stormwater and hold it for 42 to 72 hours. This is an emergent potential pollutant that departments of transportation (DOTs) don't have much information or data on at this time.

species. Some die within hours of exposure to toxic concentrations of 6PPD-q, and many are harmed by 6PPD-q's sublethal effects. Tire wear is one of the sources of highway pollution mentioned in the DEIS, and the DEIS notes the presence of several waterbodies and aquatic species close to the I-270 corridor. Thus, the toxic aquatic threat resulting from tire wear and 6PPD and 6PPD-q must be considered. The DEIS errs by failing to do so.

XI. Land use and social and economic resources

The DEIS makes multiple errors in its evaluation of effects on the interrelated issues of land use and social and economic resources.

78

First, the DEIS fails to evaluate regional land use effects due to widening. Highway widening can cause significant shifts in regional traffic, altering the value and availability of transportation options for areas far beyond the immediate corridor being widened.[435] For example, it is well-established that induced demand for new highway capacity can lead to "[r]esidential & business relocation to more distant and newly-accessible sites in existing structures" and "[r]esidential & commercial growth through new construction in more distant and newly-accessible locations, leading to longer trips relative to where that growth might have taken place if not for the capacity expansion."[436]

Consistent with that reality, the DEIS claims that the Build Alternatives' operational upgrades will improve access and reliability in a regionally important way.[437] For example, the DEIS observes that "[w]estbound I-270 from Central Park Boulevard to US Highway 85 (US 85) is the third worst truck bottleneck area in the Denver metro region, costing an average of $175,273 in congestion costs for trucks and supply chains each day"[438]—a claim that can be true only if traffic on I-270 affects commerce on a regional (or broader) basis.

Yet, shockingly, the DEIS does not even attempt to account for the regional land use changes that widening might cause, instead limiting its land use analysis to "a one-quarter mile buffer of the project footprint."[439] This myopic approach undermines the Agencies' conclusion—made without modeling or any other quantitative analysis—that expansion will not induce growth "beyond that anticipated by local planning departments."[440] It also undermines the conclusion that "[l]and use within the [study area] is established and property values are not expected to

[435] *See, e.g.*, Ives Street Report at 28 Tbl. 6, 33–34 (finding that the Preferred Alternative will decrease job availability by 0.5% in the Denver region); David Levinson et al., *The Co-Evolution of Land Use and Road Networks* (Jan 27, 2011), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1748607.

[436] Ives Street Report at 8 Tbl. 1.

[437] DEIS App'x E9 at 22.

[438] DEIS App'x E10 at 9.

[439] DEIS at 4-45.

[440] DEIS App'x E9 at 22.

86

Response to Comment 78

The social and economic resources analysis was completed per guidance and in coordination with CDOT and FHWA. The Community Study Area is a much larger study area than one-quarter mile from the project (see Figure 1 in Appendix E10, Social and Economic Conditions Technical Report, of the Draft EIS).

The Land Use study area is approximately one-quarter mile from the project location. This area includes the land on which improvements are proposed as well as adjacent development and recreational facilities that have the potential to be affected by the project. Comprehensive land use plans that have been adopted for the area provide additional context for broader community priorities and development goals, which were also considered even though they extend past the study area. See Figure 6 in Appendix E9, Land Use Technical Report, of the Draft EIS for the study area and also additional information within the report about looking at comprehensive land use plans in addition to the study area.

change because of the project."[441] These claims wholly ignore regional land use and associated effects from the project.

To properly assess how the Build Alternatives will alter land use, social, and economic resources, the Agencies should prepare a supplemental DEIS that includes a robust regional analysis of land use and other changes, accounting for induced demand and other kinds of traffic shifts that will result from widening.[442]

79 ***Second***, the Agencies downplay and fail to mitigate the localized land use effects that are identified. The DEIS finds that "[b]oth Build Alternatives would acquire 10.57 acres of land," including 2.10 acres of residential and 1.94 acres of parks/open space.[443] And, [i]n addition to permanent ROW acquisition, the project would require 3.21 acres of permanent easements and 33.71 acres of temporary easements."[444] The DEIS minimizes the significance of these effects, claiming that "[l]and use would not permanently change" and that "[n]either Build Alternative would result in the displacement of any residences or businesses" or "alter existing development patterns."[445] But these land use conversions will further cement the corridor as a transportation-first, community-second area—contradicting, for example, the Agencies' conclusion that "the project is not anticipated to adversely affect community cohesion."[446] The DEIS also fails to evaluate mitigation measures that would offset the localized land use effects it does acknowledge.[447]

80 ***Third***, the DEIS errs by declining to consider "[a]ny purported environmental justice impacts" in its evaluation of social and economic resources.[448] As a result of that choice, the Agencies overlook the history and continuation of significant environmental injustice faced by the communities in Commerce City and North Denver.[449] As the Ives Street Report shows, effects from the project will not be distributed equally across the region, with highly variable changes in access to jobs (and other destinations). The Agencies should evaluate that effect in a supplemental DEIS.

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[441] DEIS at 4-55.

[442] *Compare generally* Ives Street Report (evaluating regional shifts in traffic patterns and availability to destinations) *with, e.g.*, DEIS at 4-54 (claiming that the regional "[p]opulation would likely continue to increase as forecasted," irrespective of any changes to I-270).

[443] DEIS at 4-50.

[444] *Id.*

[445] *Id.*

[446] *Id.* at 4-55.

[447] *See* DEIS App'x E9 at 22–23 (showing mitigation measures that deal only with land acquisition compliance).

[448] DEIS App'x E10 at 3.

[449] *See* Section I, above.

87

Response to Comment 79

The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

Response to Comment 80

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

However, a disproportionately impacted communities analysis was conducted, which is required as part of SB 21-260 and codified in CRS 43-1-128. That analysis is contained within the State Community Analysis Technical Report, which is available on the project website.

81 ***Fourth***, the Agencies' toll and revenue study, conducted by the Colorado Transportation Investment Office (CTIO), is incomplete. Highlighting that the Preferred Alternative "introduces a potential revenue stream" to help fund capital and operation and maintenance, the DEIS provides that the study is intended to "determine the level of contribution Express Lane revenues could make toward construction, operation, and maintenance of the corridor."[450] That comparative framing—elevating the Preferred Alternative based on potential tolling revenue—is incomplete unless the Agencies also evaluate tolling of the existing lanes, as proposed in the HCNWA. The Agencies should commit to expanding the CTIO study scope now; to including the HCNWA and model associated demand, revenue, and equity outcomes; and to publishing those results in a supplemental DEIS so that the Agencies and the public can properly compare budget effects across all alternatives.

XII. Park and recreation sites

The Agencies wrongly neglect harmful effects to parks and recreation sites, including those protected under Section 4(f) of the U.S. Department of Transportation Act of 1966. Section 4(f) stipulates that the use of certain publicly owned sites may be approved only if "(1) there is no prudent and feasible alternative to using the land;" and (2) the project includes "all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use."[451] The DEIS's Section 4(f) analysis contains at least two errors.

82 ***First***, the DEIS wrongly determines that the Sand Creek Greenway is ineligible under Section 4(f). It notes that the greenway is "important for natural land preservation and habitat conservation, and appropriate for passive recreation" but summarily finds that the greenway is not subject to Section 4(f) simply because it "is designated as open space and not managed primarily for recreation" in the Commerce City Parks, Recreation and Golf Master Plan.[452]

That finding is erroneous. FHWA has an independent duty to make the legal determination of eligibility under Section 4(f), so the Commerce City master plan cannot be dispositive on that legal issue.[453] FHWA's finding must be based, not on formalistic categorizations or labels by local governments, but by whether the site is, as relevant here, "publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance."[454] The Sand Creek Greenway plainly meets those criteria.

Moreover, the relevance that the Commerce City Parks, Recreation and Golf Master Plan *does* have on the Section 4(f) eligibility determination weighs sharply in favor of an eligibility

[450] DEIS at 3-13 to 3-14.

[451] 49 U.S.C. § 303(c).

[452] DEIS App'x E17 at 25.

[453] *See San Antonio Conservation Soc. v. Texas Highway Dep't*, 446 F.2d 1013, 1026 (5th Cir. 1971) ("Congress did not intend to leave the decision whether federal funds would be used to build highways through parks of local significance up to the city councils across the nation.").

[454] 49 U.S.C. § 303(c).

88

Response to Comment 81

The toll and revenue study will be updated based on the updated information contained in the EIS. Please see Section 5.4.3, ALT4, of the Final EIS for information on the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 82

The Sand Creek Regional Greenway is evaluated as a multiple use land holding in the Draft EIS. According to the Section 4(f) Policy Paper Question and Answer section, "Section 4(f) applies only to those portions of a multiple-use public property that are designated by statute or identified in an official management plan of the administering agency as being primarily for public park, recreation, or wildlife and waterfowl refuge purposes, and are determined to be significant for such purposes." Commerce City's Parks, Recreation and Golf Master Plan identifies the greenway as open space with primary purposes of natural land preservation and habitat conservation. Section 4(f) applies only to the trail and amenity areas (benches, etc.) within the Greenway property because they are maintained for recreators.

Please see Table 2-1, E-021, in Chapter 2.0, Changes Since the Draft EIS and Errata, of the Final EIS for revised text related to the Sand Creek Greenway that states "The Sand Creek Greenway is a recreational resource that would be temporarily and permanently impacted but is not subject to Section 4(f), except for associated trails and recreational amenities within it." Coordination was conducted with the Officials with Jurisdiction and concurrence was received. See also Section 5.4.4, IMP8, of the Final EIS for information on the Sand Creek Greenway's Section 4(f) status.

finding. The plan demonstrates that, as a factual matter, the greenway is a park or recreation area of local significance—otherwise Commerce City would not have included it in its master plan. The greenway is a Section 4(f) property and should be treated as such.

83 ***Second***, the DEIS fails to consider how noise increases under the Build Alternatives will "use" Section 4(f) sites. As explained, the Build Alternatives will meaningfully increase noise at numerous receptors along the corridor, including several trails and greenways, at a level readily perceptible to the human ear and bothersome to recreationists.[455] But the Section 4(f) analysis does not even acknowledge, much less evaluate, how this increased noise will impair eligible properties—a significant, unlawful omission.[456] The same problem applies to the Agencies' analysis of properties under Section 6(f) of the Land and Water Conservation Fund Act, which likewise does not so much as mention noise effects.[457]

Importantly, because Section 4(f) properties may be used for transportation projects only if "there is no prudent and feasible alternative,"[458] Section 4(f) underscores the need for appropriate evaluation of a no-widening option. The Agencies should redo their Section 4(f) (and Section 6(f)) evaluation in a supplemental DEIS, with the Sand Creek Greenway and noise effects included, and those effects must inform the alternatives considered.

XIII. Additional project improvements

84 In addition to the improvements described above, the proposed project would benefit from various improvements that would mitigate pollution and other harms. Agencies are required to discuss mitigation measures in sufficient detail to ensure full evaluation of environmental impacts.[459] The DEIS fails this mandate. The agencies here have overlooked numerous mitigation measures that are feasible and would reduce the project's environmental impacts. Many of the proposed measures improperly lack enforceable standards and rely on vague qualifiers that render them ineffective and legally inadequate. Further, FHWA has arbitrarily ignored greenhouse gas emissions, and therefore has also ignored mitigation for greenhouse gas; and CDOT has incorrectly concluded that "GHG mitigation is not required."[460] CDOT claims that a significance threshold is needed before mitigation is required, but NEPA does not require significance thresholds before mitigation is required. NEPA requires a full discussion of mitigation measures such that an EIS can holistically evaluate environmental impacts, regardless

[455] *See* Section VIII.D, above; DEIS App'x E4 at 13–24.

[456] *See Nat'l Parks & Conservation Ass'n v. FAA*, 998 F.2d 1523, 1533 (10th Cir. 1993) (finding agency erred under Section 4(f) by irrationally assuming that additional noise from airplane traffic would not impair users of a national recreation area).

[457] *See generally* DEIS App'x E16.

[458] 49 U.S.C. § 303(c).

[459] *See Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351 (1989) (holding that the requirement that an agency discuss mitigation measures is implicit in "NEPA's demand").

[460] State GHG Tech. Report at 40.

89

Response to Comment 83

Trails, greenways, and trailheads were analyzed as part of the Traffic Noise Analysis. Based on the noise analysis, 16 separate trail locations along the corridor are expected to see noise levels increase by 0.0 to 3.2 decibels (Preferred Alternative). Two trail locations are expected to see a 0.0 to 2.0 dB decrease in noise. The noise analysis was conducted in accordance with CDOT's September 2020 NAAG per 23 CFR 772. Noise walls were not recommended for any of the trail locations because they were not reasonable and feasible. Please see Section 5.4.4, IMP4 and IMP8, of the Final EIS for information on noise analysis, reasonable and feasible criteria, and Section 4(f).

Response to Comment 84

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

NEPA is a procedural statute and does not in itself contain a mitigation requirement. Guidance was followed to include mitigation as appropriate. Please see Chapter 5.0 of the ROD for all the federal mitigation, other environmental commitments, and permits necessary for this project.

Additional community improvements from the greenhouse gas analysis required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Greenhouse Gas and Community Analysis Technical Reports, which are available on the project website.

of significance thresholds. Both Agencies have therefore arbitrarily and capriciously failed to discuss greenhouse gas mitigation measures in sufficient detail.

Notably, the recent I-70 expansion—in Denver County—included critical project elements for public health and community engagement, such as: a highway cap with a park to serve residents; remodeling parts of a nearby school; paying for home improvements to improve air filtration in nearby homes; contributing $2 million toward affordable housing projects; tree planting and long-term maintenance in rights of way along streets near the highway; tree plantings throughout the affected neighborhoods; a public web page with weekly updates on all construction activities and traffic impacts, along with email, text, and social media alerts; a telephone hotline for community feedback and complaints, including assistance for non-English speakers.[461] In total, CDOT made 148 commitments and modifications to reduce the impact of the project, and later agreed to additional court-enforceable measures as part of a settlement agreement. Adams County and the I-270 project deserve no less.

The DEIS discusses two types of commitments: mitigation commitments, listed in Section 5.0, and "state commitments" that "are funded by state dollars" and separately available, though these state commitments are not part of the DEIS.[462] Taken together, these commitments are insufficient for the planned I-270 project.

Each of the improvements discussed below should be considered and incorporated into the project plans irrespective of which alternative is ultimately selected: each measure would reduce impacts to the surrounding community, improvements that are especially necessary and appropriate in light of the historical and environmental injustices shouldered by the community.[463]

A. Regional transit

85 The I-270 corridor serves many trips that begin and end far afield from the actual corridor. The project can minimize and mitigate impacts by ensuring that robust transit offerings are available to serve these trips. Currently, the only transit option providing service on the corridor is the Regional Transportation District (RTD)'s Flatiron Flyer 5 (FF5) route. The route provides seven trips per day eastbound, and five trips per day westbound, on weekdays only, between Boulder

[461] Jon Murray, *I-70 project through northeast Denver receives final approval from Federal Highway Administration*, The Denver Post (Jan. 19, 2017), https://www.denverpost.com/2017/01/19/i-70-project-denver-final-approval/; Earthjustice, *Summary of the I-70 Settlement Agreement*, https://earthjustice.org/wp-content/uploads/summary-of-settlement-points.pdf

[462] DEIS at 5-1. Because these commitments are in the state-only documents and not the DEIS, FHWA is foreclosed from relying on those measures.

[463] *See* Section I, above.

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Response to Comment 85

Throughout the EIS process, CDOT has coordinated with RTD on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project. Please see Section 5.4.3, ALT6, of the Final EIS for additional information on increased transit.

and the Anschutz Medical Campus in Aurora.[464] In 2022 it served fewer than 100 people per day in each direction.[465]

The DEIS correctly recognizes that better transit service can "improv[e] congestion on I-270" by enticing people away from vehicle trips.[466] But the DEIS does not consider offering more transit services, either as an alternative or as a mitigation measure. CDOT has at least partial direct authority over transit offerings, as it has its own transit division, yet it "has no existing plans for transit or rail improvement projects in the I-270 corridor."[467] In addition, the Agencies must consider all feasible mitigation, including mitigation that can be addressed in partnership with other state and federal agencies.

Although more than 40% of trips on the corridor are long-distance, very few transit options exist to serve those trips.[468] Serving the needs of these users with transit options would relieve congestion and reduce air pollution along the corridor for nearby residents. To remedy these gaps, the project should include enhanced regional transit services. These should include more frequent service on the FF5—with hourly, all-day frequency[469]—as well as new routes. New routes could include running CDOT's own Bustang service from new mobility hubs on I-25 north to the airport. In addition, mitigation measures should include funding critical transit and multimodal projects that serve Adams County. Numerous projects with high scores from DRCOG lack funding and are not planned until 10 or 15 years from now, and should be considered as mitigation for this project.[470]

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[464] RTD, *Route FF5, Boulder-Anschutz* (last visited Jan. 19, 2026), https://app.rtd-denver.com/route/FF5/schedule?serviceType=3&direction=Eastbound&branch=FF5

[465] DEIS at 2-8, Tbl. 2-1.

[466] DEIS App'x D at 39.

[467] *Id.* at 33.

[468] In response to requests by GreenLatinos and other groups, CDOT conducted an origin/destination study using StreetLight Data to assess the kind of trips that pass through I-270. That study found that more than 44% of trips in the corridor are long-distance between US-36 and Aurora, originating and ending in various suburbs. CDOT, *Project Update & Origin and Destination Webinar I-270* at 17:10 (Dec. 22, 2022) (https://www.youtube.com/live/SkQi8KuWmzI?themeRefresh=1.

[469] GDT Recommendations at 2.

[470] *See* Compilation of DRCOG 2050 Metro Vision Projects for Adams County; *see also* DRCOG, *2050 Metro Vision Regional Transportation Plan* (May, 2024), https://www.drcog.org/sites/default/files/acc/TPO-RP-50MVRTP-EN-ACC-17x11-24-06-04-V1.pdf; DRCOG, *2050 Regional Transportation Plan, Candidate Project Submittals Project Scoring and Additional Information*, https://www.drcog.org/sites/default/files/acc/TPO-GF-25DEC15ATTACHC2-EN-ACC-25-12-09-V1.pdf

In addition, experts with Greater Denver Transit have identified several significant regional destinations along and near the I-270 corridor that lack adequate transit access.[471] These destinations include Commerce City Civic Center, which has no transit service; Dick's Sporting Goods Park, which is difficult to access without a car; and Northfield Mall, which is served only by hourly transit.[472] The project should include measures to significantly boost transit service to these destinations, thereby reducing vehicles on the corridor and mitigating air emissions. For example, Route 48 can be extended along 60th Avenue to serve the Civic Center and Dick's Sporting Goods Park.[473]

In addition, Greater Denver Transit recommends creating a high-quality transfer hub at US-6/I-270 (Vasquez Boulevard). The hub would connect the FF5, Route 48, and future services. Seamless transfers would be enabled by redesigning the interchange[474]—design that should happen now, to, at minimum, ensure the hub is possible in the future without major capital investments to rework the interchange.

B. Local transportation options

86 In addition to serving regional transportation needs, this project should equally support and serve the local residents—those who bear the brunt of the harmful impacts from the highway. These strategies should include improvements to local transit services, improved bicycle and pedestrian infrastructure, and safety upgrades to local streets and intersections. As the DEIS acknowledges, these facilities will serve not just as mitigation, but directly serve the purpose and need of the project: "A well-connected community with good transit service and bicycle and pedestrian facilities can connect people to their neighbors and community resources . . . decreasing the number of single-occupancy cars on the road," in turn improving traffic conditions on the highway.[475] In addition, these improvements align with key local planning efforts. Commerce City's 2023 Sustainability Action Plan calls for a mode shift of 20% by 2030 and 50% by 2050.[476] The City and County of Denver's climate goals include reducing driving by shifting 50% of workers to other transportation modes by 2030.[477] While the Agencies' DEIS acknowledges these goals, the Preferred Alternative does not support the goals. The DEIS should include additional mitigation measures and commitments that support local authorities' transportation plans and goals, and balance against harms from the project, including by building additional bicycle and pedestrian infrastructure improvements.

[471] GDT Recommendations at 1.

[472] *Id.*

[473] *Id.* at 2.

[474] *Id.*

[475] DEIS App'x D at 8.

[476] *See* State GHG Tech. Report at 15.

[477] *See id.*

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Response to Comment 86

Throughout the EIS process, CDOT has coordinated with RTD on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Note, though, that there is no requirement to decrease the number of single-occupant cars on the road. Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for additional information on increased transit and bicycle and pedestrian facilities.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

Greater Denver Transit recommends numerous improvements to local bicycle, pedestrian, and transit operations. Capital improvements include expanding safe, connected walking and biking infrastructure to transit, particularly to core routes such as the N Line lightrail; prioritizing transit on 60th Avenue, which serves multiple bus routes and would benefit from dedicated bus lanes, queue jumps, and transit signal priority; implementing similar transit priority measures on US-6 (Vasquez Boulevard), to support increased frequency for Route 48; and similar transit priority measures for 72nd Avenue, which serves three bus routes and is a core corridor for northern Commerce City.[478] Operational improvements include increasing the frequency of Route 48 to every 15 minutes and increasing the frequency for Route 88 to at least every 30 minutes.[479] Notably, capital investments can be funded directly as mitigation measures to this project. Toll revenue can support operational improvements, and toll revenue should be dedicated to these purposes, in order to ensure that benefits flow to the residents most impacted by the project.[480]

Additional specific projects that the Agencies should fund as part of the project, or mitigations to the project, include all unfunded projects listed in Table 1 and shown in Figure 24 of the Transit, Bicycle, and Pedestrian Technical Report.[481] This list only includes projects that are near the study area, but the Agencies have not explained why they were not considered for inclusion in the project or as mitigation measures. The network of proposed bike lanes, side paths, and green trails would greatly improve mobility within old Commerce City, immediately north of I-270, as well as connectivity across the freeway to greenways on the south side. Additionally, the Agencies should include improvements to the Brighton/Colorado intersection. These improvements were considered in the bicycle, pedestrian, and transit enhancements alternative, but were not carried over into the Preferred Alternative solely because the improvements "do[] not directly address connectivity across I-270."[482] That statement primarily reveals the improperly constrained statement of need,[483] and the Agencies do not explain *why*, at minimum, the improvements were not considered as mitigation.

Similarly, the Agencies rejected a new trail on the south side of I-270 connecting York Street to the South Platte River Trail on the grounds that it would have "property impacts."[484] But the Agencies do not describe the property impacts. This vague assertion does not support the Agencies' decision to exclude the trail as a mitigation measure—especially given that the project itself has numerous "property impacts" already.[485]

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[478] GDT Recommendations at 2.

[479] *Id.*

[480] *See id.* at 2.

[481] DEIS App'x D at 34–36.

[482] DEIS App'x B at 32.

[483] *See* Section III, above.

[484] DEIS App'x B at 32.

[485] *See* Section XI, above.

Other improvements that must be considered for mitigation are a new sidewalk on the west side of Quebec Street between RTD Bus Stop 330320 and East 43rd Place as well as upgrades to the bus stop there. The Agencies rejected these improvements "because improvements end at the truck stop" and because they do not provide connectivity across I-270.[486] But improvements do not need to end at the truck stop. And the sidewalk and improved bus stop can serve as mitigation regardless of whether it directly crosses I-270. The Agencies should include these measures in the supplemental DEIS.

In addition, the Agencies gave no reasoned explanation for excluding the widening of the sidewalk on the east side of Quebec Street between Northfield Boulevard and East 53rd Place from the Build Alternatives, let alone for excluding it as mitigation. The Agencies only said that "there is already an existing facility providing connectivity across I-270."[487] Additional connectivity is a *good* thing for users, and the Agencies should include this measure in the supplemental DEIS.

The measures that CDOT lists as "enhancements" intended to address greenhouse gas emissions are insufficient as mitigation measures and must be supplemented with the other measures described in these comments. First, to the extent that these measures are outside of the DEIS, they are not proper mitigation measures, are not enforceable, and otherwise cannot be relied upon by the Agencies in their analysis. Second, several measures are far too vague to constitute mitigation. For example, CDOT does not explain which transportation demand management strategies will be implemented with the local Transportation Management Organization, how much funding will support those strategies, or what the impact would be (how many e-bike tax credits? How many free transit passes?).[488] The measures include collaborating with local agency projects "that enhance community well-being," but do not specify which projects or even which agencies CDOT will work with.[489] The measures also "*could*" include a tow truck patrol system to clear crashes and reduce idling, but might not.[490] Such vague, half-hearted commitments do not provide adequate specificity for meaningful public comment and do not represent enforceable or useful mitigation measures.

C. Minimizing harm from construction activities

87 The DEIS acknowledges that construction activities will be disruptive, noisy, and contribute to air pollution. Yet the mitigation measures do not firmly commit to actually reducing noise or pollution, despite the availability of cost-effective technologies to do so. Instead, the DEIS hedges its commitments and provides no detail on which clean technologies will be deployed, and how those requirements will be enforced. The DEIS relies on commitments to use "the cleanest available engines" "[t]o the extent practicable" and to use "alternatives to diesel

[486] DEIS App'x B at Attach. A, Tbl. 3 (no page number available).

[487] *Id.*

[488] State GHG Tech. Report at 41.

[489] *Id.*

[490] *Id.*

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Response to Comment 87

CDOT and the I-270 project team will implement strategies to encourage local contractors to work on the project. CDOT has a statewide program, Connect2DOT, that is designed to help small businesses become more competitive and successful in working with CDOT and other local transportation agencies. CDOT offers free unlimited consulting, free or low-cost business training, and outreach events tailored to highway and bridge construction contractors and engineering-related professional services firms.

The Draft EIS acknowledges that there will be temporary increases in noise and emissions that may result in disturbances to the area. CDOT will take steps to minimize these disturbances through creating bid specifications in the contractor selection for project construction that prioritize and maximize use of zero emissions and lower emitting engines to the extent that a fair and open competitive solicitation process is maintained.

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. The I-70 East/Central 70 project mitigation fell under environmental justice. There are many construction-related mitigations, other environmental commitments, and permits required for the Preferred Alternative as shown in Chapter 5.0 of the ROD.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

engines" "[t]o the extent practicable."[491] This language is impermissibly vague and noncommittal. Contractors and the public cannot discern what actions are required, what constitutes "practicable," or who determines practicability. Such open-ended, discretionary mitigation does not meet NEPA's demand for discussion of specific mitigation measures. Without specificity, clear oversight, and consequences for noncompliance, the Agencies' evaluations of this measure and others that include similar qualifiers do not comply with NEPA or benefit the public.

The DEIS also provides a list of options that contractors can use as alternatives to diesel engines, leaving contractors and the public with no clarity about what is actually required.[492] The measure also lists electric engines last out of the available options, suggesting that electric engines are not actually required even when feasible. The agencies have thereby omitted feasible, available mitigation in the form of requiring the use of zero-emission construction equipment. The DEIS overlooks the important dual benefits of electric equipment, which is not just cleaner, but also quieter than combustion equipment. The DEIS should therefore prioritize electric equipment and specify when it will be deployed, as well as methods of oversight to ensure compliance.

A wide range of zero-emission electric equipment is available on the market today across machine classes.[493] Because this equipment is commercially available and feasible, reliance on biodiesel, liquified natural gas, compressed natural gas, and fuel cells is inappropriate. Electric equipment is both cleaner—releasing zero tailpipe emissions—and is quieter, producing "significantly less noise and vibration."[494] The use of electric trucks is a feasible mitigation for both emissions and noise impacts, and should be incorporated into the EIS. Electric trucks are

[491] DEIS at 5-6 to 5-7.

[492] *Id.* at 5-7.

[493] Jinjian Li, *Zero-emission construction machinery in China, 2025*, ICCT (Sep. 2025), https://theicct.org/wp-content/uploads/2025/09/ID-443-%E2%80%93-ZE-Machinery_market-spotlight_final.pdf.

[494] Sustainable Procurement Platform, ICLEI – Local Governments for Sustainability, *Big Buyers Initiative Factsheet for Citizens*, https://sustainable-procurement.org/fileadmin/user_upload/Big_Buyers_Initiative/ZemCons/Big-Buyers-factsheet-citizens.pdf ("Zero emission equipment produces significantly less noise and vibration, which reduces the impact on workers' health and reduces nuisance to those living or working nearby. Reduced noise may allow for extended hours of construction work, leading to overall reduced project time."); Clean Transp. Program, Cal. Energy Comm'n, *Port of Long Beach Zero Emissions Terminal Equipment Transition Project*, at 54 (Apr. 2024), https://www.energy.ca.gov/sites/default/files/2024-04/CEC-600-2024-042.pdf ("The eRTG cranes are significant improvements for operators and the environment, who immediately noticed the lack of diesel exhaust and noise in their cabs.").

much quieter than diesel trucks.[495] Some studies have found noise reductions of up to 10 dBA.[496] The Project will generate numerous daily and annual truck trips. If those trips were not made by diesel trucks, but were instead made by electric trucks, the project's air pollution, GHG emissions, and noise impacts would be greatly reduced. The usage of battery-electric trucks is also feasible because numerous studies show that the current total cost of ownership for even a large battery-electric semi-truck is less than a diesel equivalent,[497] and numerous models are available for purchase.[498] The EIS should therefore require the use of electric vehicles to serve the construction site, including heavy-duty electric trucks.

Similarly, electric construction equipment is commercially available now, as are solutions for on-site electricity; the EIS should require use of these technologies at the construction site. Construction sites around the world are reducing their emissions by electrifying equipment, including some all-electric construction sites.[499] Available electric equipment includes mini

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[495] Marie Agnès Pallas et al., *Noise emission assessment of a hybrid electric mid-size truck*, Applied Acoustics, Feb. 2014, at 280–90, https://doi.org/10.1016/j.apacoust.2013.08.012; Giles Parkinson, *Sounds of silence: How quiet are heavy duty electric trucks?*, The Driven (Sep. 26, 2022), https://thedriven.io/2022/09/26/sounds-of-silence-how-quiet-are-heavy-duty-electric-trucks/.

[496] David Ibarra et al., *Noise emission from alternative fuel vehicles: Study case*, Applied Acoustics, Mar. 2017, at 58–65, https://doi.org/10.1016/j.apacoust.2016.11.010.

[497] *See, e.g.*, Cal. Air Res. Bd., *Draft Advanced Clean Trucks Total Cost of Ownership Discussion Document* (Sept. 9, 2021), https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc_ADA.pdf; Dale Hall and Nic Lutsey, *Estimating the Infrastructure Needs and Costs for the Launch of Zero-Emission Trucks*, International Council on Clean Transportation (Aug. 2019), https://theicct.org/sites/default/files/publications/ICCT_EV_HDVs_Infrastructure_20190809.pdf . In addition, incentives are available in Colorado that make electric truck purchases even more cost-effective. *See* Colorado Department of Public Health & Environment, *Clean Fleet Vehicle and Technology Program*, https://cdphe.colorado.gov/clean-fleet-vehicle-and-technology-program. Electric trucks are even more cost-effective when the environmental externalities of air pollution and GHG emissions are monetized and incorporated into a TCO analysis. *See* Amol Phadle et al., *Why Regional and Long-Haul Trucks are Primed for Electrification Now*, Lawrence Berkeley National Laboratory, 20 (Mar. 2021), https://eta-publications.lbl.gov/sites/default/files/updated_5_final_ehdv_report_033121.pdf.

[498] CALSTART, *Zeroing In On Zero-Emission Trucks* (Jan., 2024), https://calstart.org/wp-content/uploads/2024/01/ZIO-ZET-2024_010924_Final.pdf (noting that as of June 2023, more than 160 models of zero-emission trucks were available in the U.S. from over 40 different manufacturers).

[499] *See, e.g.*, KlimaOslo, *Zero-emission construction sites are on the way* (Apr. 10, 2019), https://www.klimaoslo.no/moving-on-from-fossil-free-construction/; KlimaOslo, *Electric excavators mean zero-emissions construction sites* (Jun. 20, 2019), https://www.klimaoslo.no/emissions-free-construction-site/; Autodesk, *Switching on electric*

excavators, mid-size excavators, compact wheel loaders, asphalt compactors, compact track loaders, skid-steer loaders, swing loaders, small articulated loaders, backhoe loaders, site dumpers, stand-on track loaders, crawler cranes, boom lifts, telehandlers, tandem rollers, and mini dumpsters.[500] Also available are portable chargers for small machines, as well as transportable charging units that can fast-charge larger equipment without a converter or secondary charger.[501] Advantages of this equipment also include reduced maintenance costs compared to diesel machines and the fact that electric equipment does not need to idle.[502] The EIS should specify that these types of equipment must be electric, and any deviations from that requirement must be justified and approved by an independent third-party monitor.

For any equipment that must use a diesel engine, the EIS should require the use of Best Available Control Technology, without any qualifiers. This should apply to off-road equipment, on-road trucks, and stationary equipment, such as generators. Again, an independent third-party monitor should oversee compliance with these provisions.[503]

The DEIS also fails to consider construction mitigation measures that CDOT provided as recently as the I-70 construction. For that project, residents of nearby neighborhoods were provided with interior storm windows and two free portable or window-mounted air conditioning

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construction equipment can make jobsites greener (Jan. 3, 2022), https://www.autodesk.com/design-make/articles/electric-construction-equipment

[500] Nate Hendly, *Electric equipment sparking excitement*, On-Site (Nov. 25, 2024), https://www.on-sitemag.com/features/electric-equipment-sparking-excitement/; Heavy Equipment Guide, *Battery-powered heavy equipment gains ground in construction* (Dec. 10, 2025), https://www.heavyequipmentguide.ca/article/40462/battery-powered-heavy-equipment-gains-ground-in-construction; Cal. Air Res. Bd., *CARB Advanced Clean Off-Road Equipment List Fact Sheet,* (Aug. 2023), https://ww2.arb.ca.gov/sites/default/files/classic/ZEE/2023%20ZEE%20List%2008182023%20CORE%20TRL%20No%20Hybrid.pdf

[501] Nate Hendly, *Electric equipment sparking excitement*, On-Site (Nov. 25, 2024), https://www.on-sitemag.com/features/electric-equipment-sparking-excitement/; Heavy Equipment Guide, *Battery-powered heavy equipment gains ground in construction* (Dec. 10, 2025), https://www.heavyequipmentguide.ca/article/40462/battery-powered-heavy-equipment-gains-ground-in-construction.

[502] Heavy Equipment Guide, *Battery-powered heavy equipment gains ground in construction* (Dec. 10, 2025), https://www.heavyequipmentguide.ca/article/40462/battery-powered-heavy-equipment-gains-ground-in-construction.

[503] *See, e.g.*, Los Angeles World Airports, *LAX Master Plan, Community Benefits Agreement (CBA), 2010 Annual Progress Report* (Sept., 2011), https://www.lawa.org/sites/lawa/files/documents/CBAStatusReport2010.pdf (LAX community benefits agreement requiring BACT for diesel equipment with third-party oversight).

units with air filtration, as well as assistance for the potential additional utility costs.[504] These measures specifically were aimed at mitigating construction dust for residents who ventilate their homes by opening windows. Impacted Adams County residents must receive these same benefits.

Finally, the EIS should include a requirement for regular public-facing reports detailing construction emissions, including (a) the third-party monitor's findings as to each piece of diesel equipment, documenting compliance as it relates to the infeasibility of deploying a zero-emissions alternative, as well as outfitting the device with the best available control devices; and (b) total estimated emissions from construction equipment. Full transparency will increase public trust and ensure proper oversight and accountability with respect to the mitigation measures' implementation.

D. Reducing freight emissions on the corridor

88 The agencies assert that a primary purpose of this project is to support existing and future freight travel on the corridor, including hazardous and oversize loads. Yet the DEIS does not consider any methods of mitigating emissions from freight traffic. To mitigate the impacts of these vehicles, the Agencies must consider methods of supporting freight electrification. Colorado's current plans to support vehicle electrification focus primarily on passenger vehicles and locations distant from the I-270 corridor, despite the fact that the I-270 area is suffering from heavy freight pollution and some of the heaviest state impacts of vehicle pollution generally.[505] The opportunity for deploying electric trucks in Adams County is particularly high: RMI's analysis estimates that more than 14,000 heavy and medium-duty vehicles are primed for electrification in the county, more than in any other Colorado county.[506]

To mitigate the impact of freight traffic on I-270, the Agencies should install charging infrastructure along the corridor. The charging infrastructure should follow the guidelines established by NEVI, including the requirements regarding distance from the corridor. Zero emission charging infrastructure will support long-distance freight as well as medium- and heavy-duty trucks that operate in south Commerce City and north Denver, having the added impact of supporting lower emissions from freight on local streets.

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[504] CDOT, I-70 East Final Environmental Impact Statement and Section 4(f) Evaluation at 5.20-6 (Jan. 2016).

[505] CDOT, *Colorado National Electric Vehicle Infrastructure (NEVI) Plan* (July, 2022), https://www.codot.gov/programs/innovativemobility/assets/co_neviplan_2022_final-1.pdf at 38 (explaining that "the NEVI program is intended to support . . . light-duty passenger vehicles," with freight electrification as a co-benefit); coloradobiz, *Colorado sues Trump administration over EV charging funds* (Dec. 16, 2025), (https://coloradobiz.com/colorado-sues-trump-ev-charging-funds/ (describing award of CFI funds for hydrogen fueling-stations, not electric freight vehicles, to Colorado State University).

[506] RMI, Advanced Clean Trucks Dashboard, https://rmi.org/advanced-clean-trucks-dashboard/opportunity-electrifiable-trucks.

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Response to Comment 88

There is no federal requirement to reduce freight emissions.

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

The federal mitigation and commitments included in Chapter 5.0 of the ROD.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

The agencies should also commit to creating an incentive-based zero-emission truck program, or I-270 Clean Truck Program. Specifically, the project should include at least $50 million in dedicated funds for zero and near-zero emission trucks. To receive funds, the truck owners would need to report travel on I-270. There should also be a minimum VMT travel commitment for each truck that receives Program funds. The program should work to identify potential applicants and prioritize fleets that serve origins and destinations within the I-270 area, to ensure maximum benefits for local residents.[507]

E. Green space & connectivity

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The DEIS treats the area surrounding I-270 as a sacrifice zone—an area already polluted and degraded, such that further pollution and degradation will have little additional harm.[508] This lens causes the DEIS to overlook key mitigation measures concerning green space.

For example, the Agencies describe Sand Creek as anomalous compared to the overriding "industrial setting" of the area.[509] In fact, industrial incursions into the Sand Creek watershed have degraded the original, natural character of the area, where three waterways—Sand Creek, Clear Creek, and the South Platte River—are present. The proposed project should not only avoid further degradation, but seek to restore the area, improving its conditions for both residents and wildlife.

First, the proposed project should include a land bridge crossing I-270 and connecting wildlife along Sand Creek to areas northeast of the highway.[510] Just as the I-70 project included a freeway cap with a park, Adams County and its residents should also benefit from a connection across the freeway that is accessible and pleasant. The proposed pedestrian walkway, while a step in the right direction, would be difficult to access—requiring long detours for some residents in order to access the stairs or ramp, and then a steep climb, and then an unpleasant crossing traversing a noisy and polluting highway. At least one land bridge would be a meaningful improvement to the proposed design that would provide greater benefits.

In addition, the DEIS only contemplates replacing trees that are removed—not adding additional trees or landscaping. The agencies should provide tree plantings and long-term maintenance in rights of way along nearby streets; provide vine or other plantings on community-facing sides of permanent noise walls, except where community art is planned; and provide at least $25,000 for

[507] *See generally,* I-710 Clean Truck Program, Program Description (Sept. 18, 2020), https://lede-admin.la.streetsblog.org/wp-content/uploads/sites/50/2021/05/I-710-Clean-Truck-Program-Long-Description-09.20.20.pdf at 8-11 (describing clean emission truck program on I-710).

[508] *See* Section I, above.

[509] DEIS at 4-82.

[510] *See* DAT Report at 30–31.

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Response to Comment 89

Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Many bridges cross streams in the area and nearly all these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the project does not include new wildlife connectivity features across I-270.

Wildlife or "land bridge" crossings were not carried forward due to the absence of documented wildlife crash patterns on the corridor, the corridor's exclusion from CDOT's prioritized wildlife crossing list, and the substantial ROW and cost implications.

However, the project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Please see Section 5.4.3, ALT7 and ALT8, of the Final EIS for information on increased bicycle and pedestrian connectivity.

Please see Chapter 5.0 of the ROD for information on mitigation that requires tree replacement.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

tree plantings in nearby neighborhoods—as the agencies did in the I-70 project, and as recommended by the DAT.[511]

The project should also implement key greening strategies recommended by the DAT. These include creating a green buffer directly adjacent to I-270, creating green buffers between residential and industrial areas, and connecting the areas' existing green network.[512] As the DAT Report explains, green buffers "are strips of land with vegetation designed to mitigate the impact of human activities on the environment and sensitive ecological areas."[513] These green buffers can help "mitigate the flow and transmission of harmful pollutants by capturing and sequestering carbon and releasing oxygen to help mitigate greenhouse gases," in addition to creating a useful separation between industrial operations and other areas.[514]

F. Transparency during construction

90 The DEIS's commitments to monitoring and addressing construction-related pollution emissions are insufficient to protect workers' and the public's health. With respect to air quality, the DEIS explains CDOT's plans to "[d]evelop a monitoring plan" for PM that would "trigger additional mitigation measures when elevated PM readings occur during construction."[515] The agencies do not define the trigger levels or explain how PM will be monitored, leaving the public unable to meaningfully comment on the sufficiency of this mitigation measure. The agencies should commit to real-time monitoring, with web and app-based accessibility for users to monitor air quality levels, and to a maximum trigger level of 135 $\mu g/m^3$ for $PM1_{10}$, which is just below the National Ambient Air Quality Standard (NAAQS) of 150 $\mu g/m^3$ over a 24-hour period.[516] This trigger level would therefore ensure that the construction pollution stays below that threshold. This measure should include opt-in alerts for members of the public to receive when thresholds reach the limit.

In addition, the DEIS states that "[r]eal time monitoring during construction for VOCs, methane, and ACMs are *recommended*,"[517] and that "[h]ealth and safety monitoring . . . *may* be necessary"[518] to manage the risks associated with historic landfills. These measures should not be recommended, but required. Given the project's likelihood of encountering and releasing large quantities of landfill gas—which consist of methane in addition to dozens of toxic air pollutants,

[511] Settlement Agreement between Petitioners Sierra Club, et al., and CDOT (Dec. 20, 2018); DAT Report at 27.

[512] DAT Report at 26.

[513] *Id.*

[514] *Id.*

[515] DEIS at 5-5.

[516] *See* 78 Fed. Reg. 3085 (Jan. 15, 2013) (retaining 24-hr PM10 standard of 150 $\mu g/m^3$).

[517] DEIS at 4-61 (emphasis added).

[518] *Id.* at 5-41 (emphasis added).

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Response to Comment 90

Air quality monitoring during preconstruction and during construction is required by state regulation CRS 43-1-128 for this project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the ROD. Air quality monitoring will be completed in compliance with state regulation and related guidance.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

For additional information related to construction, see the State Community Analysis Technical Report, which includes additional enhancements that CDOT is committed to including in the project such as public involvement and transparency. This report is available on the project website.

including airborne PFAS[519]—it is critically important for those emissions to be monitored, and if any large plumes are detected, quickly remedied. The state of Colorado has just finalized its first-ever landfill emission reduction rules, only heightening the importance of ensuring that these emissions do not escape into the atmosphere and surrounding neighborhoods.[520]

91 Similarly, the DEIS does not appropriately consider and minimize impacts to groundwater from PFAS releases. The DEIS states that as mitigation, the Agencies will later "[c]onsult with [Colorado's water quality agency] on potential PFAS impact and management."[521] That consultation and planning must happen now, as part of the environmental planning process. The public cannot meaningfully understand and comment on the environmental impacts of the proposal without this information from the water quality agency about appropriate PFAS management. The agencies should consider and include mitigation measures that would actually protect against PFAS incursions into groundwater, including a concrete monitoring plan that will rapidly identify elevated PFAS levels and trigger immediate action to remedy the situation.

92 The DEIS also fails to provide adequate public interfacing during construction. As a mitigation measure, the DEIS states that a mechanism for receiving complaints "*may*" include a hotline, but a hotline is not required, and the specific mechanism will be determined later.[522] This vague commitment offers little in the way of actual assurances concerning public access and transparency during construction. The agencies should commit to offering a hotline, email, webform, *and* text options, with each providing support for residents with limited English proficiency. The agencies should further commit to responding to complaints within the same day on weekdays and within 24 hours on weekends, as was required during the I-70

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[519] Jean Bogner et al., *Field Measurement of Speciated HAP [Hazardous Air Pollutant] Emissions from Landfill Cover Soils*, (March 2004), https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=845df9cd0fa8a6d5038b9b7137ed5b2e8fe7d7f7; EPA, *Municipal Solid Waste Landfills: National Emissions Standards for Hazardous Air Pollutants (NESHAP)*, https://www.epa.gov/stationary-sources-air-pollution/municipal-solid-waste-landfills-national-emission-standards (last updated Sept. 18, 2025). Ashley M. Lin et al., *Landfill Gas: A Major Pathway for Neutral Per- and Polyfluoroalkyl Substance (PFAS) Release*, 11 Env't Sci. & Tech. 730, 733–34 (2024), https://doi.org/10.1021/acs.estlett.4c00364 ("As landfills can be viewed as unabating PFAS repositories, the significance of [landfill gas] management in mitigating the long-term, long-range atmospheric transport of [volatile] PFAS . . . cannot be understated."); EPA, *Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Polyfluoroalkyl Substances*, at 74 (Apr. 8, 2024) ("Interim Guidance"), https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf.

[520] *See* 5 Colo. Code Regs. § 1001-35 (Regulation 31: Control of Methane Emissions from Municipal Solid Waste Landfills); *see also id.* at Part K (noting "positive health benefits" as a result of "reductions in harmful air pollutants).

[521] DEIS at 5-35.

[522] *Id.* at 5-10.

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Response to Comment 91

Per- and Polyfluoroalkyl Substances (PFAS) are discussed in the Modified Environmental Site Assessment in Appendix E11 of the Draft EIS. PFAS are emerging contaminants with potential to impact the project. In 2020, the Colorado Department of Public Health and Environment - Water Quality Control Commission adopted Policy 20-1 (Policy for Interpreting the Narrative Water Quality Standards for PFAS), which regulated several PFAS chemicals with maximum contaminant levels set at 70 milligrams per liter for drinking water. The policy also implemented other groundwater requirements and conditions for PFAS in Colorado Discharge Permit System discharge permits, in particular, the Dewatering General Permit Program. PFAS monitoring has been integrated into several facilities' sampling plans (i.e., Suncor Energy, Phillips 66 Denver Terminal and Chemical Sales Company). CDPHE maintains online mapviewers of potential PFAS source areas and risk categories associated with business type/land use. This is an emergent potential pollutant that DOTs don't have much information or data on at this time. Given the historic land use surrounding the I-270 corridor, the project team will monitor future developments in PFAS regulations and consider potential project implications (added costs, schedule delays, etc.) that additional PFAS regulations may cause.

Response to Comment 92

The contractor team, once hired, is responsible for public involvement during construction. Their team will take the commitments identified in Chapter 5.0 of the ROD and develop a public involvement plan that has more specificity included. At this time, it is anticipated that a lot of the same practices will be included that were included on the Central 70 project. All materials will continue to be provided in both English and Spanish like was done through the EIS process.

construction.[523] The contractor must also be required to log and report all inquiries and complaints to the public and to CDOT on a monthly basis.

Additional transparency should also be ensured via prompt and detailed communications. The agencies should commit to the same level of communications that were provided during the I-70 construction:

- providing a public web page, with content in English and Spanish, describing all major construction activities and traffic impacts, to be updated weekly;
- sending email blasts, text alerts, and social media updates weekly or more frequently to alert the public to changes or additions to the planned activities;
- provide notifications of major project developments and heavy construction work at least 7 days in advance in both Spanish and English;
- distribute a monthly English & Spanish newsletter, by email, posted online and at community centers, and hand delivered to residents in the area;
- post factsheets on the website on specific issues in both Spanish and English, and provide door-to-door outreach by bilingual personnel to inform specific residents of focused activities affecting their block;
- publish a quarterly communications report throughout construction, including a summary of primary construction work during the preceding quarter; a summary of communications received from the public; a detailed summary of any mitigation actions taken; and a list of times of that PM10 reached or exceeded 135 $\mu g/m^3$ during the preceding quarter, with a description of what actions were taken in response;
- push real-time opt-in alerts via text and email to members of the public whenever thresholds are exceeded.

G. Transparency post-construction

Nowhere does the DEIS discuss whether or how the Agencies will monitor future impacts of the project. Assessing the future impacts of the project—and comparing them to the DEIS' predictions—is critical for building public trust and ensuring that future planning efforts will benefit from lessons learned. Currently, it is far too difficult for the public to compare project outcomes to the predictions. In particular, the Agencies should annually publish data on travel times for general-purpose and managed lanes during peak periods; throughput rates for general-purpose and managed lanes during peak periods; traffic counts per lane broken down by hour; total daily VMT for the corridor; truck-specific vehicle counts broken down by hour; and total estimated emissions based on emissions factors derived from vehicle registrations. The data

[523] Settlement Agreement between Petitioners Sierra Club, et al., and CDOT at 8 (Dec. 20, 2018).

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Additional community improvements from the disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Community Analysis Technical Report, which is available on the project website.

should be made available with respect to I-270 as well as nearby corridors, such as I-25 and I-70, and major arterials—the routes that I-270 traffic may divert either to or from. This data and associated analysis will allow for a direct and honest comparison to the DEIS' forecasts and support future planning efforts.

H. State commitments

94 In its "state-only," non-DEIS documents, CDOT avers that it "anticipates dedicating approximately 1.5% to 2% of the total project cost to community enhancements."[524] While GreenLatinos appreciates this gesture, it falls far short of what is needed to mitigate the harms from this project and address decades of transportation-related harms inflicted on the community.[525] In light of these extensive harms, CDOT should commit to expending at least 10% of total project costs on locally beneficial projects. Further, this number should be calculated based on the full project cost, *i.e.*, including the cost of the direct connect ramps.[526]

Problematically, some of these funds are allocated to efforts that should properly be considered as part of the underlying project, including efforts that are required by Colorado law. For example, CDOT states that initial allocations from the fund have already paid for enhanced air quality monitoring prior to construction, and that additional funds will be used to improve public access to air quality via real-time dashboard.[527] But this air quality monitoring and real-time reporting is required by Colorado statute and is in no way an 'additional' benefit for the community—it is the bare minimum.[528] CDOT must pay for that monitoring as part of the underlying project, ensuring that the full community enhancements fund is directed toward truly additive benefits. Claiming credit as a 'community enhancement' for efforts that are statutorily mandated is inappropriate and disingenuous. Similarly, a large portion of CDOT's "commitments," such as expanding tree planting, supporting the Sand Creek Greenway, improving sidewalk connections, and so on, is required mitigation *within* the bounds of the project. CDOT's attempt to double-count this effort as additional enhancements, when they should be included as mitigation within the EIS as explained in the preceding sections, is—at best—misleading, and only further undermines trust with the community.

Conclusion

95 The Agencies must proceed with a Supplemental DEIS that studies the Healthy Community No-Widening Alternative and remedies the errors and deficiencies discussed above.

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[524] State Community Analysis Tech. Report at Attach. A, Community Enhancements Framework, p. A-2.

[525] *See* Section I, above.

[526] *See* Section IV.B.2.vi, above.

[527] State Community Analysis Tech. Report at Attach. A, Community Enhancements Framework, p. A-3.

[528] Colo. Rev. Stat. § 43-1-128(4).

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Please see the State Community Analysis Technical Report and I-270 Corridor Improvements Project – State Reports Responses to Substantive Comments document available on the project website for information on the amount of funding allocated towards additional community improvements that came out of the disproportionately impacted communities analysis required as part of SB 21-260 and codified in CRS 43-1-128.

Response to Comment 95

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis and a Supplemental Draft EIS is not necessary. See Section 5.4.2, ALT4, and Appendix D, Two Express Lanes that Accommodate Transit Technical Report, of the Final EIS for additional information about the evaluation.

Please contact the project team at cdot_i-270@state.co.us or 303-512-4270 for copies of any of the exhibits shown below.

Index of Exhibits

Comments of GreenLatinos, et al.
On the I-270 Draft Environmental Impact Statement and
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2	01764-01784	Paul Minett, Trip Convergence Ltd, *PASTE for I-270 in Colorado* (Jan. 20, 2026) (Expert Report prepared for Earthjustice, on behalf of GreenLatinos)
2	01785-01787	Greater Denver Transit, I-270 Transit Alternatives (Jan. 19, 2026)
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2	02161-02195	Denver Regional Council of Governments. (2020). *2050 small-area forecast & scenario planning analysis* (Appendix F). In *2050 Metro Vision Regional Transportation Plan*
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6	05685-05696	Pranab Kar et al., *Assessing the crash risk of mixed traffic on multilane rural highways using a proactive safety approach*, 188 Accident Analysis & Prevention 107099 (Aug. 2023)
6	05697-05708	CDOT, *Project Update* – I-270 Corridor Improvements Project (Dec. 17, 2025)
6	05709-05724	Erica Morrell, *Public Comment Periods and Federal Environmental Impact Statements: Potentials and Pitfalls from the American Experience*, Mich. J. Sustainability, Vol. 1 (Fall 2013)
7	05725-05729	Shelly Tan et al., *Amid the pandemic, public transit is highlighting inequalities in cities*, Wash. Post (May 15, 2020)
7	05730-05744	Christof Spieler, *Racism has shaped public transit, and it's riddled with inequities*, Rice Univ. Kinder Inst. for Urb. Rsch. (Aug. 24, 2020)

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7	05745-05748	RAQC, *2025 Ozone Season Data Shows Improvement From Favorable Meteorology, But Nonattainment Area Continues to Be Out of Compliance* (Oct. 9, 2025)
7	05749-05752	E-mail chain beginning Oct. 22, 2025 at 3:38 p.m., and ending Nov. 7, 2025 at 11:17 p.m., between Andrew Hogle, Records Request Officer, CDOT, and Alexandra Schluntz, with Subject: Dialog case #161843 – CORA Request: Alexandra Schluntz
7	05753-05820	Thomas W. Sanchez, Rich Stolz, & Jacinta S. Ma, *Moving to Equity: Addressing Inequitable Effects of Transportation Policies on Minorities*, The Civ. Rts. Project Harvard Univ. VII (2003) ("Moving to Equity")
7	05821-05821	I-270 Historic Traffic Counts Summary
7	05822-05833	Daniel J. Smith et al., *Wildlife Crossing Structures: and Effective Strategy to Restore or Maintain Wildlife Connectivity Across Roads*, Handbook of Road Ecology Ch. 21 (Apr. 1, 2015)
7	05834-05881	First Amended Complaint for Declaratory and Injunctive Relief, *State of California, et al., v, United State of America, et al.*, 4:25-34-04966-HSG, N.D. Cal. (Oct. 10. 2025)
7	05882-06022	I-710 Clean Truck Program, Program Description (Sept. 18, 2020)
7	06023-06035	Stephen Trombulak & Christopher Frissell, *Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities*, 14 Conservation Biology 18 (Dec. 24, 2001)
7	06036-06041	Rodney van der Ree & Edgar van der Grift, *Recreational Co-Use of Wildlife Crossing Structures*, Handbook of Road Ecology Ch. 21 (Apr. 1, 2015)
7	06042-06047	X. Wu et al., *Air pollution and Covid-19 mortality in the United States: Strengths and limitations of an ecological regression analysis*, 6 Sci. Advances (2020)
7	06048-06054	Courtnee Melton, *How Transportation Impacts Public Health*, The Sycamore Inst. 2 (Feb. 21, 2017)
7	06055-06060	Julie Turkewitz, *Colorado Aims to Expand a Main Artery, but Beleaguered Neighbors Balk*, New York Times (Feb. 19, 2017)
7	06061-06079	GreenLatinos, *Comments on Notice of Intent to Prepare an Environmental Impact Statement for a Proposed Highway Project; Adams and Denver Counties, Colorado (Identification Number FHWA-CO-EIS-24-001) (Docket ID FHWA-2024-0057)* (Oct. 11, 2024)

Vol.	Bates Nos.	Document
7	06080-06083	E-mail chain beginning Oct. 11, 2024 at 1:27 p.m., and ending January 30, 2025 at 2:16 p.m., between Alexandra Schluntz, Senior Attorney, Earthjustice and Chris Horn, Senior Area Engineer, FHWA , Records Request Officer, CDOT, and Alexandra Schluntz, with Subject: GreenLatinos comment re FHWA-2024-0057
7	06084-06084	Colorado Department of Health Care Policy & Financing, *Adams County Fact Sheet: Fiscal Year 2025*
7	06085-06091	Howard G. Birnbaum et al., *Measuring the Impact of Air Pollution on Health Care Costs*, 39 Env't Health 2113 (Dec. 2020)
7	06092-06092	RMI, Advanced Clean Trucks Dashboard (screenshot)
7	06093-06096	CDPHE, *Enforcement Actions Against Suncor*
7	06097-06097	Photo from South Rose Hill neighborhood, taken by Ean Tafoya, GreenLatinos (Dec. 13, 2025)
8	06098-06124	Deborah N. Archer, *Transportation Policy and the Underdevelopment of Black Communities*, 106 Iowa L. Rev. 2125, 2136 (2021)
8	06125-06131	Baldauf R. et al., *Impact of Noise Barriers on Near-Road Air Quality*, 42 Atmospheric Env't 7502 (Oct. 2008)
8	06132-06168	Rayla Bellis et al., *The Congestion Con: How more lanes and more money equals more traffic*, Transp. for Am. 9 (Mar. 2020)
8	06169-06213	CalTrans: California Department of Transportation. (2025). "CSIS CAPTI Alignment Metrics"
8	06214-06222	Cao et al., *New Evidence of Rubber-Derived Quinones in Water, Air, and Soil*, 56 Env't Sci. & Tech. 4142 (2022)
8	06223-06403	CDOT, *Traffic Analysis and Forecasting Guidelines* (Jan. 2023)
8	06404-06434	CDPHE, Cost-Benefit Analysis, Regulation Number 20 (Oct. 19–20, 2023) (Advanced Clean Cars II benefits estimates)
8	06435-06456	CDPHE, Cost-Benefit Analysis, Regulation Number 20 (Apr. 7, 2023) (Advanced Clean Trucks benefits estimates)
8	06457-06516	Colorado Transportation Investment Office (CTIO) 2024 Annual Report (Jan. 15, 2025)
8	06517-06523	Danica Lee, Denver Public Health and Environment, *Research and Recommendations regarding Regulation of Vibrations in Denver* (Feb. 26, 2020)

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8	06524-06543	Maggie Davis, *Virginia Has the Most Expensive Interstate Road, Bridge and Tunnel Tolls per Mile*, LendingTree (May 13, 2024)
8	06541-06577	Duranton, Gilles, and Turner, M.A. (2011). "The Fundamental Law of Road Congestion: Evidence from US Cities." American Economic Review 101 (6): 2616–52. DOI: 10.1257/aer.101.6.2616
8	06578-06693	FHWA: Federal Highway Administration (2018). Traffic Data Computation Method POCKET GUIDE
8	06694-06722	Gao, Y., & Levinson, D. (2025). The rise of trucks and the fall of throughput. Transportmetrica A: fTransport Science, 1–28.
8	06723-06726	Andrew R. Goetz & E. Eric Boschmann, *Metropolitan Denver: Growth and Change in the Mile High City* 138 (2018)
8	06727-06736	Handy, Susan and Marlon G. Boarnet. Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief prepared for California Air Resources Board, September 30, 2014
8	06737-06738	IRS, *IRS sets 2026 business standard mileage rate at 72.5 cents per mile, up 2.5 cents* (Dec. 29, 2025)
8	06379-06768	Levinson, D. M., & Wu, H. (2020). Towards a general theory of access. Journal of Transport and Land Use, 13(1), 129–158.
8	06769-06794	Littman, Todd. (2023). Transportation Cost and Benefit Analysis II – Travel Time Costs. Victoria Transport Policy Institute.
8	06795-06802	Marshall, N. (2018), Forecasting the impossible: The status quo of estimating traffic flows with static traffic assignment and the future of dynamic traffic assignment, Research in Transportation Business & Management, Volume 29, 2018, Pages 85-92
8	06803-07033	Minett, P., Niles, J., Lee, R., & Bogue, B. (2020). Congestion-clearing payments to passengers. Mineta Transportation Institute
8	07034-07037	Jon Murray, *Interstate 70 project in Denver gets noise variance renewal amid concerns about vibrations*, The Denver Post (Aug. 8, 2019)
8	07038-07050	Nello-Deakin, S. (2022). Exploring traffic evaporation: Findings from tactical urbanism interventions in Barcelona, Case Studies on Transport Policy, 10(4), 2430–2442. DOI:10.1016/j.cstp.2022.11.003
8	07051-07065	New York State Department of Transportation, I-81 Viaduct Project Draft EIS (July 2021)
8	07066-07072	Kayt Sukel, *With the 100-year flood model seemingly obsolete, what now?*, American Society of Civil Engineers (Nov. 6, 2024)

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8	07073-07079	Zhenyu Tian et al., *6PPD-Quinone: Revised Toxicity Assessment and Quantification with a Commercial Standard*, 9 Env't Sci. & Tech. Letters 140, 144 tbl. 1 (2022)
8	07080-07199	VDOT: Virginia Department of Transportation. (2025). "SMART SCALE Technical Guide"
8	07200-07242	Volker, James M. B. and Susan L. Handy. Updating the Induced Travel Calculator. UC Davis Research Reports, September 1, 2022
8	07243-07335	CDOT, *Draft for Internal Review: Environmental Assessment: I-270 Corridor Improvements Project* at 20 Tbl. 3-1 (Dec. 2022)

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Outlook

[cdot_i270] I-270 State Environmental Reports Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 11:52 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Your Input
Which topic(s) does your comment relate to?
State Environmental Requirements, Other
If you selected "Other", please specify
Making Public Comment on I-270
Provide your comment below:

1 CDOT DEIS-Draft Environmental Impact Statement Public Comment By Shaina Oliver Jan 10-13, 2026 Email: soliver@momscleanairforce.org Thank you for hearing my comments today. My name is Shaina Oliver. I'm a Field Coordinator for Moms Clean Air Force and EcoMadres in Colorado where we represent over 44,000 members statewide and over one million strong nationally. Parents, Guardians, and Caregivers united in fighting for our children's right to breathe clean air and to live in safe, healthy environments. Today I am testifying on behalf of Colorado parents counting on the Colorado Dept. of Transportation's leadership to protect community health and safety from the foreseeable impacts of the I-270 project. I am also an Indigenous Mother of four, part of a family of six. My children and I are descendants and survivors of the genocide known as the "Indian Removal Act", known to the Dine people as "The Long Walk of the Navajo". Today, we live and work on the ancestral lands of the 48 Tribal Nations where ancestral trails have been paved over by interstate highways. As Indigenous people we know environmental harms are embedded in and perpetuated by our laws, policies, and systems of governance. These harms do not only impact Indigenous communities, they impact communities across the United States. According to the American Lung Associate's 2025 State of the Air Report, 46% of Americans— over 150 million people—live in places with unhealthy levels of air pollution. Nearly 35 million of those affected are children. Here in the Denver metropolitan area, we rank the sixth worst regions in the nation for unhealthy ozone-smog pollution. The I-270 corridor impacts Latino, Black, Indigenous, and other disproportionately impacted communities. Residents who live near highways and industrial zoning areas are exposed to unhealthy levels of traffic-related air pollution and fine particulate matter, placing our communities - especially our children - at increased risk. As a community member living with asthma, I personally face heightened risks of asthma attacks, stroke, and premature death due to unhealthy air quality. My youngest son, who is now 14 years old, was diagnosed with asthma four years ago. Communities like ours already experience higher rates of allergies, asthma attacks, emergency room visits, infections, cognitive problems, lung cancer, heart disease, respiratory illness, adverse birth outcomes, and premature death. Expanding

Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

highways would only increase traffic pollution and safety risks, while express lanes would further create inequities and community burdens. Moms Clean Air Force urges CDOT's leadership to protect the health and safety of all communities by prioritizing safety-focused improvements that reduce traffic-ozone pollution and by expanding air quality monitoring with transparent public reporting so families can better understand and respond to local air conditions. Thank you for your time. Shaina Oliver, Field Organizer soliver@momscleanairforce.org

Personal Information

Name (first and last)

Shaina Oliver

Address

2301 Kearney St

City

Denver

Neighborhood/ZIP Code

80207

Stay Connected

Would you like to be added to the project email list?

yes

If Yes, please provide your email address

soliver@momscleanairforce.org

ReCaptcha Confirmation

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Outlook

[cdot_i270] Widening Project of I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 12/8/2025 1:42 PM
To I-270 Project Team <KathieBarstnar@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Kathie Barstnar
Subject
Widening Project of I-270
Your E-Mail Address
kbarstnar@wmrdenver.com
City
Denver
Zip Code
80204
Phone Number
3033780554
Comments
I am writing on behalf of NAIOP Colorado, the Commercial Real Estate Development Association. This is a major thoroughfare for truck traffic to route it around the I-25 / I-70 interchange and requires updating. The plan put forth from CDOT includes all the necessary improvements along with adding mass transit, bike and pedestrian accommodations. Alternative plans being proposed focus on the aspirational goals that, for many reasons, do not align with real world implementation in Colorado. Making the improvements to the system that is already in place with speed traffic through the area which will address emission concerns without a dramatic departure from the existing system. That proposed dramatic departure would significantly increase the costs of the project putting the ability to complete the project at risk. Please proceed with the proposed CDOT widening proposal.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Community member or neighbor

The I-270 Improvements Project Team

Response to Comment 1

Comments noted.

--
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cdot_i270@state.co.us
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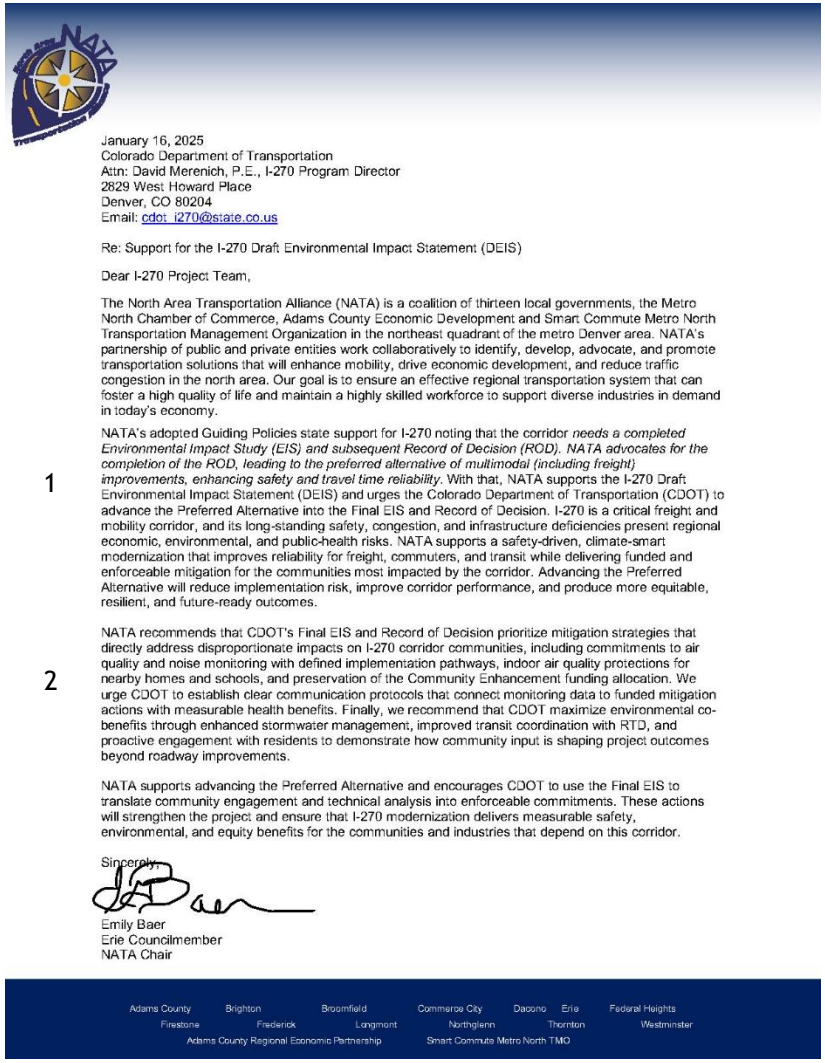
cdot_i270+unsubscribe@state.co.us.



January 16, 2025
Colorado Department of Transportation
Attn: David Merenich, P.E., I-270 Program Director
2829 West Howard Place
Denver, CO 80204
Email: cdot_i270@state.co.us

Re: Support for the I-270 Draft Environmental Impact Statement (DEIS)

Dear I-270 Project Team,

The North Area Transportation Alliance (NATA) is a coalition of thirteen local governments, the Metro North Chamber of Commerce, Adams County Economic Development and Smart Commute Metro North Transportation Management Organization in the northeast quadrant of the metro Denver area. NATA's partnership of public and private entities work collaboratively to identify, develop, advocate, and promote transportation solutions that will enhance mobility, drive economic development, and reduce traffic congestion in the north area. Our goal is to ensure an effective regional transportation system that can foster a high quality of life and maintain a highly skilled workforce to support diverse industries in demand in today's economy.

1 NATA's adopted Guiding Policies state support for I-270 noting that the corridor *needs a completed Environmental Impact Study (EIS) and subsequent Record of Decision (ROD). NATA advocates for the completion of the ROD, leading to the preferred alternative of multimodal (including freight) improvements, enhancing safety and travel time reliability.* With that, NATA supports the I-270 Draft Environmental Impact Statement (DEIS) and urges the Colorado Department of Transportation (CDOT) to advance the Preferred Alternative into the Final EIS and Record of Decision. I-270 is a critical freight and mobility corridor, and its long-standing safety, congestion, and infrastructure deficiencies present regional economic, environmental, and public-health risks. NATA supports a safety-driven, climate-smart modernization that improves reliability for freight, commuters, and transit while delivering funded and enforceable mitigation for the communities most impacted by the corridor. Advancing the Preferred Alternative will reduce implementation risk, improve corridor performance, and produce more equitable, resilient, and future-ready outcomes.

2 NATA recommends that CDOT's Final EIS and Record of Decision prioritize mitigation strategies that directly address disproportionate impacts on I-270 corridor communities, including commitments to air quality and noise monitoring with defined implementation pathways, indoor air quality protections for nearby homes and schools, and preservation of the Community Enhancement funding allocation. We urge CDOT to establish clear communication protocols that connect monitoring data to funded mitigation actions with measurable health benefits. Finally, we recommend that CDOT maximize environmental co-benefits through enhanced stormwater management, improved transit coordination with RTD, and proactive engagement with residents to demonstrate how community input is shaping project outcomes beyond roadway improvements.

NATA supports advancing the Preferred Alternative and encourages CDOT to use the Final EIS to translate community engagement and technical analysis into enforceable commitments. These actions will strengthen the project and ensure that I-270 modernization delivers measurable safety, environmental, and equity benefits for the communities and industries that depend on this corridor.

Sincerely,

Emily Baer
Erie Councilmember
NATA Chair

Adams County Brighton Broomfield Commerce City Dacono Erie Federal Heights
Firestone Frederick Longmont Northglenn Thornton Westminster
Adams County Regional Economic Partnership Smart Commute Metro North TMO

Response to Comment 1

Comments noted.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 3:23 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Business and Commerce , Bicycle and Pedestrian Resources, Community and Socioeconomics , Express Lanes, Local Traffic in Neighborhoods , Pedestrian Resources , Recreational Resources, Safety, Transit
If you selected "Other", please specify
Provide your comment below:

Northeast Transportation Connections (NETC) appreciates the opportunity to provide comments during the Draft Environmental Impact Statement (DEIS) phase of the I-270 Corridor Improvements Project. NETC serves as a Transportation Management Association focused on improving mobility, access, and transportation choice in northeast Denver and surrounding communities. As an organization, it is important to NETC to remain politically neutral with respect to which project alternatives advance. We believe strongly that community voices should guide decisions about the future of the I-270 corridor, and we appreciate CDOT's efforts to engage the public throughout this process. That said, NETC would like to lift up and support the multimodal elements included in the DEIS and encourage continued and expanded investment in transportation options beyond single-occupancy vehicle travel. Current congestion along the I-270 corridor negatively impacts residents, workers, and businesses, contributing to unreliable travel times, reduced economic productivity, degraded air quality, and safety concerns. Addressing these challenges will require a comprehensive, multimodal approach. If express lanes move forward as part of the project, NETC strongly encourages the inclusion of a robust Tolling Equity program. Such a program should be designed to put value back into the community by helping income-qualified residents and workers access express lanes when needed and by reinvesting toll revenues into complementary mobility programs. These could include, but are not limited to, free or reduced-cost transit passes, first- and last-mile solutions, and other community-serving transportation options. In addition, NETC encourages the I-270 program to actively support implementation of a microtransit service in Commerce City and nearby communities. Flexible, on-demand transit can play a critical role in improving access to jobs, services, and regional transit, particularly in areas that are currently underserved by fixed-route options. NETC also strongly supports safer and more comfortable bicycle and pedestrian connections across the I-270 corridor, including improved connections to the Sand Creek Regional Greenway. These connections are vital for community mobility, recreation, and health, and they help ensure that the interstate corridor does not function as a barrier to the mobility resources the greenway offers. Overall, NETC encourages CDOT and project partners to continue

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3
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Response to Comment 1

Comments noted.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Response to Comment 4

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Please see Section 5.4.3, ALT7, of the Final EIS for additional information on increased bicycle and pedestrian facilities.

prioritizing multimodal strategies that improve access, safety, and environmental outcomes for corridor communities, which we believe are being addressed in the local CDOT committements. We appreciate the opportunity to comment and look forward to continued collaboration as the I-270 project moves forward. Respectfully submitted, Northeast Transportation Connections (NETC)

Name (first and last)
Eric Herbst (NETC)
Address
7350 E. 29th Ave. Ste 300
City
Denver
Neighborhood/ZIP Code
80238
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
eherbst@netransportation.org

--
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codot.gov/projects/i270
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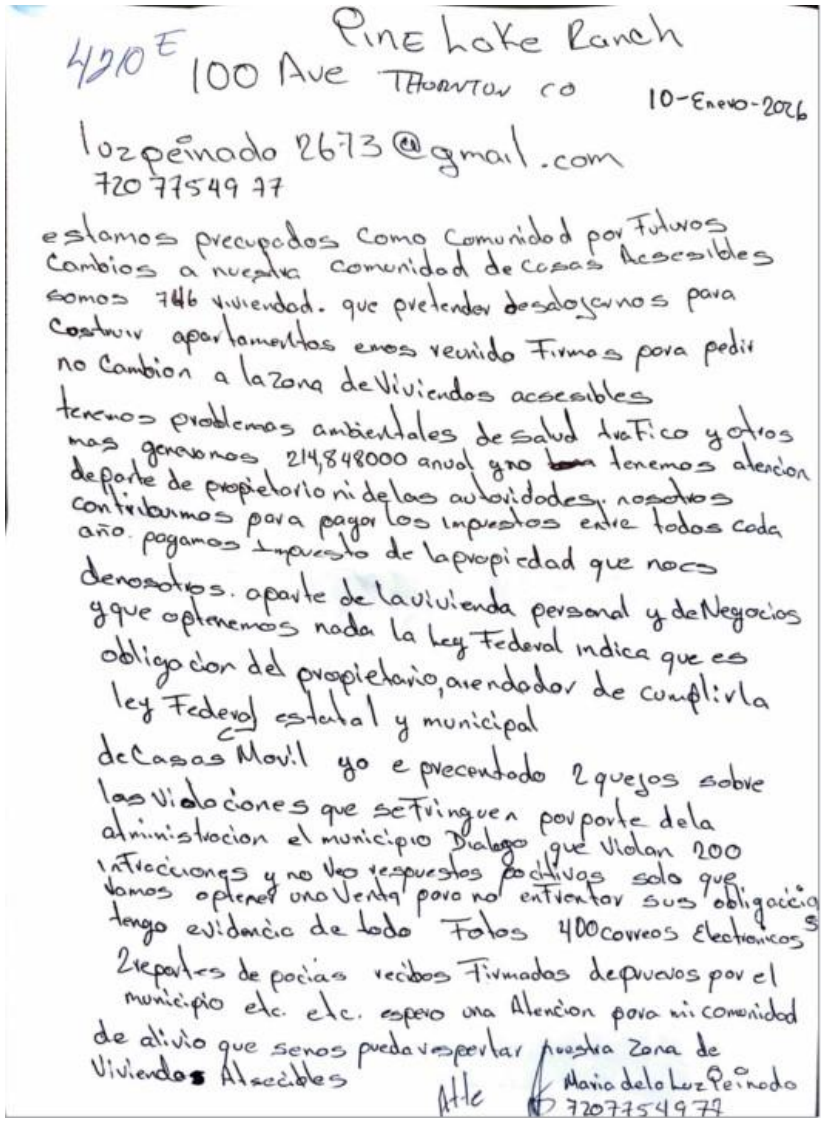
1



Pine Lake Ranch
4210 E 100 Ave Thornton CO 10-Enero-2026

luzpeinado2673@gmail.com
7207754977

estamos precupados como comunidad por futuros cambios a nuestra comunidad de casas Acsesibles somos 746 viviendad. que pretender desalojarnos para costruir apartamentos emos reunido firmas para pedir no cambion a la zona de viviendas acsesibles tenemos problemas ambientales de salud trafico y otros mas generamos 214,848000 anual y no tenemos atencion de parte de propietario ni de las autoridades. nosotros contribuimos para pagar los impuestos entre todos cada año. pagamos impuesto de la propiedad que nos de nosotros. aparte de la vivienda personal y de Negocios y que optenemos nada la ley Federal indica que es obligacion del propietario, arendador de cumplir la ley Federal estatal y municipal de Casas Movil yo e precentado 2 quejos sobre las violaciones que se fringuen por parte de la administracion el municipio Dialogo que violan 200 infracciones y no veo respuestas pocitivas solo que vamos optener una venta para no enfrentar sus obligaciones tengo evidencia de todo Fotos 400 correos Electronicos 2 reportes de pocias recibos firmados de pruevas por el municipio etc. etc. espero una Atencion para mi comunidad de alivio que se nos pueda respertar nuestra Zona de Viviendas Atsecibles

Atte
Maria de la Luz Peinado
7207754977

Respuesta al comentario 1

Este proyecto no afectará a la comunidad de viviendas asequibles Pine Lake Ranch.

Translation by project team:

Pine Lake Ranch

1

We are concerned as a community about future changes to our affordable housing community. We are 746 households that are facing eviction to make way for the construction of apartments. We have gathered signatures to request that the affordable housing area not be changed. We have environmental, health, traffic, and other concerns... and many others.

We generate $214,848,000 annually, and we receive no attention from the property owner or the authorities. We all contribute to paying the taxes. Every year we pay property taxes on land that doesn't belong to us, in addition to our personal and business taxes. And what do we get in return? Nothing. Federal law states that it is the landlord's obligation to comply with federal, state, and municipal laws regarding mobile homes. I have filed two complaints about the violations being ignored by the municipal administration. They acknowledge over 200 violations, but I see no positive responses, only attempts to gain an advantage to avoid fulfilling their obligations.

I have photographic evidence, 400 emails, two police reports, signed receipts from the municipality, and so on. I hope my community receives attention and relief, and that our affordable housing area will be respected.

Atte

Maria de la Luz Peinado

720-775-4977

Response to Comment 1

This project will not affect the Pine Lake Ranch affordable housing community.

From: Becky English
To: cdot_i270@state.co.us
Subject: [cdot_i270] I-270 DEIS Comments
Date: Tuesday, January 20, 2026 4:25:35 PM
Attachments: I-270 Comments.pdf
Attach. A.pdf
Attach. B.pdf

To Whom It May Concern:

Attached please find comments and two addendums on the I-270 DEIS, on behalf of several organizations.

Kindly provide acknowledgment of receipt.

Sincerely,

Becky English
Chair, Colorado Sierra Club Transportation Committee, on behalf of The Sierra Club

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
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cdot_i270@state.co.us
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1

January 20, 2026

Bill Schiebel, P.E.
Federal Highway Administration
12300 West Dakota Avenue, Suite 180
Lakewood, CO 80228
720-963-3032

David Merenich, P.E.
Colorado Department of Transportation
4670 Holly Street
Denver, CO 80216
720-933-5755

Re: Comments on I-270 Draft Environmental Impact Statement and State Environmental Reports, Federal Project No. STU 2706-046, CDOT Project Code 25611, ID No. FHWA-CO-EIS-24-001

1 The undersigned write to urge the Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) to pursue a Supplemental Draft Environmental Impact Statement that fully analyzes the Healthy Communities No-Widening Alternative, as proposed by GreenLatinos.
2 We also urge CDOT and FHWA to prioritize health, environmental justice, and local communities in the agencies' decision-making.

The communities in south Commerce City and north Denver already endure heavy traffic and the resulting pollution from intersecting highways I-70, I-25, and I-270, in addition to high levels of industrial pollution and the elevated ozone levels that plague our region. Less than three years ago, CDOT completed its widening of I-70, adding even more traffic and pollution to these communities. Now, CDOT and FHWA propose to worsen the situation again. These cumulative impacts are largely the result of historic racial injustices, with Colorado bulldozing and dividing neighborhoods of color to build these highways. Yet the draft environmental impact statement (DEIS) flatly refuses to consider environmental justice perspectives and fails to consider alternatives that will have fewer disproportionate adverse effects on low-income communities and communities of color. This refusal is unacceptable and will only lead to greater disparities and harms.

3 Compounding the harms, the DEIS also refuses to consider the greenhouse gas impacts of the project, despite these facts: the transportation sector is Colorado's largest source of greenhouse gas; the state most likely missed its 2025 greenhouse gas reduction target, and is not on track to achieve any of its upcoming reduction targets; and climate change is an environmental justice problem, because low-income communities and communities of color will bear the brunt of the worst impacts of the climate crisis. The DEIS does not even acknowledge, let alone address, these issues.

4 To tackle these problems, CDOT and FHWA should fully study the Healthy Communities No-Widening Alternative, including by conducting modeling. This Alternative would meet the project goals by reducing congestion using pricing mechanisms instead of by adding lanes. A full study of this Alternative is imperative because the DEIS greatly underestimates the harms caused by adding lanes

Response to Comment 1

For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments (DRCOG) indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code (USC) Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act (NEPA) process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not

broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Response to Comment 4

FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with DRCOG indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 USC Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the ISRRPP and the VPPP; however, neither program can be implemented solely through the I-270 NEPA process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

to I-270. The DEIS artificially inflates the traffic that's expected under the No Build Alternative—estimating huge increases in traffic by 2050 that are not grounded in reality and that conflict with CDOT's own plans to reduce vehicle miles traveled per capita over the same time frame.

5 To make matters worse, the DEIS completely ignores—and, in fact, rejects out of hand—the additional traffic that will result from adding lanes. The DEIS's conclusions conflict with traffic science and with Colorado's own history of widening highways has led to more traffic. CDOT's own analysis, used in other contexts, assumes that for every 10% increase in highway lane capacity, long-term VMT rises by about 6.7%, with newly expanded highway traffic returning to pre-construction levels in 3–5 years. The I-25 TREX project in South Denver is a clear example of this, with traffic returning to pre-construction levels within just two years of completion. When studying the Healthy Communities No-Widening Alternative, CDOT and FHWA must correct these significant errors.

The Healthy Communities No-Widening Alternative also enhances transit and non-driving travel choices, which public opinion strongly supports. A 2025 statewide poll[1] found that 55% of respondents prefer expanding public transportation over building more roads and expanding existing roads. Similarly, DRCOG's own engagement study[2] found that nearly 75% of respondents believe new general-purpose lanes should have no or low funding priority. Most respondents instead favor expanding transit service, sidewalks, and bikeways.

6 In addition to robust study of the Healthy Communities No-Widening Alternative, CDOT and FHWA should commit to much stronger mitigation measures. The current DEIS's proposed mitigation measures and state-only commitments fall far short of what is needed to offset the harms caused by the proposed project. In particular, the supplemental DEIS should include:

- Increased local transit service, to serve residents directly harmed by I-270's footprint and pollution;
- Increased regional transit service, to help reduce traffic on the corridor;
- Strict commitments to use zero-emission construction equipment wherever feasible, to reduce construction impacts on workers and residents;
- Funding for zero-emission trucks that make frequent trips in and around the corridor, and a charging depot for those trucks, to reduce emissions impacts on local residents;
- Enhanced commitments to green spaces throughout surrounding areas;
- Full transparency during and after construction, including real-time monitoring for key air pollutants, accessible via web and smartphone app with opt-in alerts when air levels reach unhealthy thresholds; and publishing reports on emissions and how the project's outcomes stack up against the DEIS's predictions;
- An increase in the state-only commitments to spend at least 10% of total project costs on locally-beneficial projects.

[1] Attachment A at Slide 35 (https://copollinginstitute.org/wp-content/uploads/2025/04/March-2025-CPI-Deck_TUES-CO-RELEASE.pdf).
[2] Attachment B at Slide 17 (https://www.drcog.org/sites/default/files/acc/TPO-GF-25DEC16RTCATTACHD1-EN-ACC-25-12-09-V1.pdf).

Response to Comment 5

DRCOG, as the federally designated Metropolitan Planning Organization for the Denver region, develops and maintains the region's travel demand model. The model is updated on a regular cycle to support the adopted long-range Regional Transportation Plan. It is built using regional demographic and employment forecasts, adopted land use plans from local jurisdictions, roadway and transit network characteristics, and observed travel behavior data. These inputs are combined using established transportation modeling practices to estimate how people travel across the region by time of day, mode, and route.

The model relies on multiple data sources, including US Census and American Community Survey data, regional household travel surveys, traffic counts, transit ridership data, land use plans from cities and counties, and state demographic forecasts. Local governments, transit agencies, CDOT, and other stakeholders participate in the regional planning process that establishes socioeconomic forecasts and network assumptions used in the model.

The DRCOG regional travel demand model is calibrated and validated to reflect observed real-world travel behavior before it is used for forecasting. Calibration involves adjusting model parameters so that modeled traffic volumes, speeds, trip lengths, and mode shares reasonably replicate observed base-year conditions. This process uses traffic count data, travel time data, transit ridership information, and household travel survey results. Validation compares modeled outputs to independent observed datasets to confirm that the model reproduces regional travel patterns within accepted industry standards. Only after the model demonstrates an acceptable match to existing conditions is it applied to future-year scenarios using adopted population, employment, and network assumptions.

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using DRCOG's federally

approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS1 and TRANS2, of the Final EIS for additional information about the traffic forecasting and modeling, and induced demand.

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

However, the project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Response to Comment 6

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis. Please see Appendix D, Two Express Lanes that Accommodate Transit Alternative Technical Report, for more information.

Please see Section 5.4.4, IMP2, of the Final EIS for additional information on what is classified as federal mitigation.

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental

justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Throughout the EIS process, CDOT has coordinated with RTD on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project. Please see Section 5.4.3, ALT6, of the Final EIS for additional information on consideration of increased transit options and services.

CDOT and the I-270 project team will implement strategies to encourage local contractors to work on the project. CDOT has a statewide program, Connect2DOT, that is designed to help small businesses become more competitive and successful in working with CDOT and other local transportation agencies. CDOT offers free unlimited consulting, free or low-cost business training, and outreach events tailored to highway and bridge construction contractors and engineering-related professional services firms.

The Draft EIS acknowledges that there will be temporary increases in noise and emissions that may result in disturbances to the area. CDOT will take steps to minimize these disturbances through creating bid specifications in the contractor selection for project construction that prioritize and maximize use of zero emissions and lower emitting engines to the extent that a fair and open competitive solicitation process is maintained. Refer to the State Environmental Technical Reports on the project website for additional information on potential emissions reduction items.

7 We urge CDOT and FHWA to take a better approach to the I-270 corridor, giving full consideration to approaches that would avoid doing further harm to the south Commerce City and north Denver communities. This project could be an opportunity to chart a new path forward for Colorado's transportation sector—or Colorado could continue its futile efforts to build its way out of congestion, leaving frontline communities to suffer the consequences of increased pollution. The choice is clear.

Sincerely,

Renée M Chacon, Co Founder of Womxn from the Mountain & Commerce City resident

Renee Larrarte, Climate and Transportation Campaign Manager, Conservation Colorado

Jill Locantore, Executive Director, Denver Streets Partnership

Becky English, Transportation Chair, The Sierra Club Colorado Chapter

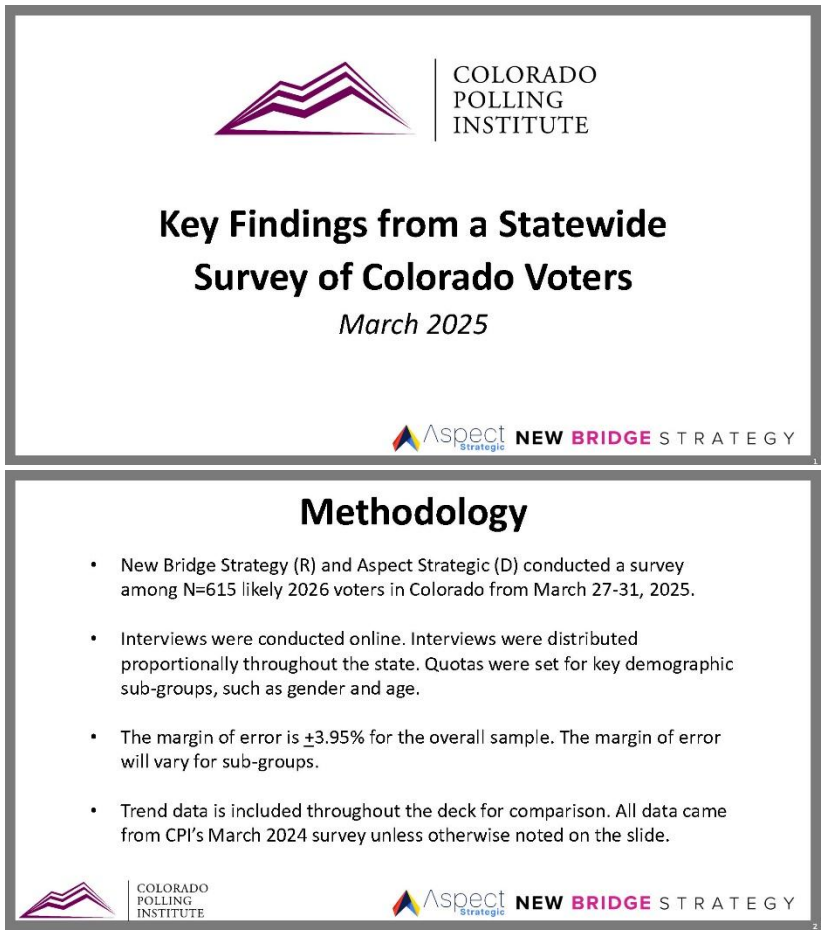
Peter Piccolo, Executive Director, Bicycle Colorado

Matt Muir, Policy Director, Coalition 4 Cyclists

Ean Tafoya, Vice President of State Programs, GreenLatinos

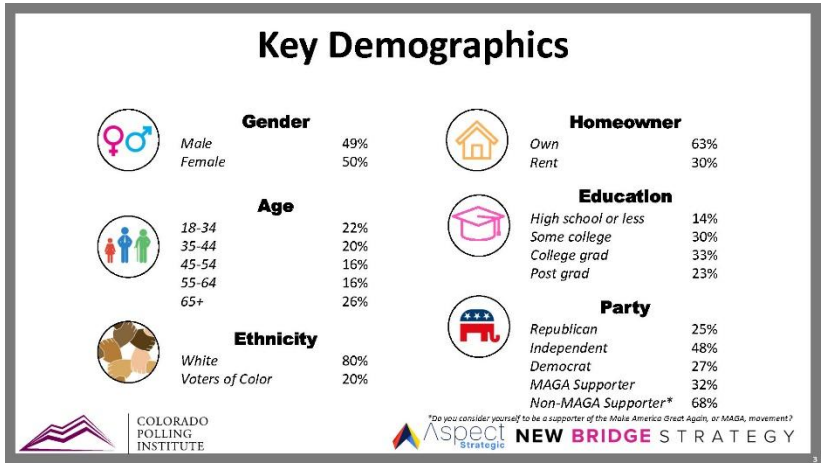
Response to Comment 7

Comments noted.



Response to Comment 8

Attachments to comment letter are noted.


Key Demographics
Gender
Male 49%
Female 50%
Age
18-34 22%
35-44 20%
45-54 16%
55-64 16%
65+ 26%
Ethnicity
White 80%
Voters of Color 20%
Homeowner
Own 63%
Rent 30%
Education
High school or less 14%
Some college 30%
College grad 33%
Post grad 23%
Party
Republican 25%
Independent 48%
Democrat 27%
MAGA Supporter 32%
Non-MAGA Supporter* 68%
*Do you consider yourself to be a supporter of the Make America Great Again, or MAGA, movement?
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Views of Colorado
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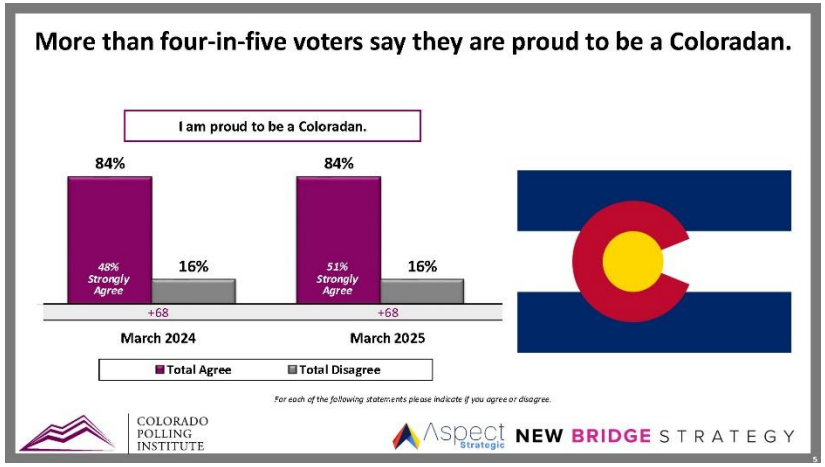
More than four-in-five voters say they are proud to be a Coloradan.
I am proud to be a Coloradan.
84%
84%
48% Strongly Agree
16%
51% Strongly Agree
16%
+68
+68
March 2024
March 2025
Total Agree
Total Disagree
*For each of the following statements please indicate if you agree or disagree.
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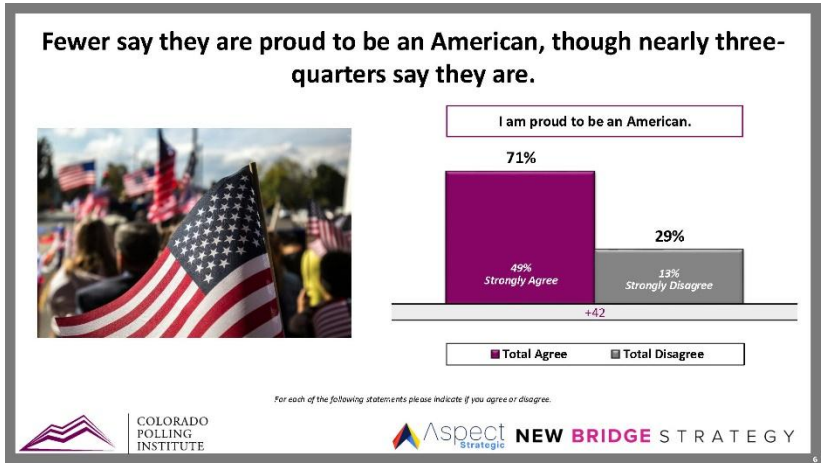
Aspect Strategic
NEW BRIDGE STRATEGY


Fewer say they are proud to be an American, though nearly three-quarters say they are.
I am proud to be an American.
71%
29%
49% Strongly Agree
13% Strongly Disagree
+42
Total Agree
Total Disagree
*For each of the following statements please indicate if you agree or disagree.
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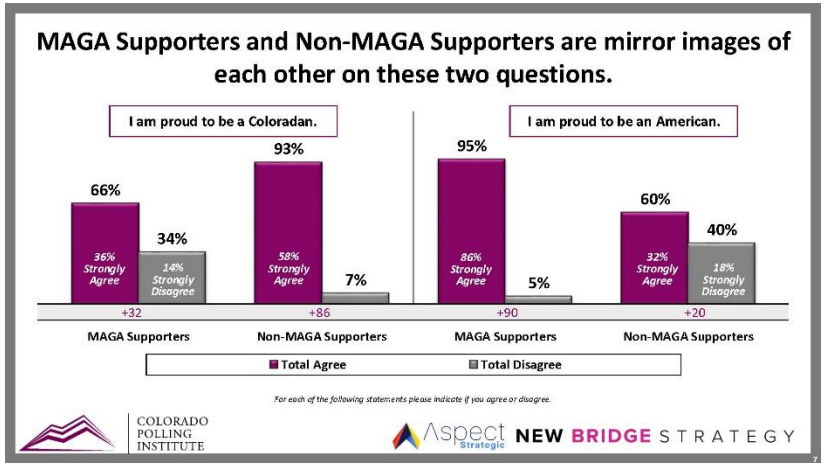
MAGA Supporters and Non-MAGA Supporters are mirror images of each other on these two questions.
I am proud to be a Coloradan.
I am proud to be an American.
66%
34%
36% Strongly Agree
14% Strongly Disagree
93%
7%
58% Strongly Agree
95%
5%
86% Strongly Agree
60%
40%
32% Strongly Agree
18% Strongly Disagree
+32
+86
+90
+20
MAGA Supporters
Non-MAGA Supporters
MAGA Supporters
Non-MAGA Supporters
Total Agree
Total Disagree
*For each of the following statements please indicate if you agree or disagree.
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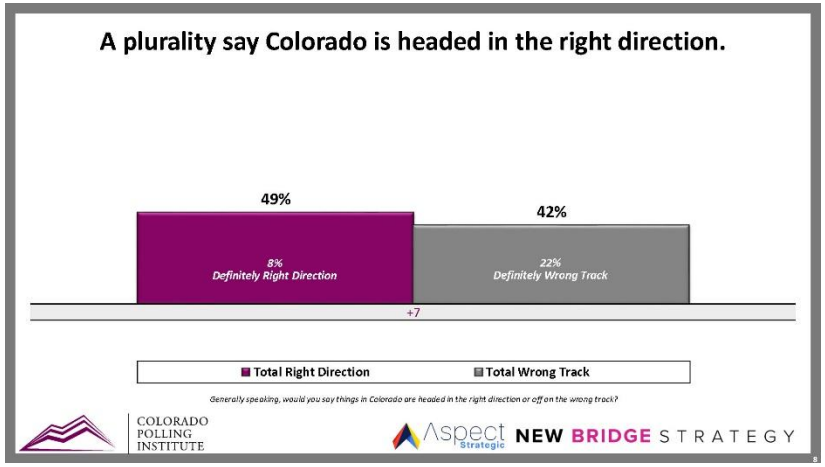
A plurality say Colorado is headed in the right direction.
49%
42%
8% Definitely Right Direction
22% Definitely Wrong Track
+7
Total Right Direction
Total Wrong Track
Generally speaking, would you say things in Colorado are headed in the right direction or off on the wrong track?
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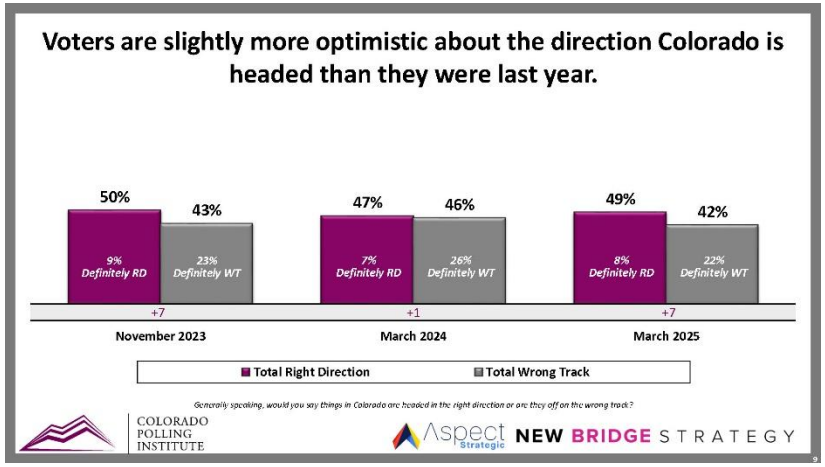
Voters are slightly more optimistic about the direction Colorado is headed than they were last year.
50%
43%
9% Definitely RD
23% Definitely WT
47%
46%
7% Definitely RD
26% Definitely WT
49%
42%
8% Definitely RD
22% Definitely WT
+7
+1
+7
November 2023
March 2024
March 2025
Total Right Direction
Total Wrong Track
Generally speaking, would you say things in Colorado are headed in the right direction or are they off on the wrong track?
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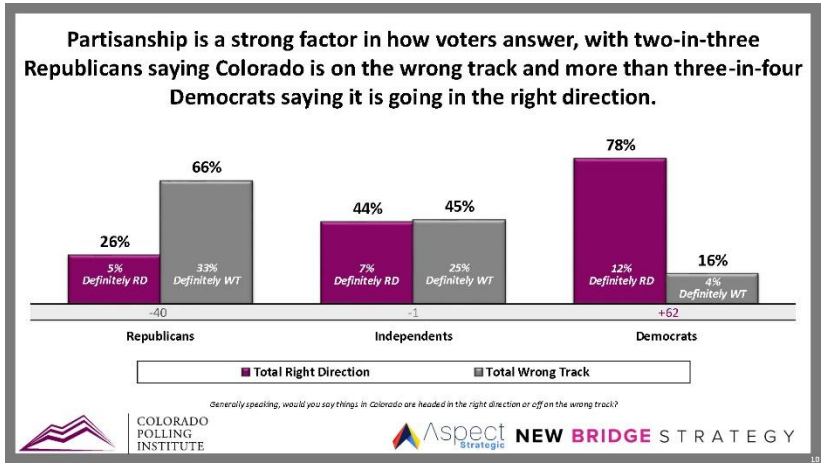
Partisanship is a strong factor in how voters answer, with two-in-three Republicans saying Colorado is on the wrong track and more than three-in-four Democrats saying it is going in the right direction.
26%
66%
5% Definitely RD
33% Definitely WT
44%
45%
7% Definitely RD
25% Definitely WT
78%
16%
12% Definitely RD
4% Definitely WT
-40
-1
+62
Republicans
Independents
Democrats
Total Right Direction
Total Wrong Track
Generally speaking, would you say things in Colorado are headed in the right direction or off on the wrong track?
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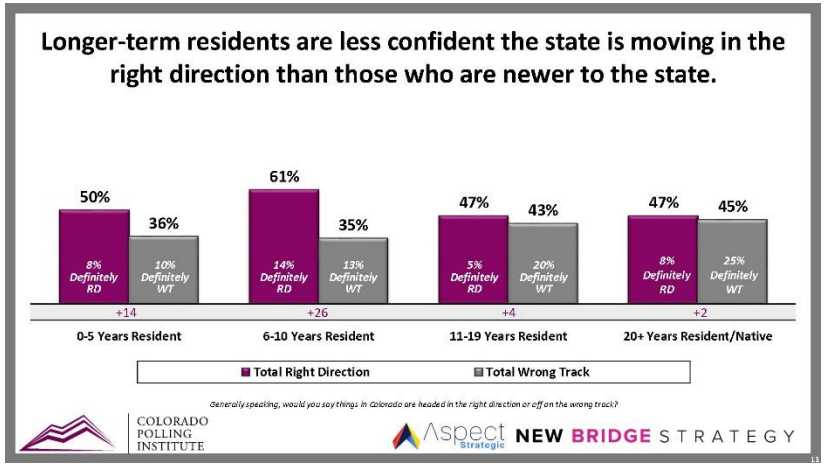
Longer-term residents are less confident the state is moving in the right direction than those who are newer to the state.
50%
36%
8% Definitely RD
10% Definitely WT
+14
0-5 Years Resident
61%
35%
14% Definitely RD
13% Definitely WT
+26
6-10 Years Resident
47%
43%
5% Definitely RD
20% Definitely WT
+4
11-19 Years Resident
47%
45%
8% Definitely RD
25% Definitely WT
+2
20+ Years Resident/Native
Total Right Direction
Total Wrong Track
Generally speaking, would you say things in Colorado are headed in the right direction or off on the wrong track?
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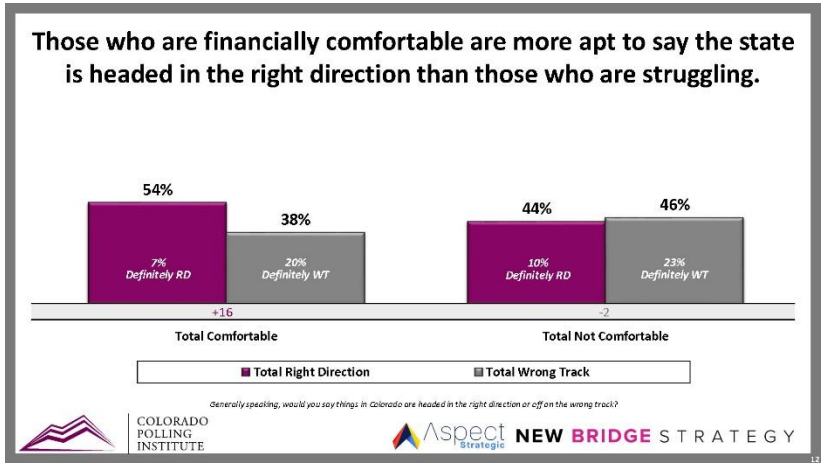
Those who are financially comfortable are more apt to say the state is headed in the right direction than those who are struggling.
54%
38%
7% Definitely RD
20% Definitely WT
+16
Total Comfortable
44%
46%
10% Definitely RD
23% Definitely WT
-2
Total Not Comfortable
Total Right Direction
Total Wrong Track
Generally speaking, would you say things in Colorado are headed in the right direction or off on the wrong track?
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Housing affordability and education are top issues for Coloradans today, followed closely by homelessness and immigration.

	%
Housing affordability/Lack of housing	9%
Schools and education	9%
Homelessness	8%
Immigration/Illegal immigration/Migrant crisis	8%
Cost of living	7%
Crime and public safety	6%
Economy and jobs	6%
Climate and the environment	5%
Taxes	5%
Standing up to Trump/MAGA/Right-wing politics	5%
Roads/Infrastructure	5%

Now, in your opinion, what are the most important issues for the Colorado state government to address?

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13

Since last year, more Coloradans are mentioning education as a top issue. Opposition to Trump and roads/infrastructure are new issues.

	March 2024	March 2025	Change
Housing affordability/lack of housing	11%	9%	-2%
School and education	6%	9%	+3%
Homelessness	12%	8%	-4%
Immigration/Illegal immigration/Migrant crisis	14%	8%	-6%
Cost of living	5%	7%	+2%
Crime and public safety	5%	6%	+1%
Economy and jobs	4%	6%	+2%
Climate and the environment	5%	5%	+0%
Taxes	8%	5%	-3%
Standing up to Trump/MAGA/Right-wing politics	0%	5%	+5%
Roads/Infrastructure	0%	5%	+5%

Now, in your opinion, what are the most important issues for the Colorado state government to address?

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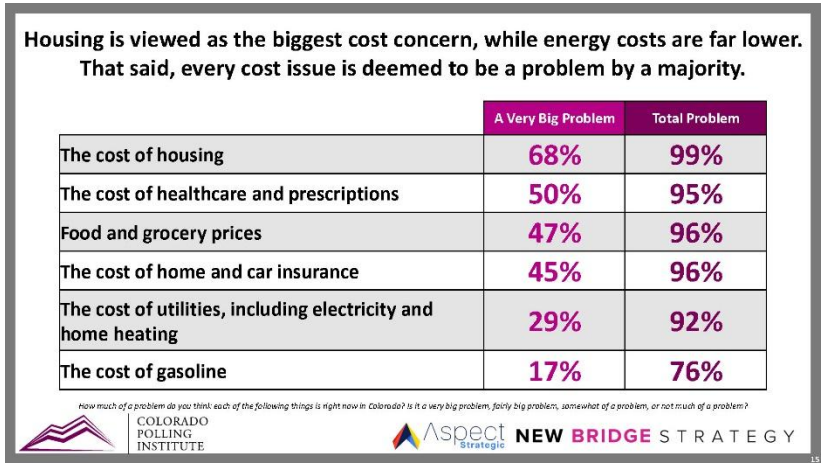
14



Housing is viewed as the biggest cost concern, while energy costs are far lower. That said, every cost issue is deemed to be a problem by a majority.

	A Very Big Problem	Total Problem
The cost of housing	68%	99%
The cost of healthcare and prescriptions	50%	95%
Food and grocery prices	47%	96%
The cost of home and car insurance	45%	96%
The cost of utilities, including electricity and home heating	29%	92%
The cost of gasoline	17%	76%

How much of a problem do you think each of the following things is right now in Colorado? Is it a very big problem, fairly big problem, somewhat of a problem, or not much of a problem?

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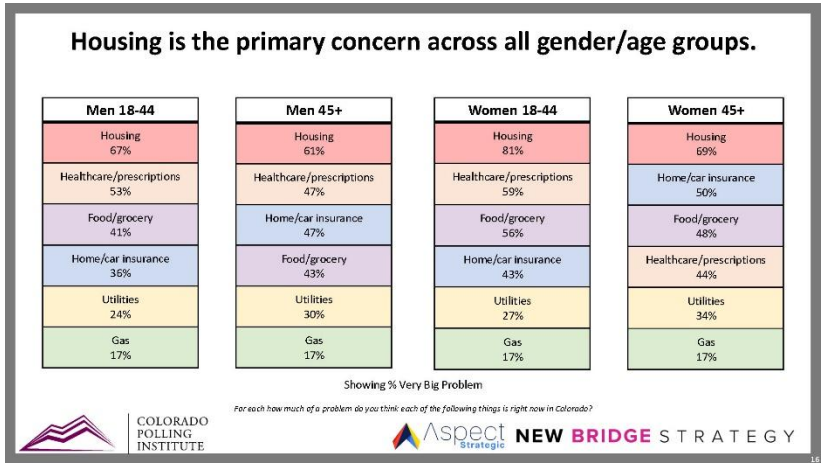

Housing is the primary concern across all gender/age groups.

Men 18-44	Men 45+	Women 18-44	Women 45+
Housing 67%	Housing 61%	Housing 81%	Housing 69%
Healthcare/prescriptions 53%	Healthcare/prescriptions 47%	Healthcare/prescriptions 59%	Home/car insurance 50%
Food/grocery 41%	Home/car insurance 47%	Food/grocery 56%	Food/grocery 48%
Home/car insurance 36%	Food/grocery 43%	Home/car insurance 43%	Healthcare/prescriptions 44%
Utilities 24%	Utilities 30%	Utilities 27%	Utilities 34%
Gas 17%	Gas 17%	Gas 17%	Gas 17%

Showing % Very Big Problem

For each how much of a problem do you think each of the following things is right now in Colorado?

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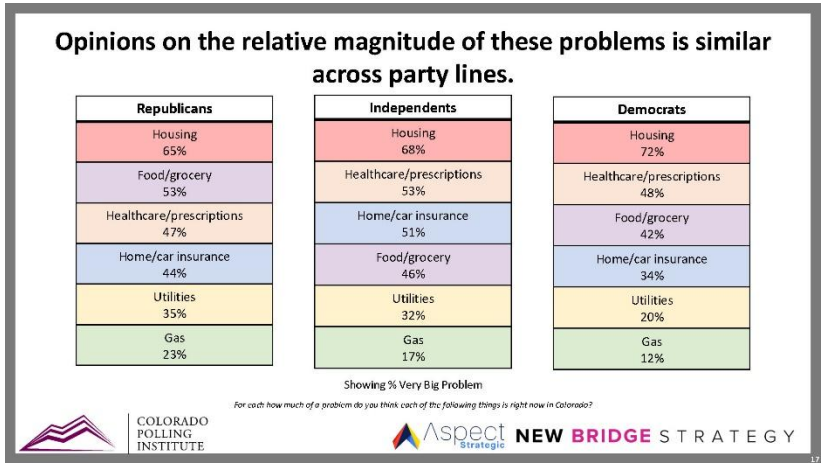
Opinions on the relative magnitude of these problems is similar across party lines.
Republicans
Housing 65%
Food/grocery 53%
Healthcare/prescriptions 47%
Home/car insurance 44%
Utilities 35%
Gas 23%
Independents
Housing 68%
Healthcare/prescriptions 53%
Home/car insurance 51%
Food/grocery 46%
Utilities 32%
Gas 17%
Democrats
Housing 72%
Healthcare/prescriptions 48%
Food/grocery 42%
Home/car insurance 34%
Utilities 20%
Gas 12%
Showing % Very Big Problem
For each how much of a problem do you think each of the following things is right now in Colorado?
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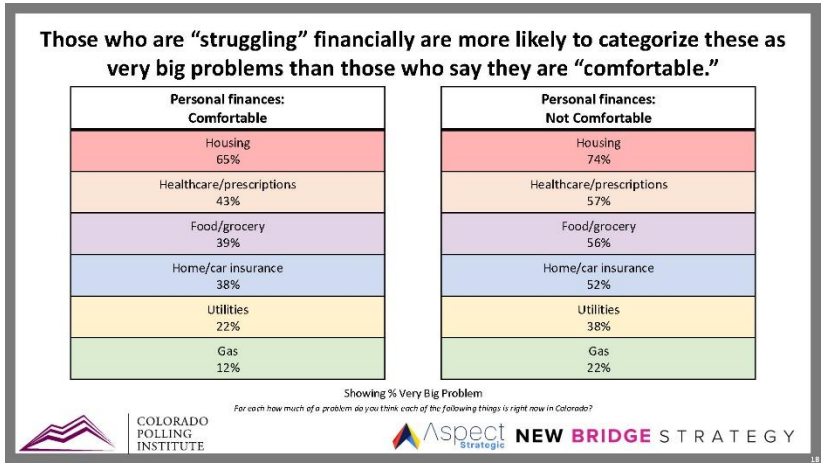
Those who are "struggling" financially are more likely to categorize these as very big problems than those who say they are "comfortable."
Personal finances: Comfortable
Housing 65%
Healthcare/prescriptions 43%
Food/grocery 39%
Home/car insurance 38%
Utilities 22%
Gas 12%
Personal finances: Not Comfortable
Housing 74%
Healthcare/prescriptions 57%
Food/grocery 56%
Home/car insurance 52%
Utilities 38%
Gas 22%
Showing % Very Big Problem
For each how much of a problem do you think each of the following things is right now in Colorado?
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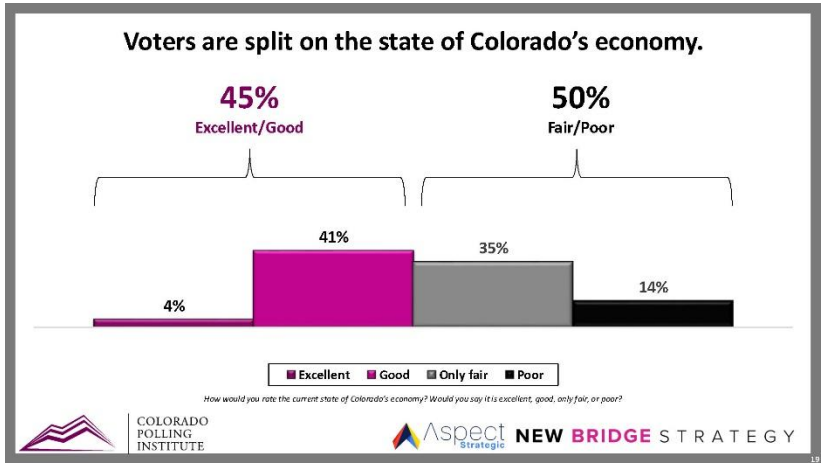
Voters are split on the state of Colorado's economy.
45%
Excellent/Good
50%
Fair/Poor
4%
41%
35%
14%
Excellent
Good
Only fair
Poor
How would you rate the current state of Colorado's economy? Would you say it is excellent, good, only fair, or poor?
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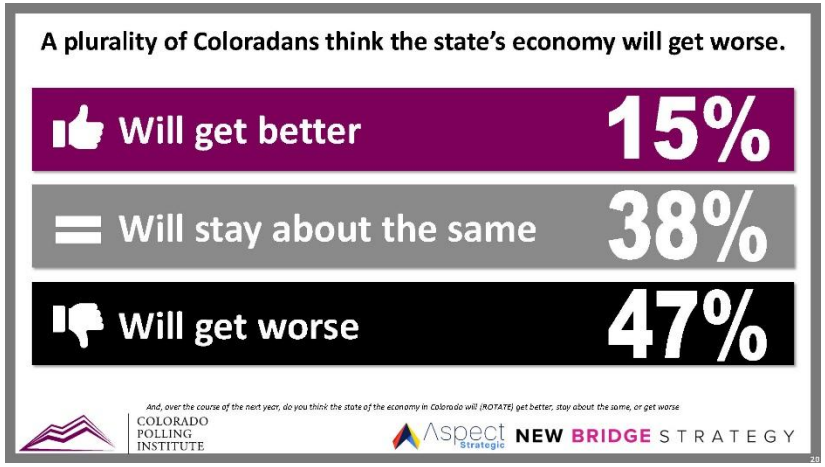
NEW BRIDGE STRATEGY


A plurality of Coloradans think the state's economy will get worse.
Will get better
15%
Will stay about the same
38%
Will get worse
47%
And, over the course of the next year, do you think the state of the economy in Colorado will (ROTATE) get better, stay about the same, or get worse
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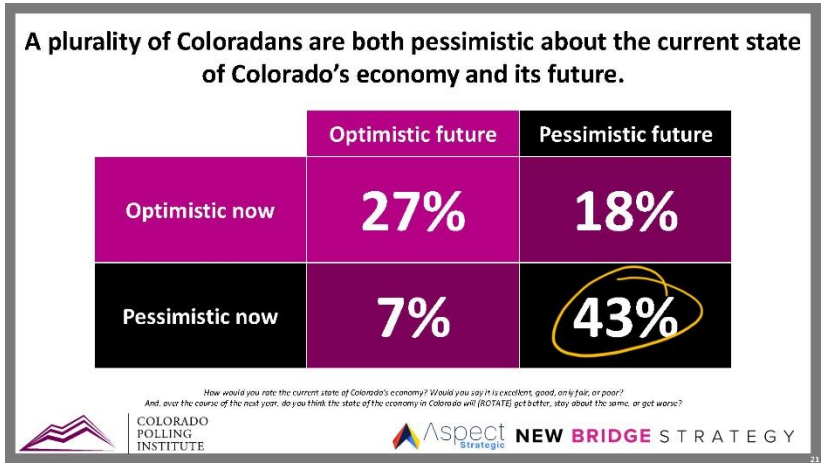
NEW BRIDGE STRATEGY


A plurality of Coloradans are both pessimistic about the current state of Colorado's economy and its future.
Optimistic future
Pessimistic future
Optimistic now
27%
18%
Pessimistic now
7%
43%
How would you rate the current state of Colorado's economy? Would you say it is excellent, good, only fair, or poor?
And, over the course of the next year, do you think the state of the economy in Colorado will [ROTATE] get better, stay about the same, or get worse?
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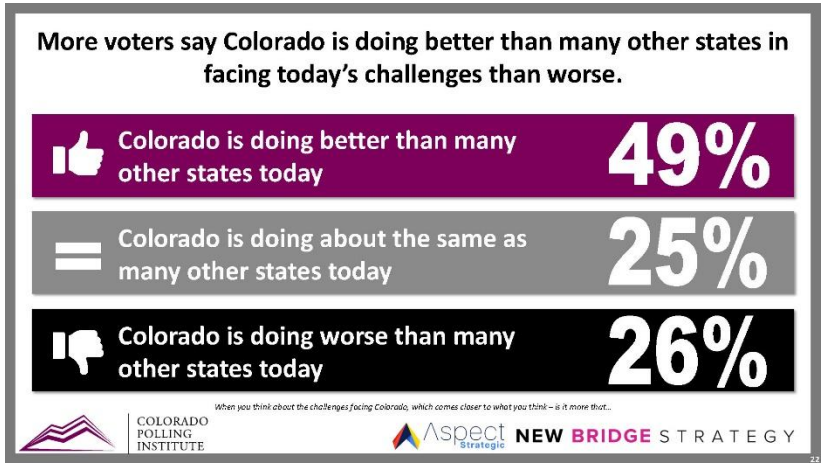
NEW BRIDGE STRATEGY


More voters say Colorado is doing better than many other states in facing today's challenges than worse.
Colorado is doing better than many other states today
49%
Colorado is doing about the same as many other states today
25%
Colorado is doing worse than many other states today
26%
When you think about the challenges facing Colorado, which comes closer to what you think – is it more that...
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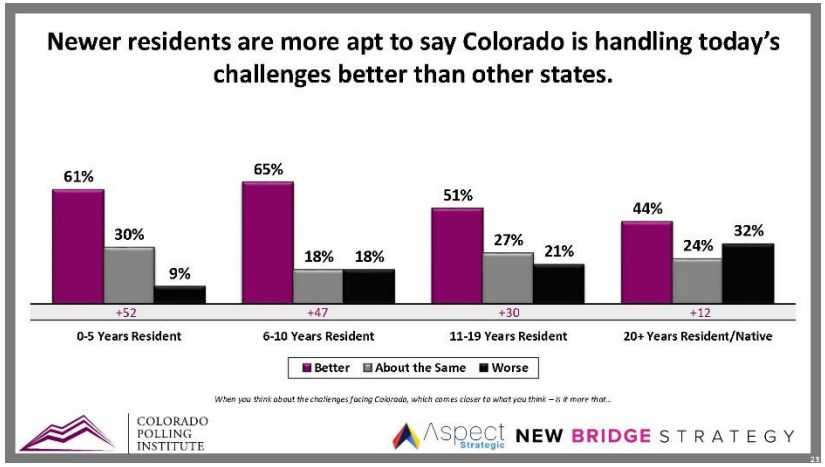
Newer residents are more apt to say Colorado is handling today's challenges better than other states.
61%
30%
9%
65%
18%
18%
51%
27%
21%
44%
24%
32%
+52
+47
+30
+12
0-5 Years Resident
6-10 Years Resident
11-19 Years Resident
20+ Years Resident/Native
Better
About the Same
Worse
When you think about the challenges facing Colorado, which comes closer to what you think – is it more that...
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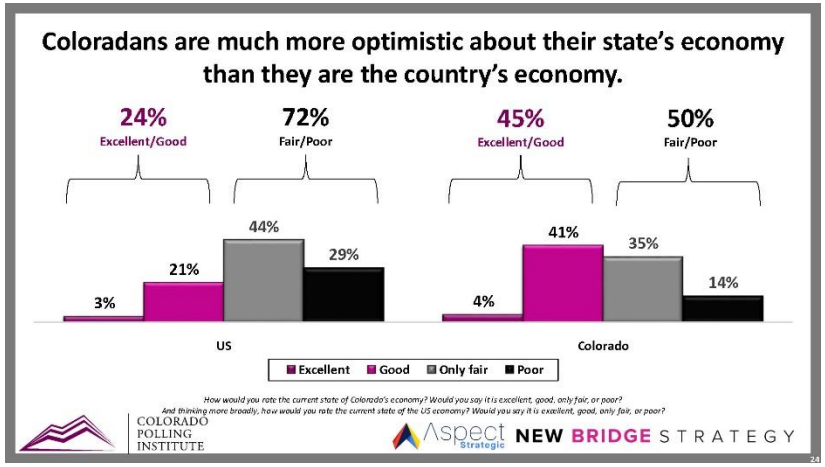
Coloradans are much more optimistic about their state's economy than they are the country's economy.
24%
Excellent/Good
72%
Fair/Poor
45%
Excellent/Good
50%
Fair/Poor
3%
21%
44%
29%
4%
41%
35%
14%
US
Colorado
Excellent
Good
Only fair
Poor
How would you rate the current state of Colorado's economy? Would you say it is excellent, good, only fair, or poor?
And thinking more broadly, how would you rate the current state of the US economy? Would you say it is excellent, good, only fair, or poor?
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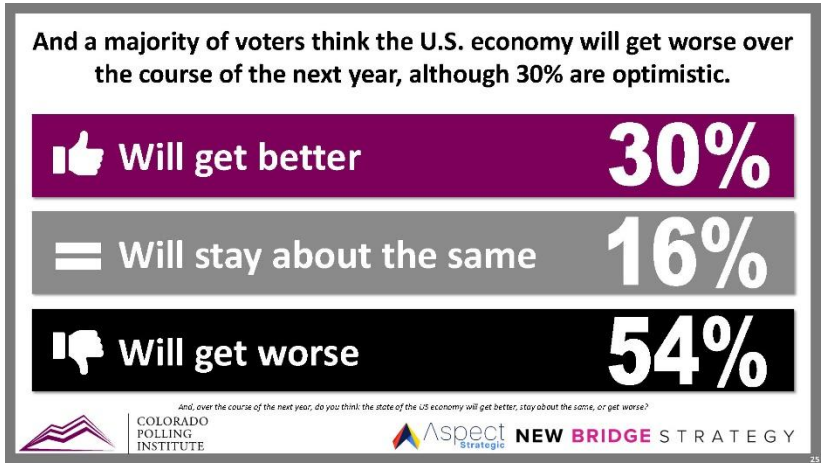
And a majority of voters think the U.S. economy will get worse over the course of the next year, although 30% are optimistic.
Will get better
30%
Will stay about the same
16%
Will get worse
54%
And, over the course of the next year, do you think the state of the US economy will get better, stay about the same, or get worse?
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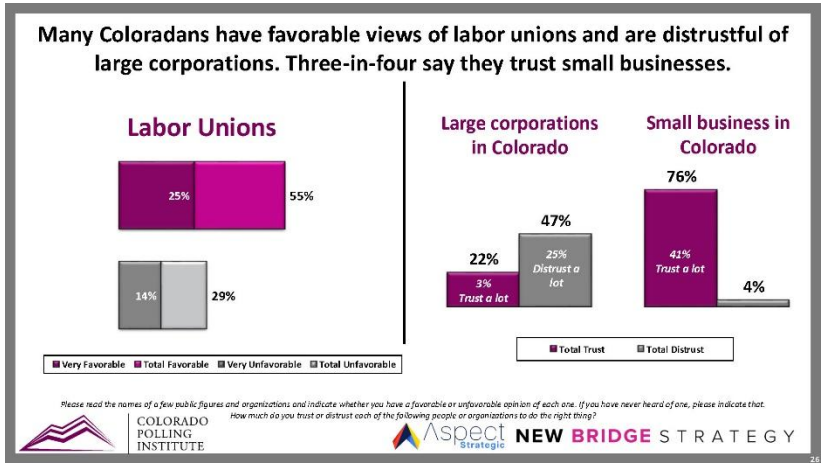
Many Coloradans have favorable views of labor unions and are distrustful of large corporations. Three-in-four say they trust small businesses.
Labor Unions
25%
55%
14%
29%
Very Favorable
Total Favorable
Very Unfavorable
Total Unfavorable
Large corporations in Colorado
22%
3% Trust a lot
47%
25% Distrust a lot
Small business in Colorado
76%
41% Trust a lot
4%
Total Trust
Total Distrust
Please read the names of a few public figures and organizations and indicate whether you have a favorable or unfavorable opinion of each one. If you have never heard of one, please indicate that.
How much do you trust or distrust each of the following people or organizations to do the right thing?
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Colorado's Political Environment

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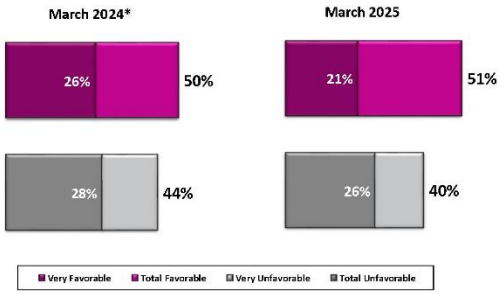
Views of Governor Polis have stayed fairly stable in the last year.

Jared Polis



Please read the names of a few public figures and organizations and indicate whether you have a favorable or unfavorable opinion of each one. If you have never heard of one, please indicate that.
**March 2024 scale was "strongly favorable" and "strongly unfavorable".*

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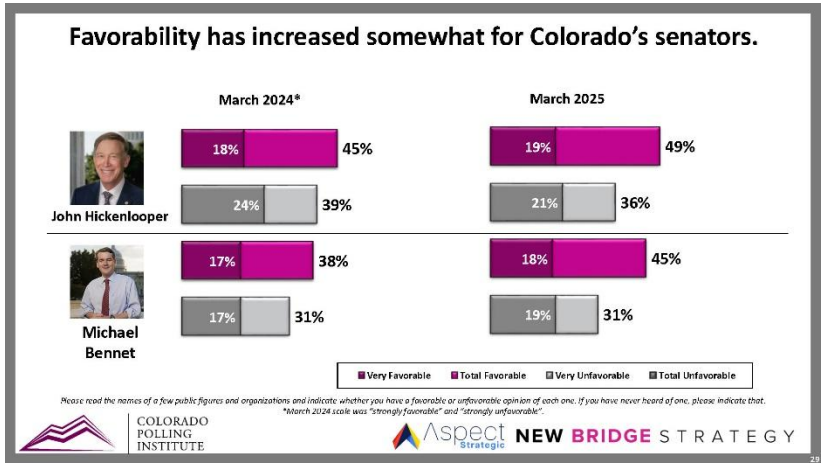
Favorability has increased somewhat for Colorado's senators.
March 2024*
March 2025
John Hickenlooper
18%
45%
24%
39%
19%
49%
21%
36%
Michael Bennet
17%
38%
17%
31%
18%
45%
19%
31%
Very Favorable
Total Favorable
Very Unfavorable
Total Unfavorable
Please read the names of a few public figures and organizations and indicate whether you have a favorable or unfavorable opinion of each one. If you have never heard of one, please indicate that.
*March 2024 scale was "strongly favorable" and "strongly unfavorable".
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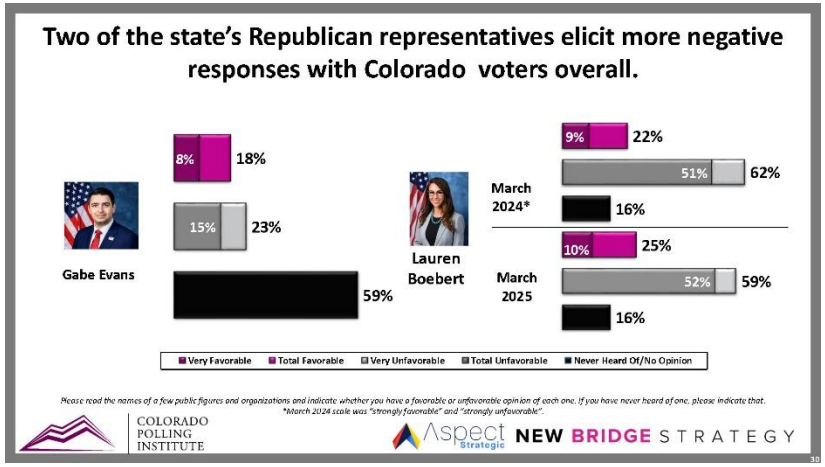
Two of the state's Republican representatives elicit more negative responses with Colorado voters overall.
Gabe Evans
8%
18%
15%
23%
59%
Lauren Boebert
March 2024*
9%
22%
51%
62%
16%
March 2025
10%
25%
52%
59%
16%
Very Favorable
Total Favorable
Very Unfavorable
Total Unfavorable
Never Heard Of/No Opinion
Please read the names of a few public figures and organizations and indicate whether you have a favorable or unfavorable opinion of each one. If you have never heard of one, please indicate that.
*March 2024 scale was "strongly favorable" and "strongly unfavorable".
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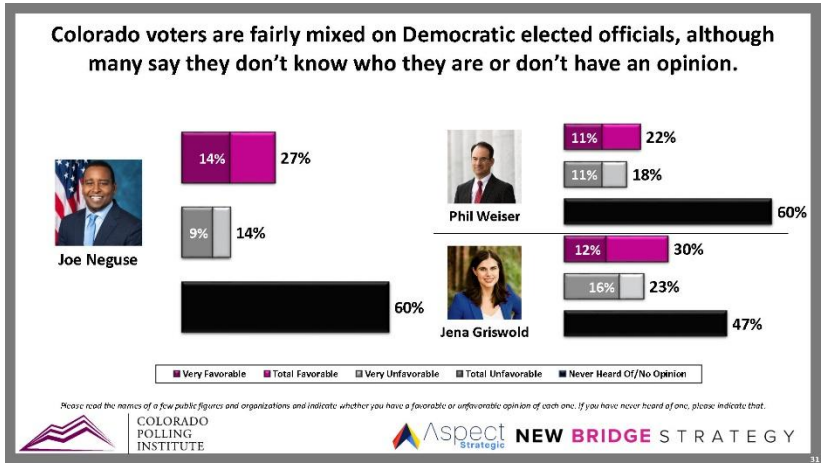
Colorado voters are fairly mixed on Democratic elected officials, although many say they don't know who they are or don't have an opinion.
Joe Neguse
14%
27%
9%
14%
60%
Phil Weiser
11%
22%
11%
18%
60%
Jena Griswold
12%
30%
16%
23%
47%
Very Favorable
Total Favorable
Very Unfavorable
Total Unfavorable
Never Heard Of/No Opinion
Please read the names of a few public figures and organizations and indicate whether you have a favorable or unfavorable opinion of each one. If you have never heard of one, please indicate that.
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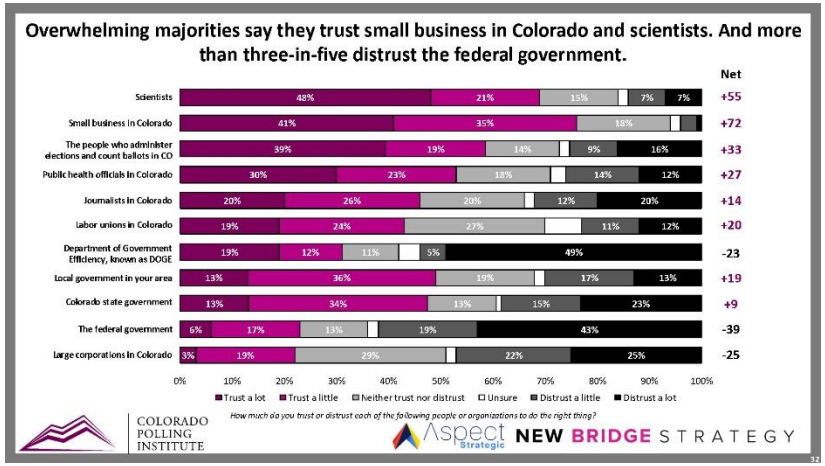
Overwhelming majorities say they trust small business in Colorado and scientists. And more than three-in-five distrust the federal government.
Net
Scientists 48% 21% 15% 7% 7% +55
Small business in Colorado 41% 35% 18% +72
The people who administer elections and count ballots in CO 39% 19% 14% 9% 16% +33
Public health officials in Colorado 30% 23% 18% 14% 12% +27
Journalists in Colorado 20% 26% 20% 12% 20% +14
Labor unions in Colorado 19% 24% 27% 11% 12% +20
Department of Government Efficiency, known as DOGE 19% 12% 11% 5% 49% -23
Local government in your area 13% 36% 19% 17% 13% +19
Colorado state government 13% 34% 13% 15% 23% +9
The federal government 6% 17% 13% 19% 43% -39
Large corporations in Colorado 3% 19% 29% 22% 25% -25
0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%
Trust a lot
Trust a little
Neither trust nor distrust
Unsure
Distrust a little
Distrust a lot
How much do you trust or distrust each of the following people or organizations to do the right thing?
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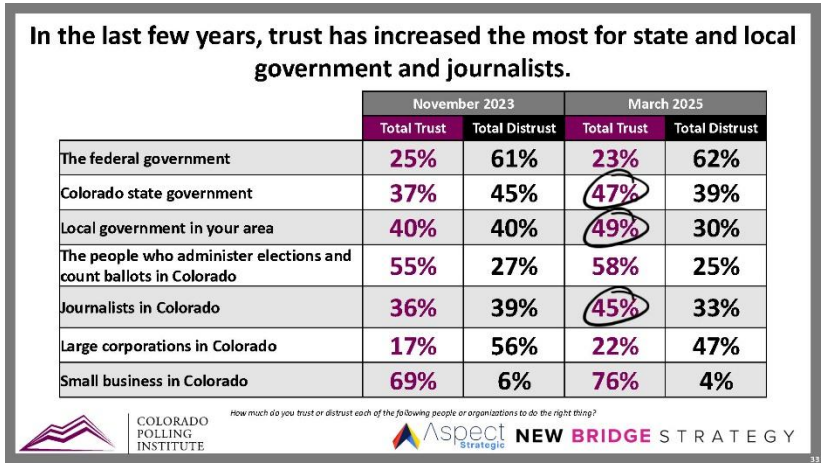

In the last few years, trust has increased the most for state and local government and journalists.

	November 2023		March 2025	
	Total Trust	Total Distrust	Total Trust	Total Distrust
The federal government	25%	61%	23%	62%
Colorado state government	37%	45%	47%	39%
Local government in your area	40%	40%	49%	30%
The people who administer elections and count ballots in Colorado	55%	27%	58%	25%
Journalists in Colorado	36%	39%	45%	33%
Large corporations in Colorado	17%	56%	22%	47%
Small business in Colorado	69%	6%	76%	4%

How much do you trust or distrust each of the following people or organizations to do the right thing?

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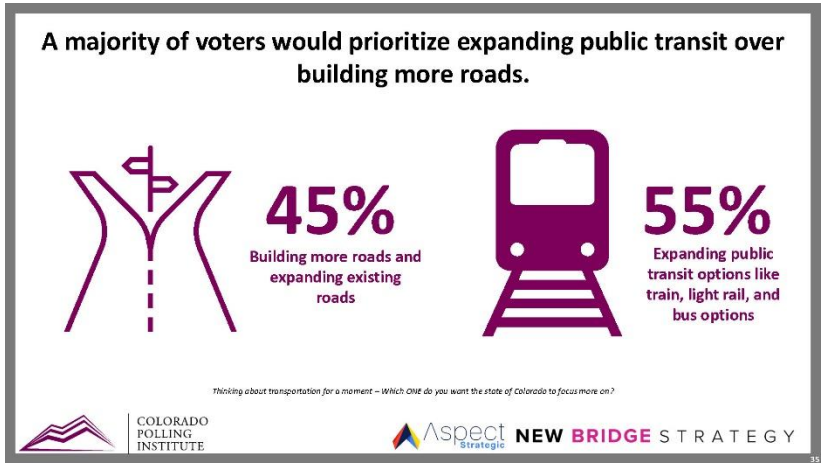
A majority of voters would prioritize expanding public transit over building more roads.
45%
Building more roads and expanding existing roads
55%
Expanding public transit options like train, light rail, and bus options
Thinking about transportation for a moment – Which ONE do you want the state of Colorado to focus more on?
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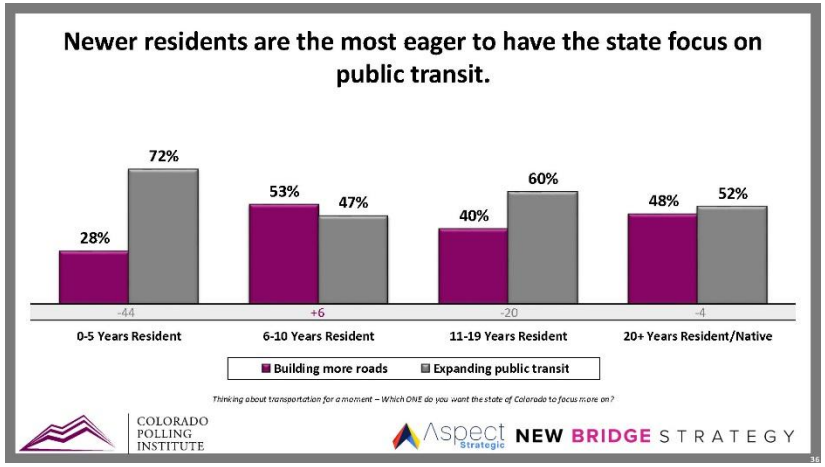
Newer residents are the most eager to have the state focus on public transit.
72%
28%
53%
47%
60%
40%
48%
52%
-44
+6
-20
-4
0-5 Years Resident
6-10 Years Resident
11-19 Years Resident
20+ Years Resident/Native
Building more roads
Expanding public transit
Thinking about transportation for a moment – Which ONE do you want the state of Colorado to focus more on?
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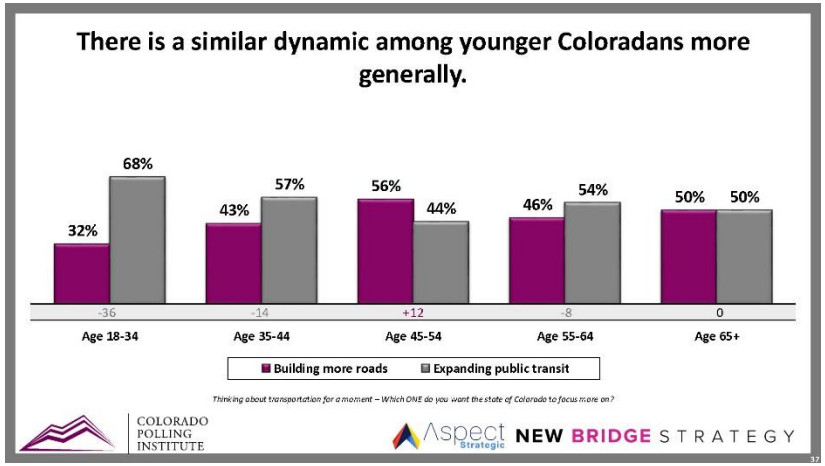
There is a similar dynamic among younger Coloradans more generally.
68%
57%
56%
54%
50%
50%
32%
43%
44%
46%
-36
-14
+12
-8
0
Age 18-34
Age 35-44
Age 45-54
Age 55-64
Age 65+
Building more roads
Expanding public transit
Thinking about transportation for a moment – Which ONE do you want the state of Colorado to focus more on?
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Aspect Strategic
Lori Weigel & Kathryn Hahne
lori@newbridgestrategy.com
kathryn@newbridgestrategy.com
Kevin Ingham & Alex Dunn
kevin@aspectstrategic.com
alex@aspectstrategic.com

Photo Credit: Regional Transportation District
Recommended investment priorities
Regional Transportation Committee: December 16, 2025
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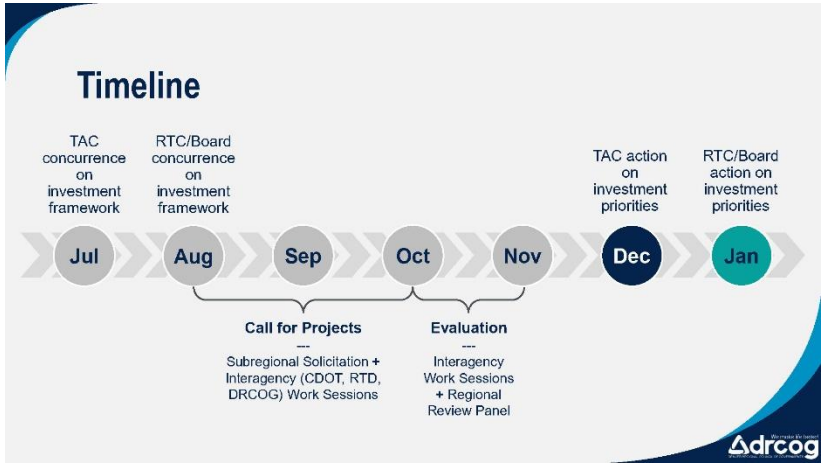
We make life better!


Timeline
TAC concurrence on investment framework
RTC/Board concurrence on investment framework
TAC action on investment priorities
RTC/Board action on investment priorities
Jul
Aug
Sep
Oct
Nov
Dec
Jan
Call for Projects

Subregional Solicitation + Interagency (CDOT, RTD, DRCOG) Work Sessions
Evaluation

Interagency Work Sessions + Regional Review Panel
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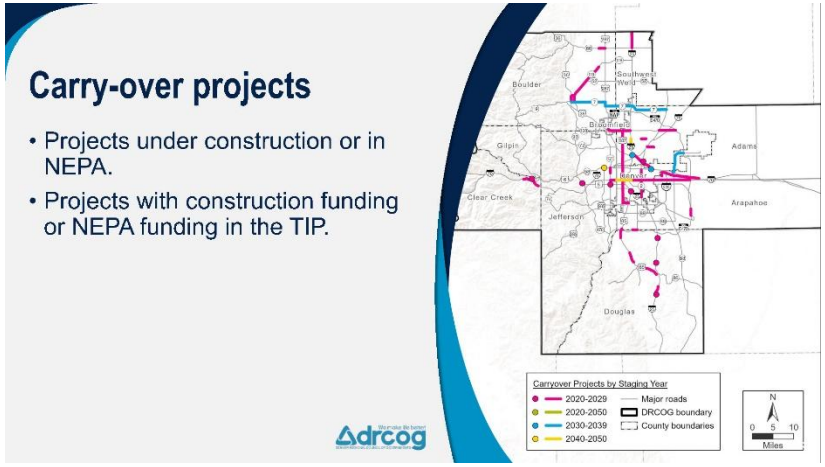
Carry-over projects
• Projects under construction or in NEPA.
• Projects with construction funding or NEPA funding in the TIP.
Boulder
Southern Weld
Broomfield
Gilpin
Adams
Clear Creek
Jefferson
Arapahoe
Douglas
Carryover Projects by Staging Year
2020-2029
2020-2050
2030-2039
2040-2050
Major roads
DRCOG boundary
County boundaries
N
0 5 10
Miles
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Candidate submittals
109
County Transportation Forums
14
CDOT Region 1 and CDOT Region 4
8
Denver Regional Council of Governments
2
Regional Transportation District
133 candidate submittals
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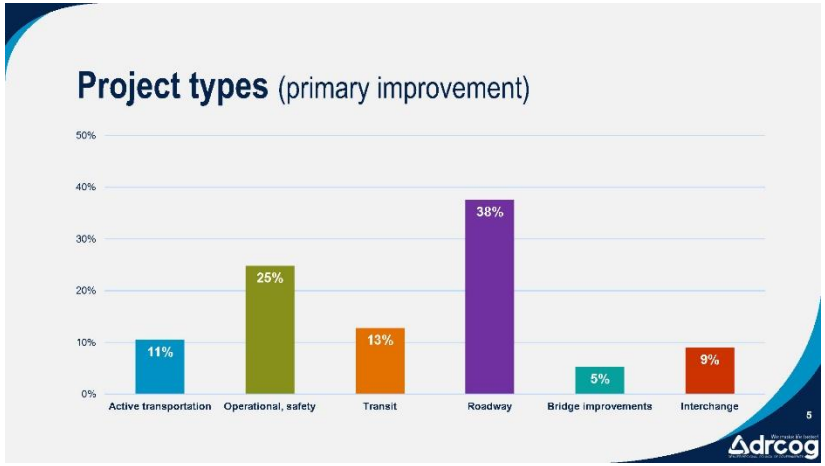
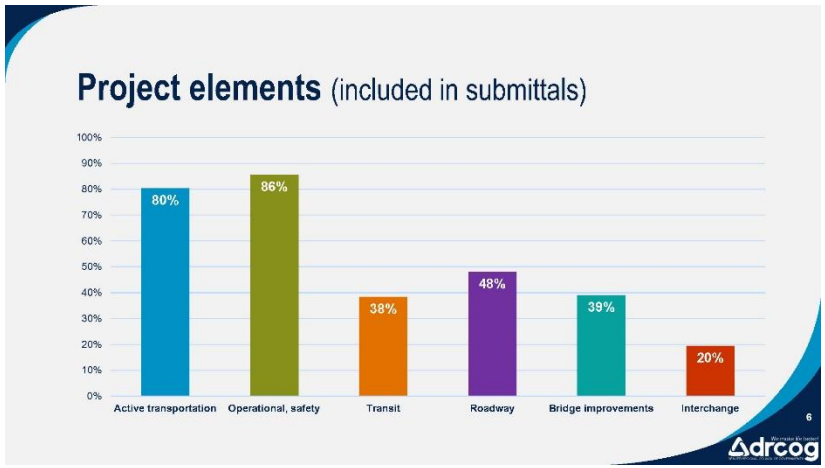

Project types (primary improvement)
50%
40%
30%
20%
10%
0%
11%
25%
13%
38%
5%
9%
Active transportation
Operational, safety
Transit
Roadway
Bridge improvements
Interchange
5
drcog


Project elements (included in submittals)
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
80%
86%
38%
48%
39%
20%
Active transportation
Operational, safety
Transit
Roadway
Bridge improvements
Interchange
6
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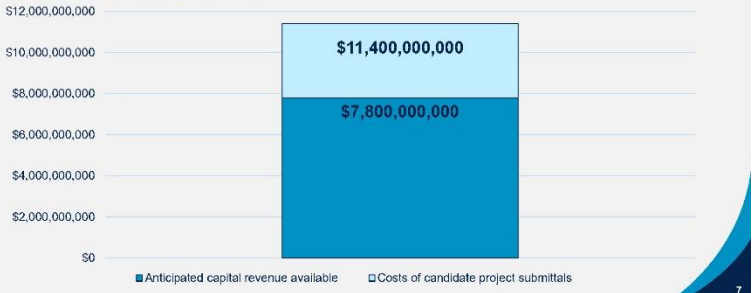
Anticipated project revenue available versus cost of submittals



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Evaluation process

- **Regional Review Panel** made up of DRCOG, CDOT, RTD staff, and County Transportation Forum representatives met three times in November.
- Investment priorities evaluated against **Metro Vision Themes** and **RTP Priorities**.
  - Additional information will be provided on **congestion mobility scores**, an analysis leveraging the **Equity Index**, **forum prioritization**, and **public feedback** to date.
- This evaluation was combined with the **draft financial plan** and **coordination** between all partner agencies to determine **draft program and project investment priorities**.

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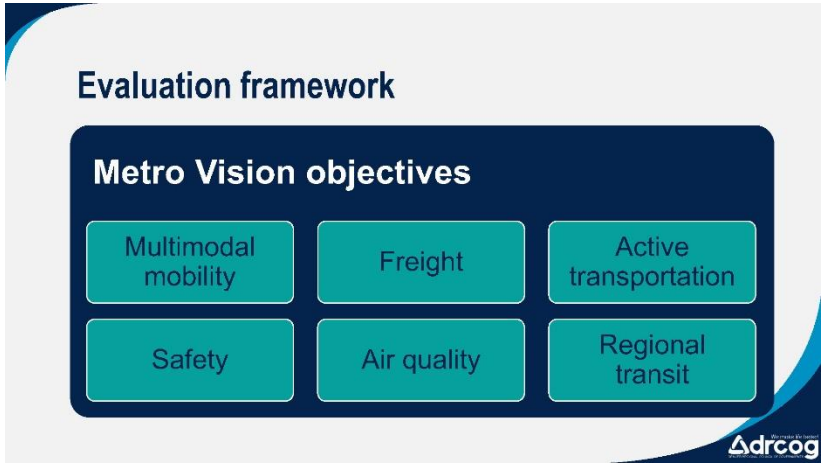
Evaluation framework
Metro Vision objectives
Multimodal mobility
Freight
Active transportation
Safety
Air quality
Regional transit
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Evaluating priorities
Regional Partner check-ins
(CDOT R1 and R4, DRCOG, and RTD)
Regional Review Panel meetings
(County transportation forums)
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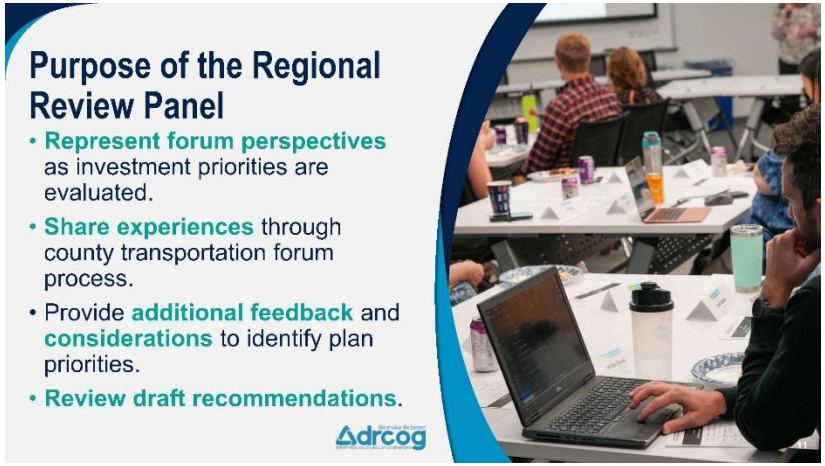
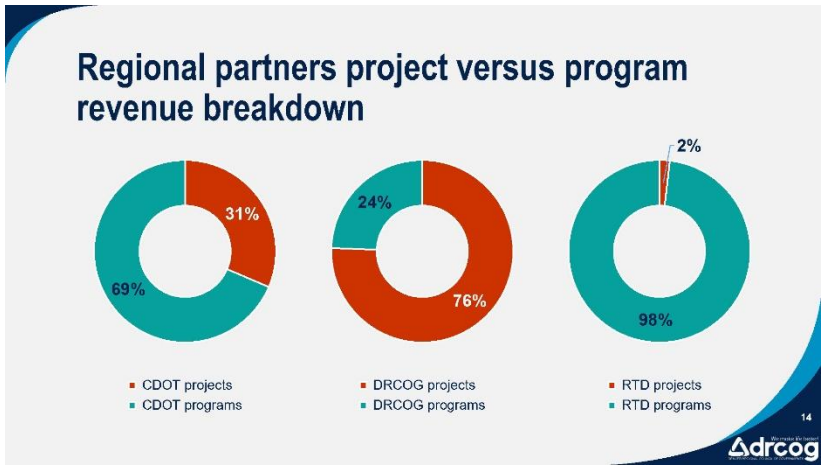
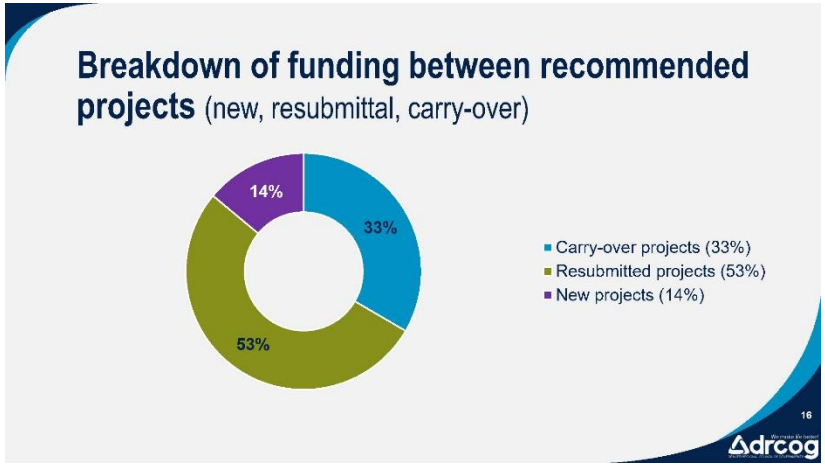
10

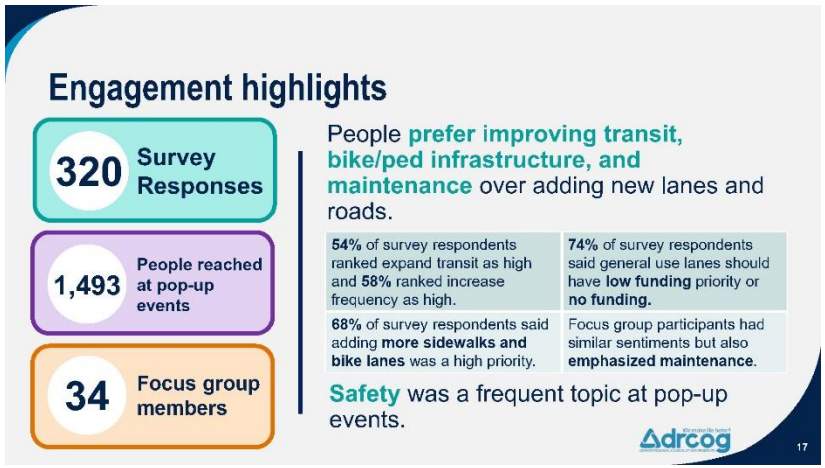

Purpose of the Regional Review Panel
• Represent forum perspectives as investment priorities are evaluated.
• Share experiences through county transportation forum process.
• Provide additional feedback and considerations to identify plan priorities.
• Review draft recommendations.
drcog

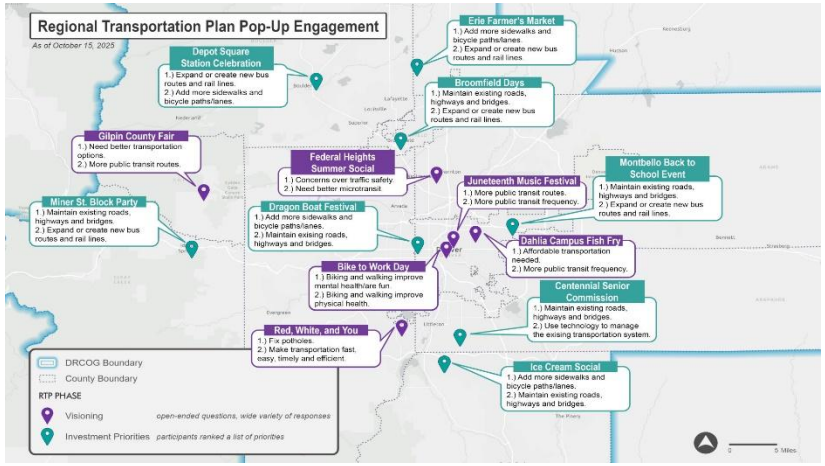
Purpose of the Regional Partner check-ins
• Review candidate project submittals in comparison to regional priorities.
• Coordinate on submittals that impact regional partner's facilities or services.
• Workshop and draft recommendations.
• Align draft recommendations with regional partner's own planning priorities.
drcog
12

Regional partners anticipated revenue
29%
7%
63%
CDOT (29%)
DRCOG (7%)
RTD (63%)
13
drcog


Regional partners project versus program revenue breakdown
31%
69%
24%
76%
2%
98%
CDOT projects
CDOT programs
DRCOG projects
DRCOG programs
RTD projects
RTD programs
14
drcog


Breakdown of funding between recommended projects (new, resubmittal, carry-over)
14%
33%
53%
Carry-over projects (33%)
Resubmitted projects (53%)
New projects (14%)
16
drcog


Engagement highlights
320 Survey Responses
1,493 People reached at pop-up events
34 Focus group members
People prefer improving transit, bike/ped infrastructure, and maintenance over adding new lanes and roads.
54% of survey respondents ranked expand transit as high and 58% ranked increase frequency as high.
74% of survey respondents said general use lanes should have low funding priority or no funding.
68% of survey respondents said adding more sidewalks and bike lanes was a high priority.
Focus group participants had similar sentiments but also emphasized maintenance.
Safety was a frequent topic at pop-up events.
drcog
17


Regional Transportation Plan Pop-Up Engagement
As of October 15, 2025
Depot Square Station Celebration
1.) Expand or create new bus routes and rail lines.
2.) Add more sidewalks and bicycle paths/lanes.
Erie Farmer's Market
1.) Add more sidewalks and bicycle paths/lanes.
2.) Expand or create new bus routes and rail lines.
Broomfield Days
1.) Maintain existing roads, highways and bridges.
2.) Expand or create new bus routes and rail lines.
Gilpin County Fair
1.) Need better transportation options.
2.) More public transit routes.
Federal Heights Summer Social
1.) Concerns over traffic safety.
2.) Need better microtransit.
Juneteenth Music Festival
1.) More public transit routes.
2.) More public transit frequency.
Montbello Back to School Event
1.) Maintain existing roads, highways and bridges.
2.) Expand or create new bus routes and rail lines.
Miner St. Block Party
1.) Maintain existing roads, highways and bridges.
2.) Expand or create new bus routes and rail lines.
Dragon Boat Festival
1.) Add more sidewalks and bicycle paths/lanes.
2.) Maintain exising roads, highways and bridges.
Dahlia Campus Fish Fry
1.) Affordable transportation needed.
2.) More public transit frequency.
Bike to Work Day
1.) Biking and walking improve mental health/are fun.
2.) Biking and walking improve physical health.
Centennial Senior Commission
1.) Maintain existing roads, highways and bridges.
2.) Use technology to manage the exising transportation system.
Red, White, and You
1.) Fix potholes.
2.) Make transportation fast, easy, timely and efficient.
Ice Cream Social
1.) Add more sidewalks and bicycle paths/lanes.
2.) Maintain existing roads, highways and bridges.
DRCOG Boundary
County Boundary
RTP PHASE
Visioning
open-ended questions, wide variety of responses
Investment Priorities
participants ranked a list of priorities
0
5 Miles

Next steps
• December 16: Regional Transportation Committee meeting. (informational briefing)
• January 21: Board of Directors meeting. (informational briefing)
• January 20: Regional Transportation Committee meeting. (recommended approval)
• January 21: Board of Directors meeting. (for approval)
19
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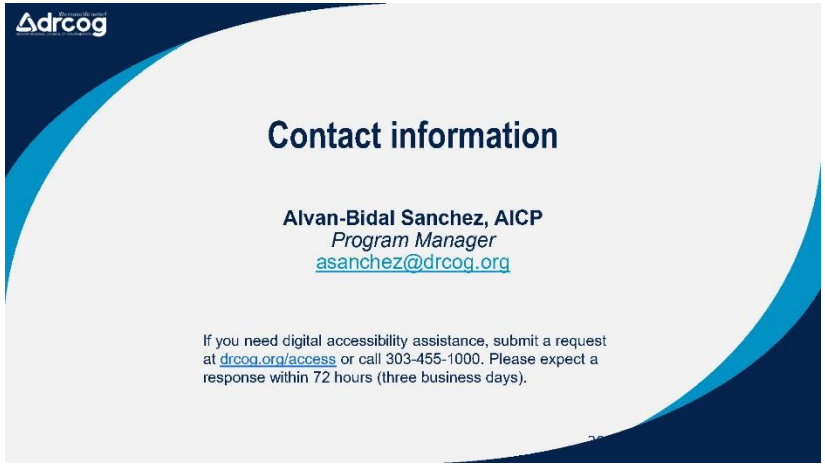
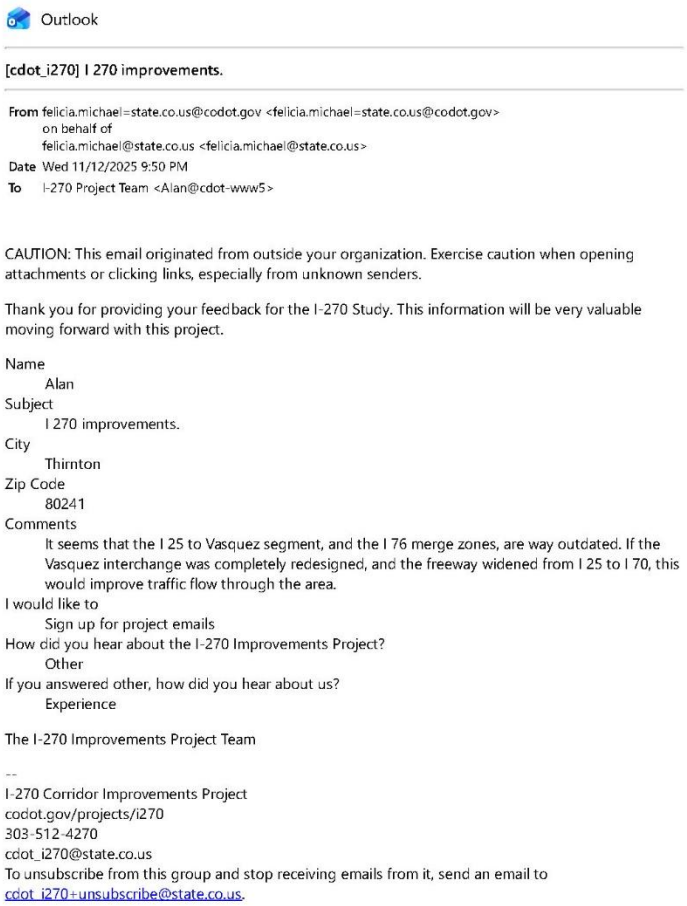

drcog
Contact information
Alvan-Bidal Sanchez, AICP
Program Manager
asanchez@drcog.org
If you need digital accessibility assistance, submit a request at drcog.org/access or call 303-455-1000. Please expect a response within 72 hours (three business days).



Outlook

[cdot_i270] I 270 improvements.

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Wed 11/12/2025 9:50 PM
To I-270 Project Team <Alan@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Alan
Subject
I 270 improvements.
City
Thirnton
Zip Code
80241
Comments
It seems that the I 25 to Vasquez segment, and the I 76 merge zones, are way outdated. If the Vasquez interchange was completely redesigned, and the freeway widened from I 25 to I 70, this would improve traffic flow through the area.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Other
If you answered other, how did you hear about us?
Experience

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

The Preferred Alternative includes adding a lane in each direction between I-25/US 36 and I-70 that will be operated as an Express Lane.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative.

From: juan alarcon
To: cdot_i270@state.co.us
Subject: [cdot_i270] I270
Date: Tuesday, January 20, 2026 5:11:03 AM

1 Don't add a toll lane! Why are do we have to pay twice already paying once.
Greedy CODT!!!!!!
Sent from my iPhone 14 pro

--
I-270 Corridor Improvements Project
https://urldefense.com/v3/__http://codot.gov/projects/i270__;!!OepYZ6Q!58rwka-PDZdbYmF7vgW0xdzt4qNB7vTVJe5aZB7OZEsSBmQr4uNPeLKQ_4Pm0EX4AsEe_1kzdzsgNnybqMlBmoS6huVy0w$
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

Comments noted.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 12/22/2025 1:15 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Alternatives
If you selected "Other", please specify
Provide your comment below:

1 3 GP lane alternative should be utilized based on current appendix C visuals, as it ties into existing highway geometry and lane configuration, especially around the I25/us36/i270 interchange. Express lanes would be better in the long run, and for benefiting transit, encouraging carpooling, guaranteeing an alternative to traffic in the long run, but based on the current appendix C visuals, express lanes would not offer any benefit into the corridor. Express lanes do not match the existing highway layout and geometry at the i25/us36/i270 interchange. I270 EB Traffic would still need to merge into 2 lanes (which is existing conditions) before an express lane opens up, but with the 3GP alternative, the 3rd lane would be added from the i25 ramp. I270 WB, the express lane would end , and a decent amount of traffic would need to merge into 2 around the i76 overpass, with the 3 GP alternative, the 3 GP mainline lanes would

2 continue to i25 which would be problematic as compared to the EL alternative. As it stands this project should NOT proceed. This projects bounds MUST expand to include the interchanges on both sides of the highway (i70 and us34/i25). This is an extremely short segment of interstate highway, with the vast majority of traffic coming and going from beyond those interchanges, and the majority of traffic traveling through the entirety of i270. For 3GP The us34/i25 interchange is designed to benefit from 3GP lanes. I70 interchange does not address nor handle 3GP. Congestion will be created where 3 lanes drop to 2, as there is not enought traffic naturally exiting at Quebec. Most traffic counties to I70. This must be addressed 2GP + 1EL Problems with us34/i25 interchange configuration with EL mentioned earlier above. Express lanes would be

3 compatible on i270 with a direct connection ramp to i25 expresslanes, us36 expresslanes, or both, as expresslanes existing on those highways would complement and benefit other systems. Expresslanes on i270 do NOT benefit other expresslanes corridors if utilizing current interchange without direct connections. On the I70 end of the i270 corridor, the express lane will drop, forming 2 GP lanes at the interchange. This creates a new merge area that will be prone to creating congestion. The I70/i270 interchange is not compatible with an express lanes. I70 mainline east IS benefitted/compatible by express lanes on i270, because expresslanes currently exist on i70, but ONLY IF a direct connect ramp is implemented from the beginning, with the express lane on i270 If i270 project does not include interchanges at end of corridor, 3GP would be less problematic as an alternative, it be moderately more beneficial than existing 2 GP.

Response to Comment 1

To determine which alternative performs better, the two Build Alternatives were evaluated against the Purpose and Need of the project. For safety, compared to the Three General-Purpose Lanes Alternative, the Preferred Alternative better supports the safety need by maintaining a free-flowing Express Lane with fewer merging conflicts and improved operational control.

For travel time and reliability, general-purpose lanes are prone to stop-and-go conditions once they reach capacity. In contrast, an Express Lane is actively managed to avoid saturation and preserve operational efficiency. This creates a dependable option for all Express Lane users, while easing congestion in the adjacent general-purpose lanes. Compared to the Three General-Purpose Lanes Alternative, the Preferred Alternative performs better for travel time and reliability, especially during peak periods, with the Express Lane providing a consistent trip option during all times of day.

For transit, the Three General-Purpose Lanes Alternative does not give transit vehicles an advantage. Buses would still be stuck in the same traffic as everyone else, offering no improvement beyond what general traffic might experience.

For bicycle and pedestrian connectivity, there is no difference between alternatives since they both contain the same improvements.

For freight operations, the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative offers the most effective long-term solution for supporting freight movement on I-270. The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is better aligned with the roads at both ends of I-270. It connects smoothly to existing and planned direct-access ramps, allowing vehicles, including freight, to enter and exit the corridor without sudden lane shifts. This

keeps traffic flowing steadily, especially near major interchanges like I-25/US 36 and I-70. In contrast, the Three General-Purpose Lanes Alternative adds a third lane, but it cannot continue all the way to either end. That third lane must merge back to two lanes at the ends of the corridor, creating bottlenecks that slow everyone down, especially large trucks, which take more time to merge and accelerate. By avoiding these lane drops, the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative reduces congestion and delays, improving travel time and reliability for freight vehicles that depend on reliable and predictable travel times.

Furthermore, detailed modeling also reflects how the Express Lane improves freight vehicle speeds in all lanes and allows freight vehicles, which typically accelerate and decelerate more slowly, to avoid frequent stops and bottlenecks, making their trips more efficient and reliable.

For potential impacts to the environment, most environmental resources are projected to experience similar impacts under both Build Alternatives. Slight differences in impacts are projected for Air Quality, Water Quality, and Visual Resources.

For more information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative, please see Section 3.4 of the Draft Environmental Impact Statement (EIS).

Response to Comment 2

For urban freeways, like I-270, the spatial limits of the study area should include upstream queuing, and temporal limits should capture the beginning and end of congestion to confirm that the model and traffic data capture the true demand volume and not just the volume served. The traffic study area was developed in collaboration with the Traffic Working Group, which was made up of technical experts from CDOT, FHWA, the Denver Regional Council of Governments, and the consultant team. Please see Appendix E2, Traffic Technical Report, of the Draft EIS for additional information on how the traffic study area was determined.

Response to Comment 3

Direct connections are included in plans for the I-25/US 36/I-270 and I-70/I-270 interchanges. The National Environmental Policy Act process is in progress for the direct connect at the I-70/I-270 interchange.

(Would be cost beneficial) If i270 project does not include interchanges at the end of corridor, 2GP and 1 EL would be problematic as an alternative, being only SLIGHTLY better that existing 2GP conditions. (Would not be cost beneficial) If i270 project includes at least 1 interchange at the end of the corridor with direct express lane connection from I70, u34 or i25 mainline to the i270 2GP + 1 EL configuration, this would be substantially less problematic as an alternative, and be substantially better than the existing 2GP configuration. (Would be cost beneficial) If i270 project includes both interchanges at the end of the corridor with direct express lane connection from I70 and us34/i25 (u34 or i25 or both) mainline to the i270 2GP + 1 EL configuration, this would be the least problematic as an alternative, and be the best alternative, exceptionally better than the existing 2GP configuration. (Would be cost beneficial)

Name (first and last)

Pedro Barrios Anderson

Address

15791 E. Bellewood Pl.

City

Aurora

Neighborhood/ZIP Code

80015

Would you like to be added to the project email list?

yes

If Yes, please provide your email address

barriosplj@gmail.com

--

I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 12/7/2025 9:16 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Transit
If you selected "Other", please specify
1 I use 270 daily to commute to and from work. It needs to be wider, the clover leaf needs to go away and the speed limit needs to be raised from 55 to 65. If you look at the choke point, it all stems at vasquez. Due to vehicles not being able to get up to highway speeds before getting on I-270, which then causes other traffic to slow down to allow them to merge safely.
Provide your comment below:
Name (first and last)
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
If Yes, please provide your email address

--
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding a lane in each direction between I-25/US 36 and I-70 that will be operated as an Express Lane.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry.

The speed limit was not evaluated during this process; however, it could be evaluated in the future.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 12/26/2025 5:04 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
Toll roads suck. Please don't make 270 a toll road
1 Provide your comment below:
Please don't make 270 a toll road
Name (first and last)
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative adds one lane in each direction on I-270, which will be operated as an Express Lane because it best meets the Purpose and Need. It will not be a fully tolled road. For more information on why the Preferred Alternative was preliminarily identified, see Section 3.4 of the Draft Environmental Impact Statement.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/9/2026 8:41 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
1 Fix the interchanges -- that will fix the back up problems. Forget about transit and all the frivolous list of stuff -- I mean really?
Provide your comment below:
What a list -- really? Most of the bottlenecks are at the interchanges, so why can't we concentrate on fixing them and forget about all this nonsense?
Name (first and last)
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
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cdot_i270@state.co.us
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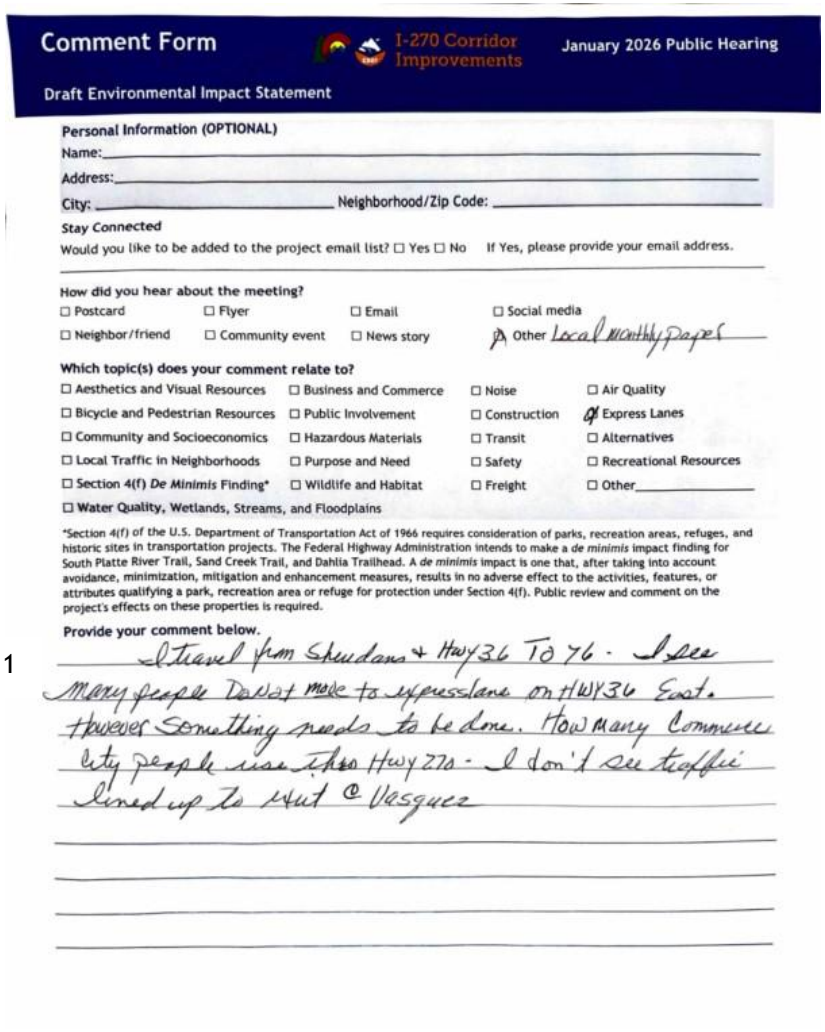
Response to Comment 1

The Preferred Alternative includes improvements to interchanges, but also needs an additional lane, safety improvements, and transit, bicycle, and pedestrian improvements to meet the Purpose and Need for the project. Please see Section 5.4.1, GEN1, of the Final Environmental Impact Statement for information on the Purpose and Need.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: _____

Address: _____

City: _____ Neighborhood/Zip Code: _____

Stay Connected

Would you like to be added to the project email list? ☐ Yes ☐ No If Yes, please provide your email address.

_____

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☐ Email ☐ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☒ Other Local Monthly Papers

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources	☐ Business and Commerce	☐ Noise	☐ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☐ Construction	☒ Express Lanes
☐ Community and Socioeconomics	☐ Hazardous Materials	☐ Transit	☐ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☐ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☐ Other_____
☐ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

1 I travel from Sheridan & Hwy 36 To 76. I see many people Do not make to express lane on HWY 36 East. However Something needs to be done. How many Commuter city people use the Hwy 270. I don't see traffic lined up to Exit @ Vasquez

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for information on the Preferred Alternative and Vasquez Boulevard interchange.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/8/2026 10:11:12 PM

Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
Do what we all know is necessary, add travel lanes to this corridor. Stop the foolishness of these environmentalist groups who refuse to recognize that population growth necessitates infrastructure investment and expansion. Take seriously the economic impacts of these decisions on Colorado now and into the future. If we don't stand up and start demanding that our highway system provide the access and reliability that's needed for our population, the state's future is dire.
Provide your comment below:
Name (first and last)
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.

Outlook

[cdot_i270] i-270 feedback

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Wed 12/24/2025 9:39 AM
To I-270 Project Team <DavidArbuckle@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
David Arbuckle
Subject
i-270 feedback
Your E-Mail Address
dintlu@gmail.com
City
Denver
Zip Code
80207
Comments
Greetings. I read about the I-270 project at Colorado Sun. I am writing to communicate my support for this project. I-270 in its current condition is undersized, dilapidated, dangerous. The cloverleaf at Vasquez would be terrifying if traffic weren't always idling at the merge. I further disagree with opponents' feedback and proposed alternatives: - Highway expansions result in more usage -> ignores Denver's unrelenting 30 years of population growth - Increases pollution -> The environmental impact assessment is thorough and frankly biased towards protecting the neighboring communities. The 'do nothing' plan fails to account for externalities. - Make it a toll road -> Pushes the worst traffic (non-time-sensitive industrial vehicles) into neighborhoods. - Invest in bus service instead -> Here, really? The Colfax corridor is an exciting test for Denver. This is an 'also', not an 'instead'. - Land bridges -> (what?) Didn't Polis just get badly shamed for one of these? That's it. I've been impressed with CODOT the past few years. The bike lanes throughout Denver are terrific. The Mccaslin interchange and whatever you guys did at Wadsworth in NW Denver is confusing but somehow works. If you fix Floyd Hill that's a miracle. I'd like to see more of an investment in high-density, rapid interval (sub-5-minutes) public transit projects. Regards, David Arbuckle
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

Response to Comment 1

Comments noted.

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 1:02 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Air Quality, Bicycle and Pedestrian Resources, Community and Socioeconomics , Express Lanes, Noise, Pedestrian Resources , Safety, Transit, Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
1 Highways are ugly, unsafe, and not a good use of resources. I would love to see all highways in Denver removed. Please fund public transportation instead.
Name (first and last)
B Barber
Address
1631 n williams st
City
Denver
Neighborhood/ZIP Code
80218
Would you like to be added to the project email list?
If Yes, please provide your email address

--
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Response to Comment 1

In order to meet the Purpose and Need for the project, highway, transit, and pedestrian and bicycle improvements are needed. Exclusive transit lane alternatives were evaluated during the screening process but were eliminated because they did not adequately address the project's Purpose and Need for corridor-wide safety, travel time reliability, and freight operations, and would have reduced capacity available to general traffic and freight on a facility that already operates over capacity.

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

For additional information on increased transit, see Section 5.4.3, ALT6, of the Final EIS.

Outlook

[cdot_i270] Concert About Widening I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 12/8/2025 10:39 AM
To I-270 Project Team <CalanBarnhardt@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Calan Barnhardt
Subject
Concert About Widening I-270
Your E-Mail Address
calan.barnhardt@gmail.com
City
Durango
Zip Code
81301
Phone Number
9707994567
Comments
1 I'm concerned that expanding I-270 will only provide a temporary improvement. Highway widening has consistently shown the same outcome across the country: any initial relief from congestion is quickly erased as induced demand fills the new capacity. Even proposals to include bus lanes are tied to widening the corridor, which undermines the long-term effectiveness and sustainability of those transit improvements. I-270 runs directly alongside Sand Creek and near the South Platte River, two areas with nice river trails and good pedestrian/bike connectivity to downtown. Instead of widening the highway, this corridor is an opportunity to reimagine the space entirely. Converting I-270 into an urban roadway with high-quality transit, safe multimodal access, and dense, walkable development around it would not only save the state money over the long run, but also create a healthier and more vibrant place for people to live and work. This approach would help reunite the communities that were separated when the highway was first built, reduce our dependence on cars, lower household transportation costs, and improve overall quality of life. I hope the state considers solutions that prioritize people, environment, and long-term sustainability over short-lived congestion relief.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?

Response to Comment 1

The Preferred Alternative includes an additional lane in each direction, improvements to interchanges, safety improvements, and transit, bicycle, and pedestrian improvements to meet the Purpose and Need for the project.

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor

project; rather, it is constrained by the region's adopted population and employment forecasts.

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The Bicycle, Pedestrian, and Transit Enhancements Alternative was developed in response to this comment that was received throughout the project development process. The alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.1, GEN1, of the Final EIS for additional information on the Purpose and Need. Please see Section 5.4.3, ALT6 and ALT7, for additional information on transit and bicycle and pedestrian improvements. Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Social media

The I-270 Improvements Project Team

--
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Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 6:44 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Alternatives, Construction , Express Lanes
If you selected "Other", please specify
Provide your comment below:
1 I'm in favor of the two alternatives that maximize the number of lanes in each direction. Two options provide a total of four lanes in each direction and based on current usage and projected growth, those seem like the only alternatives that "get ahead" of the congestion versus remaining significantly behind the demand. The cost to increase from two current lanes in each direction to only three lanes in each direction would be significant now and more significant in the future when a fourth lane is added in each direction. The better fiscal option would appear to be to maximize the carrying capacity of the right away and expand now to four lanes in each direction.
Name (first and last)
Todd Berry
Address
2325 Akron Street
City
Denver
Neighborhood/ZIP Code
80238
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
todd.berry04@gmail.com

--
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Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 10:20 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Community and Socioeconomics , Wildlife and Habitat, Water Quality, Wetlands, Streams and Floodplains, Other
If you selected "Other", please specify
Heat Island Effect due to Increased Impervious Surface Mass
Provide your comment below:
1 I commend the list of Mitigation Commitments in Chapter 5 and the commitment to Advancing Community Enhancements as described in the Community Analysis Report. Given the lack of tree cover and green space in the project area combined with the overabundance of industry, roads, concrete, and pollution sources, it is imperative that the project results in a net benefit and not just in trying to mitigate the damage from the project. There are many non-profit organizations willing to do the work and finance an increase in tree canopy and native species to improve air quality, reduce the heat island effect, reduce noise pollution, create visual beauty, and revitalize the community, but they do not have access or control to make such changes. I highly recommend allocating 1/2 acre plots, shoulders and medians in the project area to be planted and maintained by community groups such as Cultivando, The Nature Conservancy, The Neighborhood Resilience Corps, Trust for Public Lands, Wildlands Restoration Volunteers, and Wild Ones.
Name (first and last)
Cece Bloomfield
Address
3000 Galena Way
City
Boulder
Neighborhood/ZIP Code
80305
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
cecebloomfield@gmail.com

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I-270 Corridor Improvements Project

Response to Comment 1

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision. Please see Section 5.4.4, IMP2, of the Final Environmental Impact Statement for additional information on what is considered federal mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

codot.gov/projects/i270
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Outlook

[cdot_i270] Public Comments on Transportation Congestion

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 1/8/2026 9:31 AM
To I-270 Project Team <AddieBoston@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Addie Boston
Subject
Public Comments on Transportation Congestion
Your E-Mail Address
addierboston@gmail.com
City
Westminster
Zip Code
80234
Comments
1 I work in Denver, I enjoy the museums and sites in Denver. I use the light rail if I do anything in Denver that is walking distant from union station. Please, use this time and energy to put in public transport. I work on off I-270 and it would change my daily commute drastically if I could just take a train. Even if it means walking 10-15 mins to my work off of Colorado and mlk. This would drastically limit congestion. I don't need my whole car to go to work every day.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

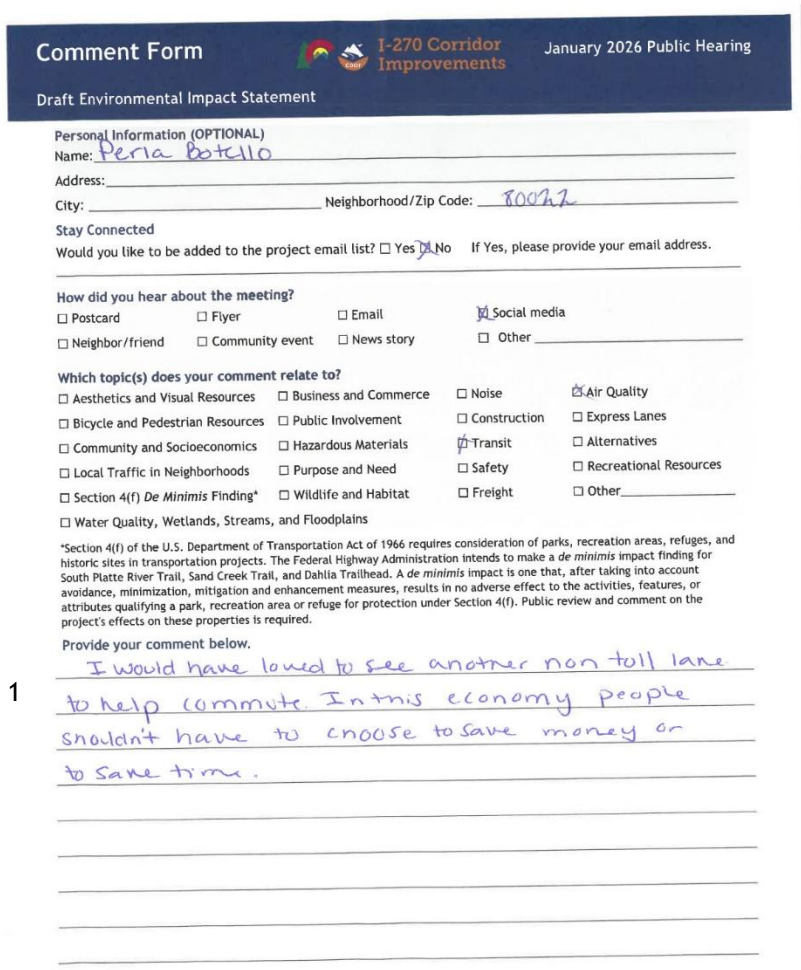
Response to Comment 1

Exclusive transit lane alternatives were evaluated during the screening process but were eliminated because they did not adequately address the project's Purpose and Need for corridor-wide safety, travel time reliability, and freight operations, and would have reduced capacity available to general traffic and freight on a facility that already operates over capacity.

The Preferred Alternative supports transit performance by allowing buses to operate in the Express Lane, free of charge, which maintains steady speeds using dynamic pricing and limited access points, consistent with managed lane operations on other Colorado highways.

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Please see Section 5.4.1, GEN1, of the Final EIS and Section 5.4.3, ALT6, of the Final EIS for additional information on the Purpose and Need and consideration of increased transit options and services.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Perla Botello

Address:

City: _____ Neighborhood/Zip Code: 80022

Stay Connected

Would you like to be added to the project email list? ☐ Yes ☒ No If Yes, please provide your email address.

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☐ Email ☒ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other _____

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources	☐ Business and Commerce	☐ Noise	☒ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☐ Construction	☐ Express Lanes
☐ Community and Socioeconomics	☐ Hazardous Materials	☒ Transit	☐ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☐ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☐ Other_____
☐ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

I would have loved to see another non toll lane to help commute. In this economy people shouldn't have to choose to save money or to save time.

1

Response to Comment 1

To determine which alternative performs better, the two Build Alternatives were evaluated against the Purpose and Need of the project. For safety, compared to the Three General-Purpose Lanes Alternative, the Preferred Alternative better supports the safety need by maintaining a free-flowing Express Lane with fewer merging conflicts and improved operational control.

For travel time and reliability, general-purpose lanes are prone to stop-and-go conditions once they reach capacity. In contrast, an Express Lane is actively managed to avoid saturation and preserve operational efficiency. This creates a dependable option for all Express Lane users, while easing congestion in the adjacent general-purpose lanes. Compared to the Three General-Purpose Lanes Alternative, the Preferred Alternative performs better for travel time and reliability, especially during peak periods, with the Express Lane providing a consistent trip option during all times of day.

For transit, the Three General-Purpose Lanes Alternative does not give transit vehicles an advantage. Buses would still be stuck in the same traffic as everyone else, offering no improvement beyond what general traffic might experience.

For bicycle and pedestrian connectivity, there is no difference between alternatives since they both contain the same improvements.

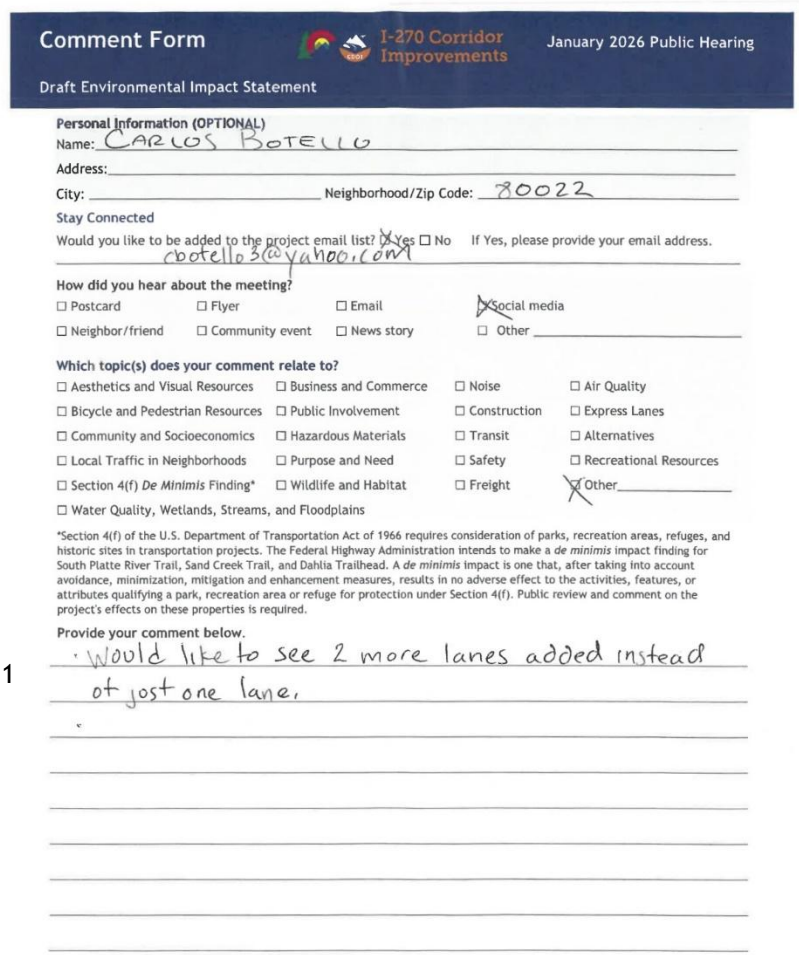
For freight operations, the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative offers the most effective long-term solution for supporting freight movement on I-270. The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is better aligned with the roads at both ends of I-270. It connects smoothly to existing and planned direct-access ramps, allowing vehicles, including freight, to enter and exit the corridor without sudden lane shifts. This

keeps traffic flowing steadily, especially near major interchanges like I-25/US 36 and I-70. In contrast, the Three General-Purpose Lanes Alternative adds a third lane, but it cannot continue all the way to either end. That third lane must merge back to two lanes at the ends of the corridor, creating bottlenecks that slow everyone down, especially large trucks, which take more time to merge and accelerate. By avoiding these lane drops, the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative reduces congestion and delays, improving travel time and reliability for freight vehicles that depend on reliable and predictable travel times.

Furthermore, detailed modeling also reflects how the Express Lane improves freight vehicle speeds in all lanes and allows freight vehicles, which typically accelerate and decelerate more slowly, to avoid frequent stops and bottlenecks, making their trips more efficient and reliable.

For potential impacts to the environment, most environmental resources are projected to experience similar impacts under both Build Alternatives. Slight differences in impacts are projected for Air Quality, Water Quality, and Visual Resources.

For more information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative, please see Section 3.4 of the Draft Environmental Impact Statement.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: CARLOS BOTELLO

Address:

City: _____ Neighborhood/Zip Code: 80022

Stay Connected

Would you like to be added to the project email list? ☒ Yes ☐ No If Yes, please provide your email address.

cbotello3@yahoo.com

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☐ Email ☒ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other _____

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources	☐ Business and Commerce	☐ Noise	☐ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☐ Construction	☐ Express Lanes
☐ Community and Socioeconomics	☐ Hazardous Materials	☐ Transit	☐ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☐ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☒ Other_____
☐ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

1 · Would like to see 2 more lanes added instead of just one lane.

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] I270 feedback

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 8:25 AM
To I-270 Project Team <SunnyBradford@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Sunny Bradford
Subject
I270 feedback
Your E-Mail Address
sbradford@metrowaterrecovery.com
City
Denver
Zip Code
80229
Phone Number
3032863056
Comments
1 Please do not make a toll road, unless you allow drivers to get out of it both at Vasquez and York. It would be better to add a extra lane for people to get off and on at Vasquez, even if you had a right lane exit only at Vasquez and then the on ramp created a new lane.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

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cdot_i270@state.co.us
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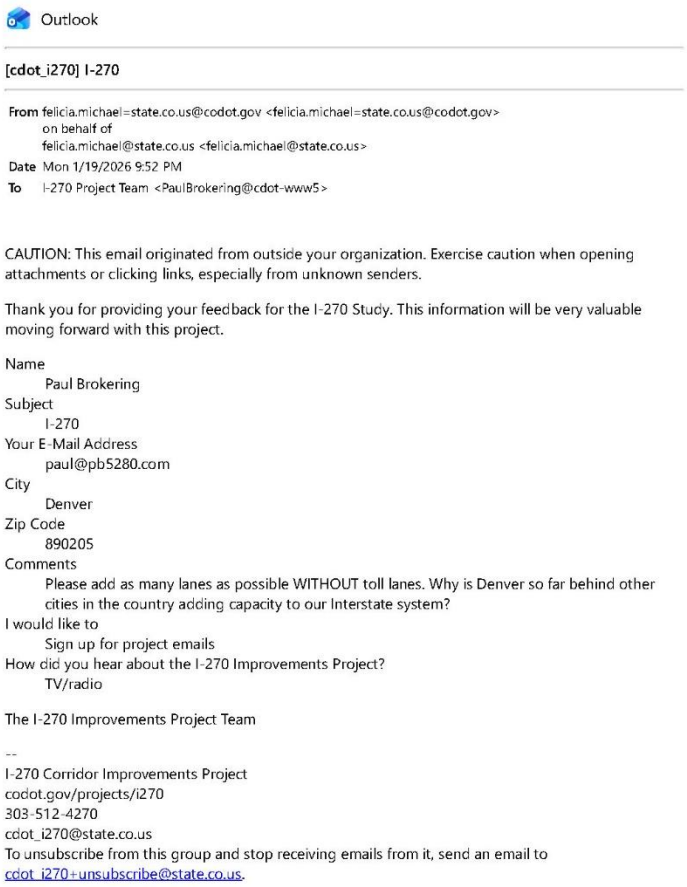
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative adds one lane in each direction on I-270, which will be operated as an Express Lane because it best meets the Purpose and Need. For information about why the Preferred Alternative was preliminarily identified, please see Section 3.4 of the Draft Environmental Impact Statement.

The Preferred Alternative Express Lane includes options along the corridor for safe ingress and egress to/from the Express Lanes and local access; including ingress and egress options to access all corridor interchanges. The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to the added "extra lane for people to get off and on at Vasquez" you described by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic.



Outlook

[cdot_i270] I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 9:52 PM
To I-270 Project Team <PaulBrokering@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Paul Brokering
Subject
I-270
Your E-Mail Address
paul@pb5280.com
City
Denver
Zip Code
890205
Comments
Please add as many lanes as possible WITHOUT toll lanes. Why is Denver so far behind other cities in the country adding capacity to our Interstate system?
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
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cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The Preferred Alternative includes adding one lane in each direction, which will be operated as an Express Lane because it best meets the Purpose and Need. For more information on why the Preferred Alternative was preliminarily identified, see Section 3.4 of the Draft Environmental Impact Statement.

From: Merenich - CDOT, David
To: CDOT - I-270
Cc: Herman Stockinger - CDOT
Subject: [cdot_i270] Fwd: Submit a Public Comment Form Submission
Sent: 1/14/2026 7:55:32 AM

Team,

Please see below for a public DEIS comment and log accordingly.

Herman - We will log this as a public comment.

Thank you,

---------- Forwarded message ---------
From: **Stockinger - CDOT, Herman** <herman.stockinger@state.co.us>
Date: Wed, Jan 14, 2026 at 7:11 AM
Subject: Fwd: Submit a Public Comment Form Submission
To: Stacia Sellers - CDOT <stacia.sellers@state.co.us>, David Merenich - CDOT <david.merenich@state.co.us>

Not sure how to handle this one. We get about 1-20 written comments from people who visit our TC website and fill out a TC public comment form. THIS one says their comment is for the I-270 public meeting. I'm including it in my list of TC written public comments. Leaving it up to you as to whether you believe this is an appropriate public comment for the DEIS.

Herman

Herman Stockinger, Deputy Director and Director of Policy
C 720.810.6934
Herman.Stockinger@state.co.us

COLORADO
Department of Transportation
Office of the Deputy Executive Director

---------- Forwarded message ---------
From: <felicia.michael@state.co.us>
Date: Tue, Jan 13, 2026 at 4:57 PM
Subject: Submit a Public Comment Form Submission
To: <herman.stockinger@state.co.us>

Name (first & last)
Wendall Brown
Your E-Mail Address
wendall.w.brown@gmail.com
Your Daytime Phone Number
7196444796
Your Company/Organization
Which group is your comment for?
Transportation Commission
Comment
1 My comment is for the 5 p.m. Jan 15 CDOT meeting on the I270 project. As a Denver resident and frequent cyclist along paths near I-270, I am deeply concerned about both the environmental impacts and the enormous financial cost of the proposed corridor improvements—particularly the lane additions, estimated at around $800 million. Expanding the highway will induce more vehicle miles traveled, worsening air quality with increased emissions. This directly harms cyclists, pedestrians, and nearby communities who already endure poor air during commutes or outdoor activities—making active transportation less safe and appealing. Moreover, spending hundreds of millions on car-centric infrastructure diverts critical funds from more sustainable, equitable options that reduce car dependency and better serve DRCOG's regional goals for multimodal access and emissions reduction. We need less reliance on highways that prioritize single-occupancy vehicles and more investment in people-friendly mobility. Instead of widening I-270, I urge CDOT and FHWA to reject lane additions and redirect these substantial resources toward: Enhanced pedestrian and bicycle infrastructure—such as safer crossings, separated paths, and better connections to transit—to make walking and cycling viable, convenient alternatives. Expanded public transportation options along the corridor to provide reliable, low-emission mobility for all users. For freight traffic, effective alternatives exist without new general-purpose lanes: Shift more long-

2
3
4

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced traffic considerations in the project's traffic modeling.

Response to Comment 2

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in DRCOG's current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

Response to Comment 3

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 4

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis

provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

However, the project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for additional information on consideration of increased transit options and service and bicycle and pedestrian facilities.

5 haul freight to intermodal rail by investing in improved connections to nearby lines (e.g., BNSF or Union Pacific in Commerce City) and incentives for mode shifts Implement dynamic tolling or managed lanes on the existing footprint to optimize traffic flow, prioritize efficient freight during off-peaks, and generate revenue for transit and active transportation Support urban consolidation centers and optimized routing technologies to minimize unnecessary truck trips These strategies would manage freight more efficiently, improve air quality for vulnerable users like cyclists, promote safer and greener mobility, and use taxpayer dollars far more responsibly by avoiding costly, outdated highway expansion. Please select a no-widening approach and reallocate funds accordingly.
ReCaptcha Confirmation

--
David Merenich, PE
I-270 Program Director
I-270 Corridor Improvements
4670 Holly Street, Denver, CO 80216
C 720-933-5755

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 5

In addition to the No Action Alternative, which is the only true no-widening alternative, other alternatives that focus on safety and innovation instead of adding capacity were considered, the Minimal Build Alternative; the Bicycle, Pedestrian, and Transit Enhancements Alternative; and the Two Express Lanes that Accommodate Transit Alternative.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

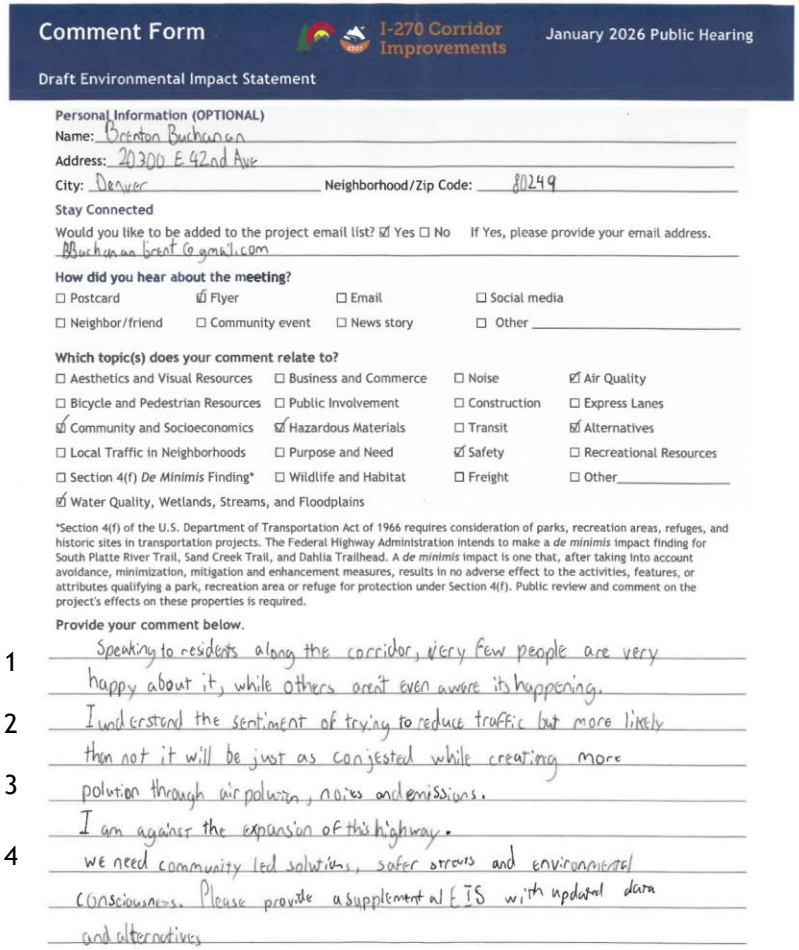
The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

Consistent with ISRRPP and VPPP requirements, CDOT consulted with DRCOG to evaluate regional planning implications. The analysis indicates that the alternative would shift traffic from I-270 to other interstate facilities and to the local network, resulting in measurable system-level effects that must be considered within the region's long-range transportation framework.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and

Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT3, ALT4, and ALT7, of the Final EIS for information on alternatives that do not add capacity to the interstate.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Brenton Buchanan

Address: 20300 E 42nd Ave

City: Denver Neighborhood/Zip Code: 80249

Stay Connected

Would you like to be added to the project email list? ☑ Yes ☐ No If Yes, please provide your email address.

BBuchanan.brent@gmail.com

How did you hear about the meeting?

☐ Postcard ☑ Flyer ☐ Email ☐ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources	☐ Business and Commerce	☐ Noise	☑ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☐ Construction	☐ Express Lanes
☑ Community and Socioeconomics	☑ Hazardous Materials	☐ Transit	☑ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☑ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☐ Other
☑ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

1 Speaking to residents along the corridor, very few people are very happy about it, while others aren't even aware it's happening.

2 I understand the sentiment of trying to reduce traffic but more likely than not it will be just as congested while creating more

3 pollution through air pollution, noise and emissions.

I am against the expansion of this highway.

4 we need community led solutions, safer streets and environmental consciousness. Please provide a supplemental EIS with updated data and alternatives

Response to Comment 1

A Public Involvement Plan (PIP) was developed and implemented when the Environmental Impact Statement (EIS) process began in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within one mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the United States Environmental Protection Agency and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development. Please see Section 5.4.2, OUT1, of the

Final EIS for additional information on outreach conducted throughout the EIS process.

Response to Comment 2

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

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Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on traffic modeling and induced demand.

Response to Comment 3

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in DRCOG's current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the EPA's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-

butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable.

For more information on the noise analysis and mitigation, see Section 5.4.4, IMP4, of the Final EIS. Please see Chapter 5.0 of the Record of Decision for the list of mitigation and commitments that will be implemented as part of the project.

Response to Comment 4

The community has been part of the development of the Purpose and Need and alternatives for the project through public meetings, Stakeholder Workshops, and the numerous outreach events that have occurred.

In addition to the No Action Alternative, which is the only true no-widening alternative, other alternatives that focus on safety and innovation instead of adding capacity were considered, the Minimal Build Alternative; the Bicycle, Pedestrian, and Transit Enhancements Alternative; and the Two Express Lanes that Accommodate Transit Alternative.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

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Consistent with ISRRPP and VPPP requirements, CDOT consulted with DRCOG to evaluate regional planning implications. The analysis indicates that the alternative would shift traffic from I-270 to other interstate facilities and to the local network, resulting in measurable system-level effects that must be considered within the region's long-range transportation framework.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT3, ALT4, and ALT7, of the Final EIS for information on alternatives that do not add capacity to the interstate.

Outlook

[cdot_i270] I-270 Redesign

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 1:31 PM
To I-270 Project Team <ToniBudoff@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Toni Budoff
Subject
I-270 Redesign
Your E-Mail Address
budoffmom@yahoo.com
City
Arvada
Zip Code
80003
Phone Number
3039408509
Comments
Thank you for being diligent with your initial research and being open minded in considering the best options to move forward with these improvements! Our primary use of the I-270 corridor is to DIA or SE Aurora and it is always a mess. The infastructure update is long overdue... whether it is three traditional lanes or two traditional lanes with a HOV/Toll lane, the increased capacity will be very appreciated. Keep up the goo work.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

Comments noted.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 5:51 PM
To I-270 Project Team <JamieBuechler@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Jamie Buechler
Subject
I-270
Your E-Mail Address
Jamie@kjblawoffice.com
City
Westminster
Zip Code
80021
Comments
Please make it 3 lanes both ways. And eliminate the York street exit westbound. Traffic always backs up the highway bc of that exit.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes three lanes in each direction and improvements to the York Street exit.

Outlook

[cdot_i270] I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 12/28/2025 1:51 PM
To I-270 Project Team <RickyCButterfass@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Ricky C Butterfass
Subject
I-270
City
Denver
Zip Code
80221-2740
Comments
1 I-270 Improvements should be a top priority. They are coming about 15 years too late. I-270 is a mess. In fact I-25 is being negatively impacted as well. It needs at least two more lanes in both directions North West bound and South West bound. Do not just put in a 50 year toll lane like on US 36. Big mistake in planning. The CO transportation system has not been keeping up with
2 population growth. Also trucking freight is a problem. Where I-270 merges with I-25 North bound. Colorado should adopt trucking regulations like Oregon. Also the express lanes are also a problem. I never use them. The transponder requirement is a problem. Do like Nevada,
3 Michigan, California and other states on toll lanes. No transponder requirement. People in express lanes fly by above the speed limit. Then crowd in at their exit. They with Trucks trying to pass each other jam things up. You should also plan for GPS linked with full self driving hardware
4 and software. I drive a Tesla. If vehicles talk to each other via A.I. software? Then each vehicle can link up like a train. Then decouple as they approach their programed exit. Don't wait another 5 to 10 years and try to catch up with technology. It will be a lot safer and expedient.
How did you hear about the I-270 Improvements Project?
Postcard

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270

Response to Comment 1

The Draft Environmental Impact Statement (EIS) acknowledges that I-270 has long-standing congestion and safety issues and has not kept pace with regional growth.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Response to Comment 2

Freight operations and truck-related safety issues were a key focus of the study. I-270 is a designated freight, hazardous materials, oversized and overweight, and Strategic Highway Network (STRAHNET) route, and restricting trucks or applying state-specific freight regulations similar to other states was not considered because the corridor must continue to serve these essential functions. Instead, the Preferred Alternative improves interchange

geometry, merge spacing, and acceleration and deceleration lengths to reduce conflicts between trucks and passenger vehicles.

Response to Comment 3

Toll collection methods, transponder requirements, and enforcement methods are determined by the Colorado Transportation Investment Office.

Response to Comment 4

The EIS is required to evaluate improvements based on proven, deployable infrastructure and current federal design standards. The Preferred Alternative focuses on correcting known safety and operational deficiencies while allowing flexibility for future technologies to be accommodated as they are adopted more broadly.

303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

FW: [cdot_i270] I-270 widening

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Mon 11/24/2025 4:18 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Mandy Whorton
PEAK CONSULTING GROUP
200 Union Blvd, Ste 210
Lakewood CO 80228
Phone: 303-886-6258

From: felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> **On Behalf Of** felicia.michael@state.co.us
Sent: Monday, November 24, 2025 2:42 PM
To: I-270 Project Team <CoryDByrom@cdot-www5>
Subject: [cdot_i270] I-270 widening

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Cory D Byrom
Subject
I-270 widening
Your E-Mail Address
corybyrom@gmail.com
City
Denver
Zip Code
80238
Phone Number
6786379840
Comments
1 Widening I-270 will not alleviate the traffic congestion, as has been proven time and time again with other widening projects. Please consider other options, such as the toll proposal.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

Response to Comment 1

The Two Express Lanes that Accommodate Transit Alternative proposes using dynamic pricing; all alternatives, including Express Lanes would use dynamic pricing strategies. Additional details for pricing will be evaluated and determined, following the Environmental Impact Statement (EIS).

The Two Express Lanes that Accommodate Transit Alternative proposes toll exemptions for freight vehicles. Providing freight exemptions on I-270 would create a unique condition within Colorado's statewide Express Lane system. At approximately 6.5 miles long, I-270 would become the only Express Lane segment in the state where freight vehicles would be exempt from tolls, resulting in an isolated and inconsistent transition area within the broader Express Lane network. Such a condition could increase driver confusion and introduce safety risks associated with complex or changing signage and operational rules.

This alternative also proposes use of automated license plate reader technology on the local street network to enforce against trucks and commuter traffic seeking to avoid tolls by diverting from I-270. Implementation would require installation of infrastructure on local roadways outside the I-270 study area and beyond the jurisdiction of CDOT and FHWA. Local agencies retain authority over their respective roadways, and CDOT does not have the authority to restrict or penalize vehicles for using local streets as alternate routes. Even if such authority existed, it would not be practicable to distinguish between vehicles using local streets for legitimate local access and those using them as diversion routes, rendering enforcement infeasible.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

From: Tim C
To: cdot_i270@state.co.us
Subject: [cdot_i270] If I have this right on the 2 options...
Sent: 11/21/2025 6:58:19 PM

So apparently there are 2 options considered and you are looking for public comment? Those being 1) add a third lane or 2) add a third lane but toll/express?

1 (2) by miles. The traffic density on that stretch is high enough that really adding a toll lane AND a third regular lane is really what's required. BUT, since that's apparently not an option, the way people drive here they will just spread out and create the standard "Colorado Rolling Road Block" blob. At least there will be some relief for those willing to pay with option (2).

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] feedback for third lane

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:29 AM
To I-270 Project Team <BenjaminCasey@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Benjamin Casey
Subject
feedback for third lane
Your E-Mail Address
manofgate@gmail.com
City
wesminster
Zip Code
80030
Comments
1 I think adding a 3rd lane is the correct move here. I think past 4 lanes there needs to be other methods but the third lane is really needed if there are alot of semi trucks. I often see the semis struggling to get up to speed on vasquez on ramp to york exit and that reduces the speeds a lot. This corridor is basically the only stretch for me to go to children's hospital. so it needs to be adjusted. a third lane with all the trucks would be the most appropriate action at this time.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative includes a third lane; however, it will be an Express Lane for anyone who wants to pay a toll or is a high-occupancy vehicle to use. Trucks do not make up enough of the traffic to warrant a truck-only lane on I-270.

As noted, the existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

Outlook

[cdot_i270] I-270 Improvement Plan

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 2:12 PM
To I-270 Project Team <DixieChild@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Dixie Child
Subject
I-270 Improvement Plan
Your E-Mail Address
dalrympledixiel@comcast.net
City
Aurora
Zip Code
80013
Phone Number
3039156907
Comments
Express lanes only benefit the state and don't help commuters unless they can afford to pay the fees. Adding a lane each direction may help but ultimately and road surface needs replaced so drivers aren't startled every time they hit another pothole or bridge transition. Just fix the road!!! No express lanes. Not everyone can afford to use these lanes just to get where they need to go efficiently.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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1

Response to Comment 1

The Preferred Alternative includes an Express Lane as well as safety improvements to improve the road conditions and bridge replacements. The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative because it best meets the Purpose and Need; please see Section 3.4 of the Draft Environmental Impact Statement for information on how it best meets the Purpose and Need.

Community improvements as part of the disproportionately impacted communities analysis required by Senate Bill 21-260 codified in Colorado Revised Statutes 43-1-128, including the information about Express Lanes usage, are discussed in the State Community Analysis Technical Report, which is available on the project website (https://www.codot.gov/projects/studies/i270study).

Outlook

[cdot_i270] I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 5:29 PM
To I-270 Project Team <Chris@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Chris
Subject
I-270
Your E-Mail Address
stncldshrek@comcast.net
City
Aurora
Zip Code
80013
Comments
1 I'm glad to see an effort is underway to address I-270 which is about 30 years overdue, but enough with the express lanes already! The projects on C-470 and I-70 didn't actually fix anything except for those willing or able to pay the toll. Everyone else is still sitting in bumper-to-bumper traffic as before. Please just widen I-270 to four lanes each direction and actually have a strech of highway the benfits the entire population instead of another way to take money from hard working people. If you only add one express lane in each direction (like C-470), you have fixed exactly nothing.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Draft Environmental Impact Statement (EIS) acknowledges that I-270 has long-standing congestion and safety issues and has not kept pace with regional growth.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft EIS for information on why the Two General-Purpose Lanes and One Express Lane was preliminarily identified as the Preferred Alternative.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Date: Saturday, January 17, 2026 11:08:43 AM

Which topic(s) does your comment relate to?
Air Quality, Alternatives, Bicycle and Pedestrian Resources, Community and Socioeconomics , Construction , Express Lanes, Noise, Pedestrian Resources , Safety, Transit, Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
My name is Justin and I'm the campaign director for Pro-Animal Colorado. While I live in Boulder, I often travel to different areas around Denver using my car, public transport, and my bike. I would like to oppose the I-270 widening in general, but absolutely before a supplemental EIS is done. This project hurts to see because it will be impacting some of the communities that are already to most polluted. For me, I don't want more people switching lanes constantly and dangerously. I also have no idea why it's happening. I understand the I-270 has too much traffic but adding lanes doesn't reduce traffic. Doing a Google search, it's clear that none of the results say that adding lanes reduces traffic. Not that google search results were the only thing I looked at to research this before commenting. It's sad to see so much money wasted and a giant disruptive construction project started that will hurt vulnerable communities with extra noise and pollution for no good reason. I would love to see alternatives to this project considered like investment in tolls, strategic exemption from tolls for certain vehicles, and public transport. From my experience, the demand for better public transport is much higher. I believe people don't use it because it's not good enough to be a viable alternative to driving. I'm also worried about the local wildlife. Can you look at the I-270 Healthy Communities No-Widening Alternative?
Name (first and last)
Justin Clark
Address
360 S 42nd St
City
Boulder
Neighborhood/ZIP Code
80305
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
justin@proanimal.org

--
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303-512-4270
cdot_i270@state.co.us
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1

Response to Comment 1

The Purpose and Need for this project includes improvements not just for the interstate but also related to transit and bicycle and pedestrian connectivity.

Please see the mitigation and commitments included in the project in Chapter 5.0 of the Record of Decision.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Many bridges cross streams in the area and nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the project does not include new wildlife connectivity features across I-270.

For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Outlook

[cdot_i270] Prefer the 3 lane plus 1 express lane each direction

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 12/4/2025 6:53 PM
To I-270 Project Team <StephenCochrane@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Stephen Cochrane
Subject
Prefer the 3 lane plus 1 express lane each direction
Your E-Mail Address
Stephen.cochrane07@yahoo.com
City
Denver
Zip Code
80238
Phone Number
2514635032
Comments
1 I'd rather see the 3 General and 1 express lane in each direction plan, why spend all of this money to build only 1 extra lane, when the road is already over capacity and has been for years, when we can just build it 4 lanes each direction and potentially not need to worry about over capacity for 30 to 50 years?
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] Preferred Alternative

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Wed 1/7/2026 9:53 AM
To I-270 Project Team <richardcrane@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
richard crane
Subject
Preferred Alternative
Your E-Mail Address
richard.p.crane@gmail.com
City
golden
Zip Code
80401
Comments
I did not see congestion pricing as an alternative to be evaluated. Adding highway lanes will only further vehicle miles traveled in the metro area, increasing noise and pollution. Congestion pricing in NYC has been very successful in raising money for transit and reducing traffic on the freeway. This should be considered and is a viable alternative. Design; Building a 12' shoulder and 4' buffer is a hugh added footprint. In the future, this tarmac could be restripped to add another lane. There is no need to construct such a wide footprint. CDOT should be sensitive to noise levels. Sound wall installation should be a bare minimum under any alternative. I think CDOT is over designing this corridor, with alternatives no greater than the current footprint.
I would like to
Sign up for project emails
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Email

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1

2

Response to Comment 1

A corridor-wide congestion pricing alternative was not advanced for detailed evaluation in this Environmental Impact Statement (EIS). The exact tolling scheme, including pricing levels, eligibility, and any additional exemptions has not been determined and would be evaluated and decided through a separate process following completion of the EIS process.

Response to Comment 2

With respect to roadway design, the shoulder and buffer widths included in the Build Alternatives are intended to meet current interstate design and safety standards, address documented crash patterns, provide adequate space for vehicles to pull over during breakdowns, and accommodate emergency service vehicles. These elements are not included as placeholder space for future lane additions.

Response to Comment 3

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor. Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must

determine if mitigation is feasible and reasonable. One noise wall was determined to be reasonable and feasible near the South Rose Hill Neighborhood. Please see Section 5.4.4, IMP4, of the Final EIS for additional information on the noise analysis and walls.

cdot_i270@state.co.us
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Outlook

[cdot_i270] I 270 project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 4:11 PM
To I-270 Project Team <CynthiaDafler@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Cynthia Dafler
Subject
I 270 project
Your E-Mail Address
kloanne@comcast.net
City
Boulder
Zip Code
80301
Phone Number
3035161448
Comments
I don't live in the area but drive this stretch regularly and it's a nightmare. Bumpy roadways (the ramp from 36 is essentially a ski jump, crumbling bridges, wall to wall traffic even nights and weekends). The amount of traffic is bound to go up with burgeoning development in that part of the metro area so the solution needs to manage the traffic better. I often clear the ski jump from 36 and must instantly brake to avoid rear-ending the car ahead of me that has come to the I270 standstill. And then navigate the sludge of traffic until my exit. Surprised there aren't more accidents. Whatever you choose, please fix the ski jump.
How did you hear about the I-270 Improvements Project?
Other
If you answered other, how did you hear about us?
Friend

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270

Response to Comment 1

The "ski jump" is being fixed as a separate project ahead of the I-270 Corridor Improvements project.

303-512-4270
cdot_i270@state.co.us
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Comment on the Air Quality Technical Report - I-270 Corridor Improvements Draft Environmental Impact Statement (DEIS) (Appendix E-3)

-Priyanka deSouza
Assistant Professor
Department of Urban and Regional Planning
University of Colorado Denver

1 The Air Quality Technical Report prepared for the I-270 Corridor Improvements DEIS does not satisfy NEPA's requirement to take a "hard look" at environmental and human health impacts. While the analysis demonstrates procedural compliance with transportation conformity rules, it fails to meaningfully evaluate air quality impacts as experienced by nearby communities, particularly in an already overburdened environmental justice corridor. As a result, the DEIS understates both the magnitude and significance of air quality impacts associated with the proposed build alternatives. I now list three ways in which the report does so:

1. The Analysis Conflates Regulatory Conformity with Impact Disclosure

2 The Air Quality Technical Report relies heavily on regional transportation conformity determinations and future-year emissions reductions driven by fleet turnover to conclude that air quality impacts are acceptable. However, NEPA also requires disclosure and evaluation of environmental impacts, including localized and disproportionate effects, irrespective of whether a project conforms to a State Implementation Plan or Regional Transportation Plan.

The report repeatedly concludes that project-level impacts are insignificant because:

- Ozone is addressed only at the regional scale.
- Hot-spot analyses are not required for $PM_{2.5}$, PM_{10}, or CO under current conformity rules
- Emissions decline between 2023 and 2050 due to assumed technological improvements

This approach substitutes regulatory thresholds for impact analysis, which is inconsistent with NEPA's disclosure mandate.

2. Emissions Inventories Do Not Evaluate Human Exposure or Health Risk

3 The air quality analysis in the DEIS is limited to aggregate emissions inventories and does not evaluate how those emissions translate into ambient pollutant concentrations, human exposure, or health risk. Specifically, the analysis does not assess:

- Changes in ambient pollutant concentrations attributable to the project
- Near-road exposure gradients, where traffic-related pollutants are known to peak
- Population exposure at sensitive receptors (including homes, schools, trails, and healthcare facilities) or
- Health risk implications for communities living adjacent to I-270.

Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

The region is in attainment with all National Ambient Air Quality Standards with the exception of ground-level ozone. The Preferred Alternative is contained in the Denver Regional Council of Governments' current Regional Transportation Plan, which has demonstrated compliance with the associated motor vehicle emissions budget for volatile organic compounds and oxides of nitrogen in the Denver Metropolitan/North Front Range state implementation plan for ozone. Ground-level ozone is a regional rather than localized pollutant and it is not considered at the project-scale in the NEPA.

There is no requirement under NEPA or federal or state regulation for project-level air quality dispersion modeling analysis of mobile source pollutants, including nitrogen dioxide, diesel particulate

matter, or particulate matter less than 2.5 microns in diameter. Refer to the State Air Quality Technical Report for additional analysis of the project alternatives as they relate to air quality.

For additional information on the air quality modeling conducted for the NEPA process, please see Section 5.4.4, IMP5 and IMP6, of the Final EIS.

Response to Comment 2

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

This omission is particularly consequential in the I-270 corridor, which contains dense residential land use, sensitive receptors immediately adjacent to the roadway, and documented cumulative pollution burdens.

Empirical evidence from high-resolution mobile monitoring conducted in Denver, Colorado, directly demonstrates that traffic-related air pollutants peak on and near major highways. Using second-by-second mobile measurements aggregated at 100-meter resolution, deSouza et al. (2025)[1] observed substantially elevated concentrations of ultrafine particles (UFPs) and black carbon (BC) on highways and highway ramps, with the highest concentrations occurring on heavily trafficked interstate facilities such as I-70. These pollutants are well-established markers of traffic emissions, particularly diesel traffic, and are strongly associated with adverse respiratory and cardiovascular health outcomes.

The study further shows that pollutant levels vary sharply over short distances and by road type, with BC concentrations significantly higher on U.S. highways and interstate segments compared to local streets. This spatial heterogeneity underscores that regional averages or corridor-wide emissions totals mask localized exposure hotspots that are most relevant for public health. Importantly, the observed near-road elevations occurred despite relatively short sampling periods, indicating that these patterns are robust features of the urban environment rather than transient anomalies

In contrast, the DEIS does not model or estimate whether increased traffic volumes and vehicle miles traveled under the build alternatives would increase localized concentrations of NO_x, diesel particulate matter, or $PM_{2.5}$ at receptors located within several hundred meters of I-270—the distance range where near-road effects are most pronounced. Instead, the analysis relies on future fleet turnover and regional conformity to infer acceptability, without evaluating how increased activity on the corridor would affect exposure for adjacent communities over the project's operational life.

Without dispersion modeling, receptor-based exposure assessment, or health-relevant interpretation, the DEIS cannot substantiate its conclusion that air quality impacts are minimal or acceptable. The Denver mobile monitoring evidence demonstrates that traffic-related pollutants are not evenly distributed, but instead peak near major roadways in ways that emissions inventories alone cannot capture. Failing to account for these well-documented near-road exposure gradients renders the air quality analysis incomplete and inconsistent with NEPA's requirement to disclose real-world environmental and human health impacts.

3. Ozone Nonattainment Is Treated as a Background Condition Rather Than a Project Constraint

4 The project is located within a severe ozone nonattainment area, yet ozone impacts are dismissed from project-level consideration because ozone formation is "regional" and therefore adequately addressed through RTP-level conformity. This framing mischaracterizes ozone behavior in Colorado and obscures well-documented spatial heterogeneity in ozone concentrations, exceedances, and health burdens across the Front Range.

Response to Comment 4

Ozone is a regional pollutant and is not modeled at a project scale. The Draft EIS and associated Air Quality Technical Report acknowledge ozone nonattainment and the severity of the nonattainment status.

Peer-reviewed research demonstrates that ozone levels in the Denver Metro–North Front Range are not spatially uniform, but instead vary systematically with local traffic density, population patterns, elevation, meteorology, and proximity to emission sources.[2] High-resolution spatio-temporal modeling shows that the highest ozone concentrations and the greatest number of exceedance days occur along the urbanized Front Range corridor, particularly near major transportation corridors and population centers, even within the broader nonattainment area

While ozone chemistry involves regional photochemical processes, project-generated NO_x and VOC emissions are local inputs into that system, and their impacts are mediated by highly localized conditions. In the Front Range, stagnant summer meteorology, temperature-driven ozone formation, and traffic-related precursor emissions interact to produce place-specific ozone outcomes, rather than uniform regional responses. Importantly, the literature shows that even modest increases in ozone concentrations on the order of 0.5-1 ppb are sufficient to delay attainment by multiple years and to increase adverse respiratory outcomes, particularly in already overburdened communities[2].

The DEIS quantifies increases in NO_x and VOC emissions under both build alternatives relative to the No Action alternative in the design year, yet it does not evaluate whether these increases are consistent with timely attainment, margin-of-safety considerations, or the region's documented difficulty meeting ozone standards. Nor does it assess whether additional precursor emissions concentrated along a freight corridor could exacerbate localized ozone formation during high-ozone periods, when health risks are greatest.

By treating ozone as exclusively regional and outside the scope of project-level analysis, the DEIS improperly insulates the project from scrutiny in a region where scientific evidence clearly shows that local emissions, local conditions, and local exposure matter for ozone outcomes and public health. In a severe nonattainment area with demonstrated spatial heterogeneity and environmental justice disparities, dismissal of project-level ozone impacts is neither scientifically justified nor consistent with NEPA's requirement to disclose context-specific environmental effects.

In sum, the air quality conclusions presented in the DEIS are contingent on external regulatory success rather than project design, and therefore do not reflect the project's true environmental footprint. Without sensitivity analyses or alternative scenarios, the DEIS cannot support its conclusion that the project's air quality impacts are minimal or acceptable.

Requested Actions

To comply with NEPA, the Final EIS should:

5

1. Include near-road concentration or exposure modeling for NO_2 and $PM_{2.5}$.
2. Provide a health-relevant interpretation of emissions changes, not just regulatory comparisons.

Response to Comment 5

The federal air quality analysis under NEPA was completed per requirements.

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Absent these analyses, the air quality assessment does not provide decision-makers or the public with an adequate understanding of the project's true air quality and public health implications.

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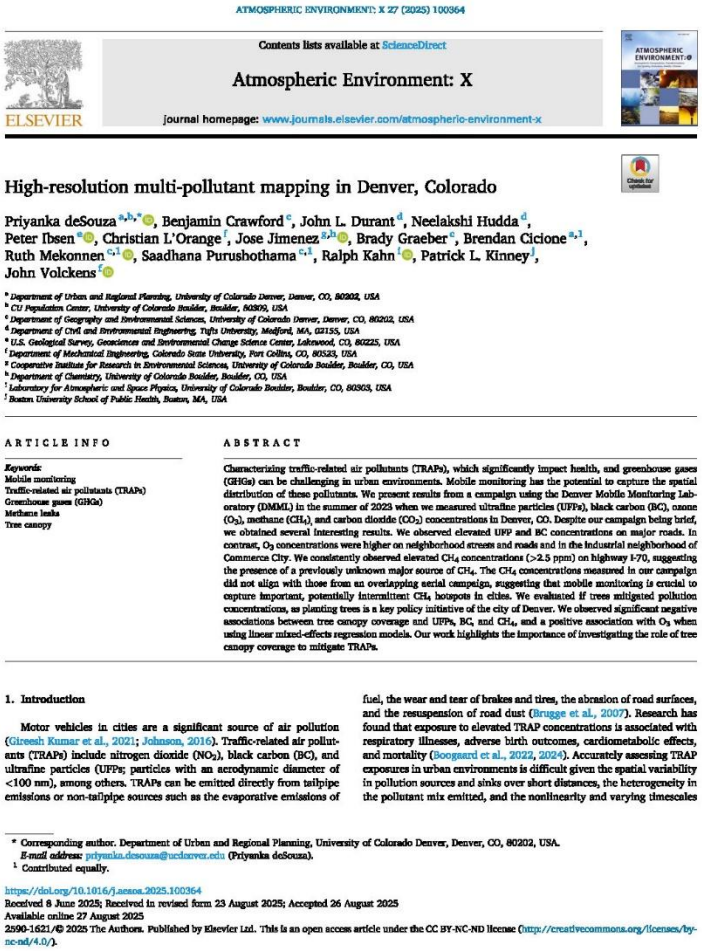

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High-resolution multi-pollutant mapping in Denver, Colorado

Priyanka deSouza [a,b,*], Benjamin Crawford [c], John L. Durant [d], Neelakshi Hudda [d], Peter Ibsen [e], Christian L'Orange [f], Jose Jimenez [g,h], Brady Graeber [e], Brendan Cicione [a,1], Ruth Mekonnen [c,1], Saadhana Purushothama [c,1], Ralph Kahn [i], Patrick L. Kinney [j], John Volckens [f]

[a] Department of Urban and Regional Planning, University of Colorado Denver, Denver, CO, 80202, USA
[b] CU Population Center, University of Colorado Boulder, Boulder, 80309, USA
[c] Department of Geography and Environmental Sciences, University of Colorado Denver, Denver, CO, 80202, USA
[d] Department of Civil and Environmental Engineering, Tufts University, Medford, MA, 02155, USA
[e] U.S. Geological Survey, Geosciences and Environmental Change Science Center, Lakewood, CO, 80225, USA
[f] Department of Mechanical Engineering, Colorado State University, Fort Collins, CO, 80523, USA
[g] Cooperative Institute for Research in Environmental Sciences, University of Colorado Boulder, Boulder, CO, USA
[h] Department of Chemistry, University of Colorado Boulder, Boulder, CO, USA
[i] Laboratory for Atmospheric and Space Physics, University of Colorado Boulder, Boulder, CO, 80303, USA
[j] Boston University School of Public Health, Boston, MA, USA

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ABSTRACT

Characterizing traffic-related air pollutants (TRAPs), which significantly impact health, and greenhouse gases (GHGs) can be challenging in urban environments. Mobile monitoring has the potential to capture the spatial distribution of these pollutants. We present results from a campaign using the Denver Mobile Monitoring Laboratory (DMML) in the summer of 2023 when we measured ultrafine particles (UFPs), black carbon (BC), ozone (O_3), methane (CH_4), and carbon dioxide (CO_2) concentrations in Denver, CO. Despite our campaign being brief, we obtained several interesting results. We observed elevated UFP and BC concentrations on major roads. In contrast, O_3 concentrations were higher on neighborhood streets and roads and in the industrial neighborhood of Commerce City. We consistently observed elevated CH_4 concentrations (>2.5 ppm) on highway I-70, suggesting the presence of a previously unknown major source of CH_4. The CH_4 concentrations measured in our campaign did not align with those from an overlapping aerial campaign, suggesting that mobile monitoring is crucial to capture important, potentially intermittent CH_4 hotspots in cities. We evaluated if trees mitigated pollution concentrations, as planting trees is a key policy initiative of the city of Denver. We observed significant negative associations between tree canopy coverage and UFPs, BC, and CH_4, and a positive association with O_3 when using linear mixed-effects regression models. Our work highlights the importance of investigating the role of tree canopy coverage to mitigate TRAPs.

1. Introduction

Motor vehicles in cities are a significant source of air pollution (Gireesh Kumar et al., 2021; Johnson, 2016). Traffic-related air pollutants (TRAPs) include nitrogen dioxide (NO_2), black carbon (BC), and ultrafine particles (UFPs; particles with an aerodynamic diameter of <100 nm), among others. TRAPs can be emitted directly from tailpipe emissions or non-tailpipe sources such as the evaporative emissions of fuel, the wear and tear of brakes and tires, the abrasion of road surfaces, and the resuspension of road dust (Brugge et al., 2007). Research has found that exposure to elevated TRAP concentrations is associated with respiratory illnesses, adverse birth outcomes, cardiometabolic effects, and mortality (Boogaard et al., 2022, 2024). Accurately assessing TRAP exposures in urban environments is difficult given the spatial variability in pollution sources and sinks over short distances, the heterogeneity in the pollutant mix emitted, and the nonlinearity and varying timescales

* Corresponding author. Department of Urban and Regional Planning, University of Colorado Denver, Denver, CO, 80202, USA.
E-mail address: priyanka.desouza@ucdenver.edu (Priyanka deSouza).
[1] Contributed equally.

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Response to Comment 6

Attachment information provided with the comment letter is noted.

of atmospheric transformation and secondary formation processes.

Mobile monitoring has emerged as a key tool for characterizing the spatial distribution of TRAPs concentrations in cities worldwide (deSouza et al., 2020, 2021, 2023; Mora et al., 2023). These data have been used to evaluate (1) the impact of specific sources such as highways and airports (Hudda et al., 2018; Padró-Martínez et al., 2012; Patton et al., 2014), (2) exposure assessments in epidemiologic studies (Alexeeff et al., 2018), (3) health risk assessments of pollution (Southerland et al.,), (4) fine-scale disparities of exposure to pollution concentrations (Chambliss et al., 2021; deSouza et al., 2021), (5) inputs in land use regression models to derive city-wide exposure assessments of pollution (Messier et al., 2018; Patton et al., 2015; Tian et al., 2022), (6) atmospheric processes such as new particle formation (Gani et al., 2021), and (7) the impacts of green space on pollutant levels (Han et al., 2023) among other applications.

Cities are responsible for 67–72 % of greenhouse gas (GHG) emissions (Pathak et al., 2022). Monitoring trends in CO_2 emissions by tracking ambient concentrations in urban environments is challenging because of the immense diversity of emissions sources, complex spatial and temporal patterns of emission rates, varied topography, and the effects of meteorology on the observed concentrations. Most cities rely on economic and social data to estimate GHG emissions and do not independently verify if reported emissions match CO_2 enhancements in ambient air. The increasing significance of urban emissions has resulted in a recent trend of deploying networks of CO_2 sensors in cities. However, most networks are sparse, comprising only 5–15 instruments per city, and cannot resolve individual emission sources (Kort et al., 2013; Turnbull et al., 2015); networks like the BEACO$_2$N network (http://beacon.berkeley.edu) are the exception (Patel et al., 2025). Mobile monitoring of CO_2 levels has the potential to capture fine-grained spatial variability in CO_2 levels. Recently, researchers have paired inverse modeling with the spatial distribution of pollutant concentrations to fine-tune city-level emissions inventories (Asimow et al., 2024; Mancanda et al., 2024). Finally, mobile monitoring has also been leveraged to track concentrations of CH_4, another potent greenhouse gas, in cities worldwide (Vogel et al., 2024). Mobile monitoring studies of CH_4 have been able to identify important leakages of natural gas and improve emissions inventories (Ars et al., 2020).

No mobile monitoring campaign has previously characterized TRAPs and CO_2 and CH_4 in Denver, Colorado, to the best of our knowledge. Accordingly, we present the design of the University of Colorado Denver's Denver Mobile Monitoring Laboratory (DMML) and results from a focused campaign to measure TRAPs and GHG levels in Denver in the summer of 2023. We also measure ozone (O_3), a key pollutant of interest in Denver, since the area has been out of compliance with the ozone national ambient air quality standard for ~ 15 years (deSouza and Hood, 2024). We use this novel dataset to conduct several exploratory analyses with our data to (1) characterize the spatial distribution of different pollutants along our sampling route and discuss their relationship with each other during our campaign, identify hotspots, and evaluate emission factors for TRAPs, (2) compare CH_4 concentrations measured by the DMML with those from an overlapping aerial campaign to recommend strategies to capture CH_4 hotspots, and (3) evaluate the efficacy of proposed planting trees to reduce pollution, a key strategy proposed by the city of Denver (Equitable Community Tree Planting Initiative, 2024), by reporting associations between tree canopy cover and pollutant concentrations. Although our campaign was short, we highlight results from our campaign that can provide decision makers with important insights into important air pollution sources and lay the groundwork for future measurement campaigns in Denver.

2. Data and methods

2.1. Instrumentation

During the campaign, we measured CH_4, CO_2, O_3, BC, and UFPs along with GPS location and time of day using the DMML, an electric car (2023 Chevrolet Bolt). An electric car was chosen to avoid measuring self-emissions. Instruments were placed in the rear of the car, with the instrument inlets near the windows to minimize line losses. To reduce road vibration, instruments were cushioned and strapped with bungee cords (Fig. S1). The instruments used were as follows:

1) A photoacoustic extinctiometer (PAX; Droplet Measurement Technologies, Boulder, CO) was used to measure BC.
2) We used a Li-Cor LI-7810 to measure CH_4 and CO_2.
3) A TSI Model 3007 Condensation Particle Counter (CPC) was used to measure ultrafine particles. Because the particle number size distribution in urban air is dominated by particles <100 nm, we use particle number concentration as a measure of the ultrafine particle number concentration.
4) The 2B Technologies Model 202 was used to measure O_3.
5) A Columbus P-7 Pro GPS was used to collect the latitude and longitude coordinates of the mobile vehicle.

All instruments were rapid response, portable, battery operated, and factory calibrated. The instruments measuring GPS, CH_4, CO_2, and UFPs measured and logged data at 1-s resolution, whereas the instruments measuring O_3 and BC logged data at a 10-s resolution. We worked with each pollutant data set at its native temporal resolution. A summary of the performance characteristics of the different instruments and protocols to ensure robust measurement is provided in Table S1 in the *Supplementary Information (SI)*.

2.2. Sampling strategy

We opted to sample on a route that cut across several Denver neighborhoods, was ~40 miles long and took ~1.5 h to drive (Fig. S1). Our team drove the route 13 times: August 7, 8, 9, 10, and 15 in the morning and afternoon, August 14 and 17 in the morning, and August 16 in the afternoon of 2023. Note that on one street in the western part of the route, which has tall buildings that obstruct the view of the sky, the GPS failed to receive signals on all but one trip (Fig. S2).

The vehicle was consistently driven at a relatively low speed (the 1st quartile, mean, 3rd quartile, and median speeds were 4.3 mph, 23.0 mph, 34.7 mph, and 24.3 mph, respectively) to try to ensure a steady air flow to the instruments and improve comparability of measurements between mobile-monitoring days. The vehicle was driven at > 30 mph on the highways and <20 mph on other roads.

2.3. Developing maps of pollutant concentrations for the period of the mobile deployment in the sampling area

We deployed widely used data reduction algorithms (Apte et al., 2017; deSouza et al., 2020; Dons et al., 2011) to convert our dataset, comprising instantaneous measurements, into estimates of median concentrations for individual 100-m road segments.

2.3.1. Background correction

We accounted for biases of hourly variation in urban background concentrations of each pollutant. To do this, we adopted the lowest 10th percentile of pollutant concentrations for a given hour during the run as the fixed background value ($Pollutant_{bkgd}$). Note that although the total length of a sampling run was ~1.5 h, all runs straddled at least 2 consecutive hours, e.g., a run from 9:45 a.m. - 11:15 a.m.

Next, we performed a background time-of-day adjustment using Equations (2) and (3) to account for diurnal patterns of air pollution during each run. This approach makes the implicit assumption that temporal background patterns over a given mobile monitoring run are spatially invariant and hold for well-mixed daytime conditions (Dons et al., 2013; Van den Bossche et al., 2015).

$$Pollutant_{c,i} = Pollutant_i - Pollutant_{bkg,i} + Pollutant_{bkg,\ median} \quad (2)$$

where $Pollutant_{c,i}$ is the background-corrected pollutant measurement at time i, $Pollutant_i$ is the raw measurement for a given pollutant at time i, $Pollutant_{bkg,i}$ is the contemporaneous hourly background value of the pollutant, and $Pollutant_{bkg,\ median}$ is the median of the $Pollutant_{bkg,i}$ values over the sampling run.

When the background pollutant concentration was calculated to be greater than the actual measured concentrations, we applied a multiplicative background correction factor as displayed in Equation (3).

$$Pollutant_{c,i} = Pollutant_i \times Pollutant_{bkg,\ median} / Pollutant_{bkg,i} \quad (3)$$

Unlike Equation (2), this assures non-negative $Pollutant_c$ based on considering the background value assessed during the measurement hour as a fraction of the day's median background, thus reducing the contribution of possible measurement error due to treating the hourly value as an absolute quantity. We use this approach because research has not yet definitively answered the question of whether an additive or multiplicative correction should be used. Different research studies have compared additive versus multiplicative background correction methods and have reported different results. Our current approach follows that taken by Dons et al. (2013) and Van den Bossche et al. (2015). The temporal correction only had a minor impact (<5 %) on the measured concentrations.

We include the median background pollution logged over the course of the sampling run in our corrections because we intend to evaluate generalizable pollutant concentrations over our campaign, that include the contributions of both local and regional sources. The goal of our background correction is only to account for the diurnal variation in regional pollutant concentrations observed over the course of each sampling run, not to remove it entirely.

By accounting for the time-of-day-run-resolved regional background from the pollution measurement, we can now spatially compare background-adjusted pollutant concentrations measured during hours of the same run.

2.3.2. Calculating median pollutant concentrations across the sampling route

We divided the route into segments of 100 m (the average distance covered by the vehicle in 10 s, the time resolution of the BC and O_3 measurements). We aggregated the background-corrected pollutant concentrations obtained from different runs and derived the sampling error using the method described by deSouza et al. (2020) and outlined briefly below.

First, we joined each background-corrected pollutant measurement to the centroid of the road segment on which it fell. We had 1245 segments for the 1-s measurements and 905 segments for 10-s averaged measurements. The discrepancy in coverage is due to missing data from the BC and O_3 monitors because of issues with battery life. This allows us to evaluate measurements made on the same segment as a group. Second, we selected the median (which is outlier resistant) of all background-corrected pollutant measurements associated with a given road segment as the generalizable pollutant concentration for that segment for the measurement period. Third, we quantified the effect of sample-to-sample variability by evaluating the sampling error of the median concentration for each road segment. As a precision metric, we used the ratio of the standard error of the median concentration to the median concentration itself to determine how robust the median concentration was as a representation of pollutant levels of a segment.

We use the maps generated for each pollutant to describe spatial patterns. We also evaluate correlations between the generalizable concentrations of the different pollutants. We especially focus on characterizing correlations between UFPs and BC as other studies have shown these TRAPs to be highly correlated (Zhu et al., 2008), and we evaluate if this was the case in our experiment in Denver.

We conducted further exploratory analyses with these data, including evaluating disparities in the pollutant concentrations and as mapping out quasi emission factors of the TRAPs. More details can be found in sections s3 and s4 in the *SI*. In our main analysis, we focused on evaluating a key strategy used by the city of Denver to mitigate air pollution-planting trees.

2.4. Evaluating associations between pollutant concentrations and tree canopy

We joined each road segment with the percentage of land cover in the 100-m buffer around road-segment centroids from the 2020 1-m resolution DRCOG Land Cover dataset (DRCOG Land Cover Data,), which included the following categories: Structures, Impervious Surface, Tree Canopy, Water, Grassland, Irrigated Land, Barren Rock, Cropland, and Scrubland. We only retained the percentage of Structures, Impervious Surface, Grasslands (green space), and Tree Canopy Coverage, because other categories were minimally or not present in our study area. We also joined each segment with the length of the surrounding roads in the 100-m buffer. We provide the distribution of measurements across the different land cover types used in our analyses.

We used a linear mixed-effects regression model to evaluate associations between the median background-corrected pollutant concentrations for each segment and percentage tree canopy coverage after controlling for the above factors and road type (Ramps, Major, Interstate, State highway, U.S. highway; Definition of each type of roadway is listed in section S5 in the *SI*) and random effects for roads. Note that four measurements were made on a parking lot (1), a local road (2), and an alleyway (1). These four measurements were assigned to 'Major Roads.' By including random effects for roads, we are controlling for all factors associated with a specific road. Microenvironments along specific roads can vary, as the road traverses through different neighborhoods. However, given the relatively small study area sampled in this campaign, controlling for the road a measurement was made on is a likely an effective means of accounting for traffic emissions sources. Percentage land cover and road length networks are proxies for emissions of the different air pollutants, which have been used in regression models in other studies (Venter et al., 2024). Given the many factors that can impact pollutant concentrations, including unmeasured real time traffic, the most robust manner to test associations between air pollution and greenspace is via longitudinal models that automatically control for place-specific factors. Because we did not have longitudinal data in our study, the results from our regression should be seen as indicative only.

We scaled all independent variables using a z-transformation in this analysis to compare the magnitude of associations observed between each independent variable and the dependent pollutant concentrations. Because the pollutant concentrations are distributed lognormally, in supplementary analyses, we log-transformed the pollution variable to ensure the model residuals are normally distributed. We provide the distribution of measurements by land cover class and road type in our analysis.

2.5. Identifying potential CH_4 leaks

Following previous studies, we first subtracted the local background concentration (the lowest 10th percentile of measurements made in a given hour during a run) from the measured CH_4 values to obtain ΔCH_4. Previous studies have found that CH_4 enhancements from leaks are highly localized. We defined a potential leak as CH_4 emissions exceeding 2.5 ppm, in line with previous studies (McKain et al., 2015; Phillips et al., 2013).

2.6. Comparing ground-based dry-air CH_4 measurements with aerial snapshots of dry-air CH_4 concentrations

To compare our data with CH_4measurements made over the Denver region during the MethaneAIR campaign, we joined segments from our route with mean dry-air CH_4 concentrations measured during the MethaneAIR campaign (available from Google EarthEngine) (MethaneAIR L3 Concentration v1,). MethaneAIR is the airborne simulator of MethaneSAT, an area-mapping satellite launched in 2024 to locate and quantify large anthropogenic CH_4 sources, including oil and natural gas (O&NG) (Chan Miller et al., 2024). MethaneAIR, built to closely replicate MethaneSAT, has been shown to retrieve columnar CH_4 concentrations at a 10 m × 10 m pixel resolution with high precision (Chan Miller et al., 2024). More information can be found on MethaneAIR in the following references: Chan Miller et al., 2024; Chulakadabba et al., 2023; Conway et al., 2024.

We derived the 1-s dry-air mole fraction of CH_4 concentrations from our ground-based measurements to ensure comparability with the MethaneAIR campaign using Equation (1).

$$[CH_4]_{dry} = [CH_4]_{raw} \times \frac{1013.25\ hPa}{P_{tot}} \times \frac{T}{298.15\ K} \times \frac{1}{1-([H_2O])} \quad (1)$$

In this equation, $[CH_4]_{dry}$ is the dry air mole fraction, or the amount of CH_4 that would be measured if the observed air parcel were dried and brought to standard temperature and pressure. $[CH_4]_{raw}$, T, P_{Tot}, and $[H_2O]$ are, respectively, the raw CH_4 concentrations reported by the instrument, the temperature measured in K, atmospheric pressure in hPa, and the mole fraction of water vapor also reported by the instrument. Hourly T and P_{Tot} were downloaded via Google Earth Engine from hourly ERA5 land analysis data obtained at its native 9 km × 9 km for the grid cell that overlapped with the location of each measurement for the corresponding hour (ERA5, 2025).

The MethaneAIR research flights were primarily conducted to validate CH_4 emissions estimates from oil and natural gas sources based on MethaneAIR retrievals (Chan Miller et al., 2024). A volume-controlled release experiment was conducted to estimate CH_4 emissions. Specifically, a release was carried out in eastern Colorado, and the plane repeated overflights of the release site in 20-min intervals for up to 6 h while the ground crew manipulated release rates. The five flight campaigns occurred on:

1) May 25, 2023, 5–8 pm UTC/11 a.m. - 1 p.m. MST (MX001).
2) Jun 22, 2023, 3–6 pm UTC/9 a.m.-noon MST (MX013)
3) Aug 24, 2023, 3–5 pm/9 a.m.–11 a.m. MST UTC (MX036)
4) Sep 25, 2023, 5–8 pm UTC/11 a.m. - 1 p.m. MST (MX050)
5) Sep 26, 2023, 3–7 pm UTC (MX051)

We retrieved the column-averaged dry-air mole fraction of CH_4 from the experiment at a 10 m × 10 m resolution grid over our study area. We calculated mean columnar CH_4 concentrations from MethaneAIR in the 100-m buffer around the centroid of each road segment in our study area. We then evaluated pairwise Pearson correlations between CH_4 measurements from each flight and ground-based, median background-corrected, dry-air CH_4 concentrations from our mobile experiment over the sampling area. Separately, we also calculated the maximum columnar CH_4 concentrations from MethaneAIR in the 100-m buffer around the centroid of each road segment in our study area to evaluate whether the aerial campaign was able to capture the hotspots identified from the mobile monitoring campaign.

Because our study area was on the western fringe of the flight paths, not all road segments were covered by the flyovers. Also, MethaneAIR reports column-averaged CH_4 concentrations, whereas we report surfaceCH_4 concentrations. Although we expect much of the CH_4 to be concentrated near sources at the surface, and therefore, make this comparison, this may not always be the case. CH_4 remains in the atmosphere longer than diurnal convection times and some CH_4 may be higher in the column. Another limitation of this comparison is that the dates of the aerial campaign did not overlap with the exact dates of the mobile monitoring campaign that ran between Aug 7–17, 2023, raising concerns about whether differences in CH_4 source activity over time would impact our analysis.

3. Results

Overall, we collected 40,170, 1-s measurements with location data across 13 sampling runs (~11 h; note that we lost part of each monitoring run because of a faulty GPS, which reduced the number of hours of data we obtained) in 7 days in the summer of 2023 in Denver, Colorado. Table S2 provides summary statistics (5th/95th percentile, 25th/75th percentile, mean, median) of the distribution and the number of quality-controlled measurements corresponding to the different pollutants.

3.1. Developing maps of pollutant concentrations for the period of the mobile deployment in the sampling area

Median concentrations of background-corrected pollutant concentrations over all 100-m segments in the study area are displayed in Fig. 1. Stable (error in median ≤20 % median concentrations for 100-m segments over which measurements were made for more than one run) median concentrations of background-corrected pollutant concentrations are displayed in Fig. S3.

In general, BC and UFP concentrations were highest on highway I-70. We observed a weak, non-significant Pearson correlation coefficient (R) of −0.04 between 10-s averaged median background corrected UFP and BC concentrations produced over all 905 road segments (Fig. 2). We observed similar results when evaluating correlations of each pollutant normalized by its maximum concentrations. When evaluating correlations between BC and UFPs on segments located on U.S. highways, we observed a higher correlation (R) of 0.25, although it remained non-significant.

We plotted the distribution of UFP and BC concentrations as a function of road type in Fig. S4. Concentrations of BC are significantly higher on U.S. highways and highway ramps than on other roads. Although concentrations of UFPs are also higher on U.S highways and highway ramps, the difference is less stark than for BC concentrations (Fig. S4). Non-parametric Kruskal-Wallis tests (used because the UFP and BC concentrations followed a non-normal distribution; Table S3) reveal that although the distribution of BC concentrations differed significantly by road type ($p < 0.05$), this was not the case for UFP concentrations ($p = 0.098$).

Median concentrations of background-corrected O_3 concentrations were lowest on I-70 and highest on Colfax Avenue, another major road in the south (Fig. 1). O_3 concentrations were also high in the northernmost section of the route, in an industrial neighborhood of Commerce City. We observed a moderate correlation between individual O_3 measurements and vehicular speed corresponding to −0.29 (Fig. 2).

Fig. 1 also displays the spatial variation of CO_2 and CH_4 concentrations over the study area. Dry-air CH_4 concentrations are displayed in Fig. S5 and closely follow the spatial distribution observed in Fig. 1. The correlation between median background-corrected CH_4 and dry-air CH_4 is 0.46 and is significant. The large range of background-corrected median CO_2 and CH_4 concentrations (Table S3) highlights the impact of local sources. Exploratory analyses did not find disparities in pollutant concentrations by neighborhood socioeconomic status (section s3 in the SI).

3.2. Evaluating associations between pollutant concentrations and tree canopy

A map of the sampling route overlaid with land cover data from the

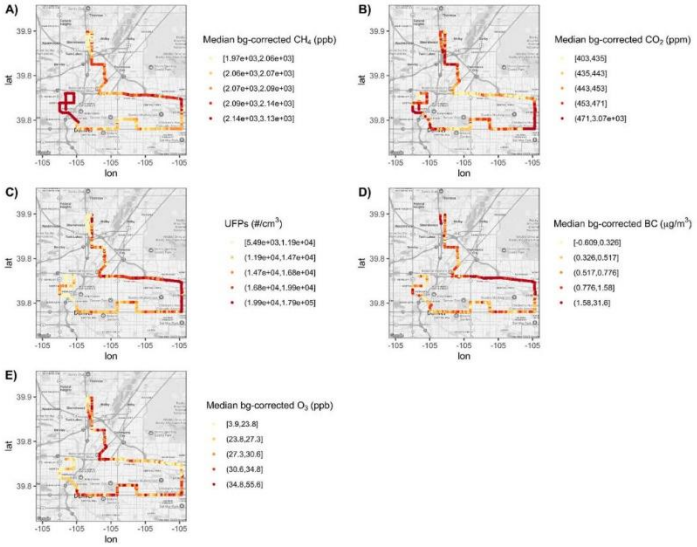

Fig. 1. Median background-corrected concentrations of: A) methane (CH_4), B) carbon dioxide (CO_2), C) ultrafine particles (UFPs), D) black carbon (BC), and E) Ozone (O_3) for every 100 m road segment in the study area across all sampling runs, categorized into quantiles.

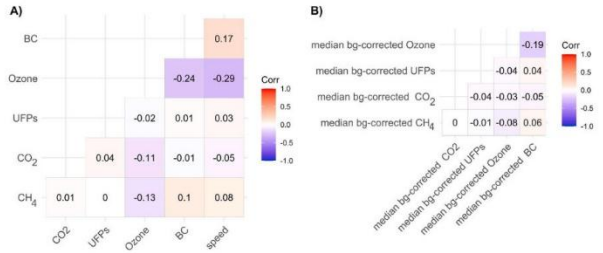

Fig. 2. Pairwise Pearson correlations between (A) 10-s averaged pollutant concentrations (methane-CH_4, carbon dioxide-CO_2, ultrafine particles-UFPs, black carbon-BC, Ozone-O_3) and vehicular speed, (B) background-corrected median pollutant concentrations over each 100 m sampling segment during the sampling period.

5

DRCOG dataset is displayed in Fig. S6. Results from linear mixed-effects regressions are presented in Table S4. The percentage of tree canopy has a significant negative association with CH_4 and a positive association with O_3. Specifically, every increase in the percentage of tree canopy cover by 1 standard deviation results in a decrease of CH_4 by 4.3 (95 % CI: 0.5, 8.0) ppb and an increase of O_3 by 0.8 (95 % CI: 0.2, 1.4) ppb. The distribution of the median background-corrected values of the different pollutants are skewed (Table S3). Therefore, we reran the regression using log-transformed pollution concentrations to mitigate non-normality in the residuals (Table 1).

In this analysis, associations between percentage tree canopy coverage and UFPs, BC, CH_4 and O_3 were significant (Table 1). Specifically, an increase in the percentage of tree canopy cover by 1 standard deviation results in a decrease in UFPs by 2.4 % (95 % CI: 0.02 %, 4.8 %), BC by 15.6 % (95 % CI: 7.3 %, 23.2 %) and CH_4 by 0.2 % (0.03 %, 0.4 %), and an increase in O_3 by 3.2 % (95 % CI: 0.5 %, 5.9 %). An increase in percentage green space by 1 standard deviation is associated with an increase in O_3 of 4.0 % (95 % CI: 0.6 %, 7.5 %), and a decrease in UFPs by 3.3 % (0.3 %, 6.2 %) (Table 1).

3.3. Identifying potential CH_4 leaks and comparing ground-based dry-air CH_4 measurements with aerial snapshots of dry-air CH_4 concentrations

Locations where enhanced CH_4 concentrations were >2.5 ppm are displayed in Fig. 3. Multiple measurements of elevated CH_4 concentrations over almost every run are observed along I-70.

Fig. S7 presents mean CH_4 concentrations derived from the five MethaneAIR flights over the study area between June 22 and Oct 9, 2023. Fig. 4 displays correlations between CH_4 measurements from the five flights with ground-based median background-corrected measurements. The low correlations (mostly <0.20, and in some cases negative) between CH_4 concentrations derived from the five flights and the ground-based concentrations suggest that CH_4 concentrations in Denver exhibit high temporal variability (Fig. 4). When we evaluated maximum CH_4 concentrations within 100-m buffers of each segment in our study area, we noted that the MethaneAIR instrument did not detect any measurements in the study area >2.5 ppm observed consistently on the ground from the mobile lab (Fig. S8).

4. Discussion

In our campaign using the DMM_s, we unsurprisingly observed high concentrations of UFPs and BC along major, heavily trafficked roads in

Table 1
Associations (95 % CI) expressed as % change in the median background-corrected pollutant concentrations of each 100 m road segment for a unit increase in the standard deviation of % tree-canopy derived from a linear mixed regression model that controlled for % of other land-use types, road length in 100 m buffer, road type and includes random effects for road. All independent variables were scaled using a z-transformation. The dependent variables are log-transformed.

		% Land Cover[a]				Road Type[a] (default: Ramps)				
Pollutant	No. of measurements	% Tree Canopy	% Grass	% Structures	% Impervious	RoadType: Major	RoadType: State Highway	RoadType: U. S Highway	RoadType: Interstate	Road length
UFPs	1123	−2.4 %* (-4.8 %, -0.02 %)	−3.3 %* (-6.3 %, -0.3 %)	−3.9 %* (-6.3 %, -1.5 %)	0.9 % (−1.5 %, 3.5 %)	42.2 % (9.4 %, 84.8 %)	40.7 % (−6.8 %, 112.5 %)	24.6 % (−12.7 %, 77.8 %)	23.5 % (−11.4 %, 72.2 %)	−0.9 % (−3.2 %, 1.4 %)
BC	727	−15.6 %* (-23.2 %, -7.3 %)	−5.4 % (−15.7 %, 5.1 %)	−13.5 %* (-21.6 %, -4.7 %)	1.7 % (−8.1 %, 12.7 %)	−33.2 % (−73.3 %, 66.8 %)	−45.9 % (−83.3 %, 75.6 %)	81.8 % (−41.4 %, 464.5 %)	81.8 % (−41.4 %, 464.5 %)	−25.4 %* (-31.9 %, -18.3 %)
CO_2	1145	−0.0 % (−0.7 %, 0.7 %)	−0.7 % (−1.6 %, 0.2 %)	0.3 % (−0.4 %, 1.1 %)	−0.4 % (−1.1 %, 0.4 %)	3.5 % (−3.9 %, 11.5 %)	−0.3 % (−10.7 %, 11.3 %)	−0.1 % (−9.4 %, 10.0 %)	1.0 % (−7.8 %, 10.6 %)	−1.1 %* (-1.8 %, -0.4 %)
CH_4	1145	−0.2 %* (-0.4 %, -0.03 %)	−0.05 % (−0.3 %, 0.2 %)	−0.3 %* (-0.4 %, -0.1 %)	−0.0 % (−0.2 %, 0.1 %)	−1.4 % (−3.3 %, 0.5 %)	−3.0 % (−7.7 %, 1.9 %)	−2.6 % (−5.3 %, 1.2 %)	−2.8 % (−5.2 %, 0.7 %)	−0.3 % (-0.5 %, -0.1 %)
Ozone	789	3.2 %* (0.5 %, 5.9 %)	4.0 %* (0.6 %, 7.5 %)	−0.2 % (−2.9 %, 2.7 %)	−1.2 % (−3.9 %, 1.6 %)	15.1 % (−14.8 %, 55.4 %)	37.7 % (−7.1 %, 104.1 %)	11.6 % (−23.2 %, 62.1 %)	13.2 % (−20.1 %, 60.5 %)	5.6 %* (3.3 %, 8.6 %)

*p < 0.05.
The native resolution of all pollutants was used in this analysis to derive median background-corrected concentrations at each 100-m segment.
[a]: The number and % of the 1245 background-corrected 1-s measurements made on.
1) Major roads were 773 (62.1 %).
2) State highways: 47 (3.8 %).
3) U.S highways: 78 (6.3 %).
4) Interstate highways: 274 (22.0 %).
5) Ramps: 73 (5.9 %).
The mean % of tree canopy cover is: 8.6 % (5th percentile: 0.0 %, 25th percentile: 0.9 %, median: 4.6 %, 75th percentile: 15.0 %, 95th percentile: 27.6 %).
The mean % of grassland cover is: 8.3 % (5th percentile: 0.0 %, 25th percentile: 0.8 %, median: 4/6 %, 75th percentile: 12.5 %, 95th percentile: 29.0 %).
The mean % of structures is: 12.0 % (5th percentile, 25th percentile: 1.4 %, median: 9.4 %, 75th percentile: 19.6 %, 95th percentile).
The mean % of impervious surface is: 51.3 % (5th percentile 28.6 %, 25th percentile: 42.1 %, median: 51.4 %, 75th percentile 61.3 %, 95th percentile: 72.9 %).
The number and % of the 905 background-corrected 10-s measurements made on.
1) Major roads were 577 (63.8 %).
2) State highways: 36 (4.0 %).
3) U.S highways: 39 (4.3 %).
4) Interstate highways: 209 (23.1 %).
5) Ramps: 44 (4.9 %).
The mean % of tree canopy cover is: 8.6 % (5th percentile: 0 %, 25th percentile: 1.2 %, median: 4.5 %, 75th percentile: 14.6 %, 95th percentile: 27.5 %).
The mean % of grassland cover is: 9.1 % (5th percentile: 0 %, 25th percentile: 1.0 %, median: 5.3 %, 75th percentile: 13.3 %, 95th percentile: 31.1 %).
The mean % of structures is: 12.7 % (5th percentile: 0.0 %, 25th percentile: 2.3 %, median: 10.8 %, 75th percentile: 20.3 %, 95th percentile: 31.9 %).
The mean % of impervious surface is: 51.3 % (5th percentile: 27.6 %, 25th percentile: 41.9 %, median: 52.0 %, 75th percentile: 62.2 %, 95th percentile: 72.4 %).

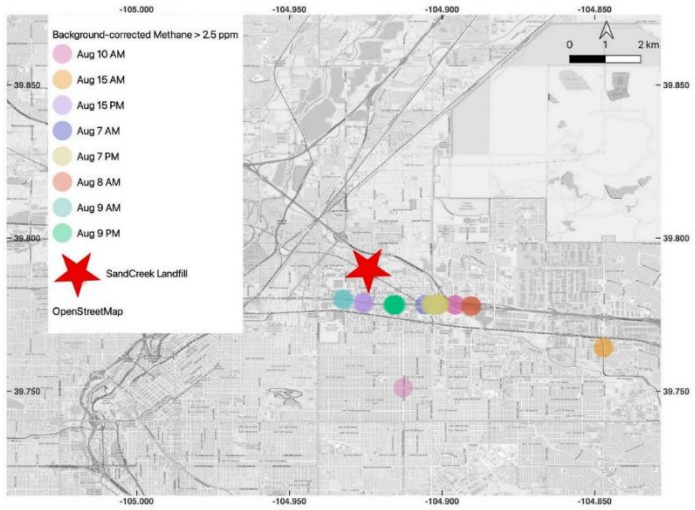

Fig. 3. Locations and dates where enhanced CH_4 concentrations were >2.5 ppm. The location of a potential source of the elevated concentrations, the cleaned-up Sand Creek Landfill Superfund site, is displayed.

Denver. The weak, non-significant correlation between UFP and BC observed in our campaign differs from the findings of previous research in campaigns in other cities, which have observed higher correlations between these two species (Collins et al., 2022; Zhu et al., 2008).

In urban areas, the principal sources of UFPs include vehicular traffic (tailpipe emissions, brake wear, and tire wear), other combustion of fossil fuels, and cooking and nucleation events. Because traffic is often assumed to be the dominant source of UFPs, UFP concentrations are sometimes approximated based on more commonly observed traffic-related air pollutants. The studies that have reported high correlations between UFPs and BC have done so for measurements made on freeways where traffic emissions were the dominant source, and the different TRAPS underwent similar atmospheric dispersion processes. The DMML was driven through several different microenvironments. When we restricted our dataset to road segments on U.S. national highways, we observed a higher correlation between UFP and BC of 0.23, as expected. Although the spatial distribution of UFPs and BC was similar (Fig. 1; Fig. S2), a possible reason for the poor correlation observed is the varying source strengths in different microenvironments under different driving conditions. Other studies have observed similar findings because of the latter reasons (Gani et al., 2021; Zhu et al., 2008).

BC is likely more strongly influenced by traffic emissions, whereas UFPs are also substantially affected by other sources, such as cooking (Kim et al., 2024). Indeed, BC concentrations display sharper gradients by road type, unlike UFPs (Fig. S4) Results from our campaign suggest that these factors need further investigation in Denver and that other TRAPs might not serve as effective proxies for exposure to UFPs.

O_3 is a secondary pollutant that forms when NO_2 or volatile organic compounds (VOCs) react with oxygen in the presence of sunlight. Unlike TRAPs, we observed low levels of O_3 on highways such as I-70. On I-70, high levels of freshly emitted NO from traffic can scavenge O_3, leading to the formation of elevated NO_2 and low O_3 concentrations. The inverse correlation between O_3 and traffic speed observed is likely because traffic speeds serve as a proxy for traffic. Higher-trafficked areas tend to have lower speeds and lower O_3 concentrations due to the scavenging action of NO emissions. Our observation of low O_3 concentrations on heavily trafficked roads, due to the scavenging effect of NO, has been observed in other cities in the U.S. (Collins et al., 2022).

However, we also observed high O_3 concentrations on Colfax Ave, which is a major arterial road in Denver. Moreover, O_3 concentrations appear to be positively associated with major roads (although it is negatively associated with national highways) (Table 1). This discrepancy is likely because we tended to drive on Colfax Ave at non-rush-hour time periods, when there was less traffic. In Commerce City (north of I-70), the many VOCs emitted by industries in the area that can act as precursors of O_3 potentially explain the high O_3 levels observed in that area.

We observed that increased tree canopy cover in our study area was significantly associated with O_3, UFPs, BC, and CH_4. Urban trees have been hypothesized to influence O_3 concentrations due to the production

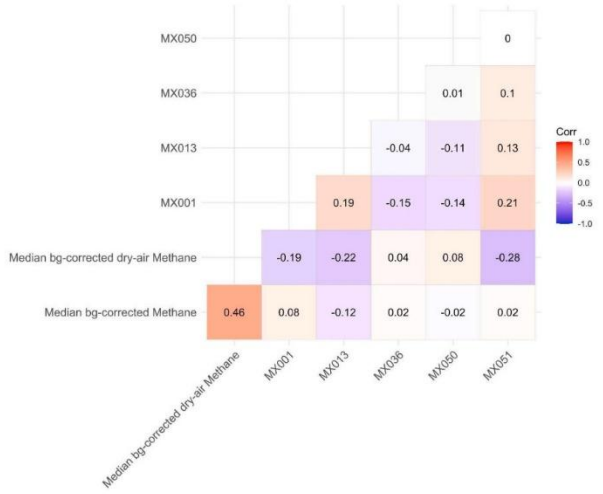

Fig. 4. Correlations between CH_4 measured from the different MethaneAIR flight campaigns (MX001, MX013, MX036, MX050, MX051) with that of the median background-corrected CH_4 and dry-air CH_4 measurements from the ground campaign for segments in the study area.

of VOCs, which would interact with tailpipe emissions (Fitzky et al., 2019). Our work builds on these results.

The impact of green space on traffic pollutants is complicated. Research has found that the differing impacts of tree canopy on aerosol pollution depend on the type of trees, street configuration, and meteorology (Abhijith et al., 2017; Gromke and Ruck, 2007; Salmond et al., 2013). In our study, the decrease in UFPs and BC associated with an increase in tree canopy coverage, could be because trees effectively filter out particles along the streets sampled in our study area. Although, recent research has evaluated the associations between $PM_{2.5}$ and greenspace, less work has been done on other pollutants due to the lack of data. We hope to build on this initial campaign by TRAPs and GHGs along the same route and conduct a more robust, low-bias longitudinal analysis to definitively assess the relationship between greenspace and pollution in Denver, CO.

CH_4 does not have biomechanical interactions with the tree canopy. Nevertheless, we observed significant decreases in CH_4 concentrations with increased green space. In our campaign, this could be the case because our study route partially overlapped with an industrial area in Denver that has many CH_4 sources. Tree canopy coverage in the industrial area is lower than in other neighborhoods. Therefore, the association derived here could be due to unmeasured confounding from these additional industrial sources.

CO_2 is taken up by the tree canopy during photosynthesis. However, the scale of urban canopy that could create unique patterns of CO_2 distribution is generally only noticed when comparing CO_2 values across cities, especially when confining data collection to transit roadways (Weissert et al., 2014), which is one reason why we did not observe a significant association between CO_2 and tree canopy coverage in our study.

We note that our model results are indicative, alone, as our findings could be confounded by differing traffic trends on the streets sampled; areas with lower tree canopy could have inherently less emission sources. We attempted to correct for this by adding a random effect for each street and correcting for local-cover, and road density, which have been used by other researchers as a proxy for emission sources (deSouza et al., 2021). However, because a specific street could have different amounts of traffic in different locations, our method does not completely mitigate potential confounding bias. In future experiments, we hope to include a camera that can detect real-time vehicular traffic to control for this important confounder.

We observed elevated levels of CH_4 (background-corrected CH_4 levels >2.5 ppm) along I-70. Our results suggest these elevated concentrations could arise from leaks in the natural gas infrastructure along this route. Another potential explanation for the elevated CH_4 levels on I-70 is its proximity to the closed Sand Creek Landfill, formerly a Superfund site, which has been reported to emit a significant amount of CH_4 (US EPA,). More experiments are needed to survey the Denver area for potential leaks and to better understand their impacts.

Finally, the spatial distribution of the dry-air CH_4 measurements was highly variable over the study area from the aerial measurements made in the MethaneAIR campaign. Our ground-based measurements also did not agree well with the aerial CH_4 measurements made on any flight day. Our results indicate that multiple measurements over a wide range

of meteorological and source conditions are needed to robustly identify surface CH_4. The aerial campaign did not temporally overlap with the mobile monitoring campaign, which is one possible reason for why we didn't see strong correlations between the two. However, the aerial campaign failed to detect the persistent CH_4 hotspots (>2.5 ppm) observed during the mobile monitoring campaign along I-70. This could be because the source was too small to see from the air or the source was not active during the aerial campaign. Aircraft campaigns are expensive, but mobile monitoring using the DMML has the potential to fill in gaps in understanding the spatial variation of CH_4 in Denver.

5. Conclusion

In conclusion, we present the design of the DMML and results from a campaign using the DMML that mapped multiple pollutants, TRAPs, and GHGs that are not routinely monitored and studied at a high spatial resolution, for the first time in Denver, Colorado. Despite our campaign being brief, we still identified key issues of interest, namely, a previously unknown CH_4 hotspot on I-70. We also demonstrated how mobile monitoring can be key to mapping highly variable CH_4 levels and tracking localized hotspots that aerial campaigns may miss. We present concentrations of different pollutants over space and discuss their relationship with each other and potential sources. Finally, although our analyses evaluating associations between pollutant concentrations with tree canopy coverage should be interpreted as indicative, they lay the groundwork for future studies in Denver, CO to investigate the efficacy of measures such as planting trees to reduce TRAPs in Denver.

CRediT authorship contribution statement

Priyanka deSouza: Writing – review & editing, Writing – original draft, Visualization, Validation, Supervision, Software, Resources, Project administration, Methodology, Investigation, Funding acquisition, Formal analysis, Data curation, Conceptualization. **Benjamin Crawford:** Writing – review & editing, Resources, Funding acquisition, Conceptualization. **John L. Durant:** Writing – review & editing, Resources, Conceptualization. **Neelakshi Hudda:** Writing – review & editing, Resources, Conceptualization. **Peter Ibsen:** Writing – review & editing, Resources, Funding acquisition. **Christian L'Orange:** Writing – review & editing, Resources. **Jose Jimenez:** Writing – review & editing, Resources. **Brady Graeber:** Data curation. **Brendan Ciclone:** Data curation. **Ruth Mekonnen:** Data curation. **Saadhana Purushothama:** Data curation. **Ralph Kahn:** Writing – review & editing. **Patrick L. Kinney:** Writing – review & editing. **John Volckens:** Writing – review & editing, Resources.

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Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper. Any use of trade, firm, or product names is for descriptive purposes only and does not imply endorsement by the U.S. Government.

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Appendix A. Supplementary data

Supplementary data to this article can be found online at https://doi.org/10.1016/j.aeaoa.2025.100364.

Data availability

Data will be made available on request.

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The ozone climate penalty, NAAQS attainment, and health equity along the Colorado Front Range

James L. Crooks[1,2], Rachel Licker[3]✉, Adrienne L. Hollis[3] and Brenda Ekwurzel[3]

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BACKGROUND: While ozone levels in the USA have decreased since the 1980s, the Denver Metro North Front Range (DMNFR) region remains in nonattainment of the National Ambient Air Quality Standard (NAAQS).
OBJECTIVE: To estimate the warm season ozone climate penalty to characterize its impact on Colorado Front Range NAAQS attainment and health equity.
METHODS: May to October ozone concentrations were estimated using spatio-temporal land-use regression models accounting for climate and weather patterns. The ozone climate penalty was defined as the difference between the 2010s concentrations and concentrations predicted using daily 2010s weather adjusted to match the 1950s climate, holding constant other factors affecting ozone formation.
RESULTS: The ozone climate penalty was 0.5–1.0 ppb for 8-h max ozone concentrations. The highest penalty was around major urban centers and later in the summer. The penalty was positively associated with census tract-level percentage of Hispanic/Latino residents, children living within 100–200% of the federal poverty level, and residents with asthma, diabetes, fair or poor health status, or lacking health insurance.
SIGNIFICANCE: The penalty increased the DMNFR ozone NAAQS design values, delaying extrapolated future attainment of the 2008 and 2015 ozone standards by approximately 2 years each, to 2025 and 2035, respectively.

Keywords: Ozone; Climate penalty; Climate change; NAAQS; Environmental Justice; Colorado

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INTRODUCTION

Ground-level ozone is a well-known respiratory irritant and component of smog. Ozone levels above US Environmental Protection Agency (EPA) standard are causally linked to a number of acute health effects, including eye and nose irritation, exacerbations of chronic respiratory diseases like asthma and chronic obstructive pulmonary disease (COPD), and adverse effects on lung function [1]. In addition, both short- and long-term exposures to ozone at concentrations below the current regulatory standards are associated with increased deaths from both respiratory and cardiovascular disease.

Ozone in the lower troposphere is produced through photochemical reactions with precursor emissions of volatile organic compounds (VOCs) and nitrogen oxides (NOx), which increase in the presence of heat [2]. Sources for NOx emissions include power plants, motor vehicles, and other sources of high-heat combustion, and sources of VOC emissions include motor vehicles, chemical plants, refineries, factories, gas stations, paint, and other sources [3].

In 2008, EPA tightened the National Ambient Air Quality Standard (NAAQS) for ozone from 80 to 75 parts per billion (ppb), calculated based on the fourth-highest daily maximum 8-h concentration across all regulatory ozone monitors in a given region, averaged across 3 consecutive years [4]. The standard was tightened again in 2015, with the new standard set at 70 ppb, though the calculation method was not changed. This 2015 standard was reaffirmed in 2020.

Importantly, the 2008 standard was not revoked after promulgation of the 2015 standard. The US EPA gives regions several years to meet each standard, and as a result, a region can be in nonattainment of the 2008 standard but in attainment of the 2015 standard even when the 2015 standard is tighter. These counter-intuitive designations that stem from the timing of standards also apply to each specific stage of nonattainment (for example, marginal, moderate, and serious). That is why, as of 2020, the Denver Metro North Front Range (DMNFR) was in serious nonattainment of the 2008 standard but only in marginal nonattainment of the 2015 standard [5, 6]. Because a designation of serious nonattainment has substantial economic consequences for a region, the older, looser standard is of most immediate concern to policymakers, even though the newer, tighter standard is more relevant to public health.

Colorado's Front Range has struggled with ground-level ozone pollution at least since systematic monitoring began in the 1980s, presenting health risks to the region's residents. In Colorado's Denver-Aurora-Lakewood area, over the last three decades there have been at least 15 days per year in which ground-level ozone concentrations have been unhealthy for sensitive populations [7]

[1]National Jewish Health, Denver, CO, USA. [2]Colorado School of Public Health, Aurora, CO, USA. [3]Union of Concerned Scientists, Washington, DC, USA. ✉email: RLicker@ucsusa.org

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with annual totals reaching as high as 81 days. Consequently, the DMNFR has consistently had difficulty meeting its obligations under the Clean Air Act.

Several studies have estimated the contribution of local factors to these high ground-level ozone values in Colorado's Front Range. For example, Cheadle et al. found that the highest concentrations of ozone were associated with as much as 30 ppb from precursor emissions primarily from local oil and gas activity, moderate urban sources, and low agricultural sources [8].

Regional and global factors also contribute to ground-level ozone in Colorado's Front Range. Biomass burning from agricultural practices, prescribed burns or wildfires can produce regional ozone precursor emissions. Lindaas et al. measured up to 10 ppb ozone at Boulder Atmospheric Observatory (Erie CO) during days when atmospheric transport of precursor emissions from Canada and Pacific Northwest wildfires occurred [9]. Huang et al. found interstate transport from southern California in May 2010 contributed around 1 and 15 ppb ozone on days with surface ozone levels of 60 and 75 ppb in Arizona and New Mexico, respectively, over a 1-to-3-day time period, reaching Colorado on the third day [10]. Ozone precursor emissions transported to the region from Asia have decreased as pollution controls in Asia have improved [11]. The highest non-anthropogenic production of ozone occurs during the late winter and early spring in mid-latitudes from the stratosphere transfer into the troposphere, with estimates in the western US of 17–40 ppb. This process is not significant during the summertime [1]. Springtime stratospheric intrusion episodes have been shown to be more frequent in the western US after strong La Niña winters [12].

However, weather further contributes to ground-level ozone formation in Colorado's Front Range, with higher values typically occurring during the summer amidst higher temperatures and more hours of sunlight. Low wind and sunny summer days are the most conducive for surface ozone production in the Denver region [13]. On days when the wind is not blowing in from the west, especially the stagnant summer days, ozone precursor emissions from the east can get trapped in the region adjacent to the foothills of the Rocky Mountains [14].

As weather is a factor influencing surface ozone concentrations, it follows that climate change influences surface ozone concentration as well. Researchers have increasingly looked at the consequences of climate change on surface ozone pollution, using the term "climate penalty" to describe the additional ozone associated with climate change [15]. Recognizing the influence of temperature for catalyzing chemical reactions, some researchers have found a climate penalty factor ranging between 1 and 3 ppb ozone per degree Celsius change [15, 16].

Typically, these climate penalty approaches focus on future climate change. However, for local jurisdictions with unhealthy ozone levels, assessing the contribution of a historical climate penalty could factor into planning decisions. This is because in many locations, a global climate penalty of a few ppb could push communities into nonattainment, requiring those communities to make investments to solve the problem and protect local residents. Put another way, any region in the world that has people exposed to unhealthy ground-level ozone would benefit from information on the various contributors in order to evaluate where to deploy resources to improve public health.

In this work, we estimate the ozone climate penalty due to climatic changes between the 1950s and 2010s in Colorado's Front Range, the period over which human-attributed climate change accelerated most dramatically [17]. We define the climate penalty as the difference between ozone concentrations observed in the 2010s and predicted ozone concentrations under a counterfactual scenario based on the 2010s but with daily weather adjusted to match the observed seasonal climate trends in 1950s. We estimated this penalty over all warm season (May–October) days in the 2010s and over a dense grid of locations. To calculate the penalty, we used spatio-temporal land-use regression (LUR) models incorporating weather, elevation, population density, and traffic variables. We used changes in seasonal and spatial trends of four local weather variables (maximum daily temperature, mean daily wind speed, relative humidity, and sea level pressure) between the two decades as representative of the changes in climate that the region experienced during that time frame. Based on this analysis, we also estimated the impact of this climate penalty on regional attainment of the EPA ozone NAAQS and assessed which sociodemographic groups and groups with chronic health conditions were associated with a higher climate penalty.

This analysis helps identify which populations on the Front Range could have benefited most from earlier action to reduce global climate change. Regional efforts to reduce ground-level ozone in the Colorado Front-Range region have successfully decreased levels of the pollutant, but levels still often exceed NAAQS limits during the summer months. When out of compliance with regulations, every part per billion ozone climate penalty can have significant health and economic implications for affected communities.

METHODS

Study region and ground-based monitors

The study region encompassed the counties of the Front Range urban corridor between Laramie, Wyoming and Pueblo, Colorado along Interstate Highway 25 (I-25), as well as more sparsely populated rural counties on the plains to the east (Fig. 1). Counties to the west were not included because the mountains of the Front Range put them in a distinct airshed. The region includes 17 counties, all but one of which are in Colorado. The US EPA NAAQS ozone nonattainment area is shown outlined in black in Fig. 1 and includes the city of Denver and its suburbs as well as the cities of Boulder, Fort Collins, and Greeley.

This region includes 21 weather monitoring sites (Fig. 1). However, as our study spans the 1950s and the 2010s, not all sites were active in all study years. In particular, three sites had monitors that were active in the 1950s but not the 2010s, an additional four sites were active in both decades, and the remaining sites were active only in the 2010s.

Daily data from these monitors were downloaded from the National Oceanic and Atmospheric Administration's National Centers for Environmental Information and included: mean, maximum, minimum, and dew point temperature; station and sea level pressure; mean and maximum sustained wind speed; wind gust speed; precipitation and snow depth [18]. We calculated relative humidity from the mean daily and dew point temperatures. Based on data completeness, collinearity between related variables, and known relationships to ozone, we focused our analysis on four of these daily variables: maximum temperature, mean wind speed, relative humidity, and sea level pressure.

The region also includes 26 ozone monitoring sites (Fig. 1). Of these, 14 were used by the Colorado Department of Public Health and Environment to assess NAAQS attainment during the 2010s. All of the latter sites fall within the NAAQS nonattainment area. Because the decade of the 1950s predates the passage of the Clean Air Act of 1970 and the creation of the US EPA, no ozone data from the 1950s are available for the study region. Daily 8-h maximum ozone mixing ratios from all 26 ozone monitors were downloaded from the US EPA Air Quality System [19].

Because ozone usually only reaches high concentrations during warmer months, we limited our study to the 6 warmest months of each year, May through October [1, 4].

Other geospatial variables crucial for modeling ozone and weather included elevation, population density, and traffic density. Elevations of these points were evaluated using the elevatr package (version 0.2.0) [20]. Population density data from 2015 at 30 arc-second resolution were provided by Columbia University's Socioeconomic Data and Applications Center's Gridded Population of the World version 4 [21]. Highway Vehicle Miles Traveled shapefiles for Colorado and Wyoming in the years 2011–2017 were provided by the US Department of Transportation Highway Performance Management System [22]. Maps of these variables are given in Supplementary Fig. S1.

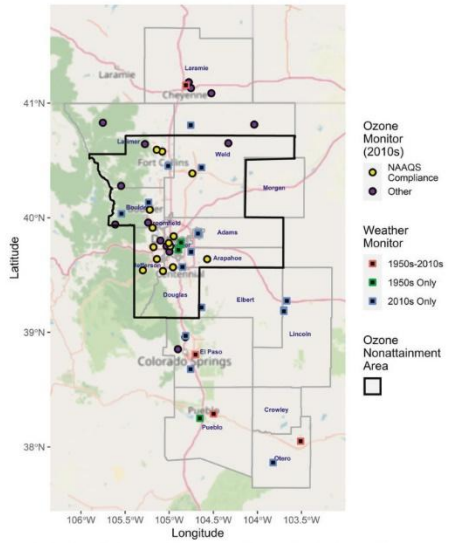

Fig. 1 Study region and monitor sites. The study region includes 17 counties, one in Wyoming and the remainder in Colorado. The outlined region is the Metro Denver North Front Range ozone 2008 NAAQS nonattainment region.

Spatio-temporal land-use regressions

Our goal was to estimate the spatially resolved and temporally resolved ozone climate penalty on the Front Range. To do so, we compared spatio-temporal ozone fields in the 2010s ("Observed 2010s") to counterfactual ozone fields that would have been observed had the daily 2010s meteorology been shifted to align with a 1950s climate ("Counterfactual 1950s"). These ozone fields and the weather fields influencing them were developed using spatio-temporal LUR models. These models do not directly characterize the underlying physical, chemical, or biological processes influencing ozone formation, but instead infer statistical relationships between empirical ozone and weather observations and other environmental variables varying in space and/or time. These statistical relationships are then used to predict ozone or weather variables at unmonitored locations or times.

All modeling was performed in the R language (version 4.0.2) with the mgcv package (version 1.8-31) [23–25]. Mean daily wind speed was log-transformed, and the relative humidity, expressed as a value on the unit interval, was probit-transformed. Computing the ozone climate penalty required several steps, which are visualized in Supplementary Fig. S2 and described below:

Step 1: For each of the four meteorological variables, we fit a spatio-temporal LUR model to the 1950s and 2010s together. Specifically, we used a generalized additive mixed model (GAMM) fitted to daily meteorology monitor observations with fixed effects of spatially indexed variables and a smooth seasonal trend (up to 6 degrees of freedom per year; possibly crossed with the spatially index variables), and a random effect by date. The full mixed effects models captured daily weather conditions across the DMNFR in each decade, while the fixed effects portion of the model captured the decade-specific spatial and seasonal climate trends. That is, the full model characterized the weather while the fixed effects portion characterized the climate. The final set of fixed and random effects was chosen independently for each meteorological variable using leave-one-monitor-out cross-validation and is listed in Supplementary Table S1.

Step 2: For each meteorological variable, we used the corresponding LUR to perform spatial prediction to estimate the daily values of the weather and climate fields on a dense grid over the study domain. This grid had a resolution of 1/48 degree in longitude and 1/36 degree in latitude. We also predicted at each ozone monitor location.

Step 3: For each meteorological variable, we calculated a counterfactual 1950s weather field by taking the observed 2010s weather field and subtracting the difference between the 2010s and 1950s climate fields at each grid point and ozone monitor location on each day.

Step 4: We created an ozone LUR to model the relationship between ozone and meteorology over the 2010s. Specifically, we fit the observed daily 8-h maximum ozone monitor observations using a GAMM with fixed effects selected from among the (potentially nonlinear functions of the) weather fields, latitude, longitude, elevation, log10 population density, log10 inverse-distance weighted traffic density, as well as categorical year and smooth trends over location and date. The non-meteorological variables in the fixed and random terms attempted to capture non-meteorological factors influencing ozone production, such as ambient NOx

and VOC concentrations. The final model, selected through leave-one-monitor-out cross-validation, included a five-way interaction between the four weather fields and categorical year, separate additive effects of population density and traffic, a smooth trend over spatial location (two degrees of freedom), a smooth trend over date (six degrees of freedom per year), and an interaction between location and day of the year. The random effects included separate coefficients for the intercept, latitude, longitude, and elevation on each date. These random effects represented the aggregate of all non-meteorological time-varying influences on ozone concentrations.

Step 5: Using the ozone LUR, we performed spatial prediction to estimate the daily 8-h maximum ozone concentration field at each grid location, each ozone monitor location, and at the centroid of each of the 1003 census tracts in the domain. This procedure yielded our observed 2010s ozone field.

Step 6: We fed the counterfactual 1950s weather fields into the ozone LUR to predict what the 2010s daily ozone concentration field would have been had the meteorology been different, but all other factors held constant. This procedure yielded our counterfactual 1950s ozone field.

Step 7: Finally, we calculated the ozone climate penalty by subtracting the counterfactual 1950s ozone field from the observed 2010s ozone field. The result was an estimate of the ozone climate penalty on each date at each spatial location referred to in Step 5.

NAAQS attainment

Next, we evaluated how the ozone climate penalty has made attainment of the ozone NAAQS more difficult. First, we mapped the average number of annual NAAQS exceedances over our study domain under the observed 2010s ozone field and compared them to the average number of annual exceedances under the counterfactual 1950s ozone field. Second, we contracted the true DMNFR ozone design values to the design values that would have occurred under the counterfactual 1950s climate. Design values are the numbers (computed from air pollution monitor observations) that are directly compared against the NAAQS to evaluate regional attainment. This comparison proceeded in two steps as visualized in Supplementary Fig. S3 and described here:

Step 1: We estimated counterfactual 1950s ozone observations by taking the true 2010s ozone monitor observations at the 14 monitors used to assess attainment and subtracted the difference between the observed 2010s ozone field and the counterfactual 1950s ozone field evaluated at these locations.

Step 2: We calculated the design values for the 2010s ozone observations and for the counterfactual 1950s ozone observations.

Given these design values we were able to predict the expected attainment year of the 2008 (75 ppb) and 2015 (70 ppb) standards under the 2010s climate and under a counterfactual 1950s climate. This simple extrapolation effectively assumed regulatory actions continue to push precursor emissions lower at the historical rate and temperatures do not continue increasing.

Health equity

Because neither population characteristics nor the ozone climate penalty is spatially uniform, the penalty is greater for some populations than others. To determine which populations were associated with the greatest ozone increase in ambient ozone driven by climate change (or, conversely, which populations could have benefited most from earlier climate action), we estimated the ozone climate penalty at each census tract. For tracts large enough to overlap three or more points from our prediction grid, we used a population-weighted approached to estimate this penalty. For tracts overlapping two or fewer grid points, we evaluated the penalty at the tract centroid. We then regressed the penalties at all 1003 tracts against tract-level sociodemographic and health burden variables from the 2018 American Community Survey 5-year estimates and from the Colorado Department of Public Health and Environment. Specifically, we tested race, Hispanic ethnicity, foreign birth, child poverty, and rates of asthma, diabetes, heart disease, obesity, healthcare coverage, and overall health status. Census tracts in Laramie County, Wyoming ($n = 7$) were included in demographic analyses but were not included in the analysis of health burdens because health burden data were produced by a Colorado state agency. We also tested the difference between tracts that overlap the DMNFR ozone nonattainment area and tracts that do not. For each variable, we tested simple models as well as models controlling for urbanicity either through tract area or tract population density.

RESULTS

Meteorology and climate models

Seasonal results from the climate and weather models for each meteorological variable averaged over all years in each decade and spatial grid locations in the modeling domain were plotted (Supplementary Fig. S4). The maximum daily temperature was 1.6–2.2 °C (3–4 °F) higher in the 2010s than in the 1950s during most of the warm season months; mean daily wind speed was lower in the 2010s during the spring and early summer. The seasonal trends for relative humidity and sea level pressure were similar between decades.

Spatial results from the climate and weather models for each meteorological variable were averaged over all warm season days in each decade and mapped (Supplementary Fig. S5). Elevation had a major influence on local meteorology along the Front Range; mean wind speed, sea level pressure, and maximum temperature all showed strong elevation dependence. Relative humidity displayed a nonlinear dependence on longitude and latitude.

All four variables displayed systematic differences in spatial trends between decades (Supplementary Fig. S5), though for relative humidity and sea level pressure this difference was relatively small (−0.033% for humidity, 0.0326 mb for pressure). Wind speed dropped between 0.5 and 1.5 knots from the 1950s to the 2010s with the largest drops in the high elevation areas; maximum temperature increased by 2.0 °C (3.6 °F). Because the spatially indexed variables selected by the predictive climate models for sea level pressure and maximum temperature did not vary between decades the difference surfaces are spatially uniform even though the temporal differences are not uniform over time (Supplementary Fig. S4).

Ozone models

We present results focusing on the 3-month high ozone season, June–August, a subset of our full warm season time domain. Results for the full warm May–October warm season are given in the supplement. Ozone during the 2010s was highest around mid-July (200th day of the year; Fig. 2). The same was true for our counterfactual 1950s predictions. However, the difference between the two decades—the ozone climate penalty—was highest later in the summer, averaging around 0.5 ppb before the 200th day of the year but rising to roughly 1.0 ppb after and through August (Fig. 2; Supplementary Table S2). Both the overall concentration and the penalty drop in early September (Supplementary Fig. S6).

Population-weighted monthly average ozone climate penalties averaged over counties track together relatively closely over time (Supplementary Fig. S7), indicating that the temporal variation in the ozone penalty is larger than spatial variation on the scale of counties. The largest difference between the county with the highest penalty and the county with the lowest occurs in August where the range of penalties is 0.17 ppb. Thus, capturing local-scale variability in the penalty is vital for accurately estimating health impacts.

June–August Ozone displayed marked spatial patterns with gradients identifiable by population density, traffic proximity, altitude, latitude, and longitude (Fig. 3). Predicted concentrations were generally lower in proximity to roadway traffic as expected given titration of ozone by traffic-emitted NO, but higher in suburban areas surrounding the major urban centers. Our LUR also estimated higher ozone in the less-populated southern quarter of our study domain, though as shown in Fig. 1 there is no ozone monitoring in this region to constrain the model. Spatial patterns over the full warm season (May–October) display similar spatial gradients (Supplementary Fig. S8).

The ozone penalty itself is highest in the lowest elevation regions, which includes the major urban centers at the foot of the Front Range within the DMNFR nonattainment area: Boulder, Fort

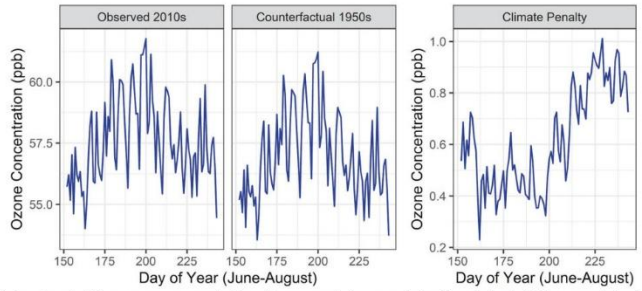

Fig. 2 June-August daily average ozone concentrations. Ozone concentrations on each day of year during the high ozone period under the observed 2010s climate, the counterfactual 1950s climate, and their difference.

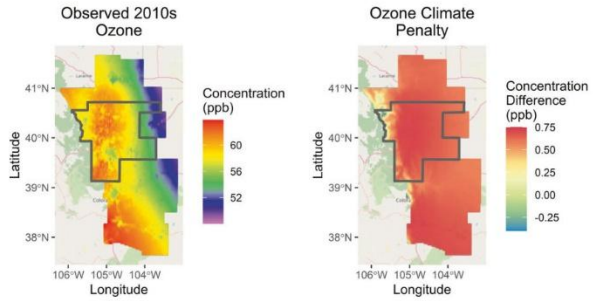

Fig. 3 June-August average ozone concentrations and ozone climate penalty. Ozone concentrations across the modeling domain during the high ozone period (June–August) under the observed 2010s climate and the difference between the observed and counterfactual climates.

Collins, Greeley, and Denver and its suburbs (Figs. 1, 3, and S8). In this region, the ozone climate penalty reaches an average of 0.75 ppb per day during the high ozone months (Fig. 3).

NAAQS attainment

Figure 4 shows the average annual number of 2015 ozone NAAQS (70 ppb) exceedances at each grid point in our study domain. The I-25 urban corridor between Colorado Springs and Fort Collins displays roughly 15 exceedances per year, higher than the surrounding less-populated areas, which have none. The number of exceedances is also high in the high-altitude extreme west of our domain and in the extreme south of our domain where there is no ozone monitoring to constrain the LUR. That said because our LURs assume spatial smoothness they may underestimate the true number of local exceedances. But given this limitation, under the counterfactual 1950s climate the I-25 urban centers were found to experience approximately 3 fewer exceedance per year.

Results for the full warm season (May-October) appear nearly identical to the high ozone season (Figs. 4 and S9). Results for the 2008 standard (75 ppb) during June–August show roughly one additional exceedance per year due to the climate penalty (Supplementary Fig. S10).

Observed ozone design values (the value computed from regulatory monitor observations that is compared to the NAAQS to assess regional attainment) for the DMNFR in the 2010s were compared with the design values under the counterfactual 1950s climate (Fig. 5). Observed design values trended downward over time during the 2010s as regulatory actions decreased precursor emissions. The climate penalty was found to increase the design values by roughly 1 ppb compared to what they would have been

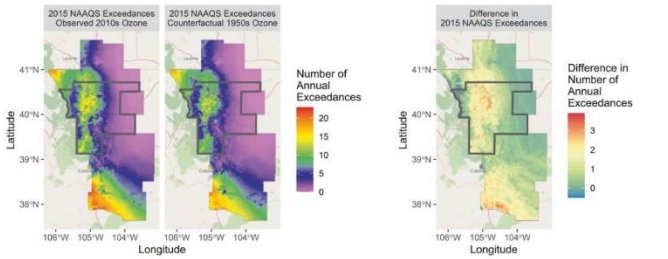

Fig. 4 Annual average number of ozone 2015 NAAQS exceedances. (Left) The average number of annual exceedances of the 2015 ozone NAAQS (70 ppb) during the months of June–August under the observed 2010s climate and the counterfactual 1950s climate. (Right) The difference in the number of annual exceedances of the 2015 standard between the observed 2010s and counterfactual 1950s.

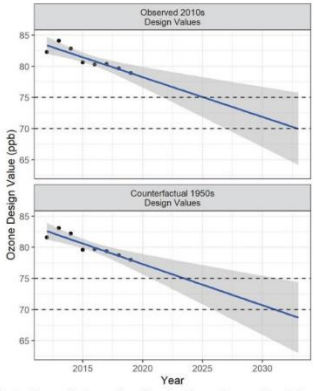

Fig. 5 Ozone design values for the Metro Denver North Front Range. Design values based on the monitored ozone daily concentrations (left panel) and based on the monitored daily concentrations adjusted by the time- and location-specific climate penalty (right panel). Design values are based on 3-year running averages so, e.g., the 2012 design value incorporates monitor observations from 2010, 2011, and 2012. Best-fit lines and prediction error envelopes are shown in blue and gray, respectively. Dashed lines display the levels of the 75 ppb and 70 ppb standards.

under the counterfactual 1950s climate. Extrapolating the design value trends forward in time, the DMNFR would expect to reach attainment of the 2008 (75 ppb) standard in 2025 under the observed 2010s climate but could have reached attainment in 2023 under the counterfactual 1950s climate. A similar delay also applies to attainment of the 2015 (70 ppb) standard, which the DMNFR would expect to meet in 2035 but could have met by 2033 without the climate penalty.

Health equity

Associations between census tract population-weighted ozone climate penalties and health equity variables are shown in Fig. 6. Results are shown separately for simple univariate models and models controlling for urbanicity via tract area or population density, as well as for models using the warm season (May–October) ozone climate penalty or the high ozone season (June–August) ozone climate penalty as the outcome. Tract area and population density were negatively and positively associated, respectively, with the ozone climate penalty.

Several health equity variables were consistently found to be positively associated with the ozone climate penalty: % American Indian/Native Alaskan, % Hispanic, % asthma, % diabetes, % with fair or poor health status, and whether the tract overlaps the DMNFR nonattainment area. Only % with Health-care Coverage was negatively associated with the ozone climate penalty. The strongest positive association with the ozone climate penalty was found with % Asthma, where a 1 percentage point increase in the tract asthma rate as associated with a 0.010 ppb higher ozone climate penalty on each day of the high ozone season. However, multiplying each association by the standard deviation of the health equity predictor variable, i.e., normalizing across the observed variability across tracts, showed that whether the tract overlaps the DMNFR nonattainment area was the strongest predictor, followed distantly by % with healthcare coverage and % with fair or poor health status (Supplementary Fig. S11).

DISCUSSION

Our findings of a modest ozone climate penalty on the Front Range are broadly consistent with estimates of several ppb daily maximum 8-h surface ozone per degree Celsius temperature change [26]. The ozone climate penalty can be expected to grow over the next several decades. The Earth's surface will continue to absorb heat trapped by long-lived greenhouse gases emitted over the past two centuries [27]. Additionally, even under the most optimistic climate mitigation scenarios, the world will continue to add carbon to the atmosphere for two more decades [28] along with associated precursor emissions for ozone formation. Without

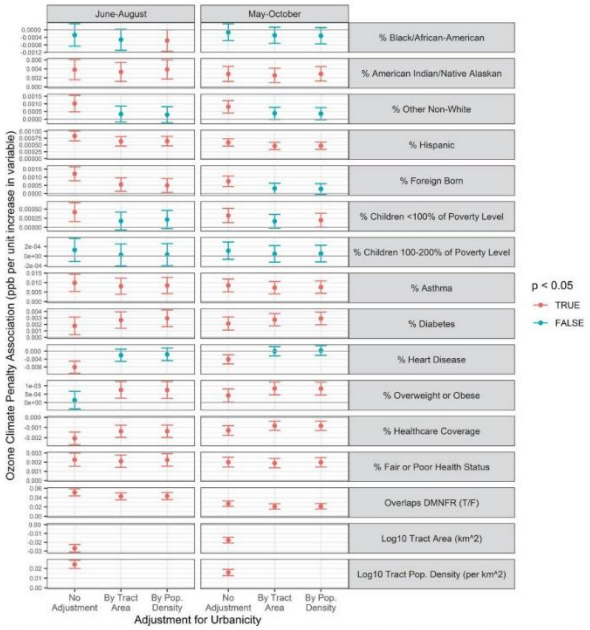

Fig. 6 June-August and May-October ozone climate penalty health equity associations. Point estimates and 95% confidence intervals of associations between tract ozone climate penalties and tract health equity measures.

substantial intervention, warming is virtually guaranteed for the decades to come, and with it, difficulty controlling ground-level ozone.

While changes in climate affect everyone, people living in certain geographic areas are at heightened risk of experiencing adverse health outcomes worsened by climate change. Rising temperatures can exacerbate existing health conditions, including respiratory illnesses such as asthma and COPD. An increase in temperature raises the level of ozone and other pollutants in the air, exacerbating some health conditions, including premature deaths, acute and chronic cardiovascular and respiratory illnesses [29, 30].

Even modest changes to long-term ozone levels can have substantial impacts on respiratory health, especially in children. For example, Lin et al. found that a 1 ppb increase in 8-h max ozone over a summer ozone season was associated with a 22% higher odds of pediatric asthma hospitalization in New York State [31], while Hwang et al. found that this exposure was associated with a 4–6 mL decrement in pediatric lung function growth (FVC, FEV_1, and FEF_{25-75}) in Taiwan [32].

We leave the investigation of the ozone climate penalty's full health impact to future work. However, at the census tract level, the penalty was consistently and positively associated with the percentage of Hispanics living in that tract, the percentage of children living within 100–200% of the federal poverty level, and the percentage of residents with asthma, diabetes, fair or poor health status, or lacking health insurance. Thus, the ozone-specific health burden due to climate change since the 1950s has fallen disproportionately on disenfranchised and frontline communities. Conversely, these communities could have benefited the most from past climate action and could benefit the most from future mitigation. Indeed, given the association between the penalty and percent with asthma, a disease that is directly exacerbated by ozone, future climate action that reduces ozone on the Front

Range could have a particularly positive impact on this patient group.

Furthermore, communities with the highest minority and low-income populations would also be expected to benefit most directly from actions to lower ozone precursor emissions and their associated co-pollutants because these communities are often located near major sources; Many of the precursor and co-pollutant gases are themselves harmful. For example, the majority-Hispanic residents of Denver's Globeville-Elyria-Swansea neighborhood cluster live in close proximity to three interstate highways, numerous marijuana grow operations [33], a power plant, and the state's largest oil and gas refinery. Community organizers have asked the state to revoke the refinery's operating license over concerns about hydrogen cyanide and VOC emissions [34]. Doing so could provide both short-term and long-term health benefits to its neighbors.

The association with the percentage of Hispanic community members indicates the burden imposed by the ozone climate penalty is skewed along racial and ethnic lines, potentially reinforcing disparities in housing, employment, and education as well as in exposures to other environmental stressors such as noise, diesel particles, and the ozone precursors themselves. The percentage of Black/African-American community members was not consistently associated with the climate penalty. This result is due to the fact that Black/African-American community members are highly concentrated in Colorado's urban centers where the climate penalty was estimated to be relatively uniform. However, given that the climate penalty is high precisely in these urban areas, we would expect people living there to benefit from climate action as well.

In addition to the adverse health outcomes, two additional years of NAAQS nonattainment have substantial economic consequences for the State of Colorado and municipalities in the region.

This work had several strengths: First, it selects the best-predicting LURs from among a comprehensive family of possible inferential models. Second, it studies the ozone climate penalty on a scale relevant to local, regional, and national policymaking. Third, it quantifies the ozone climate penalty at individual ozone monitor sites such that its impact on ozone design values and thus NAAQS attainment can be quantified. Fourth, its spatial resolution enables determination of which census tracts (and thus which Front Range sociodemographic groups) were most impacted by warming-attributed ozone.

This work also has several limitations. First, it assumes a degree of spatial smoothness in the ozone fields and thus could miss important local-scale processes influencing ambient ozone levels. However, since ozone is a secondary pollutant, smoothness is likely a reasonable approximation. Second, the work does not attempt to model physical, chemical, or biological processes directly, but instead relies on those processes being implicitly captured by empirical monitor data. Thus, if certain processes or feedbacks are only significant in areas that happen not to have ozone monitors, the LUR's predictions in those areas may not be accurate. However, in the DMNFR, areas without ozone monitoring are not well-populated and (by construction) do not inform NAAQS attainment.

Given that many ozone precursor gases are emitted during fossil fuel extraction, transportation, processing, and/or burning, and thus are inextricably linked to anthropogenic climate warming, well-designed regulatory actions that decrease ozone precursor emissions have the potential to limit ozone formation in two ways: directly through lower precursor concentrations and indirectly through slower climate warming.

However, global climate change and associated projected increases in the extreme heat that leads to ozone formation will make achieving and remaining in attainment increasingly difficult. If moderate action is taken to reduce greenhouse gas emissions (RCP4.5), significant increases in the number of days with temperatures above high thresholds are expected even at midcentury across the case study region [35]. For example, in Boulder County, while historically (1971–2000) there have been on average 2 days per year with a heat index above 32.2 °C (90 °F), this threshold is projected to be exceeded 12 times in an average year by midcentury [18]. Under a higher emissions scenario (RCP8.5), this would increase to 17 exceedances per year. In Morgan County, where there have been 15 days on average with a heat index above 32.2 °C (90 °F), under RCP4.5 this would increase to 45 by midcentury and to 55 under RCP8.5.

Importantly, we found that climate change is already contributing significantly to the DMNFR's nonattainment status and is delaying projected attainment of the 2008 and 2015 standards by around 2 years each. Information that disentangles the causes of ground-level ozone pollution is critical for communities experiencing its adverse effects. This information can empower disproportionately affected communities in their pursuit of both preventing future harms and acquiring resources needed to deal with those harms that have already occurred, or those that are unavoidable in the future due to past greenhouse gas emissions. Yet, localized information on climate change's role in ground-level ozone pollution has not been readily available to date. The approach pursued here takes existing methods a step further so that such local analyses can be conducted to help inform community and local-to-regional planning decisions.

In summary, we found that residents of the Front Range are already affected by climate change through higher temperatures and higher ozone levels, and that the resulting ozone burden is already falling disproportionately on historically disenfranchised and frontline communities. Thus, our results underscore the need for aggressive climate mitigation and adaptation action that centers those communities.

DATA AVAILABILITY

Data generated for this manuscript can be found at the OSF repository: https://osf.io/ymr4e/.

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AUTHOR CONTRIBUTIONS

JLC was responsible for developing the scope of the study, collecting the climate and ozone monitoring data, designing and conducting the analysis, interpreting results, developing the figures and tables, and writing the report. RL was responsible for developing the scope of the study, collecting the health equity data, writing the report, interpreting the results, and updating the references. ALH was responsible for developing the scope of the study, writing the report, and interpreting the results. BE was responsible for developing the initial idea for the study, developing the scope of the study, writing the report, interpreting the results, and updating the references.

COMPETING INTERESTS

The authors declare no competing interests.

ADDITIONAL INFORMATION

Supplementary Information The online version contains supplementary material available at https://doi.org/10.1038/s41370-021-00375-9.

Correspondence and requests for materials should be addressed to RL.

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Outlook

[cdot_i270] I-270 Widening Project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 12/9/2025 1:42 PM
To I-270 Project Team <BrianDietz@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Brian Dietz
Subject
I-270 Widening Project
Your E-Mail Address
brianvictordietz@hotmail.com
City
Denver
Zip Code
80210
Comments
The notion that more lanes just get filled by more cars is not backed by data. More lanes = more capacity. By not expanding the highway and instead tolling lanes, CDOT is making a huge mistake that will ultimately negatively impact the residents it is trying to appease by not expanding the highway. There will be tons of drivers that will simply opt to take surface streets.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding a third travel lane in each direction as an Express Lane, safety improvements, and interchange improvements. Additional capacity is included; tolling the existing lanes is not included.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 10:03 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Alternatives, Community and Socioeconomics , Express Lanes, Hazardous Materials, Local Traffic in Neighborhoods , Noise, Safety, Transit
If you selected "Other", please specify
Provide your comment below:
1 It appears that the current plans simply duplicate what was done on HW36 which is nothing like I-270. I think it's time to go back to the drawing board and apply some innovation to figure out how to keep the trucks and mass transit moving and figure out a way to keep other types of transportation diverted. If tolling is the way to go, then the locals should be exempt. The bridges should be the first priority. Sound walls are a must.
Name (first and last)
Kristi R Douglas
Address
10970 Unity Pkwy
City
Commerce City
Neighborhood/ZIP Code
80022
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
c3kristi@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes a third travel lane in each direction, which will be operated as an Express Lane. This alternative best meets the Purpose and Need for the project and also includes safety and other improvements.

The specific tolling structure, including pricing and eligibility policies such as potential exemptions, has not been finalized and would be addressed after completion of the Environmental Impact Statement (EIS) process.

Please see Section 5.4.8, FUND1, of the Final EIS for information on construction package phasing. The bridges are the first phase.

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation, which is near the South Rose Hill Neighborhood.

Please see Section 5.4.4, IMP4, of the Final EIS for additional information on the noise analysis and walls.

1

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/14/2026 8:09:22 AM

Which topic(s) does your comment relate to?
Air Quality, Alternatives, Bicycle and Pedestrian Resources, Hazardous Materials, Noise, Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
Colorado is behind on all our roads throughout the state. 270 is just another example of not thinking ahead of 'what if's'. I wished I had suggestions for improvements. But driving on 270 trying to avoid the pot holes and hoping I get home without bumper to bumper traffic seems impossible. I do like the light rail!
Name (first and last)
Kris
Address
Edwards
City
Denver
Neighborhood/ZIP Code
80221
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
catnip9009@gmail.com

--
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cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative includes fixing potholes and an additional lane in each direction, which will operate as an Express Lane.

Throughout the Environmental Impact Statement process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Outlook

[cdot_i270] I-270 corridor improvement

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 10:41 PM
To I-270 Project Team <LewisElliott@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Lewis Elliott
Subject
I-270 corridor improvement
Your E-Mail Address
scent2you@myctl.net
City
Boulder
Zip Code
80303
Comments
Dear Sirs: I commuted on I-270 daily, for over 20 years, eastbound at 5 a.m and westbound at 1 p.m Hardly a day was not without some "drama". The holes opening on the Platte River bridges were especially memorable. Thank you for planning a rebuild. I support the most the state can afford.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
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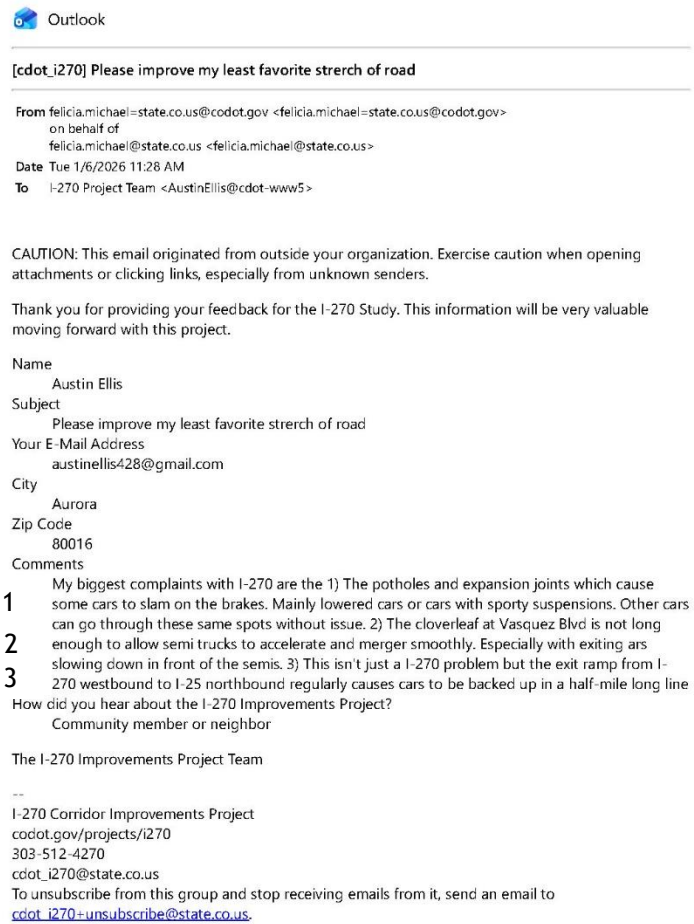
Response to Comment 1

Comments noted.



Outlook

[cdot_i270] Please improve my least favorite strerch of road

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:28 AM
To I-270 Project Team <AustinEllis@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Austin Ellis
Subject
Please improve my least favorite strerch of road
Your E-Mail Address
austinellis428@gmail.com
City
Aurora
Zip Code
80016
Comments
1 My biggest complaints with I-270 are the 1) The potholes and expansion joints which cause some cars to slam on the brakes. Mainly lowered cars or cars with sporty suspensions. Other cars
2 can go through these same spots without issue. 2) The cloverleaf at Vasquez Blvd is not long enough to allow semi trucks to accelerate and merger smoothly. Especially with exiting ars
3 slowing down in front of the semis. 3) This isn't just a I-270 problem but the exit ramp from I-270 westbound to I-25 northbound regularly causes cars to be backed up in a half-mile long line
How did you hear about the I-270 Improvements Project?
Community member or neighbor

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes safety improvements to address these issues, such as bridge replacements.

Response to Comment 2

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Response to Comment 3

The Preferred Alternative also includes restriping the westbound to northbound ramp from I-270 to I-25 to increase ramp capacity.

Outlook

[cdot_i270] I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 1:41 PM
To I-270 Project Team <KarenEmily@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Karen Emily
Subject
I-270
Your E-Mail Address
colokaren58@gmail.com
City
Denver
Zip Code
80238
Phone Number
3039081161
Comments
The I-270 highway between I-70 and highway 36 is a JOKE! Studies say that widening won't reduce the amount of traffic on that freeway. Well DUH! It won't but it would most certainly make this road LESS CONGESTED and easier to drive on. The westbound section coming from highway 36 to 270 has had a HUGE ski slope damage and all CDOT can do is put a SIGN stating ROAD DAMAGE!?!?! It damages cars! I-270 has been in this congested, almost undriveable condition for YEARS! IT IS TIME TO FIX IT!
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

The “ski jump” is being fixed as a separate project ahead of the I-270 Corridor Improvements project.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/13/2026 12:36:35 AM

Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Express Lanes, Local Traffic in Neighborhoods , Other
If you selected "Other", please specify
Streetlights
Provide your comment below:
1 The express lanes should be looked into to have similar entrances and exits to those on C470 where there is a merge lane onto and off the express lanes. Also, It should be looked into to have a traffic signal at Sand Creek Drive South and E 56th Ave. It is very hard to turn left there onto 56th and the pedestrian crossings would be dangerous without a signal. Having better access to this frontage road would help reduce the risks of crashes.
2 There needs to be streetlights installed across the entire corridor for increased safety and illumination. It is currently very dark in most areas at night. The streetlights across I270 should be consistent across the corridor and with those of the cities nearby. It is an issue that CDOT or Xcel chooses random poles for any installation and there is no consistency across the state making for an eyesore on the roads of Colorado with all the
3 mismatched pole styles. Just choose one style and go with just that one across the entire state. See Utah DOT for example, every streetlight and traffic signal looks the same.
Name (first and last)
Ethan Esson
Address
7721 E 8th Avenue
City
Denver
Neighborhood/ZIP Code
80230
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
eyesson@icloud.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The design details of the Express Lane will be completed in final design. However, preliminary design shows that they will not be similar to the ones on C-470 in order to reduce impacts because the C-470 ones take up a lot more space.

Response to Comment 2

The Sandcreek Drive South and East 56th Avenue intersection is outside of CDOT's jurisdiction and cannot be included in the Preferred Alternative.

Response to Comment 3

Streetlights will only be added at crossings of I-270 and not along the entire interstate. Streetlights will be included in the corridor's design guidelines, which will help ensure consistency throughout the corridor. Visual mitigation includes minimizing stray light in the illumination plan for I-270 to the people in the adjacent communities to the extent possible (this can be done by designing the headlamps to be downcast).

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 9:00 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Bicycle and Pedestrian Resources, Express Lanes, Recreational Resources, Transit, Wildlife and Habitat, Water Quality, Wetlands, Streams and Floodplains
If you selected "Other", please specify
Provide your comment below:

1 I appreciate that, of the two build alternatives considered here, you are leaning toward the one that is more oriented toward transit. However, I'm concerned that this represents one more way that we are causing permanent changes to ecosystems to commit our community to car-based infrastructure for generations to come. I recognize that driving 270 is a pain - it's slow. But we also know that expanding lanes on roads just brings in more traffic - drivers fill the extra capacity, and we're back where we started but with more road infrastructure to maintain and less open space for the natural world we rely on. This plan trades permanent damage to an

2 ecosystem for temporary alleviation of a few minutes of inconvenience for drivers. Additionally, it fails to adequately consider the health impacts of poor air quality for the neighboring areas and of climate impacts on the health of the residents of the state as a whole - this project as planned does not help the state work toward its emissions reductions goals, and those emissions are not reflected in this DEIS. We could do so much more with $800 million! Think about how many buses that could buy, how many EVs or e-bikes it could provide to Commerce

3 City residents, how many trees it could plant, how many houses it could insulate, how many families could become energy-independent with their own solar panels! This plan seems to show a real failure of imagination. Instead, it's just doubling down on this stretch of concrete that isn't working for the community it cuts through. This DEIS shows that, rather than supporting decarbonization and actual improvement to our failing metro area air quality, this plan would sink millions of dollars into maintaining an unsustainable, unhealthy status quo. The priority here should not be saving drivers 10 minutes, but rather improving the health of our communities.

Name (first and last)
Darryl Etter
Address
2671 Clinton Way
City
Denver
Neighborhood/ZIP Code
80238

Response to Comment 1

Comments noted.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes (CRS) 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under SB 21-260, which is codified in CRS 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website.

Would you like to be added to the project email list?
yes
If Yes, please provide your email address
etter.dw@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Outlook

Fwd: [cdot_i270] I-270

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Wed 12/31/2025 8:11 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Thanks,
Mandy

Begin forwarded message:

From: felicia.michael@state.co.us
Date: December 31, 2025 at 6:47:11 PM MST
To: I-270 Project Team <AlexanderFairfield@cdot-www5>
Subject: [cdot_i270] I-270
Reply-To: cdot_i270+managers@state.co.us

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Alexander Fairfield
Subject
I-270
Your E-Mail Address
ngaalex@duck.com
City
Commerce City
Zip Code
80022
Phone Number
(303) 263-9176
Comments
1 The need for three lanes in each direction I in much more of a need than an added express lane. The need to handle more traffic volume is higher than trying to tax the drivers on driving on the interstate.
I would like to

Response to Comment 1

The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative best meets the Purpose and Need for the project and was preliminarily identified as the Preferred Alternative. Please see Section 3.4 of the Draft Environmental Impact Statement for additional information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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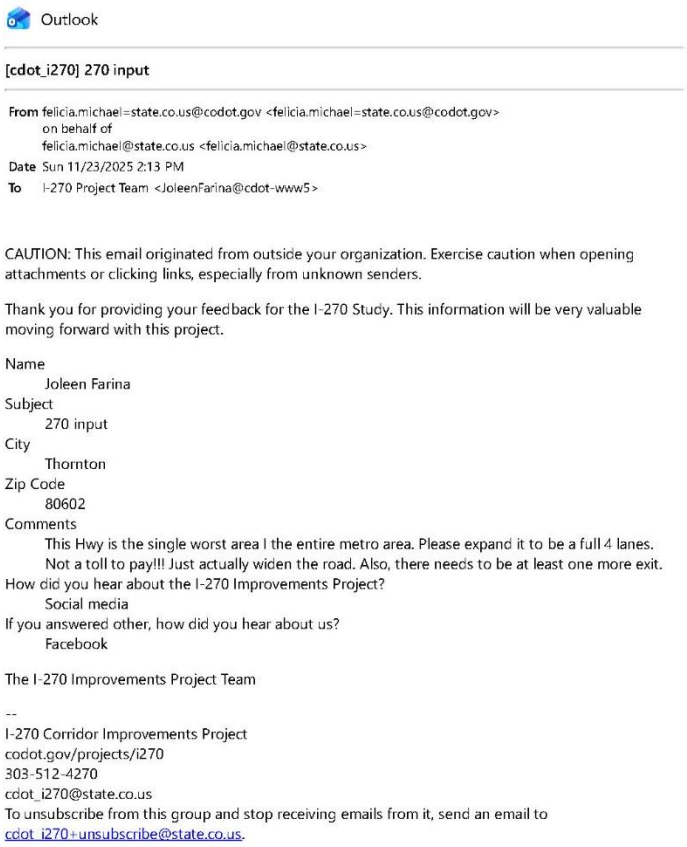
cdot_i270+unsubscribe@state.co.us.



Outlook

[cdot_i270] 270 input

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 2:13 PM
To I-270 Project Team <JoleenFarina@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Joleen Farina
Subject
270 input
City
Thornton
Zip Code
80602
Comments
1 This Hwy is the single worst area I the entire metro area. Please expand it to be a full 4 lanes. Not a toll to pay!!! Just actually widen the road. Also, there needs to be at least one more exit.
How did you hear about the I-270 Improvements Project?
Social media
If you answered other, how did you hear about us?
Facebook

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study. Please see Section 5.4.3, ALT2, of the Final Environmental Impact Statement for additional information on why the alternatives that added two lanes in each direction were not advanced for consideration.

The Preferred Alternative is the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative because it best meets the project Purpose and Need. Please see Section 3.4 of the Draft EIS for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Additional exits are not part of the Preferred Alternative because there was no need identified during the evaluation process to include a new exit.

Outlook

FW: [cdot_i270] I270 project

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Mon 1/5/2026 3:28 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

From: felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> **On Behalf Of** felicia.michael@state.co.us
Sent: Monday, January 5, 2026 11:17 AM
To: I-270 Project Team <JillFarrer@cdot-www5>
Subject: [cdot_i270] I270 project

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Jill Farrer
Subject
I270 project
Your E-Mail Address
5280farrer@gmail.com
City
Northglenn
Zip Code
80234
Comments
No study needed. It's been awful for 30 years. Just expand it and get it done. More important than getting skiers to ski land!
How did you hear about the I-270 Improvements Project?
Other
If you answered other, how did you hear about us?
Nextdoor

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 7:45 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Alternatives, Bicycle and Pedestrian Resources, Express Lanes, Pedestrian Resources , Safety, Transit
If you selected "Other", please specify
Provide your comment below:
1 I would prefer the alternative proposed by GreenLatinos, which is to keep the highway as 4 lanes and implement tolls for all lanes. This would improve travel times and safety while also reducing pollution. As mentioned in the study, the highway traverses through many diverse communities who would be negatively impacted should the highway be expanded. As an occasional commuter on the highway, I'd choose to pay a toll if it meant the highway did not expand. I also
2 travel regularly on the South Platte River Trail and think CDOT should prioritize making it safer and easier for pedestrians, cyclists, and other non-car users to cross I-270.
Name (first and last)
Brandon Figliolino
Address
7635 Barbara Ann Dr.
City
Arvada
Neighborhood/ZIP Code
80004
Would you like to be added to the project email list?
yes
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

FHWA and CDOT evaluated the alternative proposed by the GreenLatinos, which is being called the Two Express Lanes that Accommodate Transit Alternative, using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS). Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information on the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Response to Comment 2

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.3, ALT8, of the Final EIS for information on the consideration of increased bicycle and pedestrian facilities, which are included in the Preferred Alternative.

Outlook

[cdot_i270] Try diverting traffic to E470

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:27 AM
To I-270 Project Team <CFischer@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
C Fischer
Subject
Try diverting traffic to E470
Your E-Mail Address
Cherissa.Fischer@outlook.com
City
Boulder
Zip Code
80305
Comments
Try no tolls on NW parkway and E470 from 25 to 70 for 6 months before making final decisions on 270. I don't think you're looking at 270 in the context of the greater Denver traffic system. It's currently the only way to get from the NW side of the city to 70 eastbound. The toll road is *exorbitant,* and much more expensive than toll roads throughout the rest of the continental US, so of course everyone piles into the "free" option. I bet the demand for 270 would drop in half if E470 and NW parkway were free (or even merely "reasonable"). Just try it for 6 months - it will take you that long to complete the paperwork for 270 improvements anyway.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Northwest Parkway and E-470 are private toll roads and CDOT has no authority on them.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 12/5/2025 3:15 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

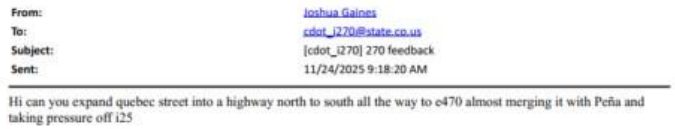
CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Transit
If you selected "Other", please specify
Provide your comment below:
1 Additional lanes are needed on 270 but please don't make them toll lanes. Those only benefit the wealthy who can afford to pay those tolls. I pay taxes for our state highways systems to be maintained and upgraded, I shouldn't have to also pay a toll to drive on any of them.
Name (first and last)
Tracy Fullerton
Address
10231 Zenobia Cir
City
Westminster
Neighborhood/ZIP Code
80031
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is identified as the Preferred Alternative because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for additional information on why the Express Lane best meets the Purpose and Need.

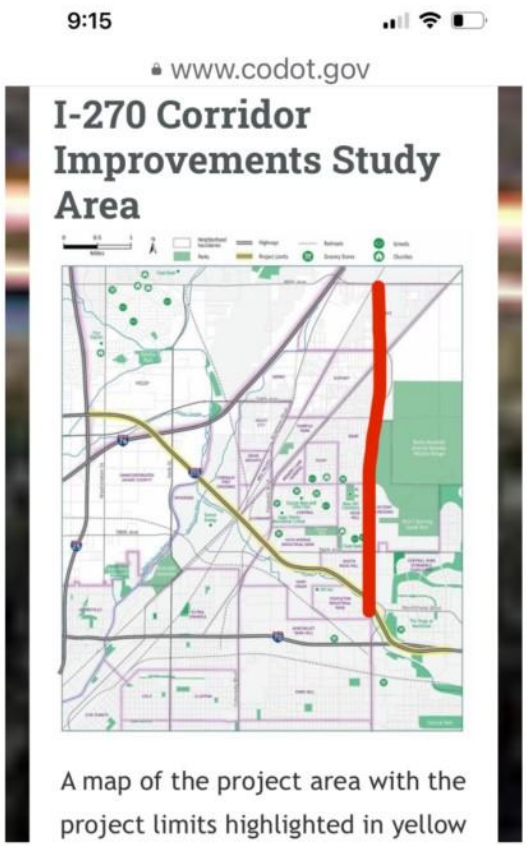


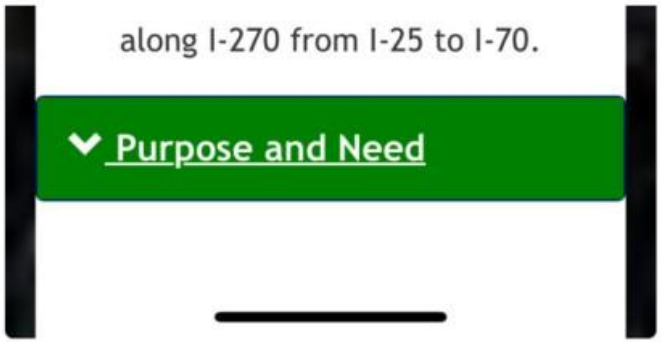
From: Joshua Gaines
To: cdot_i270@state.co.us
Subject: [cdot_i270] 270 feedback
Sent: 11/24/2025 9:18:20 AM

1 Hi can you expand quebec street into a highway north to south all the way to e470 almost merging it with Peña and taking pressure off i25

Response to Comment 1

The Environmental Impact Statement is limited to evaluating improvements within the I-270 corridor and at its interchanges, consistent with the authority and responsibilities of CDOT and FHWA. CDOT and FHWA do not have the authority through this project to implement or fund broader land use changes, regional transit system expansions, or off-corridor roadway and community network improvements beyond the defined I-270 study area.


9:15
www.codot.gov
I-270 Corridor Improvements Study Area
A map of the project area with the project limits highlighted in yellow



--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

FW: [cdot_i270] I-270 Corridor

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Tue 12/2/2025 12:34 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Another one to add. This is not a comment but we should capture anyway.

From: felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> **On Behalf Of** felicia.michael@state.co.us
Sent: Tuesday, December 2, 2025 12:08 PM
To: I-270 Project Team <PatriciaGarcia-Nelson@cdot-www5>
Subject: [cdot_i270] I-270 Corridor

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

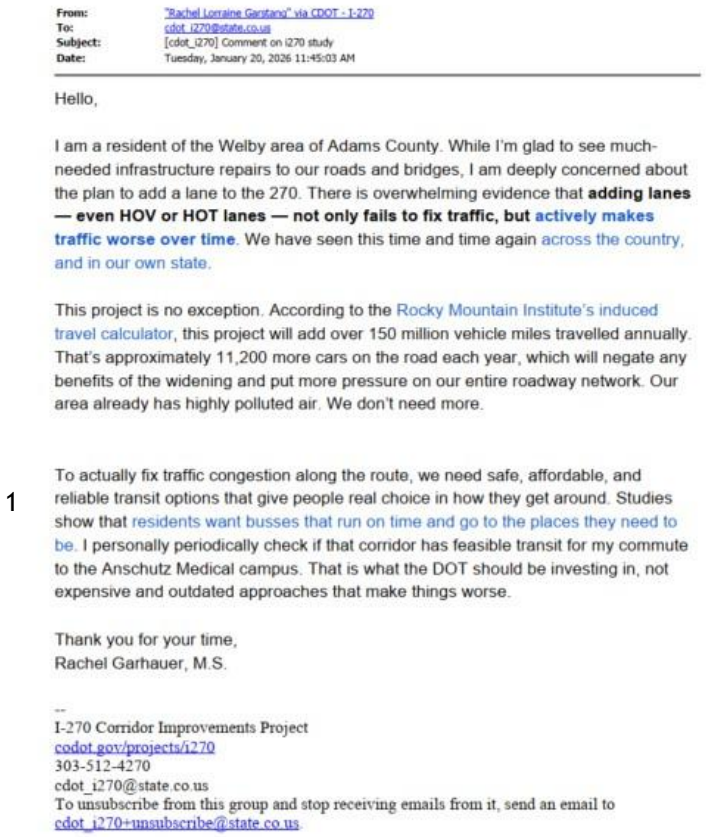
Name
Patricia Garcia-Nelson
Subject
I-270 Corridor
Your E-Mail Address
patricianelson@greenlatinos.org
City
Greeley
Zip Code
80634
Comments
I would like to be added to the email list. Thank you!
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Stakeholder Workshop

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

You have been added to the project email list.



From: "Rachel Lorraine Garstang" via CDOT - I-270
To: cdot_i270@state.co.us
Subject: [cdot_i270] Comment on i270 study
Date: Tuesday, January 20, 2026 11:45:03 AM

Hello,

I am a resident of the Welby area of Adams County. While I'm glad to see much-needed infrastructure repairs to our roads and bridges, I am deeply concerned about the plan to add a lane to the 270. There is overwhelming evidence that **adding lanes — even HOV or HOT lanes — not only fails to fix traffic, but actively makes traffic worse over time**. We have seen this time and time again across the country, and in our own state.

This project is no exception. According to the Rocky Mountain Institute's induced travel calculator, this project will add over 150 million vehicle miles travelled annually. That's approximately 11,200 more cars on the road each year, which will negate any benefits of the widening and put more pressure on our entire roadway network. Our area already has highly polluted air. We don't need more.

To actually fix traffic congestion along the route, we need safe, affordable, and reliable transit options that give people real choice in how they get around. Studies show that residents want busses that run on time and go to the places they need to be. I personally periodically check if that corridor has feasible transit for my commute to the Anschutz Medical campus. That is what the DOT should be investing in, not expensive and outdated approaches that make things worse.

Thank you for your time,
Rachel Garhauer, M.S.

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us

1

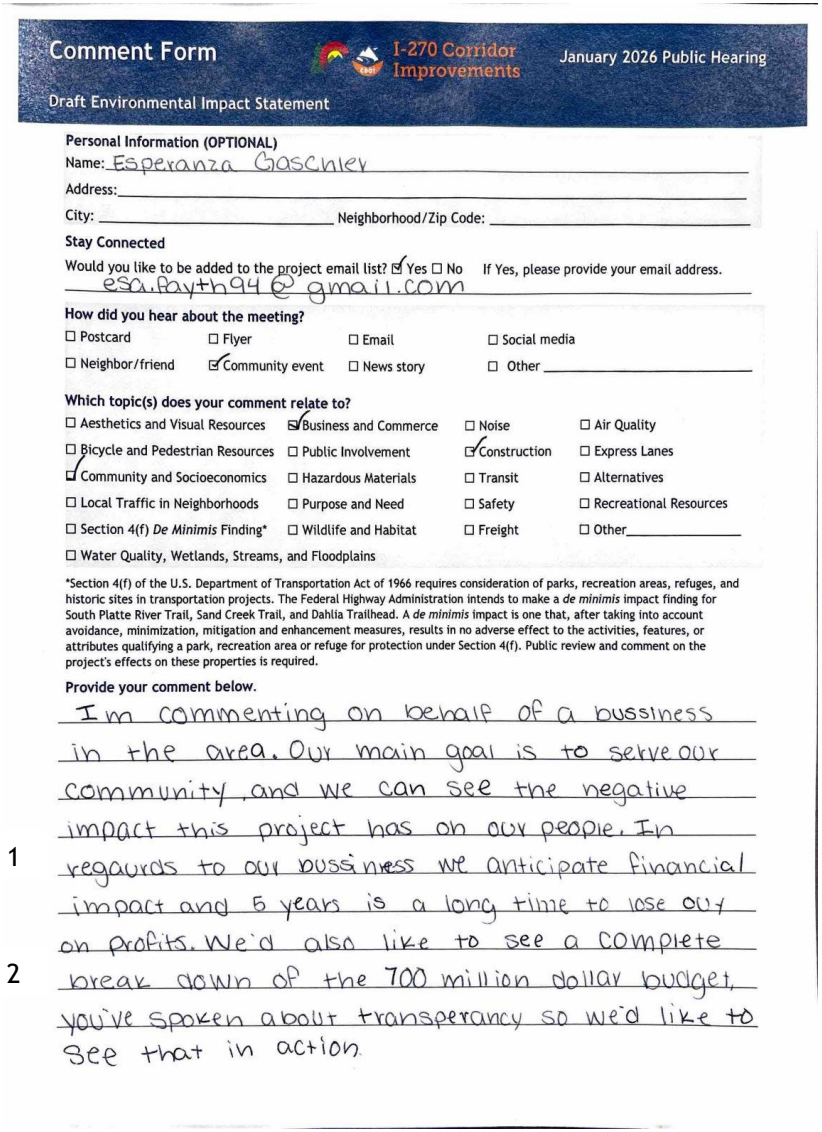
Response to Comment 1

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding Flatiron Flyer 5 buses and stops. During the stakeholder workshop on May 27, 2025, RTD indicated that adding a stop at the Central Park location would add 12 minutes to the FF5 route, which may draw pushback from existing customers. The FF5 bus route was originally designed to serve students traveling between Boulder and the Anschutz Medical Campus. Adjustments to its route would require a broader regional planning study. In addition, ridership data does not support adding a stop in Commerce City. While this project does not include a new FF5 stop, it would add four new local stops to better serve nearby routes, two on Quebec Street and two on Sandcreek Drive.

Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder.

When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Please see Section 5.4.3, ALT6, of the Final EIS for additional information on increased transit options and services.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Esperanza Gaschler

Address:

City: _____ Neighborhood/Zip Code: _____

Stay Connected

Would you like to be added to the project email list? ☑ Yes ☐ No If Yes, please provide your email address.

esa.fayth94@gmail.com

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☐ Email ☐ Social media

☐ Neighbor/friend ☑ Community event ☐ News story ☐ Other _____

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources	☑ Business and Commerce	☐ Noise	☐ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☑ Construction	☐ Express Lanes
☑ Community and Socioeconomics	☐ Hazardous Materials	☐ Transit	☐ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☐ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☐ Other_____
☐ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

I'm commenting on behalf of a bussiness in the area. Our main goal is to serve our community, and we can see the negative impact this project has on our people. In regaurds to our bussiness we anticipate financial impact and 5 years is a long time to lose our on profits. We'd also like to see a complete break down of the 700 million dollar budget, you've spoken about transperancy so we'd like to see that in action.

1

2

Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations.

Please see Section 5.4.4, IMP3, of the Final Environmental Impact Statement (EIS) for additional information on traffic management and public involvement during construction that will occur to limit impacts to businesses as much as possible.

Response to Comment 2

Please see Section 5.4.8, FUND1, of the Final EIS for a breakdown of the project budget and how the project will be funded.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 3:04 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality
If you selected "Other", please specify
1 Appendix E – Air Quality Technical Report, Section 4.2.1 (Affected Environment): Section 4.2.1 should be revised to accurately reflect the severity of ozone nonattainment in Adams County and the Front Range. CDPHE's 2024 Air Quality Data Report (Nov. 17, 2025) shows the 2024 fourth-highest 8-hour ozone concentration in Adams County was 83 ppb—13 ppb above the 70 ppb NAAQS (over 18 percent) and the highest value in the fifteen-year record. These data are consistent with the Front Range's Clean Air Act reclassification from "marginal" nonattainment (2018) to "serious" (2020) and "severe" (2022). The affected-environment discussion understates this deterioration and relies on historic modeling assumptions that are inconsistent with observed monitoring data. The report should reconcile modeled projections with measured ozone trends and clearly acknowledge current nonattainment conditions to establish an accurate baseline for NEPA and conformity analyses.
Provide your comment below:
Name (first and last)
Jon Girand
Address
11970 W 67th Ave
City
Arvada
Neighborhood/ZIP Code
80004
Would you like to be added to the project email list?
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Draft Environmental Impact Statement (EIS) has been updated to reflect the severity of ozone nonattainment. See Table 2-1 of Chapter 2.0, E-004, of the Final EIS. The project is in the Denver Regional Council of Governments' current Regional Transportation Plan and conforming emissions budgets for ozone precursor emissions. Ground-level ozone is a regional pollutant and is not analyzed at the project-level. Table 2 represents the 3-year average of the 4th maximum 8-hr average which provides an accurate representation of the Adams County ozone conditions as related to the National Ambient Air Quality Standards (NAAQS). The NAAQS for ground-level ozone is established based on the 3-year average of the 4th highest 8-hour concentration.

1

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/19/2026 3:10:40 PM

Which topic(s) does your comment relate to?
Community and Socioeconomics
If you selected "Other", please specify
Provide your comment below:
The Draft EIS and Appendix E-10 (Social and Economics) do not adequately account for travel time savings and delay reduction as core transportation user benefits. Under established FHWA guidance, changes in travel time are a primary component of user costs and are routinely monetized using vehicle-class–specific values of time for passenger, freight, and commercial vehicles. By omitting peak-period travel time and user-cost calculations, the analysis systematically understates the economic benefits of alternatives that reduce congestion on the I-270 corridor. Consistent with FHWA benefit–cost analysis practices, peak-hour travel time savings and associated user costs should be estimated, monetized, and incorporated into the economic evaluation to provide a complete and defensible comparison of project alternatives.
Name (first and last)
Jon Girand
Address
11970 W 67th Ave
City
Arvada
Neighborhood/ZIP Code
80004
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
jgirandpe@msn.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

In the p.m. peak hour, the Three General-Purpose Lanes Alternative is projected to experience nearly a 25 percent reduction in total delay and nearly a 30 percent reduction in average delay per completed trip. For the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative, the p.m. peak hour total delay is projected to result in a nearly 35 percent decrease, with a 38 percent decrease in average delay per completed trip. Please see Appendix E2 of the Draft Environmental Impact Statement for additional travel time savings and delay reduction information. Benefit-cost analyses as described are not typically completed during the National Environmental Policy Act process.

Outlook

[cdot_i270] I-270 project suggerstion

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 6:09 PM
To I-270 Project Team <ScottGrabau@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Scott Grabau
Subject
I-270 project suggerstion
Your E-Mail Address
s.graba@comcst.net
City
Westminster
Zip Code
80021
Phone Number
7202375379
Comments
1 Have you considered putting weight restrictions on all of I-270 to turn it into a car only highway? Weight is the enemy of bridges and overpasses and the wear and tear on concrete surfaces is severe. Tractor trailers have a tough time keeping up with the flow. If they have to stop, they take forever to get back up to speed. It's also the scariest thing ever if you are in front of a semi and have to suddenly stop. Has there been a study of wrecks that involve those big trucks? One other suggestion. if this idea is too extreme, what about a ban on these trucks during morning and evening rush hour?
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

The Draft Environmental Impact Statement did not consider restricting trucks or imposing time-of-day truck bans on I-270. I-270 is designated as part of the Primary Highway Freight System, Strategic Highway Network, a hazardous materials route, and an approved oversized and overweight load corridor, and the project was developed with the assumption that freight traffic must continue to be accommodated on the facility.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

Fwd: [cdot_i270] I-270 Suggestions

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Tue 12/30/2025 5:43 AM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Thanks,
Mandy

Begin forwarded message:

From: "'Green, Adam' via CDOT - I-270" <cdot_i270@state.co.us>
Date: December 29, 2025 at 10:47:15 PM MST
To: cdot_i270@state.co.us, herman.stockinger@state.co.us
Cc: jessica.myklebust@state.co.us, jordan.rudel@state.co.us, kyle.mullica.senate@coleg.gov, jacque.phillips.house@coleg.gov, jduranmullica@adamscountyco.gov, lbaca@adamscountyco.gov
Subject: [cdot_i270] I-270 Suggestions
Reply-To: cdot_i270+managers@state.co.us

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Dear CDOT and Elected Officials,

I am writing as a physician-scientist at the University of Colorado and Children's Hospital Colorado who lives in Boulder and commutes, mostly by RTD but occasionally by car, from Boulder to the Anschutz Medical Campus several times a week. I would like to share my perspective on persistent congestion and operational issues on Interstate 270 and to urge continued prioritization of improvements that address these problems effectively.

Having lived in Colorado for nearly 15 years, I can say from consistent observation that traffic congestion on I-270 in both directions is among the worst in the region at nearly all hours of the day. This chronic delay affects not only commuters but also business transportation and freight movement on a corridor that is a critical link and relief route for I-70 and the broader interstate network. In recent years, Google Maps and other navigation tools have even begun to recommend taking I-70 instead of I-270 because of current congestion patterns, which completely defeats I-270's function as a relief route and amplifies overall regional traffic.

I also note from the Draft Environmental Impact Statement (DEIS) that there appears to be unused paved space along segments of I-270 where additional merging or exit lanes could

be accommodated. For example, where other major roads merge into I-270, this additional paved width could be leveraged for auxiliary or merge lanes that would help reduce bottlenecks.

I strongly encourage CDOT and regional partners to keep safety, reliability, and mobility at the forefront as the corridor improvement alternatives are refined. Specifically:

1 • Explore alternatives that expand merge capacity and reduce recurring bottlenecks, including auxiliary lanes where paved space exists.
2 • Focus on solutions that improve travel time reliability for commuters and commercial traffic.
3 • Ensure that community input, as part of the public comment process, is weighed in the final selection of alternatives.

Thank you for considering this input on a corridor that is vital to daily travel, freight movement, and economic activity across the metro area.

Sincerely,

Adam Green, MD
Associate Professor of Pedatrics, University of Colorado School of Medicine
Pediatric Neuro-Oncologist, Children's Hospital Colorado
Lafayette, CO 80026

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement (EIS) for additional information on the Preferred Alternative.

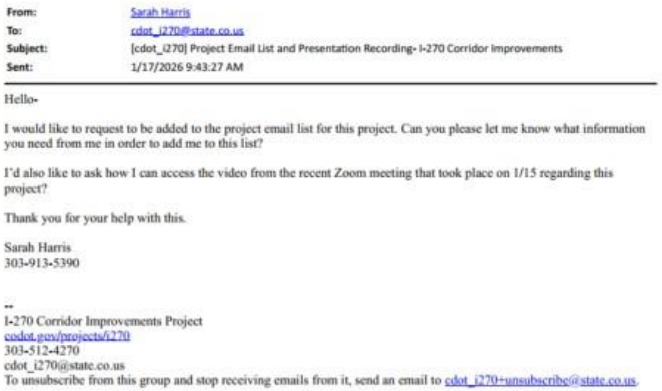
Response to Comment 2

The Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative, the Preferred Alternative, adds one lane in each direction that will be operated as an Express Lane. An Express Lane provides travel time reliability for those who choose to use it.

Response to Comment 3

All community input, including that received during the Draft EIS public comment process, has been considered in the final selection

of the alternative. However, comments are not weighted; all comments are considered equally.



From: Sarah Harris
To: cdot_i270@state.co.us
Subject: [cdot_i270] Project Email List and Presentation Recording- I-270 Corridor Improvements
Sent: 1/17/2026 9:43:27 AM

Hello-

I would like to request to be added to the project email list for this project. Can you please let me know what information you need from me in order to add me to this list?

I'd also like to ask how I can access the video from the recent Zoom meeting that took place on 1/15 regarding this project?

Thank you for your help with this.

Sarah Harris
303-913-5390

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

You have been added to the project email list.

Response to Comment 2

The video from the January 15, 2026, Zoom meeting can be accessed at https://www.codot.gov/projects/studies/i270study/deisandstatereports.

Outlook

[cdot_i270] 270 expansion

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 7:36 AM
To I-270 Project Team <ThomasHart@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Thomas Hart
Subject
270 expansion
Your E-Mail Address
tomhart875@comcast.net
City
Denver
Zip Code
80206
Phone Number
n/a
Comments
I regularly use 270 to go to the northern suburbs from my home in Congress Park. I find the experience of driving 270 hair raising at the least. I have started adding 45 minutes to my travel plans when I head west on 270. the on ramp at Colo. Blvd is often backed up for more than 2 blocks on the surface road. It takes fierce assertion to actually wedge into a lane on the west bound corridor. Cars typically are wildly changing lanes and trying to get positioned for various moves like getting on to 76, and 25 and some of the surface streets in the area. We need to expend and improve the road way. Environmental factors can be mediated but the conditions now are not satisfactory for the Co. residents who use and pay for our roadway system.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project

1

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. One lane in each direction will be added throughout the corridor and that lane will be operated as an Express Lane.

For a list of federal mitigations and commitments for environmental impacts from the project, please see Chapter 5.0 of the Record of Decision.

codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

From:	'Hass Home' via CDOT - I-270
To:	cdot_i270@state.co.us
Subject:	[cdot_i270] I 270 improvements
Sent:	11/28/2025 10:18:45 AM

1 Anybody can see the primary problem with this road is the Vasquez interchange. Start there! Next address the obsolete bridges that can't seem to sustain a suitable deck. Next is the settling problem at the old landfill site. Finally an additional lane at the western end. I can't believe all the red tape, documents, and meetings you are using for this project. Most of that is not needed. The needed design improvements are not complicated. Time is of the essence. Speed it up, please.

George Hass
Sent from my iPad

--
I-270 Corridor Improvements Project
https://urldefense.com/v3/__http://cdot.gov/projects/i270__;!!OepYZ6O!54T1N9BKJKJFGVnAwYRqVn-AlFgHfET1UXelpcs4HUpVc-g9nYKxOGF6q9n2vmalwH_1P4RJIitO9e-S1GrwLVvpbsuMS
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane. In addition, it will also address the settling due to the landfill.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] Highway expansions
Sent: 1/11/2026 5:32:35 AM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Beth Heesters
Subject
Highway expansions
Your E-Mail Address
Delany1207@gmail.com
City
Arvada
Zip Code
80007
Phone Number
720-245-3522
Comments
I do not get it. Formally from Northeast Coast. "Everybody" pays a toll for expansions of another lane. If you use the road, you enjoy the expansion and you all pay a toll! No one gets excluded. There isn't one lane that entitled people are zipping on while the rest, remains in gridlock. You see this on 170 and 470. 470 is a mess down southwest You got the entitled zipping and the rest- stuck in gridlock - still! What does this solve? Nothing. Add a lane, add a ezpass toll for EVERYONE so EVERYONE gets to be out of traffic!
How did you hear about the I-270 Improvements Project?
Community member or neighbor

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 7:17 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Bicycle and Pedestrian Resources, Express Lanes, Local Traffic in Neighborhoods , Purpose and Need, Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
1 We do not need more highways. We need more public transit. More/expanded highways don't lead to less traffic. They take away vital resources from creating a lower pollution, community growing alternative: public transit. This is proposterous to waste resources on creating more pollution that will harm local communities and the world. Please do not expand the highway or I will take further action. Thank you :))
Name (first and last)
Tynan Hewes
Address
4355 41st street
City
boulder
Neighborhood/ZIP Code
80305
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
nanyt96@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Bicycle, Pedestrian, and Transit Enhancements Alternative was developed in response to this comment that was received throughout the project development process. The alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

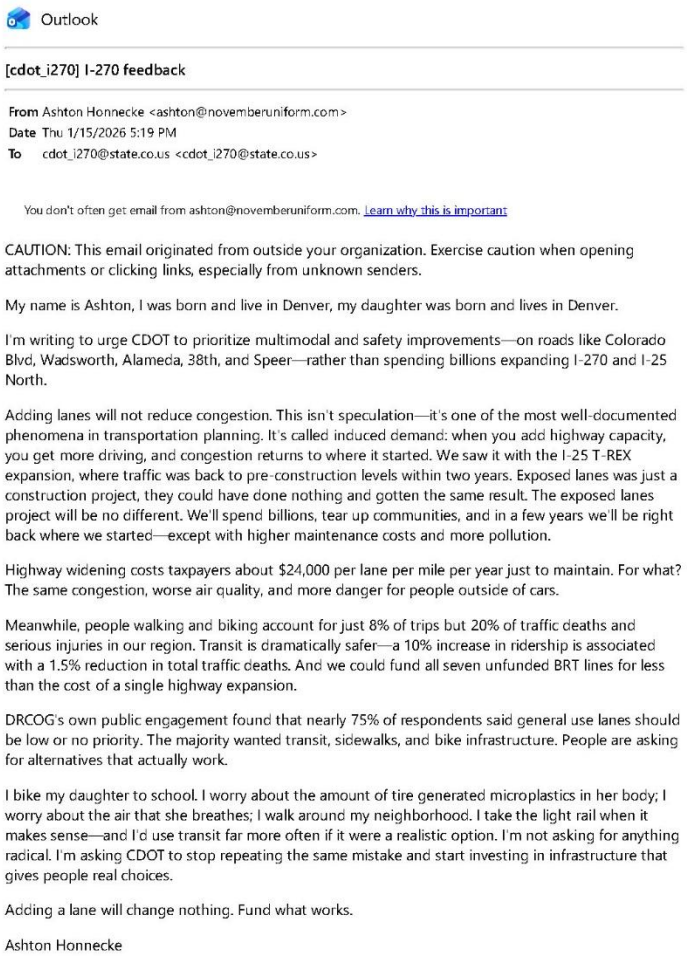
Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding Flatiron Flyer 5 (FF5) buses and stops. During the stakeholder workshop on May 27, 2025, RTD indicated that adding a stop at the Central Park location would add 12 minutes to the FF5 route, which may draw pushback from existing customers. The FF5 bus route was originally designed to serve students traveling between Boulder and the Anschutz Medical Campus. Adjustments to its route would require a broader regional planning study. In addition, ridership data does not support adding a stop in Commerce City. While this project does not include a new FF5 stop, it would add four new local stops to better serve nearby routes, two on Quebec Street and two on Sandcreek Drive.

Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder.

When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area,

even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for additional information on increased transit options and services and bicycle and pedestrian improvements.



Outlook

[cdot_i270] I-270 feedback

From Ashton Honnecke <ashton@novemberuniform.com>
Date Thu 1/15/2026 5:19 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

You don't often get email from ashton@novemberuniform.com. Learn why this is important

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

My name is Ashton, I was born and live in Denver, my daughter was born and lives in Denver.

1 I'm writing to urge CDOT to prioritize multimodal and safety improvements—on roads like Colorado Blvd, Wadsworth, Alameda, 38th, and Speer—rather than spending billions expanding I-270 and I-25 North.

2 Adding lanes will not reduce congestion. This isn't speculation—it's one of the most well-documented phenomena in transportation planning. It's called induced demand: when you add highway capacity, you get more driving, and congestion returns to where it started. We saw it with the I-25 T-REX expansion, where traffic was back to pre-construction levels within two years. Exposed lanes was just a construction project, they could have done nothing and gotten the same result. The exposed lanes project will be no different. We'll spend billions, tear up communities, and in a few years we'll be right back where we started—except with higher maintenance costs and more pollution.

Highway widening costs taxpayers about $24,000 per lane per mile per year just to maintain. For what? The same congestion, worse air quality, and more danger for people outside of cars.

Meanwhile, people walking and biking account for just 8% of trips but 20% of traffic deaths and serious injuries in our region. Transit is dramatically safer—a 10% increase in ridership is associated with a 1.5% reduction in total traffic deaths. And we could fund all seven unfunded BRT lines for less than the cost of a single highway expansion.

3 DRCOG's own public engagement found that nearly 75% of respondents said general use lanes should be low or no priority. The majority wanted transit, sidewalks, and bike infrastructure. People are asking for alternatives that actually work.

I bike my daughter to school. I worry about the amount of tire generated microplastics in her body; I worry about the air that she breathes; I walk around my neighborhood. I take the light rail when it makes sense—and I'd use transit far more often if it were a realistic option. I'm not asking for anything radical. I'm asking CDOT to stop repeating the same mistake and start investing in infrastructure that gives people real choices.

Adding a lane will change nothing. Fund what works.

Ashton Honnecke

Response to Comment 1

The purpose of the project is to implement transportation solutions that modernize the I-270 corridor to accommodate existing and forecasted transportation demands. The identified transportation needs, which include both multimodal and safety, are as follows:

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

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

Please see Section 5.4.1, GEN1, of the Final Environmental Impact Statement (EIS) for additional information on the Purpose and Need for this project.

Response to Comment 2

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts. Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

See Section 5.4.3, ALT6, of the Final EIS for more information on increased transit considerations.

Response to Comment 3

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives. Please see Section 5.4.3, ALT7, of the Final EIS for information on increased transit and bicycle and pedestrian facilities. The Preferred Alternative includes improvements to transit and bicycle and pedestrian facilities.

For a list of federal mitigation and commitments the project will implement for environmental impacts, please see Chapter 5.0 of the Record of Decision.

2822 Federal Blvd

Denver, CO

80211

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] I-270 Improvement

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/5/2026 8:37 AM
To I-270 Project Team <DinaHowerter@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Dina Howerter
Subject
I-270 Improvement
Your E-Mail Address
dinahowerter@gmail.com
City
Broomfield
Zip Code
80023
Phone Number
7203082940
Comments
I support at least adding 1 more lane, and definitely adding an express toll lane on I-270. I drive on this highway almost everyday with my boys (Rapids Academy) and providing rides to fellow teammates to soccer practices and games at Dicks Sporting Goods Park. Many families do the same coming from north. Often they drive home on that highway from work then back on it again to take their youth player to practice. A couple more comments that I know you already know. 1. Condition of the road, bridges, overpass is in very bad shape. I worry about it collapsing one day with cars and families on it. 2. Once exiting Vasquez Blvd exit from I-270 onto US HWY 6-85 (going South), you have to quickly cross over multiple lanes to turn left onto 56th Ave (to get to Dicks Sporting Goods Park). Imagine doing that on a busy US HWY 6-85 everyday with multiple children in the car. Alternatively if I can't cross the lanes, I would stay in the same lane turn right at 56th, make an immediate u-turn to then go straight on 56th after the light turns green. I propose that there should be a 2 lane exit that continues as is and a second lane that splits to exits directly into 56th Ave.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Other

1
2

Response to Comment 1

The Preferred Alternative includes adding an Express Lane, replacing bridges, and fixing current safety issues on the interstate.

Response to Comment 2

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging. Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative and the Vasquez Boulevard interchange.

If you answered other, how did you hear about us?
Showed up randomly on my news feed. Surprised it's not talked about in the local news.

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/16/2026 4:12 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Air Quality, Alternatives, Business and Commerce , Bicycle and Pedestrian Resources, Community and Socioeconomics , Construction , Express Lanes, Freight, Hazardous Materials, Local Traffic in Neighborhoods , Noise, Pedestrian Resources , Public Involvement, Purpose and Need, Recreational Resources, Safety, Section 4(f) De Minimis Finding* , Transit, Wildlife and Habitat, Water Quality, Wetlands, Streams and Floodplains
If you selected "Other", please specify
Provide your comment below:
I approve and support CDOT's I-270 Corridor Improvements Study. I have reviewed the Draft Environmental Impact Statement (DEIS) Document for CDOT's I-270 Corridor Improvements Study and I approve and support the findings and recommendations in the document. The alternative that I support for CDOT's I-270 Corridor Improvements Study is the Preferred Alternative: Two General Purpose-Lanes and One Express Lane that Accommodates Transit Alternative. The reason I support this alternative is because adding a Express Lane on I-270 from I-70 to I-25 will improve safety, reduce congestion, and improve freight mobility in Adams County, CO.
Name (first and last)
Jackson Hurst
Address
4216 Cornell Crossing
City
Kennesaw, Georgia
Neighborhood/ZIP Code
30144
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
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303-512-4270
cdot_i270@state.co.us

Response to Comment 1

Comments noted.

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Outlook

[cdot_i270] I-270 State Environmental Reports Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/16/2026 4:00 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Your Input
Which topic(s) does your comment relate to?
Air Quality Report, Community Analysis Report, Community Enhancements, Greenhouse Gas Report, State Environmental Requirements
If you selected "Other", please specify
Provide your comment below:
I have reviewed the State Environmental Reports for CDOT's I-270 Corridor Improvements Study and I approve and support the findings and recommendations in the reports.
Personal Information
Name (first and last)
Jackson Hurst
Address
4216 Cornell Crossing
City
Kennesaw, Georgia
Neighborhood/ZIP Code
30144
Stay Connected
Would you like to be added to the project email list?
no
If Yes, please provide your email address
ReCaptcha Confirmation

--
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

Comments noted.

Outlook

[cdot_i270] I-270 improvement project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 6:56 AM
To I-270 Project Team <CharlesHutchcraft@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Charles Hutchcraft
Subject
I-270 improvement project
Your E-Mail Address
Chutch4710@yahoo.com
City
Westminster
Zip Code
80031
Phone Number
7203140151
Comments
We need to expand the highway to 3 lanes each way. The daily delays are getting unbearable.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media
If you answered other, how did you hear about us?
Facebook

The I-270 Improvements Project Team

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding an additional lane in each direction, which will operate as an Express Lane.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 3:32 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Purpose and Need, Transit
If you selected "Other", please specify
Provide your comment below:
1 We travel I-270 from Aurora to get to 94th and Federal. We can be traveling the speed limit and then come to a complete stand still. The stand still is usually at Vasques Blvd. This is dangerous as everyone slams on their brakes. I-270 should have been dealt with a long time ago.
Name (first and last)
VICKI HUTCHERSON
Address
11733 E LOUISIANA AVE
City
AURORA
Neighborhood/ZIP Code
80012
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
blktiecarp@aol.com

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging. Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative and the Vasquez Boulevard interchange.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:29 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Alternatives
If you selected "Other", please specify
1 As a commuter who uses 270, I support the no-widening alternative proposal submitted by Green Latinos. Doesn't research show that widening doesn't actually relieve congestion in the long run? Seems like we should go with the cheaper and healthier/more environmentally friendly option.
Provide your comment below:
Name (first and last)
Meg Ingram
Address
2985 Locust St
City
Denver
Neighborhood/ZIP Code
80207
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
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cdot_i270@state.co.us
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Response to Comment 1

For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not

broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

Outlook

[cdot_i270] I-270 Improvement project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 1:12 PM
To I-270 Project Team <JeffJasper@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Jeff Jasper
Subject
I-270 Improvement project
Your E-Mail Address
jjasper4@comcast.net
City
Westminster
Zip Code
80031
Phone Number
3035257235
Comments
I am in complete favor of the I-270 Improvement project. 1000's of Jobs will be lost if this project is not completed. The Metro area must have infrastructure capable of moving people and goods serving a population of 4million plus. This project must be approved and start immediately.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

Comments noted.

Outlook

[cdot_i270] I-270 Improvements

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 7:32 PM
To I-270 Project Team <JamesJensen@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
James Jensen
Subject
I-270 Improvements
Your E-Mail Address
jamesaim@gmail.com
City
Lakewood
Zip Code
80228
Phone Number
7608611698
Comments
I have been a delivery driver for 25 years. My question is do these planning and road engineers use people who use the roads for commerce work in the process of creating their decision that invariably affects especially those who use the roads for work? Why at any point these interstate roadways are considered local access roads that need to first concentrate on it's impacts on the local community and less concern for how it plays a huge economic role in the region mostly for regional interests. I for one have heard from so many other friends that they don't agree with
1 induced demand concept that new wider roads only attract more drivers. I don't think that is the case. Most people do not drive for leisure hoping for less congestion and a new road to drive as much as they drive for economic timeliness and function. However population is also a bigger driving factor and if the roads are reaching gridlock that's more the reason and I-70 has never been widened even though the metro area for which it serves is 5 or 6 times larger than at the time the highway was built. I think it might be a better idea to make a decision about the road and it's alternatives by putting the different alternatives to a region wide vote since the road is depended on for regional mobility. I believe it is more of an economic issue overall. I personally
2 would vote for the alternative of three general purpose lanes in each direction and one toll alternative transit lane. Thanks for the opportunity to voice my views.
I would like to

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts. For additional information on induced demand and traffic modeling, please see Section 5.4.6, TRANS2, of the Final EIS.

Response to Comment 2

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Sign up for project emails
How did you hear about the I-270 Improvements Project?
Other
If you answered other, how did you hear about us?
Personal research

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] i 270 improvements exceptionally needed asap

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 11/27/2025 2:24 PM
To I-270 Project Team <Stevejohnston@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Steve johnston
Subject
i 270 improvements exceptionally needed asap
Your E-Mail Address
Sjohnston1213@msn.com
City
Centennial
Zip Code
80026
Comments
I 270 needs improvement asap. We use the road regularly to go to Boulder it's heavily congested all the time. Needs massive widening and addition of lanes now. Extra Space already exists and is not even used. Has been sitting there for years unused could add at least 2 lanes right now Add a lot of extra lanes Do not add a Toll!!
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
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cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The Preferred Alternative adds one lane in each direction, and it will be operated as an Express Lane. The Express Lane was identified as part of the Preferred Alternative because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for additional information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit was preliminarily identified as the Preferred Alternative.

From:	'Cisco Unity Connection Messaging System' via CDOT - I-270
To:	CDOT i270
Subject:	[cdot_i270] Message from Cell Phone TX (+15129259157)
Attachments:	VoiceMessage.wav
Sent:	1/5/2026 11:12:12 PM

Transcription from Project Voicemail

January 5, 2026 11:12 PM MT

Uh yes, uh my name is Jonathan. I'm a local resident here in Central Denver and I strongly
1 oppose uh the addition of another lane uh for 270. I think that is a terrible, terrible, terrible
um waste of money honestly. Adding another lane it's always adding another lane, add
2 another lane adding another lane will alleviate the traffic, when in actuality it just induces
more traffic. This isn't even touching on the sound and air pollution that this would cause
and create more of. How about we spend the money and invest that into public
3 infrastructure, a public transit? I would love to have better public transit along the front
range. Um it's just ridiculous, our addiction to just the car, the highway, adding more lanes
um, and that is just , uh, yeah. I just want a walkable community with public transit and not
have to pay all this money for tollings, for gas, for car insurance, for a car - all that is very
expensive for everybody and the community and yeah. I...I...I strongly, strongly oppose that
you guys add another lane. Thank you.

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts. For additional information on induced demand and traffic modeling, please see Section 5.4.6, TRANS2, of the Final EIS.

Response to Comment 2

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and oxides of nitrogen compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the National Environmental Policy Act air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT Noise Analysis and Abatement Guidelines.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria, which is near the South Rose Hill Neighborhood.

Please see Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and noise walls.

Response to Comment 3

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight

operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for additional information on consideration of increased transit options and service and bicycle and pedestrian facilities.

Outlook

[cdot_i270] I-270 trafic mitigation

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:28 AM
To I-270 Project Team <MatthewJuaire@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Matthew Juaire
Subject
I-270 trafic mitigation
Your E-Mail Address
matt.juaire@gmail.com
City
Aurora
Zip Code
80017
Phone Number
5203708722
Comments
1 I would much rather see these funds go into viable alternatives to driving to give people options to not be on the road in the first place. Invest in expanding the light rail system into cross town options rather than adding another lane, which never actually helps improve moving people.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on the potential of adding transit services. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for information on consideration of increased transit options and service and bicycle and pedestrian facilities.

Outlook

[cdot_i270] I-270 ideas

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 1:26 AM
To I-270 Project Team <Justin@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Justin
Subject
I-270 ideas
Your E-Mail Address
Jnarans01@hotmail.com
City
Aurora
Zip Code
80018
Phone Number
9708793099
Comments
1 270 isn't wide enough, but if you can't widen it, get rid of the clover leaf at Vasquez. That's what slows everything down. The flyover to 25 N needs to be two lanes and have a wider off/on ramp to I-25. Thank you
How did you hear about the I-270 Improvements Project?
Stakeholder Workshop

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding one lane in each direction throughout the corridor, which will be operated as an Express Lane.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Improvements to the I-25/I-270 system interchange, including the flyover ramps to northbound I-25, are acknowledged as critical to corridor performance; however, those facilities are being addressed through separate, previously approved projects on I-25 and US 36 and have been assumed in the I-270 analysis but are not redesigned as part of this EIS. The Preferred Alternative does include restriping the westbound I-270 to northbound I-25 ramp to provide two lanes.

Please see Section 5.4.3, ALT9, of the Final Environmental Impact Statement for additional information on the Preferred Alternative.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/9/2026 3:40 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Alternatives, Bicycle and Pedestrian Resources, Express Lanes, Local Traffic in Neighborhoods , Wildlife and Habitat
If you selected "Other", please specify
Provide your comment below:
My Background Thanks to all the people in orange shirts and the leaders who organized this event. Personally, I am a retired Commerce City citizen who does not live near the I270 but does use the highway occasionally. SAFETY The 3 lane options provide the following: 1. Reduce crashes by 15-20. Currently crashes greatly exceed the state average. 2. Replace very old deteriorating overpasses. 3. Eliminate narrow shoulders to allow emergency vehicle access. 4. Eliminate dangerous short on and off ramps. ENVIRONMENT The 3 lane options provide the following: 1. Reduce bus and truck traffic on local streets, highway 25, and highway 70. 2. Reduce congestion and stop and starts which lowers unnecessary pollution. 3. Adds air quality monitoring equipment. CONVENIENCE The 3 lane options provide the following: 1. Improved bicycle and pedestrian crossings. PUBLIC COMMENTS I heard the following: 1. 756 households do not trust you. All they want is the environment to not get worse or preferably get better. 2. One resident is afraid of eviction. Can you guarantee no one will be evicted? 3. There are too many trucks on 60th Ave, Can you guarantee a reduction or give us predictions? 4. Accidents occur when ice is on I270. Can you de-ice the bridge? I suggest solar panels. 5. The new bicycle and pedestrian crossing does not support wildlife. Can you instead create a tunnel underneath to allow all three? 6. Consider giving local residents free toll lane privileges. 7. 600 trucking companies recognize the benefits to their bottom lines with these improvements. 8. Please allow 3 minutes per person that have comments. KUDOS Thanks to Rachel who answered or found answers to my questions. Thanks to the Project Manager, David. You have assembled a great team which is half the work. SUGGESTIONS 1. Please add a benefit summary page including the items above to the handouts. These were buried in the detailed handout. 2. Please tell the public that no evictions will be needed. 3. Please give the 756 residents free toll lane privileges. Then they can begin to trust the government. These will all be worth it in the long run. Thanks Mike Kelley
Name (first and last)
Michael Kelley
Address
17482 E 98th Way

1-8

Response to Comment 1

A Public Involvement Plan (PIP) was developed and implemented when the Environmental Impact Statement (EIS) process began in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within 1 mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the United States Environmental Protection Agency and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development.

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS. For information on public involvement during the Draft EIS public comment period, see Section 5.4.1, GEN2, of the Final EIS.

Response to Comment 2

The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

Response to Comment 3

The project study area does not include 60th Avenue and therefore cannot provide forecasts for truck traffic on the roadway.

Response to Comment 4

Deicing will occur along I-270 as needed.

Response to Comment 5

The overpass would connect the Sand Creek Trail south of I-270, cross over South Sandcreek Drive and I-270, and connect with North Sandcreek Drive at East 53rd Way north of I-270. This location was identified as the best location for a new crossing between Vasquez Boulevard and Quebec Street because it would provide a direct connection between the adjacent neighborhood and the trail system. However, the area south of I-270 is within the Sand Creek floodplain and is subject to severe drainage and flooding conditions. As a result, construction of a bicycle and pedestrian underpass is not feasible due to engineering and safety constraints.

The I-270 corridor is situated in a substantially different landscape compared to other highways where CDOT has constructed wildlife crossing structures in the state. Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Much of the natural wildlife habitat in the area surrounding I-270 has been replaced by commercial, residential, and industrial developments. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Although many bridges cross streams in the area, nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the design does not include new wildlife connectivity features across I-270. Please see Section 5.4.4, IMP9, of the Final EIS for additional information on wildlife crossings.

Response to Comment 6

Unique tolling considerations for the I-270 corridor, including pricing structure, eligibility, exemptions, enforcement methods, and operational policies, have not been finalized and are not decisions made through the EIS process. These elements would be evaluated and determined in subsequent project development phases following completion of the EIS, consistent with CDOT policy, FHWA requirements, and additional public and stakeholder coordination.

Response to Comment 7

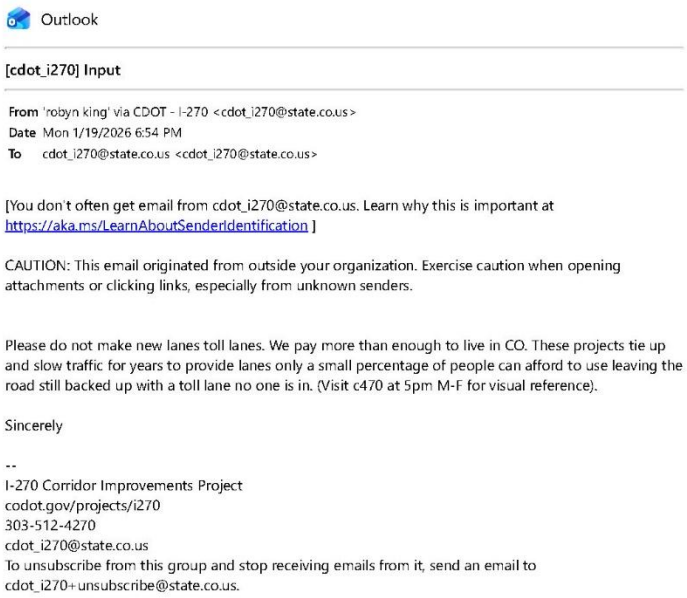
The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. These improvements will benefit all users of the interstate, including freight companies.

Response to Comment 8

Additional time was given for public comments after hearing the request at the first public hearing.

City
Commerce City
Neighborhood/ZIP Code
80022
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
kelley805@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.



Outlook

[cdot_i270] Input

From 'robyn king' via CDOT - I-270 <cdot_i270@state.co.us>
Date Mon 1/19/2026 6:54 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

[You don't often get email from cdot_i270@state.co.us. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

1 Please do not make new lanes toll lanes. We pay more than enough to live in CO. These projects tie up and slow traffic for years to provide lanes only a small percentage of people can afford to use leaving the road still backed up with a toll lane no one is in. (Visit c470 at 5pm M-F for visual reference).

Sincerely

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative best meets the Purpose and Need for the project, which does include adding an Express Lane in each direction through the corridor. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Outlook

[cdot_i270] "Connectivity"

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 11/21/2025 9:09 PM
To I-270 Project Team <AceKing@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Ace King
Subject
"Connectivity"
Your E-Mail Address
ace@acedesignlab.com
City
Arvada
Zip Code
80003
Comments
1 One of the proposed improvements listed is "enhance bicycle and pedestrian connectivity across I-270". What? From the Waste Management transfer facility to the Suncor refinery? From the warehouses on the north side to the warehouses on the south side? Why would anyone seriously need to cross I-270 for any of that? It's not like there's some kind of wonderful park on one side that people on the other side want to visit. Please be realistic. The problem is traffic on the highway, not on the surrounding streets. Please stay focused and fix what's broken.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

The community has identified connectivity between the north and south sides of I-270 as a need because there are limited opportunities to cross and access the Sand Creek Trail from the north side. CDOT, as a transportation agency, considers multimodal travel options on all projects, and bicycle and pedestrian facilities are one of those multimodal travel options. These improvements are needed to meet the Purpose and Need for the project.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] Sounds like a good improvement
Date: Thursday, January 15, 2026 1:28:49 PM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Kenneth Koklich
Subject
Sounds like a good improvement
Your E-Mail Address
ibew68hand@hotmail.com
City
Thornton
Zip Code
80241
Phone Number
3032295755
Comments
This a well needed improvment. Hope it moves forward soon.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Email

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 8:51 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Business and Commerce
If you selected "Other", please specify
Provide your comment below:

1 Hello, and thank you for your continued engagement and efforts throughout this community process. In my role as the leasing manager for multiple commercial properties with direct frontage along the I-270 corridor, I am writing to share feedback based on both operational experience and active investment in the area. I-270 serves as a critical commercial and industrial connector between I-25 and I-70 and has long been in need of modernization. I support the proposed improvements to bring this corridor in line with other regional infrastructure investments. The I-270 corridor functions primarily as a commercial and industrial zone, not a residential one. There are only a limited number of homes—approximately ten—located along the entire right-of-way, many of which are within industrial zoning districts and employment-focused comprehensive plan areas. The vast majority of land along I-270 is commercial in nature and is planned to remain so under current comprehensive plans. Residential development is not intended for this corridor. I am concerned by references in the Community Analysis Report and Appendix E4 regarding the potential installation of visual and sight barriers along portions of I-270, particularly near the South Rose Hill area. These barriers are extremely costly, provide limited noise mitigation benefit in a primarily commercial corridor, obstruct mountain views, reduce natural light, and would be detrimental to the businesses operating along the highway. Clear visibility from I-270 is essential for commercial signage, wayfinding, and safe ingress and egress for customers, employees, and service providers. Installing visual or sound barriers in front of commercial properties would significantly impair this visibility, create traffic friction on and off the interstate, and reduce customer access—resulting in tangible economic harm to corridor businesses. Additionally, such barriers can reflect noise back into surrounding areas and often become targets for graffiti and other criminal activity. Unlike I-36 and certain portions of I-25—where noise and sight barriers provide substantial benefit to dense residential neighborhoods—I-270 is not a residential corridor. Any mitigation benefit along I-270 would be minimal relative to the cost, while imposing significant negative impacts on the commercial viability and functionality of the corridor. If barriers are considered at all, they should be carefully limited so as not to obstruct visibility of commercial buildings or signage oriented toward the interstate. As the leasing manager for properties directly adjacent to the I-270 right-of-way, I respectfully urge that noise and visual barriers be removed from consideration for this project.

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood. See Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and walls.

Please see the I-270 Corridor Improvements Project – State Environmental Reports Responses to Substantive Comments document, which is located on the project website (https://www.codot.gov/projects/studies/i270study) for additional information on noise and visual barriers.

This approach would preserve taxpayer resources for higher-impact infrastructure improvements and avoid unintended economic consequences for local businesses that rely on visibility, access, and efficient movement along this critical commercial corridor. Thank you for your time and thoughtful consideration.

Name (first and last)
Jon Konuk
Address
5040 N Acoma St
City
Denver
Neighborhood/ZIP Code
80216
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
jon@re1313.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] I-270 State Environmental Reports Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 8:50 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Your Input
Which topic(s) does your comment relate to?
Community Enhancements
If you selected "Other", please specify
Provide your comment below:

1 Hello, and thank you for your continued engagement and efforts throughout this community process. In my role as the leasing manager for multiple commercial properties with direct frontage along the I-270 corridor, I am writing to share feedback based on both operational experience and active investment in the area. I-270 serves as a critical commercial and industrial connector between I-25 and I-70 and has long been in need of modernization. I support the proposed improvements to bring this corridor in line with other regional infrastructure investments. The I-270 corridor functions primarily as a commercial and industrial zone, not a residential one. There are only a limited number of homes—approximately ten—located along the entire right-of-way, many of which are within industrial zoning districts and employment-focused comprehensive plan areas. The vast majority of land along I-270 is commercial in nature and is planned to remain so under current comprehensive plans. Residential development is not intended for this corridor. I am concerned by references in the Community Analysis Report and Appendix E4 regarding the potential installation of visual and sight barriers along portions of I-270, particularly near the South Rose Hill area. These barriers are extremely costly, provide limited noise mitigation benefit in a primarily commercial corridor, obstruct mountain views, reduce natural light, and would be detrimental to the businesses operating along the highway. Clear visibility from I-270 is essential for commercial signage, wayfinding, and safe ingress and egress for customers, employees, and service providers. Installing visual or sound barriers in front of commercial properties would significantly impair this visibility, create traffic friction on and off the interstate, and reduce customer access—resulting in tangible economic harm to corridor businesses. Additionally, such barriers can reflect noise back into surrounding areas and often become targets for graffiti and other criminal activity. Unlike I-36 and certain portions of I-25—where noise and sight barriers provide substantial benefit to dense residential neighborhoods—I-270 is not a residential corridor. Any mitigation benefit along I-270 would be minimal relative to the cost, while imposing significant negative impacts on the commercial viability and functionality of the corridor. If barriers are considered at all, they should be carefully limited so as not to obstruct visibility of commercial buildings or signage oriented toward the interstate. As the leasing manager for properties directly adjacent to the I-270 right-of-way, I

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood. See Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and walls.

Please see the I-270 Corridor Improvements Project – State Environmental Reports Responses to Substantive Comments document, which is located on the project website (https://www.codot.gov/projects/studies/i270study) for additional information on noise and visual barriers.

respectfully urge that noise and visual barriers be removed from consideration for this project. This approach would preserve taxpayer resources for higher-impact infrastructure improvements and avoid unintended economic consequences for local businesses that rely on visibility, access, and efficient movement along this critical commercial corridor. Thank you for your time and thoughtful consideration.

Personal Information

Name (first and last)

Jon Konuk

Address

5040 N Acoma St

City

Denver

Neighborhood/ZIP Code

80216

Stay Connected

Would you like to be added to the project email list?

yes

If Yes, please provide your email address

jon@re1313.com

ReCaptcha Confirmation

--

I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/13/2026 7:37:48 AM

Which topic(s) does your comment relate to?
Air Quality, Business and Commerce , Construction , Freight, Transit
If you selected "Other", please specify
Provide your comment below:
The need to expand Interstate 270 is both clear and urgent. From early morning through evening, the corridor experiences sustained congestion that severely impairs mobility. The high percentage of heavy trucks—frequently forced into stop-and-go conditions—exacerbates delays and contributes significantly to elevated emissions. These conditions increase exposure to harmful pollutants for both travelers and nearby communities, undermining regional air-quality goals. The travel patterns along I-270 also limit the effectiveness of traditional transit solutions. This corridor functions as a critical regional and national freight and mobility connector, serving movements that are not easily captured by fixed-route transit. As a result, meaningful congestion relief and emissions reductions in this location require improvements to the highway itself. Recent policy decisions by the Polis and Lew Administration have delayed this essential project, often citing air-quality concerns. However, the data suggest that improving I-270 would produce greater air-quality benefits than many other transportation investments. For example, the SH 119 BRT project is projected to reduce single-occupant vehicle travel by approximately 2,500–5,000 vehicles per day. By contrast, I-270 carries roughly 100,000 vehicles daily, many of which experience 5–20 minutes of delay over a five-mile segment. Reducing this recurring congestion would yield far more substantial reductions in idling, fuel consumption, and particulate emissions. The economic implications are equally significant. I-270 serves as a backbone for the region's logistics, distribution, and industrial sectors. Delays on this corridor directly increase freight costs, which ultimately affect consumers and regional competitiveness. Enhancing mobility on I-270 would provide immediate and measurable benefits to freight operators and the broader economy. Importantly, unlike many constrained urban corridors, I-270 has available right-of-way that allows improvements to be constructed with comparatively fewer impacts to adjacent communities and businesses. This presents a rare opportunity to modernize a critical facility while minimizing disruption. Given the mobility, air-quality, and economic benefits associated with this project, it is essential that CDOT and FHWA advance the I-270 improvements without further delay. Modernizing this corridor is one of the most effective steps the region can take to improve environmental outcomes, support freight movement, and enhance overall transportation system performance.
Name (first and last)
Jeffery Kullman
Address
E Frost Dr
City
Aurora
Neighborhood/ZIP Code
80016
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
jeff@kullmanengineering.com

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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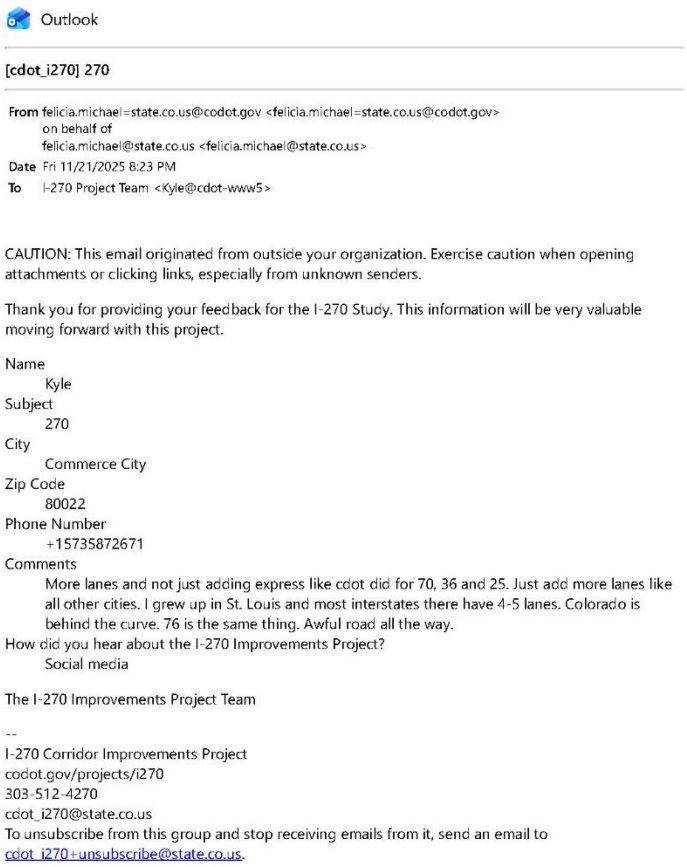
Response to Comment 1

Comments noted.



Outlook

[cdot_i270] 270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 11/21/2025 8:23 PM
To I-270 Project Team <Kyle@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Kyle
Subject
270
City
Commerce City
Zip Code
80022
Phone Number
+15735872671
Comments
More lanes and not just adding express like cdot did for 70, 36 and 25. Just add more lanes like all other cities. I grew up in St. Louis and most interstates there have 4-5 lanes. Colorado is behind the curve. 76 is the same thing. Awful road all the way.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

The Preferred Alternative, which adds a lane in each direction throughout the corridor that will be operated as an Express Lane best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Outlook

[cdot_i270] Yes 2 lanes

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 11/11/2025 2:51 PM
To I-270 Project Team <PatrickLavin@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Patrick Lavin
Subject
Yes 2 lanes
Your E-Mail Address
fatmiclav@yahoo.com
City
Denver
Zip Code
80207
Comments
1 Highly support adding 2 lanes to 270 to relieve congestion. This is long past due. Please don't delay. The current road is falling apart. It is so frequently backed up, that Google maps suggests taking 70 and 25.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative adds one lane in each direction to I-270.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

1

From: 'L B' via CDOT - I-270
To: cdot_i270@state.co.us
Subject: [cdot_i270] Highway wall
Sent: 1/9/2026 1:59:14 PM

Any chance there will be a highway wall placed between Quebec and Vasquez near the neighborhood? You can hear the high way all thru the night and the fence there is never intact. People drive straight off the highway into the neighborhood.

--
I-270 Corridor Improvements Project
https://urldefense.com/v3/__http://codot.gov/projects/i270__;!!OepYZ6O!-h2LWWmeVNdlszLJD26MU4VvP-icqnzqytVE2T-cP5Mtj-wkpfOR0C$o/Irlxb5UkVcPPdWFkXnhubwCEGLkOKZ3PAuMu$
303-512-4270
cdot_i270@state.co.us
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--
I-270 Corridor Improvements Project
https://urldefense.com/v3/__http://codot.gov/projects/i270__;!!OepYZ6O!-h2LWWmeVNdlszLJD26MU4VvP-icqnzqytVE2T-cP5Mtj-wkpfOR0C$o/Irlxb5UkVcPPdWFkXnhubwCEGLkOKZ3PAuMu$
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

A noise wall north of I-270 and south of North Sandcreek Drive was found to be both feasible and reasonable. This barrier was determined to meet the initial criteria to be considered for noise abatement and is recommended to be constructed. Additional details can be found in Section 4.3.3 of the Draft Environmental Impact Statement.

Outlook

[cdot_i270] I-270 improvement project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 11/25/2025 2:44 PM
To I-270 Project Team <DanaRLogsden@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Dana R Logsden
Subject
I-270 improvement project
Your E-Mail Address
danalogsden@gmail.com
City
Denver
Zip Code
80238
Comments
1 The state should seriously consider alternative approaches to adding lanes, including investment in public transit and the use of tolls for non-residents. Additional lanes are likely to increase air quality concerns in an area that is already impacted and unlikely to solve the congestion issue in the long term.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely

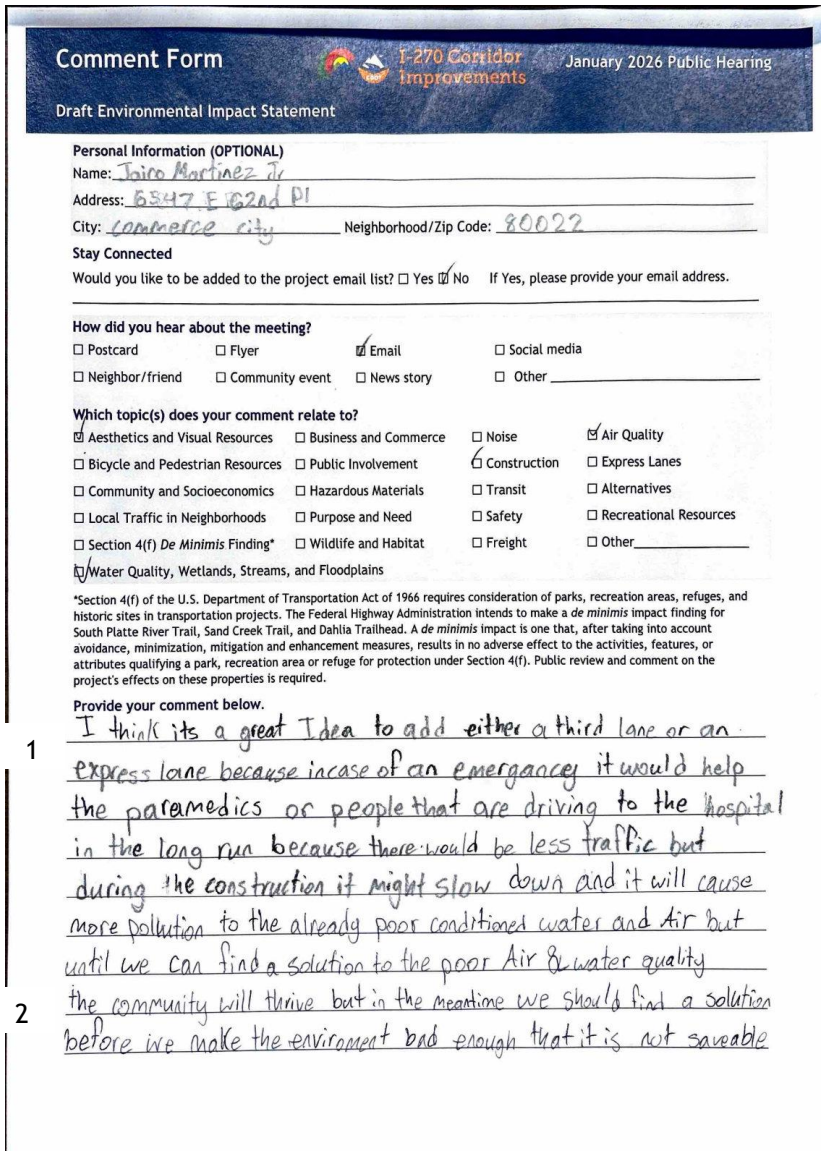
to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Jairo Martinez Jr

Address: 6547 E 62nd Pl

City: commerce city Neighborhood/Zip Code: 80022

Stay Connected

Would you like to be added to the project email list? ☐ Yes ☑ No If Yes, please provide your email address.

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☑ Email ☐ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other

Which topic(s) does your comment relate to?

☑ Aesthetics and Visual Resources	☐ Business and Commerce	☐ Noise	☑ Air Quality
☐ Bicycle and Pedestrian Resources	☐ Public Involvement	☑ Construction	☐ Express Lanes
☐ Community and Socioeconomics	☐ Hazardous Materials	☐ Transit	☐ Alternatives
☐ Local Traffic in Neighborhoods	☐ Purpose and Need	☐ Safety	☐ Recreational Resources
☐ Section 4(f) *De Minimis* Finding*	☐ Wildlife and Habitat	☐ Freight	☐ Other
☑ Water Quality, Wetlands, Streams, and Floodplains			

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

1 I think its a great Idea to add either a third lane or an express lane because incase of an emergancey it would help the paramedics or people that are driving to the hospital in the long run because there would be less traffic but during the construction it might slow down and it will cause more pollution to the already poor conditioned water and air but until we can find a solution to the poor Air & water quality

2 the community will thrive but in the meantime we should find a solution before we make the enviroment bad enough that it is not saveable

Response to Comment 1

The Preferred Alternative adds one Express Lane in each direction throughout the corridor. Please see Chapter 5.0 of the Record of Decision for information on mitigation and commitments for construction impacts that the project will implement.

Response to Comment 2

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to

reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft Environmental Impact Statement (EIS).

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures. Please see Section 5.4.4, IMP10, of the Final EIS for information on quantitative water quality modeling, water quality impacts, pollutants, and developing and locating water quality mitigation.

Outlook

[cdot_i270] I270 Project Comments

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 3:17 PM
To I-270 Project Team <LaurenMcCloskey@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Lauren McCloskey
Subject
I270 Project Comments
Your E-Mail Address
raebrooke422@yahoo.com
City
Broomfield
Zip Code
80021
Comments
1 This is a critical transportation corridor for the Denver metro area, connecting western suburbs to Aurora, Denver and DIA. Despite its regional importance, it remains limited to just two lanes, creating chronic congestion, concerns for commuters, freight carriers and emergency responders. Targeted improvements to the highway are essential to support economic vitality, regional mobility and public safety. Expanding capacity would reduce daily bottlenecks , improve access to DIA, enhance freight efficiency and provide more predictable travel for thousands of workers who rely on this route every day. Currently, many commuters are forced to divert to alternative routes such as I70, spreading congestion across the regional highway system and worsening delays well beyond the corridor itself. Improving I270 would allow drivers to return to the most direct and efficient route, relieving pressure on I70 and other surrounding roadways while restoring balance to the broader transportation network. Investing in i270 is a commitment to a more connected, safer and economically resilient metro region.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

Response to Comment 1

The Preferred Alternative includes adding one lane in each direction throughout the corridor, which will be operated as an Express Lane. The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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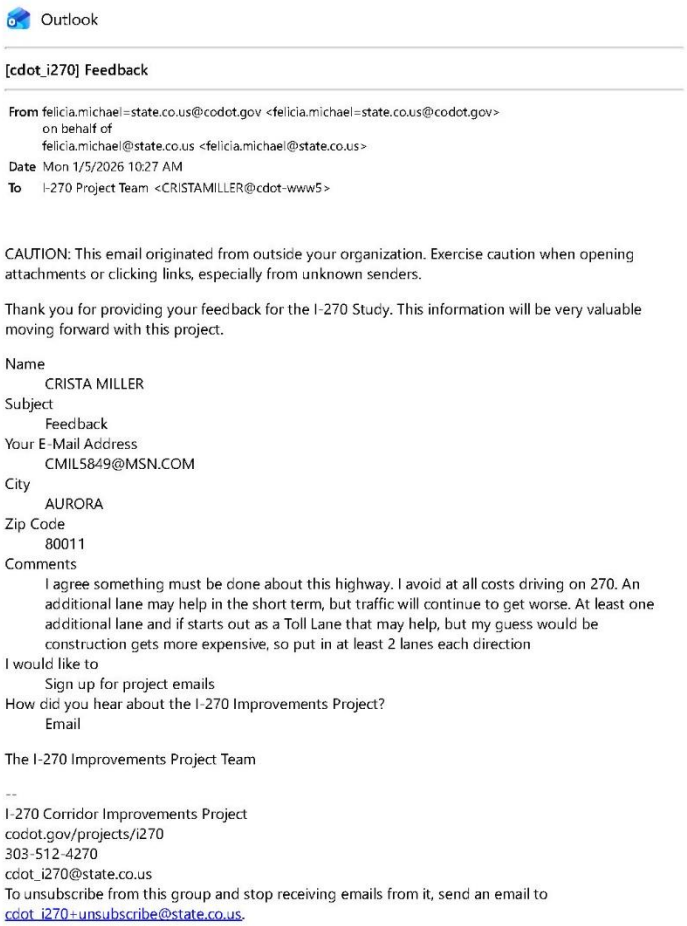
cdot_i270+unsubscribe@state.co.us.



Outlook

[cdot_i270] Feedback

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/5/2026 10:27 AM
To I-270 Project Team <CRISTAMILLER@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
CRISTA MILLER
Subject
Feedback
Your E-Mail Address
CMILS849@MSN.COM
City
AURORA
Zip Code
80011
Comments
I agree something must be done about this highway. I avoid at all costs driving on 270. An additional lane may help in the short term, but traffic will continue to get worse. At least one additional lane and if starts out as a Toll Lane that may help, but my guess would be construction gets more expensive, so put in at least 2 lanes each direction
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Email

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

The Preferred Alternative includes adding one lane in each direction throughout the corridor that will be operated as an Express Lane. The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally,

adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] I-270 Needs to be Widened

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 9:33 AM
To I-270 Project Team <CathyMoldenhauer@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Cathy Moldenhauer
Subject
I-270 Needs to be Widened
Your E-Mail Address
Icemarmot@aol.com
City
Broomfield
Zip Code
80020
Phone Number
3036351089
Comments
Please consider widening I-270 to at least 3 lanes in both directions, east and west. Traffic through there now is extremely congested & there are always delays due to the high volume of vehicles.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding one lane in each direction for a total of three lanes. The new lane would be operated as an Express Lane.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 11/21/2025 3:42 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality, Alternatives, Bicycle and Pedestrian Resources, Community and Socioeconomics , Local Traffic in Neighborhoods
If you selected "Other", please specify
Provide your comment below:
1 Alternatives indicated here indicate the narrow realm of engagement and creativity in addressing highway demand and end-of-life design studies. Lane expansion in this corridor will accomplish little for increasing speeds and improving safety (I'm aware these objectives are often at odds). A proposal for more limitation of traffic access to I270, like that proposed by GreenLatinos among others, is likely to provide local residents and freight haulers the corridor they need away from the central I70/I25 interchange, while through traffic can make economic decisions on a tolled road versus the newly expanded I70. It would likely even drive some through traffic off I70 (or I25) earlier to use E470, whose tolling has often been perceived as prohibitive to an otherwise much faster route.
Name (first and last)
Richard Neal
Address
4153 knox ct
City
denver
Neighborhood/ZIP Code
80211
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
richard1neal@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

For consistency in nomenclature with all previously identified and evaluated alternatives, the alternative submitted by GreenLatinos is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not

broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

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Outlook

[cdot_i270] I-270 congestion

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:28 AM
To I-270 Project Team <NelNelson@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Nel Nelson
Subject
I-270 congestion
Your E-Mail Address
SolarKraut@gmail.com
City
Aurora
Zip Code
80012
Phone Number
3033285188
Comments
Hello, and thank you for taking public comment on proposed solutions for the 270 issue. Congestion begins about 4am and dissappates at about 11pm, witb single-digit speeds except for persistent periods of normal flow in several spots. I would like to suggest that, rather than copy the flaws of the I-70, C-470, I-25 and I-36 toll lanes and their arguably shameful costs-per-car, that CDOT instead tries to find a balance between added general capacity, and, the congestion-releiving patterns of traffic management already present in this roadway. This right of way currently has huge margins for expansion and runs through the most polluted areas of the city. There are glaring needs for additional connections to surface streets, and more than enouugh space to draw pretty lines. Please stop considering pay-to-win options like xpress toll, which does nothing to pay back public investment? Speding a few billion dollars to let a few dozen cars per hour fly by four decades of overcrowding and bad upkeep would be just another slap in the face of the average commuter. Thank you for your patience.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

1

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] 270 improvements

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 7:03 AM
To I-270 Project Team <AnnaNoli@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Anna Noli
Subject
270 improvements
Your E-Mail Address
Annanoli62@gmail.com
City
Denver
Zip Code
80239
Phone Number
720-427-8923
Comments
Traffic on 270 is out of control. More lanes and repair to bridges are desperately needed as well as surface improvements
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
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1

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

The project also includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Outlook

[cdot_i270] Improve I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/5/2026 8:25 AM
To I-270 Project Team <KatieNoyce@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Katie Noyce
Subject
Improve I-270
Your E-Mail Address
katie_noyce@hotmail.com
City
Aurora
Zip Code
80016
Phone Number
7203140227
Comments
Please widen and improve the highway conditions for I-270. For decades this stretch of highway in Colorado has not been able to handle the amount of traffic and is in the worst condition of any CO highway. I don't understand why it has taken this long to consider improving this stretch of highway. The traffic is usually stopped or severely slow, and the road is always in horrible condition. We call it the armpit of Denver for a reason.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] I-270 State Environmental Reports Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 11:12 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Your Input
Which topic(s) does your comment relate to?
Community Analysis Report, Community Enhancements
If you selected "Other", please specify
Provide your comment below:

1 Hello, and thank you for your continued efforts and engagement in this diligent community process. I am a fifth-generation Coloradan and have grown up and currently live near I-270. My family, neighbors, and I rely on this corridor as a critical connection between I-25 and I-70. I-270 is clearly outdated and has received significantly fewer infrastructure improvements than other nearby corridors. I strongly support the proposed modernization. In addition to living in the area, I am an owner and manager of several commercial properties with direct frontage on I-270, including a large ground-up flex commercial development currently under construction that represents a substantial private investment. I-270 functions primarily as a commercial and industrial corridor, not a residential one. There are only a small number of homes—approximately ten—along the highway right-of-way, many of which are located within industrial zoning and employment-focused comprehensive plan areas. Nearly the entire area along I-270 is commercial and planned to stay commercial with the respective comprehensive plans. Residential development is not planned for or intended along this corridor. I am concerned by certain comments in the Community Analysis Report and Appendix E4, which explores the potential installation of visual / sight barriers along portions of I-270, in particular the South Rose Hill area. Barriers are extraordinarily expensive, provide limited noise mitigation benefit, obstruct mountain views, reduce natural light, and would be detrimental to the many businesses along the corridor. Clear, unobstructed visibility from I-270 is essential for signage, wayfinding, and safe access for customers, employees, and vendors. Installing barriers in front of commercial properties would significantly impair this visibility, increase traffic friction on I-270 and in surrounding neighborhoods, and result in meaningful economic harm to local businesses by reducing customer traffic. Unlike I-36 and portions of I-25—where noise / sight barriers serve dense residential areas and provide substantial public benefit—I-270 is not a residential corridor. Any noise and sight mitigation benefit along I-270 would be minimal for the small number of nearby residents, while adding significant taxpayer costs on the project and causing real harm to the economic vitality of the corridor. Any barriers that are introduced should be limited to not impede the visibility of commercial buildings with signage oriented toward the interstate. As a property owner and operator directly abutting the I-270 right-of-way, I respectfully urge that

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood. See Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and walls.

Please see the I-270 Corridor Improvements Project – State Environmental Reports Responses to Substantive Comments document, which is located on the project website (https://www.codot.gov/projects/studies/i270study) for additional information on noise and visual barriers.

noise / visual barriers be removed from consideration for this project. Doing so will preserve taxpayer dollars for more impactful and necessary infrastructure improvements and help avoid unintended economic consequences for local businesses that rely on visibility and access along this critical commercial corridor. Thank you for your time and consideration.

Personal Information

Name (first and last)

Owin Orr

Address

4090 E 71st Ave

City

Commerce City

Neighborhood/ZIP Code

80022

Stay Connected

Would you like to be added to the project email list?

yes

If Yes, please provide your email address

owin.orr@gmail.com

ReCaptcha Confirmation

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cdot_i270@state.co.us
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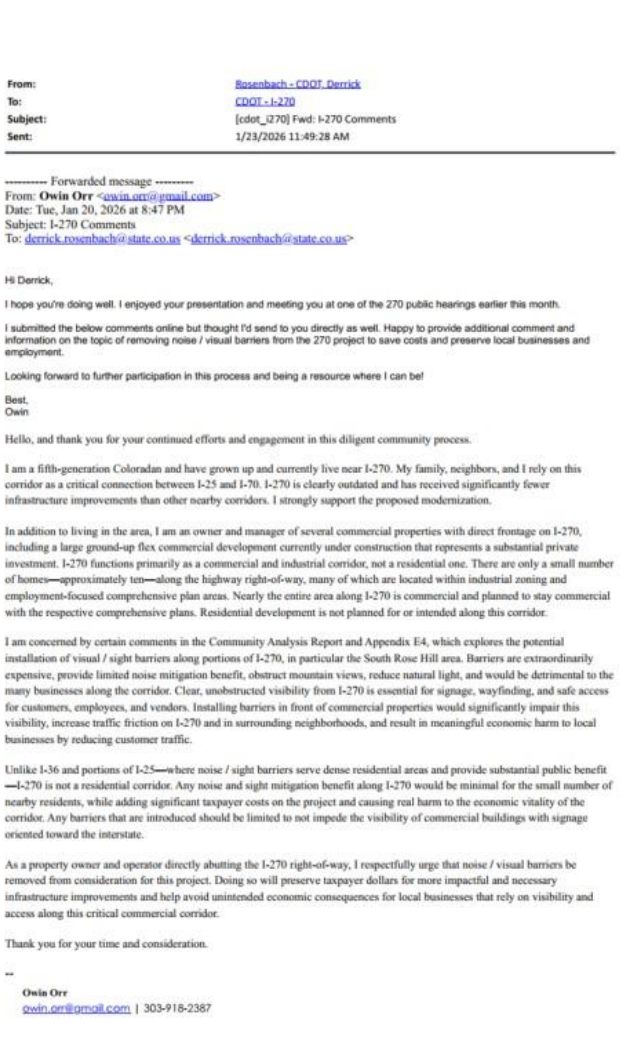
1



From: Rosenbach - CDOT, Derrick
To: CDOT - I-270
Subject: [cdot_i270] Fwd: I-270 Comments
Sent: 1/23/2026 11:49:28 AM

---------- Forwarded message ---------
From: **Owin Orr** <owin.orr@gmail.com>
Date: Tue, Jan 20, 2026 at 8:47 PM
Subject: I-270 Comments
To: derrick.rosenbach@state.co.us <derrick.rosenbach@state.co.us>

Hi Derrick,

I hope you're doing well. I enjoyed your presentation and meeting you at one of the 270 public hearings earlier this month.

I submitted the below comments online but thought I'd send to you directly as well. Happy to provide additional comment and information on the topic of removing noise / visual barriers from the 270 project to save costs and preserve local businesses and employment.

Looking forward to further participation in this process and being a resource where I can be!

Best,
Owin

Hello, and thank you for your continued efforts and engagement in this diligent community process.

I am a fifth-generation Coloradan and have grown up and currently live near I-270. My family, neighbors, and I rely on this corridor as a critical connection between I-25 and I-70. I-270 is clearly outdated and has received significantly fewer infrastructure improvements than other nearby corridors. I strongly support the proposed modernization.

In addition to living in the area, I am an owner and manager of several commercial properties with direct frontage on I-270, including a large ground-up flex commercial development currently under construction that represents a substantial private investment. I-270 functions primarily as a commercial and industrial corridor, not a residential one. There are only a small number of homes—approximately ten—along the highway right-of-way, many of which are located within industrial zoning and employment-focused comprehensive plan areas. Nearly the entire area along I-270 is commercial and planned to stay commercial with the respective comprehensive plans. Residential development is not planned for or intended along this corridor.

I am concerned by certain comments in the Community Analysis Report and Appendix E4, which explores the potential installation of visual / sight barriers along portions of I-270, in particular the South Rose Hill area. Barriers are extraordinarily expensive, provide limited noise mitigation benefit, obstruct mountain views, reduce natural light, and would be detrimental to the many businesses along the corridor. Clear, unobstructed visibility from I-270 is essential for signage, wayfinding, and safe access for customers, employees, and vendors. Installing barriers in front of commercial properties would significantly impair this visibility, increase traffic friction on I-270 and in surrounding neighborhoods, and result in meaningful economic harm to local businesses by reducing customer traffic.

Unlike I-36 and portions of I-25—where noise / sight barriers serve dense residential areas and provide substantial public benefit—I-270 is not a residential corridor. Any noise and sight mitigation benefit along I-270 would be minimal for the small number of nearby residents, while adding significant taxpayer costs on the project and causing real harm to the economic vitality of the corridor. Any barriers that are introduced should be limited to not impede the visibility of commercial buildings with signage oriented toward the interstate.

As a property owner and operator directly abutting the I-270 right-of-way, I respectfully urge that noise / visual barriers be removed from consideration for this project. Doing so will preserve taxpayer dollars for more impactful and necessary infrastructure improvements and help avoid unintended economic consequences for local businesses that rely on visibility and access along this critical commercial corridor.

Thank you for your time and consideration.

--
Owin Orr
owin.orr@gmail.com | 303-918-2387

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood. See Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and walls.

Please see the I-270 Corridor Improvements Project – State Environmental Reports Responses to Substantive Comments document, which is located on the project website (https://www.codot.gov/projects/studies/i270study) for additional information on noise and visual barriers.

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cdot_i270@state.co.us
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Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 10:56 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Business and Commerce , Local Traffic in Neighborhoods , Noise, Public Involvement, Purpose and Need, Safety, Transit
If you selected "Other", please specify
Provide your comment below:

1 Hello, and thank you for your continued efforts and engagement in this diligent community process. I am a fifth-generation Coloradan and have grown up and currently live near I-270. My family, neighbors, and I rely on this corridor as a critical connection between I-25 and I-70. I-270 is clearly outdated and has received significantly fewer infrastructure improvements than other nearby corridors. I strongly support the proposed modernization. In addition to living in the area, I am an owner and manager of several commercial properties with direct frontage on I-270, including a large ground-up flex commercial development currently under construction that represents a substantial private investment. I-270 functions primarily as a commercial and industrial corridor, not a residential one. There are only a small number of homes—approximately ten—along the highway right-of-way, many of which are located within industrial zoning and employment-focused comprehensive plans. I am concerned by Appendix E4, which explores the potential installation of noise barriers along portions of I-270. Noise barriers are extraordinarily expensive, provide limited noise mitigation benefit, obstruct mountain views, reduce natural light, and would be detrimental to the many businesses along the corridor. Clear, unobstructed visibility from I-270 is essential for signage, wayfinding, and safe access for customers, employees, and vendors. Installing noise barriers in front of commercial properties would significantly impair this visibility, increase traffic friction on I-270 and in surrounding neighborhoods, and result in meaningful economic harm to local businesses by reducing customer traffic. Unlike I-36 and portions of I-25—where noise barriers serve dense residential areas and provide substantial public benefit—I-270 is not a residential corridor. Any noise mitigation benefit along I-270 would be minimal for the small number of nearby residents, while adding significant taxpayer costs on the project and causing real harm to the economic vitality of the corridor. Any noise barriers that are introduced should be limited to not impede the visibility of commercial buildings with signage oriented toward the interstate. As a property owner and operator directly abutting the I-270 right-of-way, I respectfully urge that noise barriers be removed from consideration for this project. Doing so will preserve taxpayer dollars for more impactful and necessary infrastructure improvements and help avoid unintended

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood. See Section 5.4.4, IMP4, of the Final EIS for more information on the noise analysis and walls.

Please see the I-270 Corridor Improvements Project – State Environmental Reports Responses to Substantive Comments document, which is located on the project website (https://www.codot.gov/projects/studies/i270study) for additional information on noise and visual barriers.

economic consequences for local businesses that rely on visibility and access along this critical commercial corridor. Thank you for your time and consideration.

Name (first and last)

Owin Orr

Address

4090 E 71st Ave

City

Commerce City

Neighborhood/ZIP Code

80022

Would you like to be added to the project email list?

yes

If Yes, please provide your email address

owin.orr@gmail.com

--

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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] Importance of widening and improving auto/truck traffic

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 12/9/2025 2:10 PM
To I-270 Project Team <JessicaOstermick@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Jessica Ostermick
Subject
Importance of widening and improving auto/truck traffic
Your E-Mail Address
jessica.ostermick@gmail.com
City
Denver
Zip Code
80238
Phone Number
7208389008
Comments
I-270 is a route I avoid if possible because of the congestion, bumpiness and safety concerns. I am supportive of expanding the lanes to improve auto and truck traffic flow primarily.
How did you hear about the I-270 Improvements Project?
Community member or neighbor

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

Outlook

[cdot_i270] I-270 improvements

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 12:43 AM
To I-270 Project Team <LancePadilla@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Lance Padilla
Subject
I-270 improvements
Your E-Mail Address
Lance.powerelectricalservices@gmail.com
City
Brighton
Zip Code
80601
Phone Number
+17205271161
Comments
1 Please add a minimum two lanes per side of the highway. Also please add a on ramp and off ramp for York. This highway has been extremely neglected for as long as I can remember. As Colorado has grown nothing has happened on this highway at all over the years. I've personally been driving this highway daily for the last 24 years. As for projects on 225, 70, 25 this is the main highway from north Denver metro area to aurora and vise versa. Please help this neglected highway
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The Preferred Alternative includes separating the westbound York Street and I-76 off-ramps.

cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 1/8/2026 1:24 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Construction , Express Lanes
If you selected "Other", please specify
Provide your comment below:
1 In commenting on CDOT construction, I believe that toll express lanes do little to get traffic moving during high volume times. I admit that the ones that use them do indeed move really well, but the overall picture is if the express lane were regular lanes, more traffic would move
2 and get on through. We do need to build extra or more lanes, but not just another lane, but 2-3 more lanes to carry the traffic.
Name (first and last)
Dean Pankratz
Address
6 Overlook Lane
City
Bailey
Neighborhood/ZIP Code
80421
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative, which adds an Express Lane in each direction throughout the corridor, best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Response to Comment 2

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Three lane alternatives were not developed or evaluated because they would operate more poorly than the two lane alternatives.

Outlook

[cdot_i270] I-270 Adding lanes will not help

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:28 AM
To I-270 Project Team <PH@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
PH
Subject
I-270 Adding lanes will not help
Your E-Mail Address
chiefpad3@gmail.com
City
parker
Zip Code
80134
Comments
Adding lanes will not help. Adding express lane REALLY don't help. Adding HOV lanes will not help. RTD is a failure. * CDOT indicate that it STUDY the problem and environment issues. PLEASE publish that study. What in the world are you studying. Time and time again, it is not working. CDOT needs to study other states to what WORKS or does not work. How do other countries handle this issues. What is working oversea cities? Why reinvent the wheel? Look at the failure of I-470. It is a disaster. Look at traffic at 4pm to 6pm. Not good Look at the failure of the Express Lane at Idaho Springs. Another I-70 Disaster. The express lane does not work.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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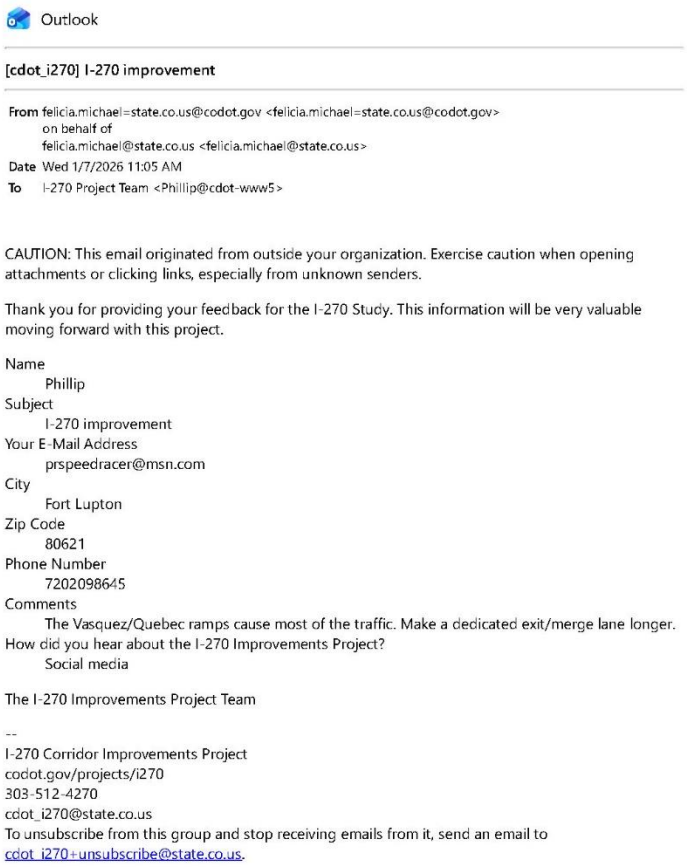
Response to Comment 1

Please see the project website for the documents associated with the study, which includes the Draft Environmental Impact Statement (EIS), State Environmental Technical Reports, and Final EIS/Record of Decision (https://www.codot.gov/projects/studies/i270study).



Outlook

[cdot_i270] I-270 improvement

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Wed 1/7/2026 11:05 AM
To I-270 Project Team <Phillip@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Phillip
Subject
I-270 improvement
Your E-Mail Address
prspeedracer@msn.com
City
Fort Lupton
Zip Code
80621
Phone Number
7202098645
Comments
1 The Vasquez/Quebec ramps cause most of the traffic. Make a dedicated exit/merge lane longer.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

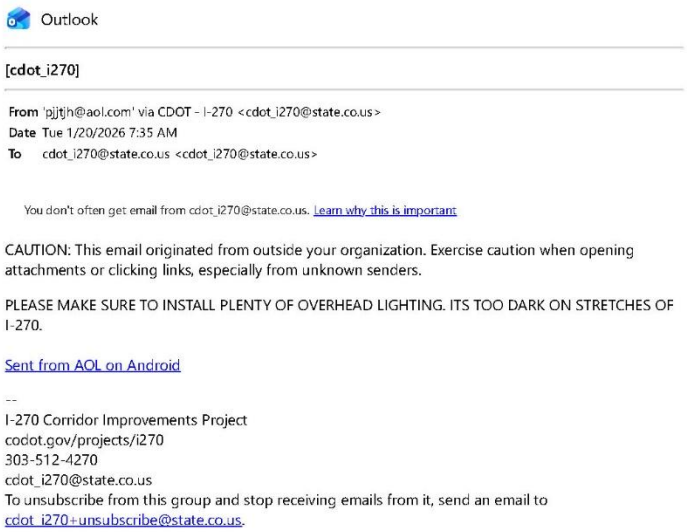
Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

The Preferred Alternative also directly addresses many of the concerns raised regarding congestion, safety, and outdated interchange design at Vasquez Boulevard. The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

The Preferred Alternative will also improve the Quebec Street interchange ramp acceleration and deceleration lengths.



Outlook

[cdot_i270]

From 'pjjtjh@aol.com' via CDOT - I-270 <cdot_i270@state.co.us>
Date Tue 1/20/2026 7:35 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

You don't often get email from cdot_i270@state.co.us. Learn why this is important

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PLEASE MAKE SURE TO INSTALL PLENTY OF OVERHEAD LIGHTING. ITS TOO DARK ON STRETCHES OF I-270.

Sent from AOL on Android

--
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codot.gov/projects/i270
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cdot_i270@state.co.us
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Response to Comment 1

Streetlights will only be added at crossings of I-270 and not along the entire interstate.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 9:16 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality, Alternatives, Transit, Wildlife and Habitat, Other
If you selected "Other", please specify
Climate change; induced demand
Provide your comment below:
1-5 This project should not move forward. The permanent loss of wildlife habitat and the decrease in air quality due to increased traffic, as mentioned in the report, are not worth the ultimate increase in traffic and congestion from induced demand (which study after study demonstrates is a result of highway widening). That increased traffic will lead to increased greenhouse gas emissions, an appalling result as we set record after record for heat and other climate-related impacts. This project is contrary to the climate goals of the state of Colorado. The project should be reassessed and an alternative emphasizing public transit and environmental protection should be further explored.
Name (first and last)
Christopher Poirier
Address
City
Denver
Neighborhood/ZIP Code
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
christopherpoirierjr@gmail.com

--
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cdot_i270@state.co.us
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Response to Comment 1

Please see Chapter 5.0 of the Record of Decision (ROD) for mitigation and commitments that will be implemented for wildlife habitat.

Response to Comment 2

Air quality doesn't decrease due to the increase in traffic. Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and oxides of nitrogen compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

Response to Comment 3

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Response to Comment 4

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 5

Exclusive transit lane alternatives were evaluated during the screening process but were eliminated because they did not adequately address the project's Purpose and Need for corridor-wide safety, travel time reliability, and freight operations, and would have reduced capacity available to general traffic and freight on a facility that already operates over capacity.

The Preferred Alternative supports transit performance by allowing buses to operate in the Express Lane, free of charge, which maintains steady speeds using dynamic pricing and limited access points, consistent with managed lane operations on other Colorado highways.

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low

regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Please see Chapter 5.0 of the ROD for mitigation and commitments for environmental impacts that the project will implement.

Outlook

[cdot_i270] Not another lane!

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/5/2026 11:09 PM
To I-270 Project Team <JonPonder@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Jon Ponder
Subject
Not another lane!
Your E-Mail Address
unseamingjarl@gmail.com
City
Denver
Zip Code
80218-4929
Phone Number
5129259157
Comments
1 - 3 Its always one more lane, one more lane will fix traffic. That literally induces more traffic and is ridiculously expensive to build and maintain. Not even mentioning the sound or air pollution. How about invest in public transit!! Make RTD better and our communities walkable. Not that hard!
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Response to Comment 2

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor. Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and oxides of nitrogen compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

Please see Section 5.4.4, IMP4 and IMP5, of the Final EIS for information on noise and air impacts.

Response to Comment 3

Throughout the EIS process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Please see Section 5.4.3, ALT6 and ALT7, of the Final EIS for additional information on the consideration of increased transit options and services and bicycle and pedestrian facilities.

1

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/12/2026 6:53:56 PM

Which topic(s) does your comment relate to?
Air Quality, Alternatives, Bicycle and Pedestrian Resources, Community and Socioeconomics , Pedestrian Resources , Transit, Wildlife and Habitat, Water Quality, Wetlands, Streams and Floodplains, Other
If you selected "Other", please specify
Environmental Justice
Provide your comment below:
I am submitting a comment asking CDOT to reconsider expanding 270, and instead focus on adding tolls, increasing public transit options, and address the already dangerous air quality in the areas around the highway. I grew up in North Park Hill, and understand first-hand the experiences of my neighbors in Commerce City, Globeville, and Elyria-Swansea. These areas are among the most-polluted in the country, and have had to deal with horrendous air quality from the litany of high-use highways, manufacturing/warehouse activities, and of course Suncor. All of these pollution sources combine to make living in these otherwise wonderful areas risky for those with children or health concerns (or both). One formative memory I have is growing up I had a friend who lived in Elyria-Swansea with asthma, and he would often ask if he could come over to my house and play because the air quality was so bad in his neighborhood. It's not like we had amazing air quality where we lived, but at least it was better than at ES, and air quality has only gotten worse. A big cause of this, yes, is oil and gas pollution. But also due to transportation. CDOT is well-aware of this, I know, and has been working hard to help the impacted communities across the state. I think CDOT is just missing the mark with this proposal. The main concern I have as a private citizen is that CDOT is still considering adding lanes to alleviate congestion, which has been proven to only be a temporary solution due to the phenomenon known as induced demand. I really liked the alternative solution proposed by GreenLatinos (and maybe some other community advocates, I'm not totally sure) which suggested toll lanes, public transit, bike lanes, more green spaces and sidewalks, and air-quality monitoring around 270. The proposal is called the I-270 Healthy Communities No-Widening Alternative and I think has some amazing points that CDOT should consider. I call it 270 because that's what we called it growing up but it looks like the official name is I-270, just something I wanted to note that I found interesting. I no longer live in the area I grew up, but many of my family and friends do. Thank you for giving members of the public an opportunity to chime in on this issue.
Name (first and last)
Sean Price
Address
4840 W 30th Ave
City
Denver
Neighborhood/ZIP Code
Slo-Hi 80212
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
seanpricenews@gmail.com

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative adds one Express Lane in each direction throughout the corridor and is the alternative that best meets the Purpose and Need for the project.

Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' (DRCOG) current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a

slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with DRCOG indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 NEPA process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of

existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final Environmental Impact Statement for information on the evaluation of the I-270 Healthy Communities No-Widening Alternative, which is called the Two Express Lanes that Accommodate Transit Alternative by CDOT.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:29 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Alternatives, Express Lanes
If you selected "Other", please specify
Provide your comment below:
1 The preferred alternative is mostly good, but all three lanes should be general access. We don't need more Lexus Lanes in this area, there are already too many. Additionally, transit is pretty much useless on I-270, since the vast majority of the interstate's users travel by car. Maybe we could use the money from not building useless/unneeded transit infrastructure on I-270 to make the third lane free.
Name (first and last)
Pro Car Colorado
Address
City
Neighborhood/ZIP Code
Would you like to be added to the project email list?
If Yes, please provide your email address

--
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cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes an Express Lane in each direction because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

From: felicia.michael=state.co.us@cdot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] I-270 Project
Date: Thursday, January 15, 2026 11:44:22 AM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Laramie W Reece
Subject
I-270 Project
Your E-Mail Address
lwr.adr@gmail.com
City
Commerce City
Zip Code
80022
Phone Number
7203001212
Comments
1 Thank you for the opportunity to provide feedback on this project. First and foremost, when you think of this project please consider that each and everyday there is backups of traffic for nothing more than cars coming onto I-270 at the Vasquez interchange and traffic will not let them in, i.e., people just being rude and won't let cars merge in, etc. And the interchange where I-270 turns into I-36 and exits to 1-25 and merges with I-76. Again, if people would just be polite, traffic would flow much smoother. One suggestion is to remove the four (4) leaf clover exits at I-270 & Vasquez/6&85/Colorado Blvd. This interchange is a nightmare both exiting and trying to get onto the highway because you have so many cars trying to fight their way around each other. You have very rude drivers who push their way in front of others and cause road rage, almost cause accidents, or have to sit there to try to cross several lanes just to try and get across traffic to be able to proceed safely. Redesigned exits to stop this would benefit this enormously. It would also help the on ramp to the highway and merging. Also getting rid of the Dahlia street exit would help flow.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Postcard

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

Improvements to the I-25/I-270 system interchange, including the flyover ramps to northbound I-25, are acknowledged as critical to corridor performance; however, those facilities are being addressed through separate, previously approved projects on I-25 and US 36 and have been assumed in the I-270 analysis but are not redesigned as part of this EIS. The Preferred Alternative does include restriping the westbound I-270 to northbound I-25 ramp to provide two lanes.

The Preferred Alternative also directly addresses many of the concerns raised regarding congestion, safety, and outdated interchange design at Vasquez Boulevard. The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces

bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

The Preferred Alternative will also improve the Quebec Street interchange ramp acceleration and deceleration lengths.

From: Paul Rocky Montoya Jr.
To: cdot_i270@state.co.us
Subject: [cdot_i270] I-270 Corridor Project: Freight Routing, Noise, and Air-Quality Impacts Near Central Park Blvd
Sent: 12/27/2025 12:30:33 PM

Dear Denver CDOT Team,

I am writing as a resident who lives near the intersection of Central Park Boulevard and Northfield Boulevard, directly adjacent to the I-270 corridor. I appreciate the City's efforts to improve this corridor and recognize that it was not originally designed to handle the level of traffic it now carries.

1 I would like to share ongoing concerns related to the heavy freight truck traffic that uses this corridor as a primary entrance point. Large diesel trucks pass in front of my home throughout the day and night, creating constant and intense noise pollution that significantly impacts the livability of the neighborhood. The noise levels are especially noticeable early in the morning and late at night, making it difficult to enjoy time outdoors or even keep windows open.

2 In addition to noise, I am increasingly concerned about air quality. When I walk outside my home, there is a persistent diesel odor from passing freight trucks. I am worried about the long-term health effects of prolonged exposure to diesel exhaust, particularly for residents who live closest to the roadway and for families with children or individuals with respiratory sensitivities.

3 I understand that freight movement is essential, but I strongly believe there should be better routing or access solutions that reduce the burden placed on residential streets and neighborhoods like ours. I encourage CDOT to consider alternative freight access routes or design solutions that would allow trucks to enter and exit the corridor without passing directly through residential frontage areas.

As the I-270 Corridor project moves forward, I hope that noise mitigation, air-quality impacts, and freight routing near homes are treated as key priorities. I appreciate your work on this project and thank you for taking the time to consider the perspective of residents who live with the daily impacts of this corridor.

Please feel free to contact me if additional community input would be helpful. I would welcome the opportunity to participate in future discussions or meetings related to this project.

Thank you for your time and consideration.

Sincerely,
Paul Rocky
Denver, CO
Email: pmontoy9@gmail.com
Phone: 303-642-5040

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

Please see Section 5.4.4, IMP4, of the Final Environmental Impact Statement (EIS) for additional information on noise impacts.

Response to Comment 2

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone

precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

Freight operations and truck-related safety issues were key focus areas of the study. I-270 is a designated freight, hazardous materials, oversized and overweight, and Strategic Highway Network (STRAHNET) route. The Preferred Alternative improves interchange geometry, merge spacing, and acceleration and deceleration lengths to reduce conflicts between trucks and passenger vehicles. With these improvements, freight vehicles should not route through neighborhoods as often with the exception of those who need to use those routes for deliveries.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 11/22/2025 5:44 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Bicycle and Pedestrian Resources, Express Lanes, Pedestrian Resources
If you selected "Other", please specify
Provide your comment below:
1 The proposal for 3 general lanes as an option should be abandoned immediately; decades of research have confirmed the phenomenon of induced demand again and again, demonstrating that additional general use lanes result in worse traffic congestion. The 2-general, 1 transit lane
2 alternative is far superior in this regard; however, an even better alternative would be to pursue converting an existing lane be a transit/dynamic toll land, rebuilding the 2 lanes of I-270
3 infrastructure to current standards and focusing on improvements on the bicycle, pedestrian, and transit network in the surrounding community.
Name (first and last)
Erin Roethlisberger
Address
2255 W. Jamison Way
City
Littleton
Neighborhood/ZIP Code
80120
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
Pyro_erin@hotmail.com

--
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codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Response to Comment 2

Exclusive transit lane alternatives were evaluated during the screening process but were eliminated because they did not adequately address the project's Purpose and Need for corridor-wide safety, travel time reliability, and freight operations, and would have reduced capacity available to general traffic and freight on a facility that already operates over capacity.

The Preferred Alternative supports transit performance by allowing buses to operate in the Express Lane, free of charge, which maintains steady speeds using dynamic pricing and limited access points, consistent with managed lane operations on other Colorado highways.

Please see Section 5.4.3, ALT6, of the Final EIS for information on the consideration of increased transit options and services, including a transit-only lane.

Response to Comment 3

An alternative that converts one existing lane on I-270 to an Express Lane that accommodates transit was not evaluated as part of this project. 23 United States Code Section 129 does not allow conversion of existing free lanes to Express Lanes and would require federal authorization.

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 1:45 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

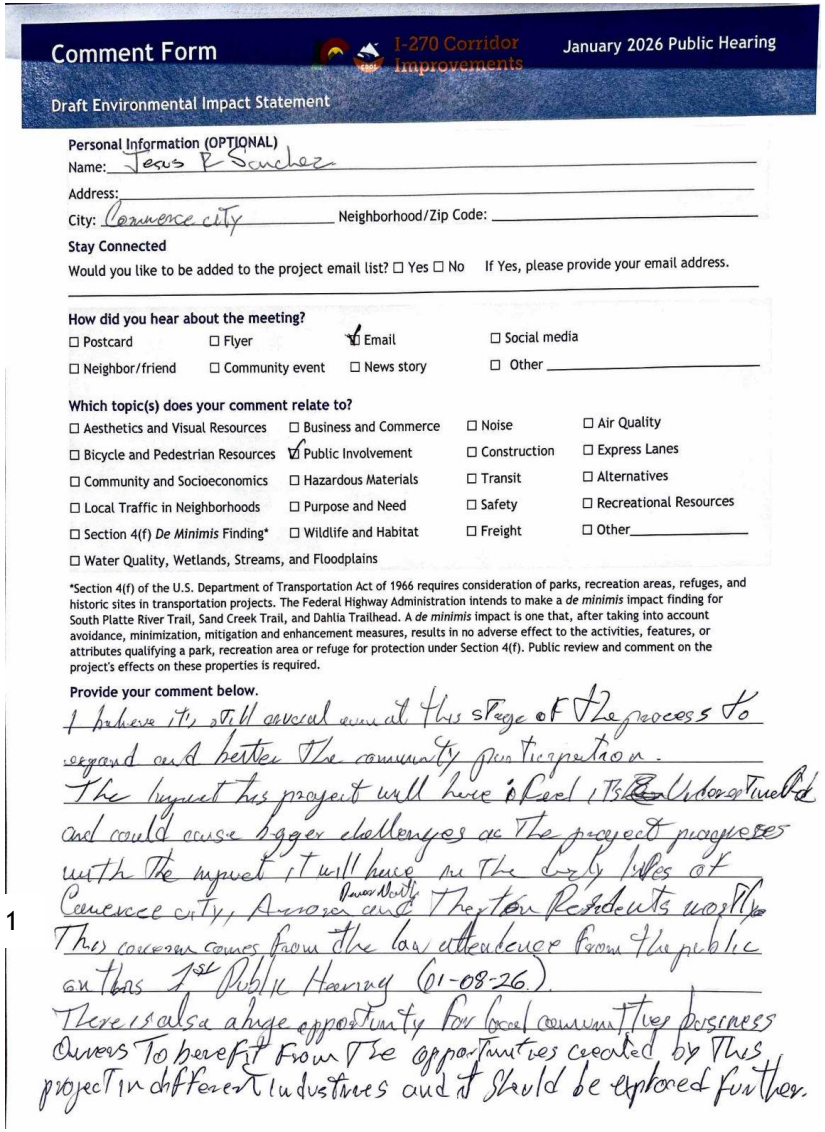
CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Air Quality, Purpose and Need
If you selected "Other", please specify
Provide your comment below:
Highway widening is one of the most idiotic waste of resources that CDOT could undertake. How many studies must be published that clearly point to the ineffectiveness of highway widening? This will not alleviate any of the issues with this stretch of road. This is an expensive bandaid. I demand that you not waste my tax dollars and that you do NOT go forward with this proposed highway widening.
Name (first and last)
Calvin Ryan
Address
3019 Grove St
City
Denver
Neighborhood/ZIP Code
80211
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
me@calvinryan.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.



Comment Form

I-270 Corridor Improvements

January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Jesus R Sanchez

Address:

City: Commerce city Neighborhood/Zip Code:

Stay Connected

Would you like to be added to the project email list? ☐ Yes ☐ No If Yes, please provide your email address.

How did you hear about the meeting?

☐ Postcard ☐ Flyer ☑ Email ☐ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources ☐ Business and Commerce ☐ Noise ☐ Air Quality

☐ Bicycle and Pedestrian Resources ☑ Public Involvement ☐ Construction ☐ Express Lanes

☐ Community and Socioeconomics ☐ Hazardous Materials ☐ Transit ☐ Alternatives

☐ Local Traffic in Neighborhoods ☐ Purpose and Need ☐ Safety ☐ Recreational Resources

☐ Section 4(f) *De Minimis* Finding* ☐ Wildlife and Habitat ☐ Freight ☐ Other

☐ Water Quality, Wetlands, Streams, and Floodplains

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

I believe it's still crucial even at this stage of the process to expand and better the community participation. The impact this project will have if and it's underestimated and could cause bigger challenges as the project progresses with the impact it will have in the daily lives of Commerce city, Aurora, Denver North and Thornton Residents mostly. This concern comes from the low attendance from the public on this 1st Public Hearing (01-08-26). There is also a huge opportunity for local communities business owners to benefit from the opportunities created by this project in different industries and it should be explored further.

1

Response to Comment 1

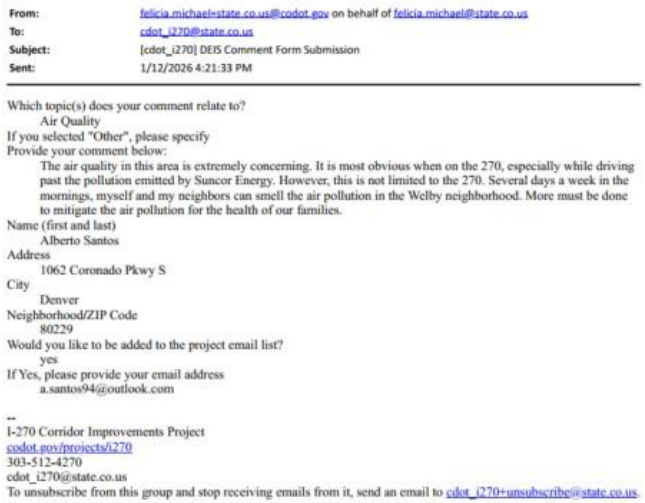
A Public Involvement Plan (PIP) was developed and implemented when the Environmental Impact Statement (EIS) process began in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within 1 mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the United States Environmental Protection Agency and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development.

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS. For information on public involvement during the Draft EIS public comment period, see Section 5.4.1, GEN2, of the Final EIS and Section 5.2 of the Final EIS.

1



From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/12/2026 4:21:33 PM

Which topic(s) does your comment relate to?
Air Quality
If you selected "Other", please specify
Provide your comment below:
The air quality in this area is extremely concerning. It is most obvious when on the 270, especially while driving past the pollution emitted by Suncor Energy. However, this is not limited to the 270. Several days a week in the mornings, myself and my neighbors can smell the air pollution in the Welby neighborhood. More must be done to mitigate the air pollution for the health of our families.
Name (first and last)
Alberto Santos
Address
1062 Coronado Pkwy S
City
Denver
Neighborhood/ZIP Code
80229
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
a.santos94@outlook.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

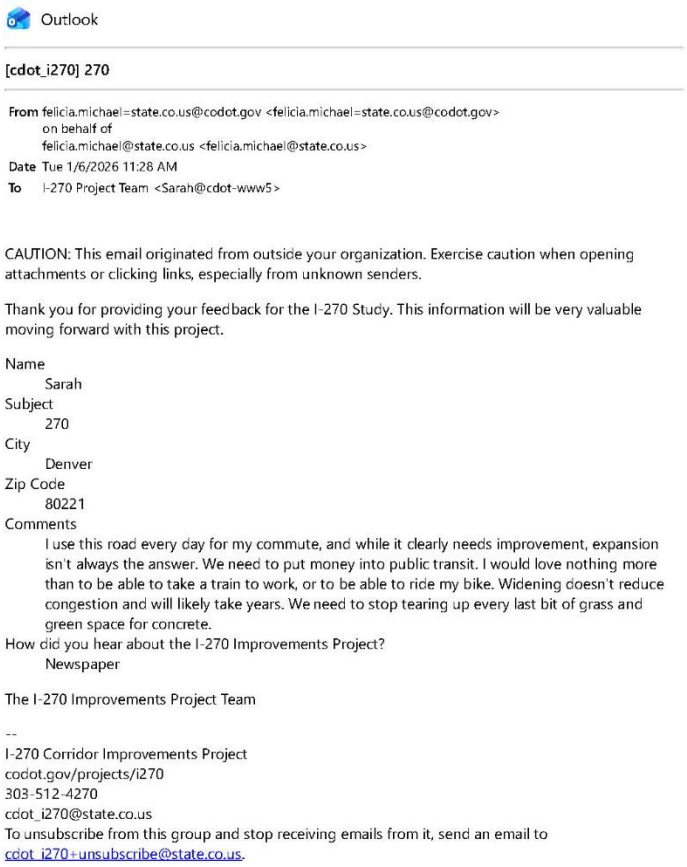
The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All

priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).



Outlook

[cdot_i270] 270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:28 AM
To I-270 Project Team <Sarah@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Sarah
Subject
270
City
Denver
Zip Code
80221
Comments
I use this road every day for my commute, and while it clearly needs improvement, expansion isn't always the answer. We need to put money into public transit. I would love nothing more than to be able to take a train to work, or to be able to ride my bike. Widening doesn't reduce congestion and will likely take years. We need to stop tearing up every last bit of grass and green space for concrete.
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

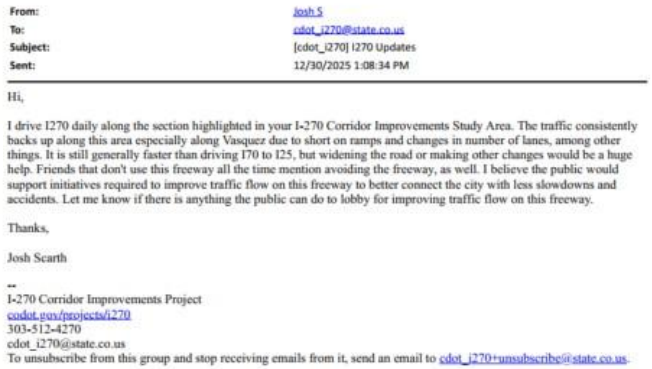
--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

Throughout the Environmental Impact Statement process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.



From: Josh S
To: cdot_i270@state.co.us
Subject: [cdot_i270] I270 Updates
Sent: 12/30/2025 1:08:34 PM

Hi,

1 I drive I270 daily along the section highlighted in your I-270 Corridor Improvements Study Area. The traffic consistently backs up along this area especially along Vasquez due to short on ramps and changes in number of lanes, among other things. It is still generally faster than driving I70 to I25, but widening the road or making other changes would be a huge help. Friends that don't use this freeway all the time mention avoiding the freeway, as well. I believe the public would support initiatives required to improve traffic flow on this freeway to better connect the city with less slowdowns and accidents. Let me know if there is anything the public can do to lobby for improving traffic flow on this freeway.

Thanks,

Josh Scarth

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane.

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sun 11/23/2025 5:52 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality, Water Quality, Wetlands, Streams and Floodplains
If you selected "Other", please specify
Provide your comment below:
1 It's been shown again and again that widening highways only serves to worsen pollution with limited benefits for traffic flow and travel times. Expanding 270 in neighborhoods that already experience elevated risks of asthma and other air quality related conditions is simply irresponsible and goes against all of CDOTs stated goals. Please don't spend money on a project that will only increase pollution in our community.
Name (first and last)
Mark Schenberger
Address
City
Denver
Neighborhood/ZIP Code
80223
Would you like to be added to the project email list?
no
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All

priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft Environmental Impact Statement (EIS).

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final EIS for additional information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

1

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Date: Sunday, January 18, 2026 1:50:49 PM

Which topic(s) does your comment relate to?
Express Lanes
If you selected "Other", please specify
Provide your comment below:
I would prefer three lanes on the i270 improvement rather than paid express lanes which are a waste of money.
Name (first and last)
Beth Schneider
Address
5053 Valentia St
City
Denver
Neighborhood/ZIP Code
80238
Would you like to be added to the project email list?
If Yes, please provide your email address

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Preferred Alternative includes the addition of one Express Lane in each direction throughout the corridor because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for additional information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit is preliminarily identified as the Preferred Alternative.

Outlook

Fwd: [cdot_i270] DEIS Comment Form Submission

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Sun 12/28/2025 7:21 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Thanks,
Mandy

Begin forwarded message:

From: felicia.michael@state.co.us
Date: December 28, 2025 at 5:52:01 PM MST
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Reply-To: cdot_i270+managers@state.co.us

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Which topic(s) does your comment relate to?

Air Quality, Alternatives, Business and Commerce , Bicycle and Pedestrian Resources, Community and Socioeconomics , Construction , Express Lanes, Freight, Hazardous Materials, Local Traffic in Neighborhoods , Noise, Public Involvement, Purpose and Need, Recreational Resources, Safety, Transit

If you selected "Other", please specify

Provide your comment below:

Context I: -Am 30 years old. My generation will live with the effects (financial, health, and environmental) of improvements, positive and negative for at least 50 additional years (the current life expectancy in Colorado is ~80 years). -Am relatively privileged. White, straight male. Can affordably house myself (albeit only with housemates) in a location not immediately adjacent to industrial polluters whose emissions, waste, and residents, possibly unlike the residents of Adams County and Commerce City who live adjacent to both industrial polluters and a major interstate in I-270 that carries vehicles whose emissions are under-regulated or not regulated at all (vehicles could be registered to addresses in parts of Colorado not subject emissions testing or other states/countries also not subject to emissions testing) -Am a former single-passenger vehicle commuter between Boulder and Aurora (I-225 & Alameda) on Mondays, Wednesdays, and Fridays at peak travel times. I experienced the drastic difference in travel time between the peak and off-peak. Due to the congestion

(including on the alternate route 70 East>25 North>36 West) my eight hour workday became a ten hour workday. Inching along I-270 was mentally draining, especially when needing to pay attention. There was no time-competitive RTD service to replace my single-passenger vehicle trip, so unfortunately there was no opportunity to sleep or do something productive during my commute. This mentally draining commute was a major reason why I quit the job to which I was commuting. -Have the time and knowledge to pay attention to public comment periods like this one. -A former transportation and land use planner (see my LinkedIn profile for additional context: https://www.linkedin.com/in/henry-schoenhoff/) In short, I am no

1 novice. Comments CDOT staff should recognize that any additional capacity (managed lanes or not) will lead to induced demand over time. Instead of implementing proven strategies to reduce congestion, adding a managed lane to I-270 will simply pass along the congestion problem to my generation. CDOT is already under-resourced. Especially after considering how inflation in construction costs is outpacing general inflation, jeopardizing my generation's ability to implement proven strategies once the induced demand materializes. Additionally, adding capacity defies CDOT's own rules aiming to decrease greenhouse gas

2 emissions, to do our part to mitigate the negative impacts of climate change on our metropolitan areas, State, country, and world, jeopardizing one of our State's favorite activities: skiing. Colorado's economy and water supply depends on snow. While we know weather and climate are different, record heat and low snowpack in December 2025 are just the beginning of the impacts of climate change if we do not hurry up and do what we can to mitigate emissions (especially when this is out of vogue for the current presidential administration). Adding capacity extenuates the negative health and environmental impacts to residents living along the corridor, who are generally more socioeconomically challenged in the context of the greater metropolitan area and likely experience more challenges in accessing healthcare to treat disease caused by acute air pollution (i.e Medicaid instability, end of Affordable Care Act subsidies). Thank you for reading, listening, and for incorporating these ideas into the final design.

Name (first and last)
Henry Schoenhoff
Address
3087 Edison Ct
City
Boulder
Neighborhood/ZIP Code
80301
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
henry.s.schoenhoff@gmail.com

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG's) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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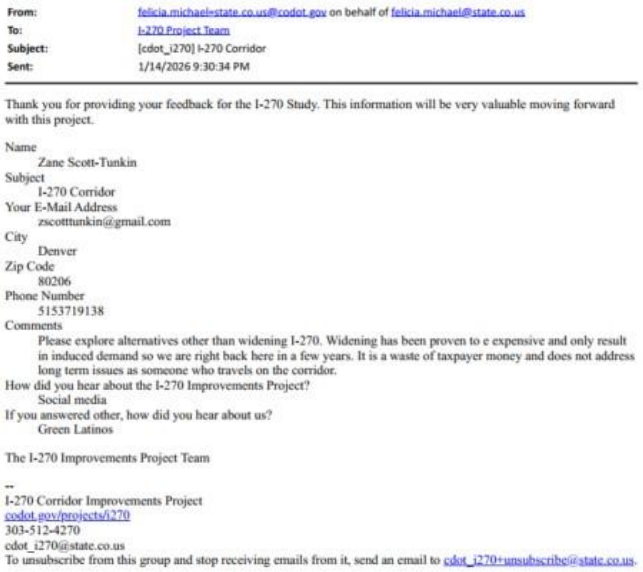
de



From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] I-270 Corridor
Sent: 1/14/2026 9:30:34 PM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Zane Scott-Tunkin
Subject
I-270 Corridor
Your E-Mail Address
zscotttunkin@gmail.com
City
Denver
Zip Code
80206
Phone Number
5153719138
Comments
Please explore alternatives other than widening I-270. Widening has been proven to e expensive and only result in induced demand so we are right back here in a few years. It is a waste of taxpayer money and does not address long term issues as someone who travels on the corridor.
How did you hear about the I-270 Improvements Project?
Social media
If you answered other, how did you hear about us?
Green Latinos

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
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cdot_i270@state.co.us
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1

Response to Comment 1

Several alternatives that do not add capacity were considered in the alternatives development and screening process. The Minimal Build Alternative focuses on safety improvements on I-270 and bicycle, pedestrian, and transit enhancements rather than adding capacity. This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

During the Draft Environmental Impact Statement (EIS) comment period, CDOT received a new alternative from the GreenLatinos,

which was called the I-270 Healthy Communities No-Widening Alternative. For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative.

In response, FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments (DRCOG) indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets.

Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain. In addition, because I-270 functions as a designated hazardous materials route, oversized and overweight load route, nuclear route, and part of the Strategic Highway Network (STRAHNET), freight operators have limited viable alternatives. Without added capacity, converting existing lanes to Express Lane operations could increase costs and reliability risks for essential freight movements without corresponding improvements in throughput.

In terms of physical footprint, the Two Express Lanes that Accommodate Transit Alternative would not add continuous through lanes but includes continuous acceleration and deceleration lanes. As a result, its footprint would be greater than the No Action and Minimal Build Alternatives and smaller than widening alternatives that add capacity.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act (NEPA) process. ISRRPP allows a limited number of states to toll existing Interstate facilities for reconstruction or rehabilitation purposes, subject to strict eligibility criteria and FHWA approval. Participation in ISRRPP is discretionary, capped nationwide, and not guaranteed; acceptance would require a separate federal application and approval process independent of this project's NEPA review. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction.

VPPP allows states to test value pricing strategies intended to manage congestion and influence travel behavior. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone. VPPP has generally been applied in urban contexts as part of broader, regionally coordinated congestion-pricing efforts.

However, while neither pilot program can be implemented solely through the I-270 NEPA process, the Preferred Alternative would not preclude CDOT and regional partners from pursuing a broader, regionally coordinated tolling pilot under either ISRRPP or VPPP in the future through the appropriate federal and metropolitan planning processes.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not

demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

The Draft EIS recognizes the body of research regarding induced demand and evaluates future travel using DRCOG's federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Outlook

[cdot_i270] i270 project

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/5/2026 4:14 PM
To I-270 Project Team <SamLSemrow@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Sam L Semrow
Subject
i270 project
Your E-Mail Address
ssemrow@yahoo.com
City
Loveland
Zip Code
805385674
Phone Number
8472263718
Comments
I support the three thru lane alternatives with auxiliary (4th lane) as illustred in the map book presentation. Prefer non toll option, but toll is acceptable if needed to start project now. This road is majorly congested during rush hour and when an accident happens and results in major delays. The no build option does not solve the problem. Please move project forward asap. The ancillary improvements are nice and should be implemented.
How did you hear about the I-270 Improvements Project?
Email

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes the addition of a third lane that operates as an Express Lane and the auxiliary lane between the Vasquez Boulevard and I-76 interchanges.

Outlook

[cdot_i270] I-270 Improvements Project Feedback

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 5:54 PM
To I-270 Project Team <MikeShinbein@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Mike Shinbein
Subject
I-270 Improvements Project Feedback
Your E-Mail Address
mshinbein@hotmail.com
City
Denver
Zip Code
80238
Comments
We HAVE to add another lane (tolled or untolled) to the 270 freeway; the traffic situation is beyond ridiculous and unsafe, and has been that way for far too long. When proceeding with the lane expansion project, please also keep the residents living near the 270 in mind by keeping incremental environmental impacts and incremental commuting costs to as close to a minimum as possible. Thank you!
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

1

Response to Comment 1

The Preferred Alternative includes a third lane in each direction throughout the corridor, which will operate as an Express Lane, because it best meets the Purpose and Need of the project.

Please see Chapter 5.0 of the Record of Decision for a list of mitigation and commitments that the project will implement to address environmental impacts.

Outlook

[cdot_i270] Suggestions on Supporting Infrastructure near I-270

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> on behalf of felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/20/2026 3:51 PM
To I-270 Project Team <ReneGarciaSimental@cdot-www5>

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Rene Garcia Simental
Subject
Suggestions on Supporting Infrastructure near I-270
Your E-Mail Address
renegs.garcia@gmail.com
City
Denver, CO
Zip Code
80216
Phone Number
7206128152
Comments

1 Greetings to the Colorado Department of Transportation, I am pleased to offer my thoughts in regards to the I-270 project that needs vital improvements. Reviewing some of the documents available, I can agree that the clover leaf intersection is cause for much of the traffic issues. Having experienced the bottle neck firsthand as I commute around this intersection just to get to the Walmart in Commerce City, or even passing by to try to get to other areas beyond this intersection is a challenge due to the congestion. I have concerns that induced demand shall be apparent when the highway is widened. My understanding is that much of the bottleneck happens due to the cloverleaf design where you have to close of an intersection where vehicles are merging that contribute to the delays. Part of it is due to the excessive volume of vehicles getting on from both north and southbound that adds to the congestion. I think there are too many options in regards to exits at this location, and the on and off ramps need to be stretched

2 out away from each other. If possible, I would recommend if a dedicated lane that handles the traffic coming onto the highway can funnel the traffic and allow it to merge once it is up to speed a half mile beyond these intersections, allowing mergers to be conducted with the dedicated lane serving as a third lane. The biggest issue is that there is a need to meter the traffic before it gets to I-270, part of the backups are the constant feed of vehicles getting on to the highway that contributes to the delays. I think it would be wise to introduce traffic calming

Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Response to Comment 2

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

Specific local intersection control measures, such as barrier placement or new signal locations, fall outside the scope of the interstate project; however, local agencies have been involved in this process and understand these challenges.

measures beyond the signal intersections on both the north and southbound intersections, that intend to limit the traffic getting on. This may not be a focus to you, but the left turn lane on southbound Vazquez at that signal intersection on 56th AVE is a huge hazard, due to the amount of vehicles (semi's) that immediately cut traffic lanes once they get off westbound I-270 and cross over just to be able to make the left turn at that intersection. I think jersey barriers should be erected so the traffic continues to flow southbound, and place a signal intersection past the overpass on Colorado to allow freight to turn into the industrial areas and remove the risk. I cannot stress how many times the left travel lane is blocked due to someone wanting to use the left turn lane here and it causes me to have to slam on the brakes. This is a hazard that needs to be addressed. People have way too much leeway in making unsafe decisions that put other drivers at risk. I think there should be some thought in adding additional on ramps that could benefit travel, in the sense that the pressure from high traffic areas are taken off. Drivers are very saavy, and if there are ways through navigation that can help suggest some travel delays are avoided, you disperse the volume of traffic from being pressed into one location. Regarding Pedestrian and people on bicyles that traverse north and southbound past 56th Ave Intersection at Vazquez: There are a number of people who commute and have created trails. I 3 believe that there should be ways to connect some infrastructure that allows pedestrians and cyclists mobility. I have seen people traverse through this area and it puts them in danger due to the speed of traffic and no proper signage, and risks creating conditions for a fatality. My last suggestion would be that if a key travel option for northbound to eastbound on I-270 is needed, 4 what if a on-ramp was moved along sand creek drive south, allowing traffic to get on along this stretch. There's far too much congestion around the clover on ramps that make it a difficult challenge, spacing it out away from vazquez would make the most sense. If the preferred alternative solves much of the congestion issues, then I affirm my support.

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Newspaper

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Response to Comment 3

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Some of these improvements are in the area of 56th Avenue and Vasquez Boulevard. Please see Section 5.4.3, ALT7, of the Final EIS for consideration of increased bicycle and pedestrian facilities.

Response to Comment 4

The Preferred Alternative includes adding this missing movement at the Vasquez Boulevard interchange and includes providing an acceleration lane to allow vehicles to get up to speed and merge onto I-270.

From: felicia.michael=state.co.us@cdot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] Suggestions on Supporting Infrastructure near I-270
Sent: 1/20/2026 3:50:56 PM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Rene Garcia Simental
Subject
Suggestions on Supporting Infrastructure near I-270
Your E-Mail Address
renegs.garcia@gmail.com
City
Denver, CO
Zip Code
80216
Phone Number
7206128152
Comments

1 Greetings to the Colorado Department of Transportation, I am pleased to offer my thoughts in regards to the I-270 project that needs vital improvements. Reviewing some of the documents available, I can agree that the clover leaf intersection is cause for much of the traffic issues. Having experienced the bottle neck firsthand as I commute around this intersection just to get to the Walmart in Commerce City, or even passing by to try to get to other areas beyond this intersection is a challenge due to the congestion. I have concerns that induced demand shall be apparent when the highway is widened. My understanding is that much of the bottleneck happens due to the cloverleaf design where you have to close of an intersection where vehicles are merging that contribute to the delays. Part of it is due to the excessive volume of vehicles getting on from both north and southbound that adds to the congestion. I think there are too many options in regards to exits at this location, and the on and off ramps need to be stretched out away from each other. If possible, I would recommend if a dedicated lane that handles the traffic coming onto the highway can funnel the traffic and allow it to merge once it is up to speed a half mile beyond these intersections, allowing mergers to be conducted with the dedicated lane serving as a third lane. The biggest issue is that there is a need to meter the traffic before it gets to I-270, part of the backups are the constant feed of vehicles getting on to the highway that contributes to the delays. I think it would be wise to introduce traffic calming measures beyond the signal intersections on both the north and southbound intersections, that intend to limit the traffic getting on. This may not be a focus to you, but the left turn lane on southbound Vazquez at that signal intersection on 56th AVE is a huge hazard, due to the amount of vehicles (semi's) that immediately cut traffic lanes once they get off westbound I-270 and cross over just to be able to make the left turn at that intersection. I think jersey barriers should be erected so the traffic continues to flow southbound, and place a signal intersection past the overpass on Colorado to allow freight to turn into the industrial areas and remove the risk. I cannot stress how many times the left travel lane is blocked due to someone wanting to use the left turn lane here and it causes me to have to slam on the brakes. This is a hazard that needs to be addressed. People have way too much leeway in making unsafe decisions that put other drivers at risk. I think there should be some thought in adding additional on ramps that could benefit travel, in the sense that the pressure from high traffic areas are taken off. Drivers are very saavy, and if there are ways through navigation that can help suggest some travel delays are avoided, you disperse the volume of traffic from being pressed into one location. Regarding

2

3 Pedestrian and people on bicyles that traverse north and southbound past 56th Ave Intersection at Vazquez: There are a number of people who commute and have created trails. I believe that there should be ways to connect some infrastructure that allows pedestrians and cyclists mobility. I have seen people traverse through this area and it puts them in danger due to the speed of traffic and no proper signage, and risks creating conditions for a fatality. My last suggestion would be that if a key travel option for northbound to eastbound on I-270 is needed, what if a on-ramp was moved along sand creek drive south, allowing traffic to get on along this stretch. There's

4 far too much congestion around the clover on ramps that make it a difficult challenge, spacing it out away from vazquez would make the most sense. If the preferred alternative solves much of the congestion issues, then I affirm my support.

I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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Response to Comment 1

The Draft Environmental Impact Statement (EIS) recognizes the body of research regarding induced demand and evaluates future travel using the Denver Regional Council of Governments' (DRCOG) federally approved regional travel demand model. Federal planning regulations require use of the Metropolitan Planning Organization's most recently adopted model and socioeconomic forecasts. DRCOG's model incorporates projected population, employment, land use, and transportation network assumptions for the 2050 planning horizon. It also accounts for changes in travel time, route choice, and mode choice across the entire regional network when capacity or operational characteristics are modified. In other words, the traffic forecasts used in the Draft EIS already reflect the model's representation of how travelers respond to congestion relief or pricing changes at a system level, rather than assuming static demand.

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

Please see Section 5.4.6, TRANS2, of the Final EIS for additional information on induced demand and traffic modeling.

Response to Comment 2

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

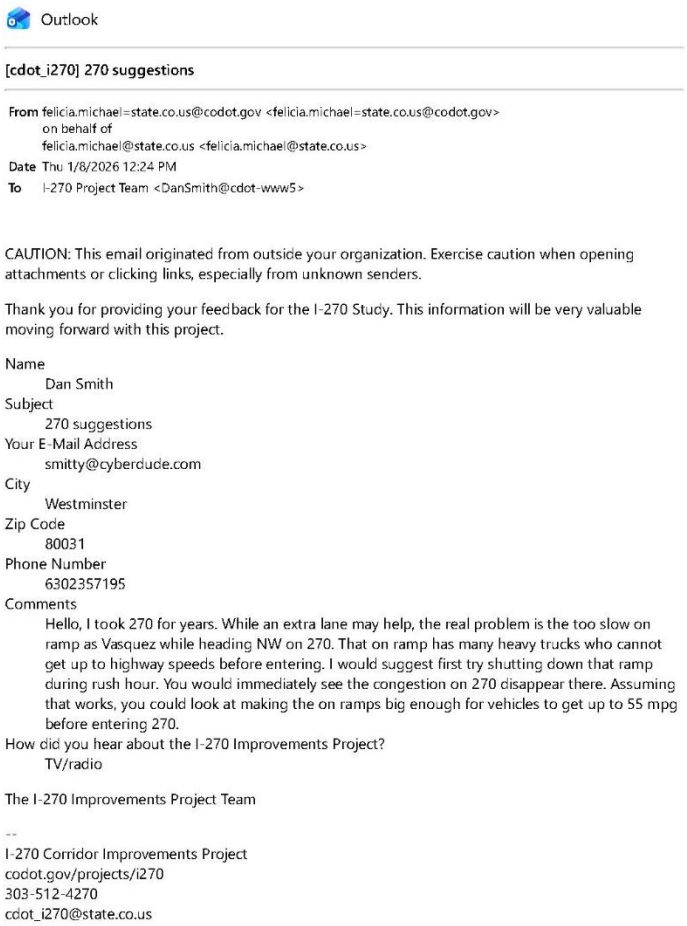
Specific local intersection control measures, such as barrier placement or new signal locations, fall outside the scope of the interstate project; however, local agencies have been involved in this process and understand these challenges.

Response to Comment 3

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Some of these improvements are in the area of 56th Avenue and Vasquez Boulevard. Please see Section 5.4.3, ALT7, of the Final EIS for consideration of increased bicycle and pedestrian facilities.

Response to Comment 4

The Preferred Alternative includes adding this missing movement at the Vasquez Boulevard interchange and includes providing an acceleration lane to allow vehicles to get up to speed and merge onto I-270.



Outlook

[cdot_i270] 270 suggestions

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 1/8/2026 12:24 PM
To I-270 Project Team <DanSmith@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Dan Smith
Subject
270 suggestions
Your E-Mail Address
smitty@cyberdude.com
City
Westminster
Zip Code
80031
Phone Number
6302357195
Comments
Hello, I took 270 for years. While an extra lane may help, the real problem is the too slow on ramp as Vasquez while heading NW on 270. That on ramp has many heavy trucks who cannot get up to highway speeds before entering. I would suggest first try shutting down that ramp during rush hour. You would immediately see the congestion on 270 disappear there. Assuming that works, you could look at making the on ramps big enough for vehicles to get up to 55 mpg before entering 270.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us

1

Response to Comment 1

The existing cloverleaf interchange at Vasquez Boulevard is a primary source of congestion and safety issues due to short merge distances, closely spaced on- and off-ramps, and heavy weaving from vehicles entering and exiting I-270. The Preferred Alternative includes a full reconstruction of the Vasquez Boulevard interchange to remove the cloverleaf configuration and replace it with longer, standard-compliant acceleration and deceleration lanes with improved ramp geometry. These improvements are intended to separate entering and exiting movements, reduce the number of closely spaced conflict points, and allow vehicles to reach highway speeds before merging.

The Preferred Alternative also includes continuous auxiliary lanes between I-76 and Vasquez Boulevard. These auxiliary lanes function similarly to dedicated merge lanes by providing additional distance and capacity for vehicles to enter, exit, and weave without immediately interacting with through traffic. This design reduces bottlenecks, improves traffic flow, and enhances safety without relying solely on widening to higher lane counts.

To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Sent: 1/10/2026 9:49:32 AM

Which topic(s) does your comment relate to?
Alternatives, Transit
If you selected "Other", please specify
Provide your comment below:

1 strongly oppose spending additional taxpayer dollars on constructing new express lanes on I-270 when we already have proven, cost-effective solutions that are largely ignored. Colorado law already requires drivers to keep right except to pass on multi-lane highways with a posted speed limit of 65 mph or more. Under Colorado Revised Statutes § 42-4-1013, a driver "shall not drive a motor vehicle in the passing lane … unless such person is passing other motor vehicles … or turning left, or unless the volume of traffic does not permit the motor vehicle to safely merge into a nonpassing lane." Violating this law is a Class A traffic infraction. We waste time, money, and years of congestion on construction projects that attempt to solve a problem that already has a legal solution. The issue isn't that the law doesn't exist — it's that it is consistently ignored, under-taught, and unenforced. If drivers were properly educated about this law and if law enforcement had the resources to enforce it, traffic flow would improve significantly — not only on I-270, but across Colorado's multi-lane highways. Signs stating "Keep Right Except to Pass" exist, but without enforcement and public awareness campaigns, they have little effect. Rather than funding another expensive construction project, we should invest in: • Education campaigns — statewide news, social media, and public service announcements explaining the keep-right law and how it improves safety and traffic flow. • Enforcement funding — more Colorado State Patrol and local traffic enforcement officers on key corridors. • Proper driver training — including clear instruction on passing lane laws for both new and existing drivers. It is particularly frustrating to witness Colorado Department of Transportation vehicles themselves violating this law. CDOT should lead by example. I have lived in Colorado for over 20 years and love this state, but driving — especially on weekends — has become a headache because too many drivers remain in the left lane unnecessarily. If everyone followed the existing law and kept right except to pass, traffic congestion would decrease, safety would improve, and we wouldn't need to spend millions on yet another construction project. Thank you for your consideration.

Name (first and last)
Ann Marie Stauber
Address
3046 s ouray st
City
Aurora
Neighborhood/ZIP Code
80013
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
Annmarie.stauber@gmail.com

--
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303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Please see Section 5.4.1, GEN1, of the Final Environmental Impact Statement for information on the Purpose and Need for the project. Education and enforcement do not meet the Purpose and Need.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Outlook

[cdot_i270] Improvements needed!

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Wed 1/7/2026 1:46 PM
To I-270 Project Team <GretchenUshakova@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Gretchen Ushakova
Subject
Improvements needed!
Your E-Mail Address
Gretchenu@gmail.com
City
Boulder
Zip Code
80304
Phone Number
7205244591
Comments
I am encouraged to see this C-Dot proposal for I-270. While I don't directly live in the area, traveling to areas including DIA, Aurora and Denver for those living off the 36 corridor is unpredictable. As a resident of the broader metro area, I think k this would be a needed and positive improvement to fuel connectivity in the region!
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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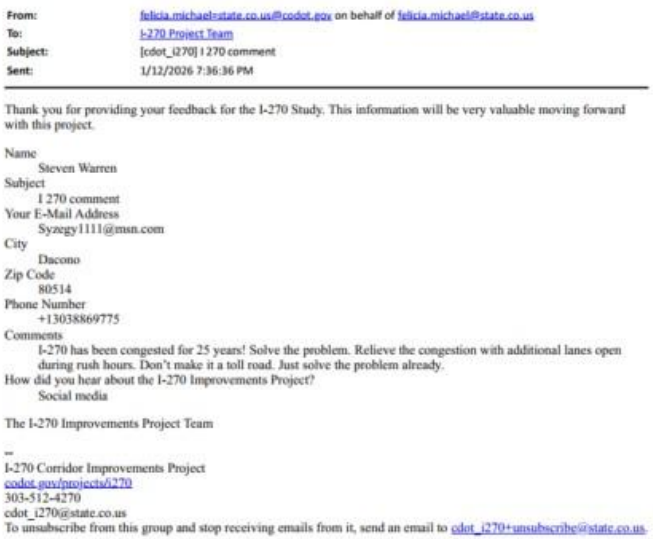
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Comments noted.



From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] I 270 comment
Sent: 1/12/2026 7:36:36 PM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Steven Warren
Subject
I 270 comment
Your E-Mail Address
Syzegy1111@msn.com
City
Dacono
Zip Code
80514
Phone Number
+13038869775
Comments
1 I-270 has been congested for 25 years! Solve the problem. Relieve the congestion with additional lanes open during rush hours. Don't make it a toll road. Just solve the problem already.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative adds one lane in each direction on I-270, which will operate as an Express Lane because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Sat 12/20/2025 6:14 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Which topic(s) does your comment relate to?
Express Lanes, Public Involvement, Purpose and Need, Safety
If you selected "Other", please specify
Provide your comment below:
1 Adding toll lanes to a road that has been too small for more than 2 decades adds insult to injury. As a taxpayer, I want roads to be maintained in good condition, and for my tax dollars serving the public good. The current proposal uses tax money to reconstruct 270 with more safety features, but then mitigates the benefit by adding aggressive cross lane transfers caused by people coming in and out of the toll lanes -- all too benefit a very small audience -- RTD buses, and people willing to spend any amount of money to pass someone. The HOV free option is a joke since most people don't have the tags with the transponders or the wherewithal to use them if they did have them. It also creates unsafe driving behavior if they have to toggle a switch while driving. It'd be one thing if this was 3 lanes in each direction already, or the proposal was for four lanes and 2 of 8 lanes were toll way, but it's not. As taxpayers we're not only suffering for not addressing this roadway sooner, or during construction, but also penalizing the working people who use this road every day for the benefit of a few. Freight truckers are the most adversely impacted and this road in so many ways exists for them to service the Denver metro area. Do not add toll lanes or HOV lanes when the road is grossly undersized to begin with.
Name (first and last)
Dan Weber
Address
1520 West 78th Circle
City
Denver
Neighborhood/ZIP Code
80221
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
dweber@gmail.com

--
I-270 Corridor Improvements Project

Response to Comment 1

The Preferred Alternative adds a third land that will operate as an Express Lane because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Outlook

FW: [cdot_i270] Feedback

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Tue 12/30/2025 4:44 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Mandy Whorton
PEAK CONSULTING GROUP
200 Union Blvd, Ste 210
Lakewood CO 80228
Phone: 303-886-6258

From: felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> **On Behalf Of** felicia.michael@state.co.us
Sent: Tuesday, December 30, 2025 3:44 PM
To: I-270 Project Team <Lexiewhite@cdot-www5>
Subject: [cdot_i270] Feedback

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Lexie white
Subject
Feedback
City
Thornton
Zip Code
80602
Phone Number
7204040562
Comments
1 Why are you spending money on putting a bicycle and pedestrian sidewalk on a highway?!? Seems so dangerous. We don't want people walking on a highway. Also maybe have the semis only drive in the right lane to free up the left lane. The semis cause the most congestion and slow traffic down in both lanes
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

Response to Comment 1

This project does not add sidewalks on the highway; it adds bicycle and pedestrian facilities off the highway. Please see Section 5.4.3, ALT7, of the Final Environmental Impact Statement (EIS) for information on bicycle and pedestrian facilities.

Requiring semis to only use the right lane was not a consideration in the project since that's not a typical practice on Colorado highways. The semis are included in the traffic modeling that was completed for the project and improving freight operations in the corridor is part of the Purpose and Need for the project. Please see Section 5.4.1, GEN1, of the Final EIS for information on the Purpose and Need.

--
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Outlook

Fwd: [cdot_i270] DEIS Comment Form Submission

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Tue 12/30/2025 5:46 AM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Thanks,
Mandy

Begin forwarded message:

From: felicia.michael@state.co.us
Date: December 29, 2025 at 5:48:18 AM MST
To: cdot_i270@state.co.us
Subject: [cdot_i270] DEIS Comment Form Submission
Reply-To: cdot_i270+managers@state.co.us

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Which topic(s) does your comment relate to?
Aesthetics and Visual Resources , Air Quality, Alternatives, Business and Commerce , Bicycle and Pedestrian Resources, Community and Socioeconomics , Construction , Express Lanes, Freight, Hazardous Materials, Local Traffic in Neighborhoods , Noise, Pedestrian Resources , Public Involvement, Purpose and Need, Recreational Resources, Safety, Transit, Wildlife and Habitat, Water Quality, Wetlands, Streams and Floodplains
If you selected "Other", please specify
Provide your comment below:
I sat on the 270 Corridor monthly meetings. I truly believe everything I have marked in the above section will benefit greatly as soon as we can get this project started. Safety is the utmost concern. I have personally been under the bridges needing replaced and it is a very unsafe situation. The longer this project takes to get started the higher the risk of a bridge collapse increases. The EIS was such a project setback it is staggering. The simple fact is, lets get this project done sooner than later and will be a win for everyone including the neighborhoods near the 270 corridor. Thank you
Name (first and last)
David White
Address

Response to Comment 1

Comments noted.

5286 Newport
City
Commerce city
Neighborhood/ZIP Code
80022
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
Dave@JFWtrucking.com

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] I-270 improvement comment

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 1/8/2026 7:36 AM
To I-270 Project Team <SamaraWilliams@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Samara Williams
Subject
I-270 improvement comment
Your E-Mail Address
samara1208@gmail.com
City
Superior
Zip Code
80027
Phone Number
3034720007
Comments
1 Please add a general use lane each direction AND an HOV lane each direction. Anything else is just silly.
How did you hear about the I-270 Improvements Project?
TV/radio

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

Outlook

[cdot_i270] I-270 opinion

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Thu 1/8/2026 7:32 AM
To I-270 Project Team <WestonWilliams@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Weston Williams
Subject
I-270 opinion
Your E-Mail Address
dubldub@hotmail.com
City
Superior
Zip Code
80027
Phone Number
3035218855
Comments
1 The only viable option that will have any positive impact is to add lanes. Please ADD A THIRD GENERAL USE LANE AND AN HOV LANE ON EACH SIDE!!!!!!!!!!!!!!!!!!!!!!!!!!!1
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Newspaper

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

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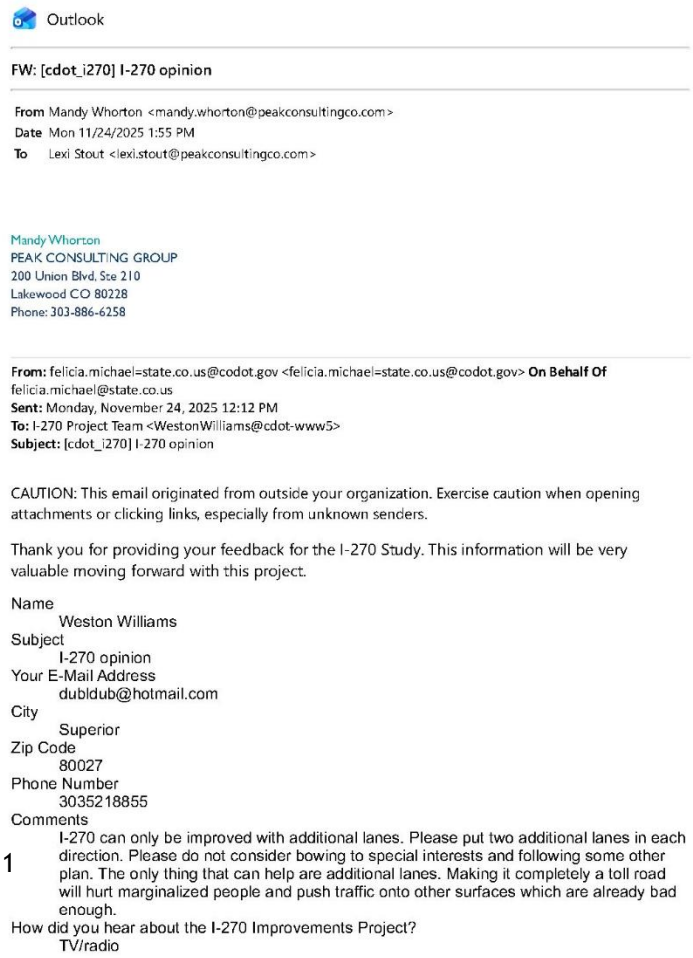

Outlook

FW: [cdot_i270] I-270 opinion

From Mandy Whorton <mandy.whorton@peakconsultingco.com>
Date Mon 11/24/2025 1:55 PM
To Lexi Stout <lexi.stout@peakconsultingco.com>

Mandy Whorton
PEAK CONSULTING GROUP
200 Union Blvd, Ste 210
Lakewood CO 80228
Phone: 303-886-6258

From: felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov> **On Behalf Of** felicia.michael@state.co.us
Sent: Monday, November 24, 2025 12:12 PM
To: I-270 Project Team <WestonWilliams@cdot-www5>
Subject: [cdot_i270] I-270 opinion

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Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Weston Williams
Subject
I-270 opinion
Your E-Mail Address
dubldub@hotmail.com
City
Superior
Zip Code
80027
Phone Number
3035218855
Comments
1 I-270 can only be improved with additional lanes. Please put two additional lanes in each direction. Please do not consider bowing to special interests and following some other plan. The only thing that can help are additional lanes. Making it completely a toll road will hurt marginalized people and push traffic onto other surfaces which are already bad enough.
How did you hear about the I-270 Improvements Project?
TV/radio

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270
cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] Configuration

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Tue 1/6/2026 11:29 AM
To I-270 Project Team <MarshaWilliams@cdot-www5>

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Marsha Williams
Subject
Configuration
Your E-Mail Address
Marsha_williams@msn.com
City
Broomfield
Zip Code
80020
Phone Number
3034650386
Comments
1 The need for this expansion has been minimized for so many years that it requires a major leap instead of an expected single toll lane addition. With the extreme number of trucking operators there is a legitimate need for extensive ramps and allowing at least one general purpose lane to remain free of these vehicles. By providing a toll lane that does minimize the use by large trucks but there is also a disadvantage to the people who live in this area. If they are unable to afford this luxury then you have done nothing but raise further environmental justice questions.
I would like to
Sign up for project emails
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
codot.gov/projects/i270
303-512-4270

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final Environmental Impact Statement for additional information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State

Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

cdot_i270@state.co.us
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cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/9/2026 10:40 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Other
If you selected "Other", please specify
Equity
Provide your comment below:
1 Everyone deserves equal access to our roads!! Being able to get around as conveniently as possible should not depend on one's ability to pay. It will not be the low income workers who will be able to pay more to travel 270 more quickly. Indeed, taking away a lane will make travel slower for those people. When they made the toll lanes on highway 36, they specifically said that the free lanes will need to be slower so that people will pay to use the toll lanes. This economic discrimination is feeding wealth inequality. It needs to stop!!!!
Name (first and last)
Anne Wilson
Address
1295 Bear Mountain Drive, Unit B
City
Boulder
Neighborhood/ZIP Code
80305
Would you like to be added to the project email list?
no
If Yes, please provide your email address
wilanneson@gmail.com

--
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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final Environmental Impact Statement for additional information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Mon 1/19/2026 11:07 PM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality, Construction
If you selected "Other", please specify
Provide your comment below:

1 My name is Daniela and I've called the Denver metro area home for nearly three decades. I'm writing because I support GreenLatinos' request that CDOT do a Supplemental Environmental Impact Statement (SEIS) before moving forward with the I-270 expansion. I want to be clear about where I'm coming from. Over my lifetime here, I have watched our air quality get worse as we've added more cars and more traffic. During ozone season especially, it's hard not to notice. Some days you can see the haze, and it feels normal now to check the air quality before you go for a run or spend time outside. That is not how a healthy city should feel. The Denver metro area is already struggling with dangerous air pollution. The American Lung Association ranked our region among the worst in the country for ozone in its 2024/2025 reporting, including a #6 ranking. When we are already that far behind on air quality, I do not think it makes sense to push forward with a project that could bring even more vehicle pollution into a corridor surrounded by communities that have been breathing this burden for decades. I'm also worried about the basic logic of widening highways. Again and again, we see that new lanes fill up with more traffic. Then we are left with the long term impacts like more pollution, more noise, and higher climate emissions, and the congestion relief does not last. Before CDOT locks us into that outcome, the public deserves a fuller analysis that reflects today's reality and takes alternatives seriously, especially options that reduce driving rather than encouraging more of it. For these reasons, I urge CDOT to complete a Supplemental EIS before moving forward with any widening or new lane options for I-270.

Name (first and last)
Daniela Withaar
Address
1177 York St. Unit 507
City
Denver
Neighborhood/ZIP Code
80206
Would you like to be added to the project email list?
no

Response to Comment 1

For consistency in nomenclature with all previously identified and evaluated alternatives, the GreenLatinos alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative. FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft Environmental Impact Statement's (EIS) Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling conducted in coordination with the Denver Regional Council of Governments (DRCOG) indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets. Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act process. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not

broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

Please see Section 5.4.3, ALT4, of the Final EIS for additional information about the evaluation of the Two Express Lanes that Accommodate Transit Alternative.

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in DRCOG's current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the EPA's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

Additional analyses were completed as required by the State of Colorado, including an assessment of alternatives as they relate to each other for air quality, greenhouse gases, and climate change. Refer to the State Environmental Reports on the project website (https://www.codot.gov/projects/studies/i270study/deisandstatereports) for more information.

If Yes, please provide your email address

--
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303-512-4270
cdot_i270@state.co.us
To unsubscribe from this group and stop receiving emails from it, send an email to
cdot_i270+unsubscribe@state.co.us.

Outlook

[cdot_i270] DEIS Comment Form Submission

From felicia.michael=state.co.us@codot.gov <felicia.michael=state.co.us@codot.gov>
on behalf of
felicia.michael@state.co.us <felicia.michael@state.co.us>
Date Fri 1/9/2026 11:09 AM
To cdot_i270@state.co.us <cdot_i270@state.co.us>

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Which topic(s) does your comment relate to?
Air Quality, Express Lanes, Freight, Transit
If you selected "Other", please specify
Provide your comment below:
I fully support the preferred alternative with express lanes that can accommodate transit. While the Flatiron Flyer operates on I-270, there's no currently no benefit for choice riders to take it, as they can either be in their own car stuck in traffic, or be on the bus stuck in traffic. I take I-270 multiple times a week, and fully support the identified improvements.
Name (first and last)
Tom Worker-Braddock
Address
2482 Lake Vista Drive, Broomfield, CO
City
Broomfield
Neighborhood/ZIP Code
80023
Would you like to be added to the project email list?
yes
If Yes, please provide your email address
matchbox81@hotmail.com

--
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cdot_i270@state.co.us
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Response to Comment 1

Comments noted.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] Expand I-270"s capacity
Date: Friday, January 16, 2026 12:29:33 PM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
Chuck Wright
Subject
Expand I-270's capacity
Your E-Mail Address
cawrigh@yahoo.com
City
Westminster
Zip Code
80031
Comments
Dear Sirs: Please expand I-270's capacity to carry automobile traffic by adding a High Occupancy Toll (HOT) lane in each direction.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
I-270 Corridor Improvements Project
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303-512-4270
cdot_i270@state.co.us
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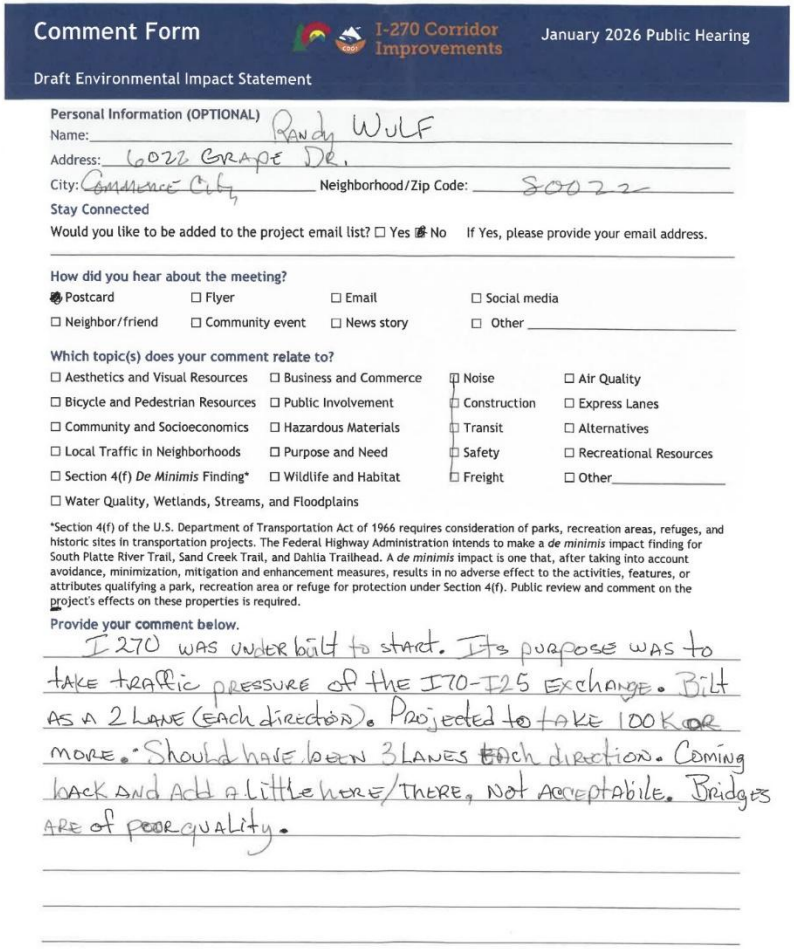
cdot_i270+unsubscribe@state.co.us.

Response to Comment 1

The Preferred Alternative includes adding an Express Lane in each direction.



Comment Form — I-270 Corridor Improvements — January 2026 Public Hearing

Draft Environmental Impact Statement

Personal Information (OPTIONAL)

Name: Randy Wulf

Address: 6022 Grape Dr.

City: Commerce City Neighborhood/Zip Code: 80022

Stay Connected

Would you like to be added to the project email list? ☐ Yes ☒ No If Yes, please provide your email address.

How did you hear about the meeting?

☒ Postcard ☐ Flyer ☐ Email ☐ Social media

☐ Neighbor/friend ☐ Community event ☐ News story ☐ Other

Which topic(s) does your comment relate to?

☐ Aesthetics and Visual Resources ☐ Business and Commerce ☐ Noise ☐ Air Quality

☐ Bicycle and Pedestrian Resources ☐ Public Involvement ☐ Construction ☐ Express Lanes

☐ Community and Socioeconomics ☐ Hazardous Materials ☐ Transit ☐ Alternatives

☐ Local Traffic in Neighborhoods ☐ Purpose and Need ☐ Safety ☐ Recreational Resources

☐ Section 4(f) *De Minimis* Finding* ☐ Wildlife and Habitat ☐ Freight ☐ Other

☐ Water Quality, Wetlands, Streams, and Floodplains

*Section 4(f) of the U.S. Department of Transportation Act of 1966 requires consideration of parks, recreation areas, refuges, and historic sites in transportation projects. The Federal Highway Administration intends to make a *de minimis* impact finding for South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. A *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area or refuge for protection under Section 4(f). Public review and comment on the project's effects on these properties is required.

Provide your comment below.

I 270 was under built to start. Its purpose was to take traffic pressure of the I70-I25 Exchange. Bilt as a 2 lane (each direction). Projected to take 100K or more. Should have been 3 lanes each direction. Coming back and Add a little here/there, not acceptable. Bridges are of poor quality.

1

Response to Comment 1

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane because it best meets the Purpose and Need of the project. Please see Section 3.4 of the Draft Environmental Impact Statement for more information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative.

From: felicia.michael=state.co.us@codot.gov on behalf of felicia.michael@state.co.us
To: I-270 Project Team
Subject: [cdot_i270] I-270 Project Feedback
Sent: 1/15/2026 9:52:27 AM

Thank you for providing your feedback for the I-270 Study. This information will be very valuable moving forward with this project.

Name
ZJ
Subject
I-270 Project Feedback
City
Brighton
Zip Code
80601
Comments
1 I believe CDOT should absolutely move forward with the 2GPL+1EL preferred alternative plan, as was very well described and analyzed in the PHB. This entire corridor is always dangerous and threatening at all hours of the day, yet it is a crucial route for much of Colorado and Denver's daily traffic. It's important that this plan and construction take place not only to assist with traffic on I-270 itself, but also due to the fact that traffic on EB I-270 particularly affects travelers from EB I-76 and NB I-25, particularly during rush hour. Most importantly of all, the listed considerations for pedestrian and cycling needs are a good start alongside the Express Lane for HOV and Motorcycles; however, this pedestrian and cycling focus must be improved upon further in the imminent future by CDOT, even if not explicitly part of this project. Thank you for all the time and effort being put into this so far.
How did you hear about the I-270 Improvements Project?
Social media

The I-270 Improvements Project Team

--
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cdot_i270@state.co.us
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Response to Comment 1

The project does include many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270. Please see Section 5.4.3, ALT7 and ALT8, of the Final Environmental Impact Statement for information on the consideration of bicycle and pedestrian facilities.

PUBLIC HEARING PRESENTATION - January 08, 2026

I-270 Corridor Improvements Study

Draft Environmental Impact Statement Public Engagement

Adams City High School

7200 Quebec Parkway, Commerce City, Colorado

Thursday, January 8, 2026

5:00 p.m.

Stenographically Reported by:

Jennifer Bajwa Melius, RPR

ROCKY MOUNTAIN REPORTING
(720) 872-9910

PUBLIC HEARING PRESENTATION - January 08, 2026

P R O C E E D I N G S

DAVID MERENICH: Thank you for taking the time to join us for tonight's public hearing presentation for the I-270 Corridor Improvements Project. Hello. My name is David Merenich. I serve as the I-270 program director, and I've been responsible for leading the environmental impact statement, or EIS, for this project.

Before we get started, I would like to hand it off to Mandy Whorton to review the order of events for tonight so everyone knows what to expect. She will be our moderator throughout the evening.

MANDY WHORTON: All right. Thanks, everyone, for being here tonight. It's nice to see so many familiar faces. We are going to have a presentation tonight followed by the oral comment period. So I'm going to go over some of the logistics on both of those pieces.

All right. So you're going to hear tonight from David Merenich, who is the I-270 project director; Derrick Rosenbach, who is the project environmental manager; and Stacia Sellers, who is the communications manager for the project. And then we'll hear some opening remarks from Herman Stockinger, who is the deputy director of CDOT. I

PUBLIC HEARING PRESENTATION - January 08, 2026

hope -- okay. There he is. I tried -- I seem to be lost, but he's not lost. So he's going to give us a couple of opening words, and then we're going to follow up with -- that will be followed by the oral comment period.

The oral comment period -- those of you who have signed up -- we have about nine people signed up right now. If you want to speak, just go ahead and sign up, and we'll take signups through 7:30. Everybody will have 90 seconds to speak, and I'll go over some of those procedures as we get closer to the oral comment period.

And importantly, this is not a Q&A session, so CDOT and Federal Highways are here to listen tonight to you and not to -- not to talk themselves. So this will just be an opportunity for you to provide comments, and any responses that you will receive through those official comment periods will be through the final environmental impact statement.

All right. There's lots of ways that you can provide comment. So tonight, coming up to the microphone is one of those. And so that opportunity will be available today. It will also be available on Saturday, the same location, in the morning; and then

PUBLIC HEARING PRESENTATION - January 08, 2026

next Tuesday as well. So those are our oral comment periods.

But there's lots of ways to provide comments otherwise. You can fill out a comment form, you can fill out an online comment form, you can mail a comment, you can email a comment, you can call the telephone hotline. All of those ways to comment are available here, and we'll go over them again tonight. So if you would like to speak at the microphone tonight, you are more than welcome to, but that is no more or less important than any other way of providing comment. So if you would also like to provide oral comments privately to a court reporter to record those comments, we have that capability as well. So let us know if that's something that you would like to take advantage of.

(Inaudible comments from the audience.)

MANDY WHORTON: Oh, okay. Well, I'll bring it back to you, Brandi.

All right. Well, with that, I'm going to catch Brandi up on speaker signup. Anybody else can go sign up at the front too.

And I will turn it over to Herman Stockinger for some opening remarks.

HERMAN STOCKINGER: Thanks.

PUBLIC HEARING PRESENTATION - January 08, 2026

Good evening, and thanks to all of you for being here today. Your participation and your time in this effort really does matter.

I want to begin by acknowledging the community residents -- community members, the residents, business owners, and partner agencies who have stayed engaged in this throughout the process. For a project of this scale and impact, CDOT believes that showing up, listening, and being transparent is not optional; it's essential. Tonight's public hearing reflects that commitment.

The I-270 corridor plays a critical role in Colorado's transportation system. It connects industrial areas, regional distribution centers, and the interstate network supporting freight movement that is vital to the region and state economy.

At the same time, I-270 runs through long-established neighborhoods and communities. We recognize that any conversation about change raises important and legitimate questions. This effort is not simply about moving traffic. It's about safety, reliability, access, connectivity for everyone that uses the corridor or lives near the corridor.

This project is part of CDOT's ten-year transportation vision plan which focuses on strategic

investments that improve safety, resilience, and multimodal connections statewide. For I-270, that means examining how to modernize this interstate by reducing crashes, improving travel time reliability, supporting freight operations, and strengthening transit, bicycle, and pedestrian connections. The goal is to address today's challenges while planning responsibly for the future of the region.

From the beginning, CDOT and the Federal Highway Administration have approached this project deliberatively and transparently. The environmental review process began in 2020 as an environmental assessment. As the work progressed, it became clear that the complexity of the corridor and the concerns raised by agencies, stakeholders, and the public required a more comprehensive review.

So in 2022, we took a step back, we shared our findings openly, and we moved forward with a full environmental impact statement. That certainly was not the fastest path, but it was the right path. The draft EIS you'll hear about today represents years of technical analysis, coordination, and public involvement. It evaluates a broad range of alternatives and potential impacts, including mitigation commitments intended to avoid, minimize, or

PUBLIC HEARING PRESENTATION - January 08, 2026

address those impacts wherever possible.

Air quality has been a central focus throughout this process. The I-270 corridor is influenced by many factors beyond the roadway itself. As part of the draft EIS, project-level air quality analyses were conducted in accordance with federal requirements.

Within response to community concerns and state law, CDOT also conducted additional state-required air quality and greenhouse gas analyses that go beyond what's included in the federal environmental review. These analyses are documented in separate state air quality and greenhouse gas technical reports and help inform commitments and transparency as the project moves forward.

Throughout this process, CDOT evaluated a range of alternatives, including design approaches and ways to manage the traffic within a constrained footprint. Based on that evaluation, CDOT identified a preferred approach that includes express lanes in both directions. Express lanes are part of the preferred alternative because they provide a practical way to improve safety and travel time reliability while balancing the many demands on this corridor. They support transit and high-occupancy vehicles, they

offer flexibility for freight movement and help the transportation system function more efficiently over the long term.

I really want to sincerely thank everyone who participated in this process, whether it be through meetings, submitting comments, asking hard questions, or sharing local knowledge. Your involvement has directly shaped this work and continues to matter.

This is not the end of the conversation, but it is an important milestone. The draft EIS is a key step in sharing information, gathering feedback, and ensuring decisions ahead are informed, balanced, and accountable. CDOT believes in this project, and we believe just as strongly in partnership and community trust.

Thank you again for being here and for your continued engagement. I'll now turn it over to Dave who is going to walk through the DEIS.

DAVID MERENICH: Okay. So an environmental impact statement evaluates potential environmental community effects of major transportation projects. The draft EIS presents the analysis and is released for public review and comment. For I-270, it describes the project and

PUBLIC HEARING PRESENTATION - January 08, 2026

compares impacts of the alternatives. The draft EIS does not make a final decision. Public comments inform the final EIS.

The EIS is performed under the umbrella of the National Environmental Policy Act, commonly referred to as NEPA. It is a procedural law that requires agencies with federal funding to consider the environmental impacts of their actions.

There are three general phases to meet the plan: a development of a proposed action, an environmental analysis, and project implementation. The preferred alternative is based on an approved NEPA process supported by technical analyses that remain valid under current federal law, regulation, and policy.

We are currently in the environmental analysis phase for the release of this public DEIS. An EIS is the most rigorous level of environmental review required under NEPA. Please note that the draft EIS does not represent CDOT or the Federal Highway Administration's final decision on this project. Herman has brought that up as well. This is not the final decision. So your input today will help inform the decisions made during the NEPA planning process that is continuing.

Now that we know what the draft EIS is, let's take a look at how the draft EIS is organized. The draft EIS is organized into six chapters supported by technical reports and appendices that contain more detailed analysis.

So the executive summary provides an overview of the project, alternatives, and major findings; Chapters 1 through 3 cover the background, purpose and need, and range of alternatives evaluated; Chapter 4 includes the environmental analysis across numerous resource areas such as air quality, noise, wildlife, water quality, and community impacts; Chapter 5 includes mitigation commitments for the preferred alternative; and Chapter 6 summarizes the public and agency involvement throughout the project. All these materials are publicly available online and in hard copy at designated repositories. We also have them here tonight over there at the green benches over there.

With that overview in mind, let's start talking about some of the project details by walking through the project limits.

I-270 runs through Denver and Commerce City and serves residential neighborhoods, industrial areas, and major employment centers. I-270 is a

critical connecter for freight and regional travel, making its performance important, not only locally but across the broader transportation network.

The study area includes the entire 6 1/2-mile segment of I-270 from the I-225/US 36 interchange on the west to I-70 on the east. And that's that orange line right there. It encompasses the interchanges I-76, York Street, Vasquez Boulevard, and Quebec Street.

So now that we've looked at the project limits real quick and its importance, let's review the purpose and need. Over the last two years, CDOT has worked heavily with stakeholders to understand and develop and refine the purpose and need of this project. The purpose of this project is to modernize the I-270 corridor to safely and reliably meet current and future transportation demands.

To support that purpose, the draft EIS identifies several transportation needs that must be addressed along the corridor. Improving safety is a major need, as crash rates on I-270 are higher than on similar corridors due to narrow shoulders, short ramps, and other outdated design features. Addressing travel time and reliability is essential given recurring congestion and unpredictable travel trips

that are expected to worsen with continued regional growth.

Enhancing transit performance is important. Enhancing transit performance is important since buses currently operate in the same congested lanes as the general traffic, resulting in delays and unreliable schedules. A reliable lane is the first step to expanding future transit on the corridor and to allow current RTD routes like Flatiron Flyer 5 to utilize I-270 instead of making a lengthy detour via I-25 and I-70.

Better bicycle and pedestrian connectivity is needed because limited crossings and outdated facilities restrict safe access between neighborhoods, trails, and transit stops.

Supporting freight operations is also a key need, as I-270 is an important freight and hazardous materials route where congestion and constrained geometry create operational challenges.

In addition to the purpose of these transportation needs, DEIS also identifies a separate key project goal to minimize environmental and community impacts resulting from the project. The project team has evaluated a full range of alternatives to address this purpose and need.

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As part of the NEPA process, CDOT and FHWA began by looking broadly at how different approaches could address the purpose and need of the I-270 corridor. We considered a full range of preliminary alternatives. Three looked at adding no lanes to the current I-270: the no-action alternative, meaning no improvements other than routine maintenance projects; the bicycle/pedestrian/transit-only alternative; and the minimal build alternative.

Then there were three that looked at adding one lane in each direction: the three general-purpose lane alternative; two general-purpose lanes plus one transit lane only; and then the two general purpose plus one express lane that accommodates the transit alternative.

Each of these alternatives were chosen based on public input and were screened using evaluation criteria based on the project's transportation needs and the goal of minimizing environmental and community impacts. Alternatives that did not sufficiently meet those needs or introduce greater impacts without proportional benefits were removed from consideration.

From this process, two build

alternatives -- the three general-purpose lanes and the two general-purpose lanes plus one express lane that accommodates transit -- were advanced for detailed study in the draft EIS. The no-action alternative was also carried forward as a baseline for comparison, even though it does not meet the purpose and need.

CDOT held public meetings in April 2024 and January 2025 at Eagle Pointe Recreation Center to share that the two build alternatives and no action were carried forward into detailed analysis. We are excited to share that we have completed a draft analysis of those alternatives.

Based on that analysis and through our work with the community, we selected a preliminary preferred alternative within this draft EIS. The preliminary preferred alternative is one express lane that accommodates transit that reconstructs the entire I-270 corridor and adds an express lane, a 4-foot buffer, and increased shoulders in each direction.

Let's talk about some of the additional elements of the preferred alternative for a few slides, and after that I want to talk more about why an express lane is the preferred alternative.

There are numerous elements that make up

the express lane preferred alternative you'll see here that all serve the purpose and need of the corridor. There is a lot on this map so I'm going to break it down into smaller elements in the next few slides.

Key design elements, including modernizing the highway geometry, widening shoulders, lengthening ramps for safety and more efficient travel. The dark blue line shows the added express lane in each direction from I-70 to I-25. The purple dots represent lengthened on- and off-ramp locations at York, Vasquez, and Quebec. The yellow dots represent enhanced lighting on the corridor at locations like York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez, and Quebec. Eastbound and westbound auxiliary lanes between on- and off-ramps at Vasquez and I-76 would allow vehicles, especially freight trucks, more time to reach speed to enter and exit onto the highway. We also propose full reconstruction of South Sand Creek Drive between 56th and Quebec.

Let's keep breaking it down. Next we'll take a deeper look at the bridges and interchanges. The project would replace aging bridges and improve interchange operations for safer and more efficient travel. The black circles represent interchange

improvements at I-76 and Vasquez. CDOT proposes a full interchange reconstruction at Vasquez that removes the full cloverleaf and eliminates the existing short merging and weaving issues. The movements from I-76 onto I-270 would be consolidated to a single entrance point, reducing vehicle conflict. Meanwhile, the current single exit from I-270 to York and I-76 would become two separate exits to reduce sideswipe questions and incidents. The blue squares show full bridge replacements at York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez, over Sand Creek, and 56th Avenue.

Next, let's take a look at some of the multimodal improvements that the project would provide. The project upgrades bicycle and pedestrian facilities at all of the reconstructed bridges. It includes new sidewalks, multiuse paths, and RTD bus stops. It improves lighting across the corridor, trail improvements that result in better visibility, safer crossings, and enhanced connections to the South Platte River Trail, Sand Creek Trail, and the -- sorry -- Clear Creek Trail are also part of the preferred alternative.

The yellow and green lines should show added or improved sidewalks and trails at York, South

Platte, Brighton, pedestrian underpasses at Vasquez, and a pedestrian overpass at the South Rose Hill neighborhood. The orange arrows show improved wayfinding for all the trails in the area: South Platte Trail, Sand Creek Trail and Clear Creek Trail. The blue dot shows an added RTD bus stop at Quebec. These combined elements work together to improve safety, mobility, multimodal access throughout the corridor.

So next I want to shift gears and talk a little bit more about the benefits of the express lane. Express lanes provide travelers with a reliable, free-flowing option, particularly during peak congestion. They are free for HOV three-plus carpools, motorcycles, and transit vehicles, helping prioritize high-occupancy and multimodal travel. Other drivers such as private vehicles and trucks can choose to use the express lanes by paying a toll, giving them flexibility depending on their travel needs. The lanes are dynamically priced. Toll rates adjust in real time based on congestion to keep traffic moving. I-25 and US 36 express lanes operate in a similar way. So this approach builds on a proven system that many travelers in the Front Range are used to. By shifting some of the vehicles into the express

lane, traffic in the general-purpose lane also moves more reliably. This extra lane prioritizes moving people with less cars.

Let's look at some other benefits of the preferred alternative. This slide summarizes how the preferred alternative performs when measured against the project's purpose and need on many of these outcomes illustrated on the boards in the hallway. For safety, this corridor currently experiences more than 40 crashes per mile each year which is well above the statewide average. The preferred alternative is expected to reduce crashes by approximately 15 to 20 percent by improving merge areas, reducing weaving, and modernizing outdated roadway features. In terms of travel time and reliability, the preferred alternative reduces peak-period delay by more than 20,000 vehicle hours per day and moves about 8 percent more peak-hour trips compared to these -- the three-general-purpose-lanes alternative which helps stabilize traffic flow and reduce the stop-and-go conditions people experience today.

Transit performance also improves. By providing more reliable travel conditions, the preferred alternative reduces corridor travel times for buses to ten minutes or less, improving schedule

reliability for people who rely on transit.

Freight movement is a critical function of I-270. The preferred alternative reduces peak-hour truck travel times by nearly 20 minutes, improving delivery reliability for freight-dependent businesses and supporting the regional economy.

For people walking and biking, the preferred alternative improves connectivity to adding wider sidewalks, better lighting, and new crossings, including a new 10-foot-wide bicycle and pedestrian overpass over I-270 and South Sand Creek Drive that connects the Sand Creek Greenway to North Sand Creek Drive. With reduced congestion on I-270, more drivers are expected to choose direct routes rather than parallel roadways, resulting in approximately a 6 percent reduction in vehicle miles traveled and greenhouse gas emissions on major surrounding roadways compared to the no-action alternative. Taken together, these performance measures show how the preferred alternative addresses safety, mobility, and connectivity challenges while supporting the long-term function of the corridor.

On the next slide we'll discuss a little more about how the project will be funded. The estimated total cost of this preferred alternative,

including pre-construction and construction costs, is $806 million and will be delivered through a combination of state and federal funding sources.

We have spent $41 million on the corridor since 2020 which includes projects like resurfacing the bridge decks, bridge rail protection projects, bridge shoring projects, environmental studies, and preliminary design of the corridor, especially the Phase 1 bridges which we'll talk a little bit about later.

The construction costs of the preferred alternative is estimated at $725 million. We estimate that it will cost $350 million just to rebuild I-270's current bridges, pavement, and other deteriorating infrastructure back to the exact same configuration that we see today.

So where is the extra $375 million going to build out the preferred alternative? It's being invested in features that directly improve safety, reliability, and quality of life for the people who use and live near this corridor every day. That includes wider shoulders so emergency responders can reach crashes faster and clear incidents sooner, reliable express lanes that incentivize carpooling and transit and help keep traffic moving during peak

hours, and truck acceleration lanes between Vasquez and I-76 to reduce dangerous speed differentials and rear-end crashes.

The funding also allows us to reconfigure two of the corridor's most severe bottlenecks at I-76 and Vasquez, locations that consistently contribute to congestion, crashes, and unpredictable travel times. Investments in upgraded cameras and traffic technology means faster incident detection and better realtime traffic management.

Beyond drivers, the protect -- the project adds meaningful multimodal improvements, including pedestrian overpasses at South Rose Hill and underpasses at Vasquez, new bus stops at Quebec, and safer connections across the corridor. It also includes required and requested mitigations such as noise walls, water quality ponds, air quality monitors to protect nearby neighborhoods during and after construction. Community enhancements like aesthetic improvements, travel demand management, and support for local projects including the 60th Avenue underpass beneath the timber bridges are also part of this investment. In short, this funding is about building a corridor that works better in emergencies, is safer for all users, moves people and goods more reliably,

and responds directly to what the community told us they need.

Key state funding sources include Senate Bill 1, strategic project funds, the statewide bridge and tunnel enterprise, and other state transportation programs. Federal funding includes competitive discretionary grants which support regionally significant projects like I-270. The Colorado Transportation Investment Office also plays a role in financing and operating an express lane, allowing toll revenue to help support construction, operations, and long-term management.

Because the preferred alternative cannot be funded all at once, construction will be delivered in three phases. The next slide outlines how that phasing works. Pre-construction began in 2020. It includes activities like design, NEPA evaluation, and preventative maintenance.

Construction will be sequenced in three phases to allow the highest priority needs, particularly the aging bridges and key structural elements to be addressed first while additional funding is secured for the remaining corridor improvements.

Phase 1 focuses on replacing several of

the corridor's oldest and most structurally inefficient bridges, including I-270 over the South Platte River, I-270 over Burlington Ditch, I-270 over Brighton Boulevard and the railroads, and I-270 over East 60th Avenue and the railroads.

Phase 2 reconstructs the I-270 main line, the I-270/Vasquez interchange, and York Street and 56th Avenue bridges.

Phase 3 completes the remaining corridor improvements, including the Vasquez Boulevard bridge over Sand Creek, upgrades to Sand Creek Drive and the frontage road, and a new bicycle and pedestrian overpass.

Construction is anticipated to begin in late 2026 or early 2027, and it's expected to take approximately five years, depending on funding availability and construction conditions. Throughout construction, CDOT will maintain at least two lanes of traffic in each direction during daytime hours with nighttime closures scheduled strategically to minimize obstruction. Regular updates including detours, lane closures, and construction sequencing will be available on the project website to help the public, residences, businesses, and emergency services perform.

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So next, now that you know a little bit more about the details of the project, we'll discuss the environmental impacts on the corridor that were identified during the DEIS. I'll hand this portion of the discussion to Derrick Rosenbach, CDOT's environmental program manager.

DERRICK ROSENBACH: Apologies, everyone. Thanks, Dave and Mandy. Apologies for the delay, everyone.

The build alternatives prioritize avoidance and minimization of environmental impacts by maintaining the highway alignment within the existing transportation corridor, thereby preventing any residential or business displacements and reducing permanent land acquisition. Furthermore, the design of the build alternatives avoids adverse effects to historic properties and minimizes impacts to recreational resources through the use of temporary detours and protectives measures rather than trail closures.

Despite many of these efforts, some impacts will be unavoidable when widening the highway to address critical safety, congestion, and freight mobility. For example, the build alternatives involve more impervious surface areas, encroachment into

floodplains, minor noise increases, and the loss of some wetlands and wildlife habitat. To address these impacts, the build alternatives incorporate mitigation measures such as upgrade the drainage system with modern water quality features to treat runoff, recommending a noise wall near the South Rose Hill neighborhood, replacing wetlands where possible, and planting native vegetation.

Now I'll briefly discuss other impact analyses that CDOT performed to adhere to state requirements. CDOT developed three reports that examine the environmental effects on resources that are separate from the federally required draft EIS. They include the air quality technical report, the greenhouse gas technical report, and the community analysis technical report. All three state reports are available on the project website and are available at local facilities such as the Commerce City Civic Center and the Adams County Government Center. These documents are open for public comment during the same 60-day comment period as the draft EIS.

Now I'll hand it over to Stacia Sellers who will discuss the public involvement that has occurred through the project as well as the recommendations CDOT has received from the community

thus far.

STACIA SELLERS: Wonderful. Thank you, Derrick.

Public involvement has been a core part of this project from the beginning. CDOT and FHWA followed best practice engagement methods informing, consulting, involving, collaborating, and empowering stakeholders, many of which are here with us today.

Our bilingual outreach teams attended or hosted nearly 200 community events, meeting people where they are. So this included neighborhood meetings, community centers, business interviews, festivals, trailheads, and other locations across the corridor.

Across these events, CDOT heard from residents, businesses, commuters, freight operators, local governments, and advocacy groups. More than 1,000 comments were submitted during earlier stages of the NEPA process, and that feedback directly influenced key project decisions. Public input helps shape the purpose and need, refine alternatives, identify community priorities, and ultimately elevate the environmental overview for an environmental assessment to a full EIS. This public hearing is a continuation of the commitment to transparency and

two-way communication.

Now that we've covered the community -- how the community has been involved, we'd like to summarize the commitments that the state has made to key meeting dates. The project team gathered community ideas through public meetings, stakeholder workshops, and other engagement activities. A community enhancement subcommittee made up of stakeholder working group members representing neighborhoods across the corridor reviewed public input and helped prioritize and recommend enhancements. These recommendations were organized into nine community commitments, each one associated from the commitments.

CDOT has committed to engaging with the public on a monthly basis to provide updates on the progress of these commitments and the use of allocated funds. The structure for this is -- ongoing engagement is expected to evolve over time to remain flexible, community-led, and responsive to changing needs, priorities, and circumstances.

Now that we've covered how community feedback translated into project commitments, I'll pass this back over to our moderator, Mandy -- hold on -- I'll pass this back to our moderator, Mandy, to

walk through the oral comment period process and a reminder of the other ways that you can submit your official comments during the public comment period.

MANDY WHORTON: Okay. So we're now ready to begin the oral comment period. As a reminder, as Stacia noted, there are many ways to share your comments on the draft EIS, and they're all treated equally and part of the official public record.

There are some comment forms -- I think Melissa was passing some of those out -- and there's a handout here on providing comments. So feel free to reference this. There's lots of ways shown here on this comment form on the way that you can provide comments. And, again, they are all provided equally. But we are really grateful to everyone tonight who has taken the time to be here and wants to share their comments here with us this evening.

So before we begin, I'm going to walk through a few simple guidelines to make sure everyone who wants to speak has the opportunity to do so. The next slide outlines the comment process and what to expect.

All right. When your name is called -- and I do -- everybody who wanted to speak did sign up.

So I have the signups here, and you just indicated "yes" if you wanted to speak. If you'd like to speak, you can still sign up to speak, and if you didn't indicate yes but you want to speak, that's also fine at this point. I have ten people signed up to speak right now.

Each speaker is going to have 90 seconds to provide comments. To ensure fairness, time cannot be transferred to others. And I'll give you a brief reminder at the time you're approaching your time. And this is a listening session. So it's not a question-and-answer period. CDOT is here to listen and receive your comments and will not be responding during this portion of the meeting. This is your time.

After the oral comment period ends, the open house will continue if there is still time left until 8:00. So there are plenty of staff that are still available here to help you comment in other forms if you'd like to do that and answer your questions. We have -- lots of the documents are available here and some other informational needs. So please take advantage of the staff that are here to help you provide comments on this.

And I think we are ready to begin. So

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as I said, I'm going to call each speaker. I'm going to call two at a time. So I'll call the first one and then let the next person know that they're on deck. Everybody will have a minute and a half. We ask that you be respectful and on topic with the -- with your comments so that they are about the project. And I don't expect anybody to have any disrespectful things to say, but we will be reminding you -- if you're going over your time or if you're veering off topic, I'm going to ask you to stay back on topic.

Okay. So the first person that we have signed up to speak is Dan Price, and the next one up is Francis Haas.

FRANCIS HAAS: I'm not going to speak.

MANDY WHORTON: Okay. Then the next one after that is Kathy Henson.

So Dan.

All right. Dan Price, have you changed your mind, or do you still want to --

(Inaudible comments from the audience.)

MANDY WHORTON: No problem. He must have chosen another way to provide his comments which is great.

All right. So then Kathy Henson is the next one up. Is Kathy here? Okay.

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And then the next one after that will be Drew Howland.

KATHY HENSON: Good evening. My name is Kathy Henson, and I serve on the Adams County Board of Commissioners.

Adams County is Colorado's logistics backbone for economic growth and innovation. Our communities sit at the convergence of the state's most critical freight corridors, carrying roughly twice the freight volume of comparable metro corridors and supporting an estimated 80- to $100 billion in annual goods movement. That activity supports thousands of jobs, regional employers, and supply chains that serve communities across Colorado.

But chronic congestion and outdated infrastructure on I-270 threaten that reliability. When freight is delayed, costs increase for businesses and consumers. When commuters lose hours sitting in traffic, productivity drops and family time disappears while greenhouse gases continue to rise from idling vehicles stuck on the road, increasing air pollution in our disproportionately impacted communities.

This is why prioritizing this corridor in CDOT's ten-year plan is not about adding lanes for the sake of expansion. It is about protecting

Response to Comment 1

Comments noted.

existing economic activity and ensuring that Colorado's freight, workforce, and transit networks remain dependable and competitive. Managed lanes and modern operational upgrades provide predictable travel times and help rate carriers plan routes, enable transit to operate reliably, and give commuters consistency and improved quality of life.

Reliability is the foundation of economic performance, and these tools deliver it. Strategic investment in Adams County yields statewide returns. When Adams County corridors fail, the entire region's economy feels it: our businesses, our workers, and our families. Protecting these corridors is about protecting Colorado's economic future. Thank you.

MANDY WHORTON: All right. Thank you, Commissioner.

The next one up is -- Drew didn't want to speak -- so Brandi Valdez. And then after Brandi will be Luz Peinado.

BRANDI VALDEZ: Hi, everybody. I'm Brandi.

So I've been on this project for the last two years, and I've done a lot of community outreach around this. And the only concerns that I've

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really heard from the community is -- when it comes to the toll lanes is that -- bringing some kind of discount to our community, to our residents, getting it where maybe, like, our low-income and elderly are free and the rest of the community gets a discount, and also offering discounts to our law enforcement, first-line workers, and veterans, and then making it -- sure that it's affordable and accessible to the community, because a lot of our community just can't afford toll roads.

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And so that's really the only -- oh, and the other thing is, like -- the only concern also is that right there on Vasquez and 62nd where we're going to be doing the underpass and stuff like that is we're getting ready to have a big, huge recycling plant right there, too, that's going to be opening up with a lot more truck traffic. And so having that truck traffic on top of all the construction and all the other construction that's going right there could potentially cause a huge cluster blockage and so if there's a way that we can try to mitigate those as well too. Thank you.

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MANDY WHORTON: All right. Thank you, Brandi.

So then Luz Peinado. Luz.

Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final Environmental Impact Statement for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 2

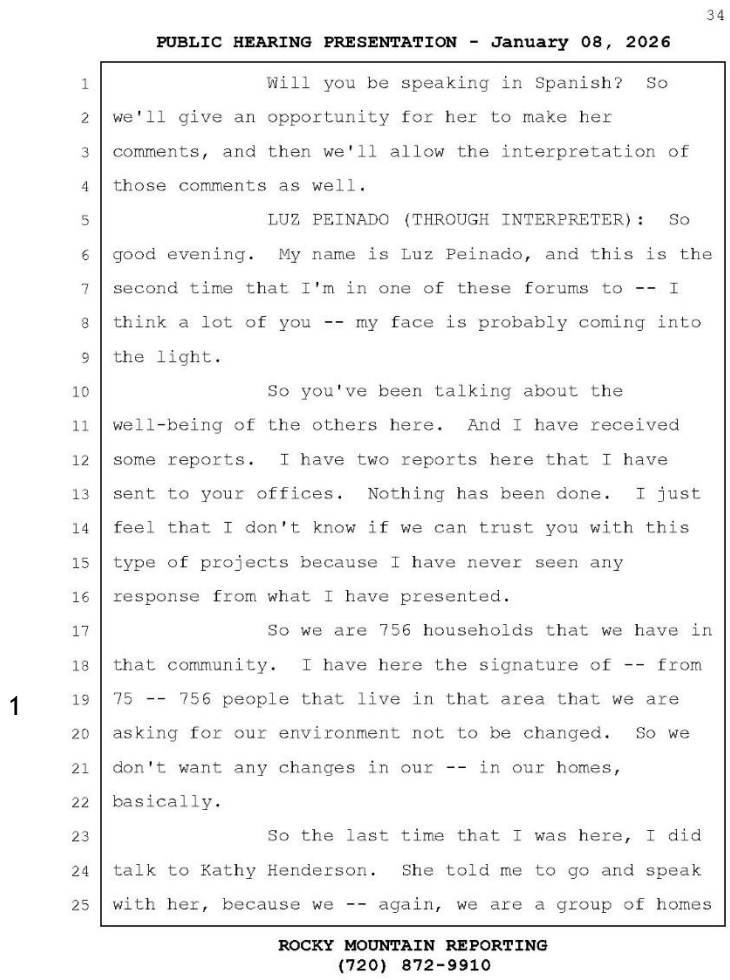
Vasquez Boulevard and 62nd Avenue is outside of this project's study area.

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local

schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.



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Will you be speaking in Spanish? So we'll give an opportunity for her to make her comments, and then we'll allow the interpretation of those comments as well.

LUZ PEINADO (THROUGH INTERPRETER): So good evening. My name is Luz Peinado, and this is the second time that I'm in one of these forums to -- I think a lot of you -- my face is probably coming into the light.

So you've been talking about the well-being of the others here. And I have received some reports. I have two reports here that I have sent to your offices. Nothing has been done. I just feel that I don't know if we can trust you with this type of projects because I have never seen any response from what I have presented.

So we are 756 households that we have in that community. I have here the signature of -- from 75 -- 756 people that live in that area that we are asking for our environment not to be changed. So we don't want any changes in our -- in our homes, basically.

So the last time that I was here, I did talk to Kathy Henderson. She told me to go and speak with her, because we -- again, we are a group of homes

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Response to Comment 1

The project team is unsure where your community is located. The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

For mitigation and commitments for impacts from the project, please see Chapter 5.0 of the Record of Decision.

that are next to the Platte River. So -- and she told us that we can come and talk to her, but the only thing that we got is cards from the people that we approached since I was having to wait for an appointment with Kathy Hendell (phonetic) to discuss these issues.

So I don't understand. How can you tell me, then, that you are people that I can trust for the improvement of my community? I think we are poor people that are not being heard, and they can take advantage of us. So I told you the last time that I was here that I wanted to attend all these meetings, and I'm going to be talking about the -- yeah. I feel like the regulations for -- are not being respected.

MANDY WHORTON: Okay. Thank you so much. And you can submit -- any of your written comments or anything that you did not get to, you can submit any of the materials that you came for -- that you prepared for the record if you like.

Okay. The next person I have is Marisela Serrano. And after Marisela -- after Marisela we have Jackie Valdez. And for the Spanish interpretation, we'll basically just do double the time so that there's time for the Spanish.

MARISELA SERRANO (THROUGH INTERPRETER):

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So my name is Marisela Serrano. I am here because we are worried about the community of Latino rights. So we are scared that they are going to close the place and that we are going to be evicted. And that is my point. Thank you.

MANDY WHORTON: Okay. Jackie, it looks like you're up next. And then after Jackie is Keith Rogers.

JACKIE VALDEZ: Good evening, everyone. It is Jacqueline Valdez. I go by Jackie. One of my main concerns is that I have heard tonight that the communities are concerned about the environmental -- environmental impact, what is going to happen with the 270 project.

That is one of our major concerns. I think that's with every community that's been involved in this. We, over the years, have dealt with a lot of toxified air, groundwater. We are double-sized in industrial. What concerns me is that this opening that we're doing as far as the impact that the 270 project is going to take place is that it's going to make it worse. It's not going to better our situation.

I get that we need to grow. I get that the 270 project needs to happen. But I also think

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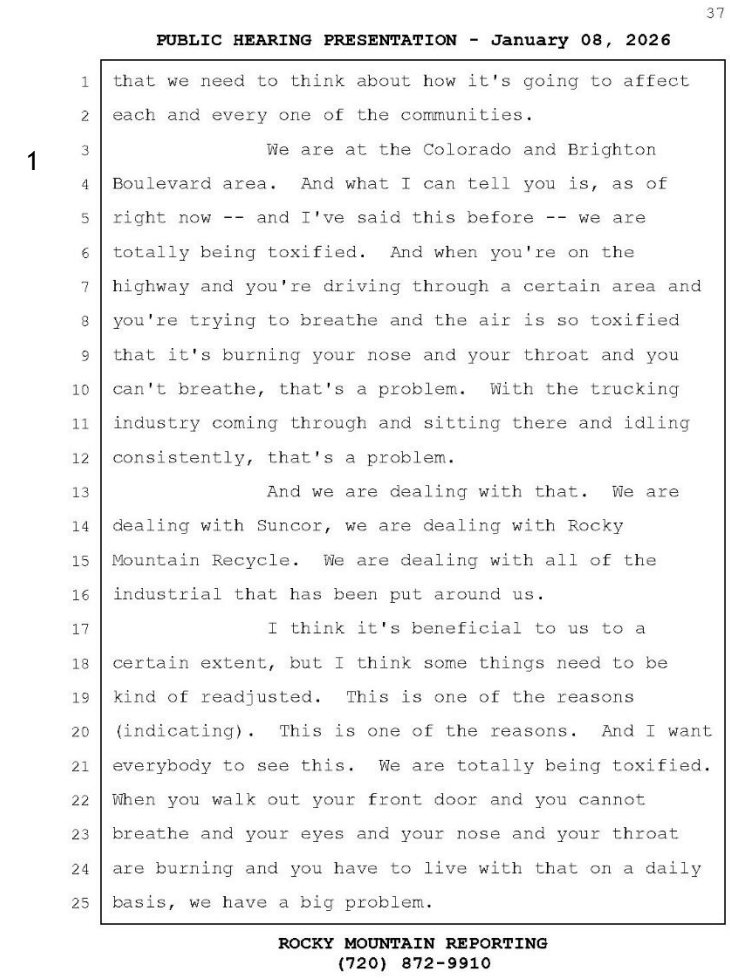
Response to Comment 1

The project team is unsure where your community is located. The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.



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that we need to think about how it's going to affect each and every one of the communities.

We are at the Colorado and Brighton Boulevard area. And what I can tell you is, as of right now -- and I've said this before -- we are totally being toxified. And when you're on the highway and you're driving through a certain area and you're trying to breathe and the air is so toxified that it's burning your nose and your throat and you can't breathe, that's a problem. With the trucking industry coming through and sitting there and idling consistently, that's a problem.

And we are dealing with that. We are dealing with Suncor, we are dealing with Rocky Mountain Recycle. We are dealing with all of the industrial that has been put around us.

I think it's beneficial to us to a certain extent, but I think some things need to be kind of readjusted. This is one of the reasons (indicating). This is one of the reasons. And I want everybody to see this. We are totally being toxified. When you walk out your front door and you cannot breathe and your eyes and your nose and your throat are burning and you have to live with that on a daily basis, we have a big problem.

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Response to Comment 1

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' (DRCOG) current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

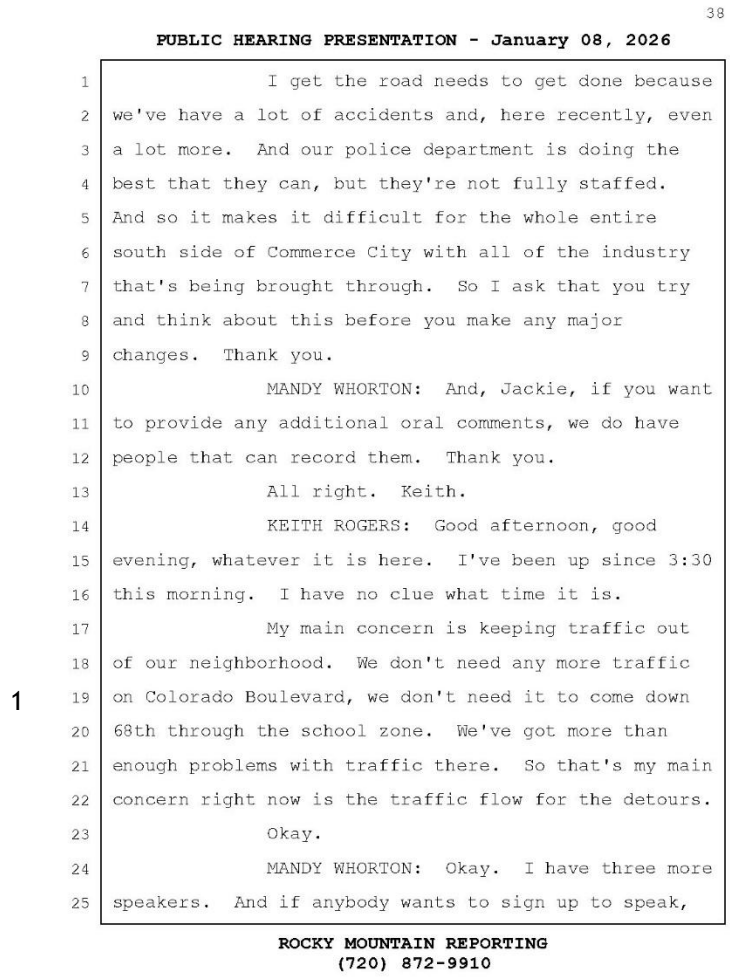
The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All

priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft Environmental Impact Statement. For mitigation and commitments for the federal air quality analysis, please see Chapter 5.0 of the Record of Decision (ROD).

Additional analyses were completed as required by the State of Colorado under Senate Bill 21-260 codified in Colorado Revised Statutes 43-1-128, including an assessment of alternatives as they relate to each other for air quality, greenhouse gases, and climate change. Refer to the State Environmental Reports on the project website (https://www.codot.gov/projects/studies/i270study/deisandstaterports) for more information.

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures. For mitigation and commitments for water quality, please see Chapter 5.0 of the ROD.



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I get the road needs to get done because we've have a lot of accidents and, here recently, even a lot more. And our police department is doing the best that they can, but they're not fully staffed. And so it makes it difficult for the whole entire south side of Commerce City with all of the industry that's being brought through. So I ask that you try and think about this before you make any major changes. Thank you.

MANDY WHORTON: And, Jackie, if you want to provide any additional oral comments, we do have people that can record them. Thank you.

All right. Keith.

KEITH ROGERS: Good afternoon, good evening, whatever it is here. I've been up since 3:30 this morning. I have no clue what time it is.

My main concern is keeping traffic out of our neighborhood. We don't need any more traffic on Colorado Boulevard, we don't need it to come down 68th through the school zone. We've got more than enough problems with traffic there. So that's my main concern right now is the traffic flow for the detours.

Okay.

MANDY WHORTON: Okay. I have three more speakers. And if anybody wants to sign up to speak,

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Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.

again, you can sign up at the front. Or if you've changed your mind and you do want to speak and you've already signed in, just let us know.

So the next one is Steve O'Dorisio. After Steve is Gerry Trujillo [sic].

MR. O'DORISIO: Thank you very much. My name is Steve O'Dorisio. I'm one of the county commissioners in Adams County. I also happen to be a resident who lives within a block or two of I-270.

And I can tell you firsthand that we have experienced challenges with health. We have experienced challenges from these decades of neglect and underinvestment of this entire area, including I-270.

What I look at and my concern is that what would the environmental impacts be if we don't complete this project? I can tell you now the status quo is not okay. The status quo is that we have cars idling on I-270 that is creating more toxification. We have cars and trucks going through the neighborhoods that is creating toxification and danger for our kids. We have all those challenges, and we can't allow folks to make this the proxy war against all sorts of improvements to highways.

What we really need is to get this done

Response to Comment 1

Please see Chapter 4.0 of the Draft Environmental Impact Statement for information on the impacts of the No Action Alternative, which would be the impacts if this project did not move forward.

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the right way. And it's important that every one of us, especially the folks in the community, continue to interact with the folks at CDOT and the folks at the County, because we will advocate for those improvements. We will advocate to try to get things like these improvements that were discussed tonight: air quality monitoring, vegetated buffers, improved stormwater systems, noise mitigation, and indoor air quality protections for the schools, for our homes, and our community facilities.

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This is what this community deserves is improvements, and this is where we get it. But we won't get it if this project doesn't go through. Stand tall and ask for what we need. We can work together.

Thank you all for your time.

MANDY WHORTON: Okay. Next is Gerry Trejo, which I mispronounced his name last time, so apologies for that. And then after that is Tracy Sakaguchi.

GERARDO TREJO: Good evening, everyone. My name is Gerardo Trejo. I'm a resident since 1983 here in Commerce City, and I guess they consider me a community leader. I don't know why.

My comment basically is throughout the

Response to Comment 1

Please see Chapter 5.0 of the Record of Decision for mitigation and commitments the project will implement for impacts.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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whole manning of the project, I've seen a lot of meetings and meetings and meetings. And like Commissioner O'Dorisio said, you know, we need to do improvements. I think that his comment is important due to the -- all the other ones that have the same importance.

It's basically taking care of the bridges. There's no heat. I talked to several firefighters going up the ramps. They're frozen. I mean, it doesn't necessarily have to snow that day. But last I heard, there was a comment that only France can implement this. Well, I think this is the United States. We can -- if we're willing to spend so million -- so many millions of dollars in making a project, then we spend the time and money to make it better.

Because at the same time, you know, when we're saying -- using words like monitoring roads and, you know, crash preventions and the -- I mean, has anybody been hit by a semi before?

UNIDENTIFIED SPEAKER: Yeah.

GERARDO TREJO: I mean, they're 50,000, 60,000 pounds on ice. So -- excuse me. You know, the keyword that -- improving the safety of the people. You know, I -- that's another keyword where, you know,

Response to Comment 1

CDOT has to weigh the benefits associated with innovative features, such as heated bridges, with the cost. There is limited funding available and these types of features are typically not included because the benefits don't justify the cost.

I mean, we all know, once we hit a frozen bridge, it's done. If we try to brake, it's done.

So sophistication is making it right, because I think that the next project that's going to get that 270 rebuilt could be 30, 40 years from now. So I'll probably -- me, myself, won't be alive. But the reason why I'm up here, because I have the grandchildren and I have my daughters -- I have seven of them -- that they don't want to live in Commerce City. Thank you.

MANDY WHORTON: All right. I -- again, if anybody else wants to speak. I have two new speakers now. So the first one is Mayor Steve Douglas, and the second one is Kristi Douglas.

STEVE DOUGLAS: Good evening, everybody. My name is Steve Douglas. I'm the mayor of Commerce City.

I wasn't going to come down here and speak tonight. I had some work things I had to take care of, so please don't -- my appearance is kind of -- speaking dressed like this, but --

UNIDENTIFIED SPEAKER: You're fine.

STEVE DOUGLAS: -- here I am.

You know, what I find very difficult -- I was in a group for 18 months with stakeholders and

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community members, great conversations about what's about to occur because we need it. It's not that we don't need it.

But what I found coming here tonight, it wasn't important, that we've got a minute and 30 seconds to speak. We spent 18 months. We spent hours talking to -- talking to -- about this project. And we get to this point, and you only allow your community who is going to be impacted 90 seconds to make a public comment?

That's not happening. There is public comment on Saturday and next Monday. Please make the correction and allow three minutes. We don't have people outstanding to talk. There's more people here working for CDOT right now. That's embarrassing.

City council, if the council is full, I will trim that time down. But if there's a handful of people speaking, they're going to get their three minutes. Be respectful. I'm the mayor of Commerce City. You're in my city. Show respect to the community, please, okay?

We're going to spend 800- -- the State is going to spend $800 million. It is important to hear what they have to say and not minimize the people who live here. That's very important to me.

Response to Comment 1

At the end of this public hearing, additional time was given to speakers who wanted it, and at the two public hearings following this one, additional time was allowed for speakers to provide comments (see transcripts following this one).

So, yes, I'm going to send in a statement, but this is my statement to the State. Be respectful to the people who have to live and endure this five-year construction zone. I'm -- but that's all I have to say. Thank you.

(Applause.)

MANDY WHORTON: Okay. Thank you for that.

Kristi Douglas is the next up.

KRISTI DOUGLAS: Hi. I'm Kristi Douglas. And I wasn't expecting to be here tonight either. I'm trying not to get feedback from the mic.

What I would like to say is that the State really needs to listen to the people who are going to be impacted. And you have to understand that those people have to come first. And so the environment has to be a big part of this.

I am new to this because I wasn't able to participate as an additional council member because I served on council at that time, and they said that there couldn't be more than two people from the council attending those meetings, which I didn't agree with but I followed the protocol.

And so what I'm going to do now is to catch up. I would like everyone to look at maybe

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innovation rather than expansion. I don't think expansion is the answer to this. And I really think that the bridges need to be repaired, but I think we need to look at alternative answers to this problem and come up with a really good solution. So I plan to be involved from now on. Thank you.

(Applause.)

MANDY WHORTON: Okay. I think we have Tracy Sakaguchi. And then if we -- it looks like we're going to have additional time. So if there is anybody that didn't get to speak that wanted to spend additional time, you can come back up and speak again since we have time.

TRACY SAKAGUCHI: All right. Good evening, everyone. My name is -- all right. Good evening, everyone. My name is Tracy Sakaguchi, and I am here today on behalf of Colorado Motor Carriers Association representing approximately 600 trucking companies and companies affiliated with trucking in the state of Colorado.

The motor carriers are in full support of the DEIS for Interstate I-270. This project will modernize the entire six-mile length of I-270 and bring overdue support for economic development and multimodal connections through improvements at local

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Response to Comment 1

The Minimal Build Alternative focuses on safety improvements on I-270 and bicycle, pedestrian, and transit enhancements rather than adding capacity. This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

interchanges.

Interstate 270 serves as a gateway connecting north Denver metro communities with the eastern metro area, including the international -- the Denver International Airport. I-270 is a national freight corridor heavily used by the commercial vehicles and as a key economic driver in our region.

Over the past decade, I-270 has become the most heavily congested corridor in the state, resulting in negative economic impacts due to excessive delays and unreliable travel time. Emergency freeway closures occur at an increasing rate, to make necessary repairs to failing bridges and crumbling infrastructure designed in the 1960s by replacing decaying infrastructure and improving safety by improving roadway geometry, improved traffic flow, and travel time reliability through the corridor. Wider shoulders will improve flexibility for emergency responders and vehicles and safely accommodate truck vehicle breakdowns. Relieving congestion and improving multimodal connections will promote lower greenhouse emissions in the corridor. Moving forward with the DEIS will improve safety for the traveling public and enhance connectivity for pedestrians and bikes into the rest of the freight network.

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The Colorado Motor Carriers is in full support of the I-270 DEIS. Thank you.

MANDY WHORTON: Thank you, Tracy.

We have somebody else who is signing in right now.

And, Jackie, I think you're the only one who ran out of time. Do you have anything -- would you like to say -- okay.

We will wait for the new person. Thank you. You just newly signed up. All right. Thank you. It's Scott VanHeusen.

SCOTT VANHEUSEN: Hello. Thank you. I'm Scott VanHeusen. I work in the hospital district in Denver, and I live right across the street on Quebec.

So I have to avoid 270. I know it's a problem. But the bigger problem is crossing 270. That's not a problem just for traffic. It's also a problem for people and for wildlife.

One of my biggest issues that I see now with 270 is that it has split our community into two parts, and it's impossible to get from the south side of 270 to the north side of 270. So that's true for traffic, it's true for bicycles, it's true for pedestrians, and it's true for wildlife.

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Response to Comment 1

Comments noted.

Response to Comment 2

The project includes many connectivity and safety improvements for pedestrians and bicyclists, which include improvements such as adding crosswalks, sidewalks, and lighting; improving wayfinding; improving sections of trails for better visibility; adding multi-use trail connections; and adding a bicycle pedestrian and bicycle overpass over I-270.

The I-270 corridor is situated in a substantially different landscape compared to other highways where CDOT has constructed wildlife crossing structures in the state. Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Much of the natural wildlife habitat in the area surrounding I-270 has been replaced by commercial, residential, and industrial developments. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Although many bridges cross streams in the area, nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the design does not include new wildlife connectivity features across I-270.

Please see Section 5.4.3, ALT7, and Section 5.4.4, IMP9, of the Final Environmental Impact Statement for more information on considerations for bicycle and pedestrian facilities and wildlife crossings.

We have the Sand Creek Regional Greenway which runs most of the way along 270, and there used to be a lot more wildlife down there. There were foxes and water muskrats, et cetera. A lot of them, I think, have been killed over the last 50 years with the highway because there was no way for them to get any movement north or south.

I do see that there's a proposed walkway at the Rose Hill area, and that would be nice for people, but it's not going to work very well for getting the wildlife. I'd really like to see that reconsidered and have something that will go underneath that area.

And I'm not completely happy with the lack of environmental study that's been done right now. My mother, of course, has been told by her doctor -- my mother is in her 80s here in Commerce City. Sorry, Mom. She has been told that not only is it the exhaust that bothers her lungs, it's also the particulates from brakes and from the tires as well.

So things like that are also not talked about. That's also going into all of our soil and groundwater. So I'd like to see if there's a way to mitigate that from bothering our environment. So thank you for your time.

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. Please see Section 5.4.4, IMP1, of the Final Environmental Impact Statement for more information on the EOs.

Additional analyses for air quality, greenhouse gas, and disproportionately impacted communities required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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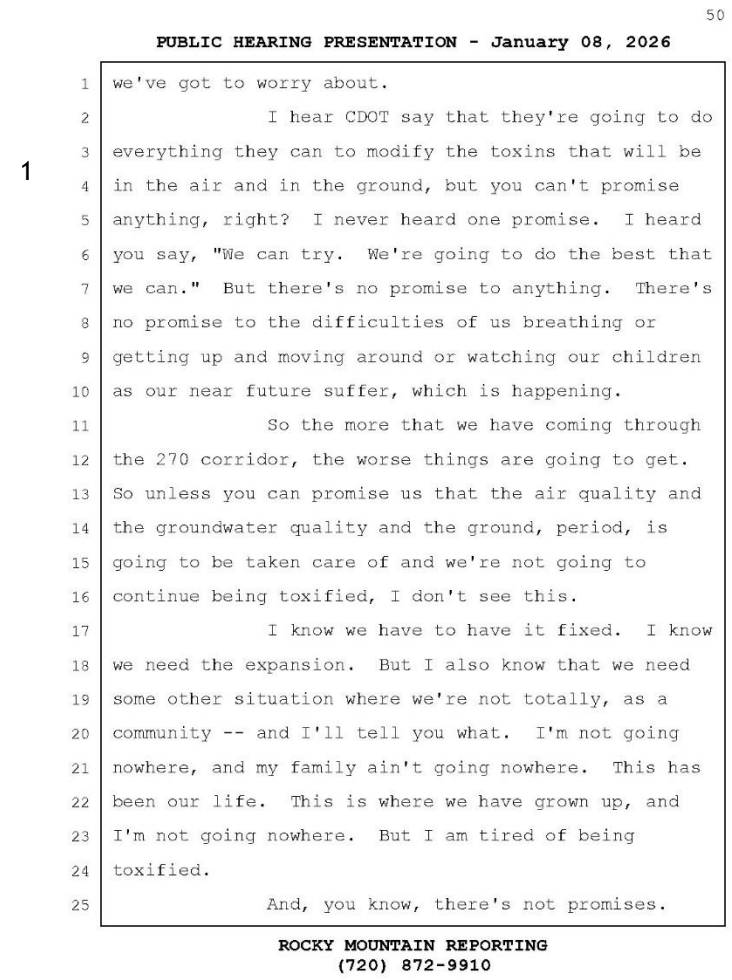
MANDY WHORTON: Okay. Jesus, are you raising your hand? Okay.

All right. We'll -- I guess we just have one last speaker, Jackie again. And then we're going to conclude the -- as I mentioned, the open house is available for the rest of the evening. There are lots of ways you can provide your comments. You can provide oral comments to the court reporter, you can fill out the comment cards, you can go online and fill out comment cards. All of them are treated the same way. So please make your voice heard and file your comments through an official channel.

Jackie, we'll end with you.

JACKIE VALDEZ: Okay. Sorry about that, folks. There was a couple other things I wanted to address.

I understand that 270 has been a major thoroughfare for the industrial road trucking industry. This right here proves it (indicating). The other day I was driving down 60th, and I happened to look up and we have nothing but truckers sitting there idling. I get that. I get that we need them. You know, it's our growth. But I also get that the more we grow and the more we expand, the more trucking industry is going to come through, and that's what



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we've got to worry about.

I hear CDOT say that they're going to do everything they can to modify the toxins that will be in the air and in the ground, but you can't promise anything, right? I never heard one promise. I heard you say, "We can try. We're going to do the best that we can." But there's no promise to anything. There's no promise to the difficulties of us breathing or getting up and moving around or watching our children as our near future suffer, which is happening.

So the more that we have coming through the 270 corridor, the worse things are going to get. So unless you can promise us that the air quality and the groundwater quality and the ground, period, is going to be taken care of and we're not going to continue being toxified, I don't see this.

I know we have to have it fixed. I know we need the expansion. But I also know that we need some other situation where we're not totally, as a community -- and I'll tell you what. I'm not going nowhere, and my family ain't going nowhere. This has been our life. This is where we have grown up, and I'm not going nowhere. But I am tired of being toxified.

And, you know, there's not promises.

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Response to Comment 1

Please see Chapter 5.0 of the Record of Decision for information on mitigation and other environmental commitments that the project will implement for impacts.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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There's no promises out of any of you. And unless you live here and you live right there in that community and you get up every morning and you breathe what we breathe -- think about it. It's a good idea. We need it to a certain extent. But I don't think we need the expansion the way that it's being presented right now.

We do need better bridges. I can tell you that. And just by hearing the accidents over the bridges that are happening, we do need better bridges. We need it to where when you're trying to get on those on-ramps that it's not nothing but pure ice for, you know, the fire department, the ambulance, the police department. We need all that. We need it for the truckers so that there's no accidents being caused. We also need it for the residents.

So I just want you to think -- when you go home tonight, just think about what we're breathing. Stand outside and breathe some of the toxins that we're breathing every day.

MANDY WHORTON: Thank you.

And would you like to speak again? I'm going to give another minute and a half to Marisela, and then we're going to conclude.

MARISELA SERRANO (THROUGH INTERPRETER): I just would like to say something that

Response to Comment 1

The Preferred Alternative includes bride replacements that will include bridges that follow the current design standards.

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I think affects everybody that is here. So please do not -- do not forget that last year the problem was not only one area with one county but it was with the whole state and it was with -- it was about the water quality for the whole state.

MANDY WHORTON: Okay. Thank you all for coming tonight. And, again, this will conclude our oral comment period, but the open house remains available and you can certainly fill out additional comment cards, talk to our staff. And thank you, and have a great evening.

(Presentation adjourned at 6:52 p.m.)

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Response to Comment 1

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures. Please see Section 5.4.4, IMP10, of the Final Environmental Impact Statement for additional information on water quality.

C E R T I F I C A T I O N

I, Jennifer Bajwa Melius, Verbatim Stenographic Reporter and Registered Professional Reporter, appointed to take the within proceedings, hereby certify that the proceedings were taken by me, then reduced to typewritten form by means of computer-aided transcription; that the foregoing is a true transcript of the proceedings had subject to my ability to hear and understand, and that I have no interest in the proceedings.

IN WITNESS WHEREOF, I have hereunto set my hand.

/s/ Jennifer Bajwa Melius
Jennifer Bajwa Melius, RPR

COMMUNITY MEETING - January 10, 2026

COLORADO DEPARTMENT OF TRANSPORTATION I-270 IMPROVEMENT PROJECT

REPORTER'S TRANSCRIPT OF:
COMMUNITY MEETING - January 10TH, 2026

PURSUANT TO NOTICE, the proceedings of THE COMMUNITY MEETING were taken at Adams City High School, 7200 Quebec Parkway, Commerce City, Colorado 80022, on January 10, 2026, at 9:36 a.m., before Rianna R. Elmshaeuser, Registered Professional Reporter, Federal Certified Realtime Reporter, and Notary Public within Colorado.

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WHEREUPON, the following proceedings were taken.

* * * * *

MR. MERENICH: My name is David Merenich. I serve as the I-270 program director, and I've been responsible for leading the environmental impact statement, or EIS, for this project. Before we get started, I'd like to hand it off to Mandy Whorton to review the order of events for tonight's webinar so everyone knows what to expect. She'll be our moderator for the evening.

MS. WHORTON: All right. Welcome, everybody. And it is morning and I'm sorry that we don't have coffee. We had an evening presentation, so we're still kind of getting our whits about us. So if we accidentally say tonight, we mean morning. So thanks, everybody, for coming today. Welcome. Thank you for participating.

Just before we get started, a few housekeeping things, restrooms are down the hall over here. We have food, breakfast burritos from La Casa Del Rey, very delicious over here. We have comment forms around the room. There's informational boards in the hallway and we have lots of staff here after

the part of the presentation, oral comment period to answer questions and help with the -- with any commenting help that you might need.

So we are starting the presentation and then after the presentation will be the formal oral comment period. So the agenda for the rest of this presentation, we can put that up. We'll start with some brief opening remarks from Jessica Myklebust, the CDOT Region 1 Transportation Director. And then we will have David Merenich, who you just heard from, will give you some information about the draft environmental impact statement as well as the project itself.

Derrick Rosenbach will be talking -- he's the environmental manager and he will be talking about some of the environmental issues associated with the project. And then we'll follow with Stacia Sellers who will give you some information about public involvement and communications on the project, and then we will start our comment period.

The comment period, there are lots of ways to comment, so this oral comment period is one of those. There are also online comment forms, written comment forms. You can comment online on the website. You can mail a letter to David, his contact

COMMUNITY MEETING - January 10, 2026

information is there as well. You can email. You can call the telephone hotline. Every type of comment that we get during this period is treated the same way.

So if you don't have time or don't have interest in coming to speak here and comment at the microphone, that's not a problem. We will definitely record your comments other ways. When we get to the oral comment period, I will go over those instructions again. We had originally had a minute and a half for everyone to speak. We are going to extend that to three minutes.

We don't have a lot of speakers signed up today, but we will -- in the speaker sign up, we'll take everybody in order. So I will call you in the order that you signed up. You'll have three minutes to speak, and I'll go over those instructions again. So I'm going to turn it over to Jessica for some opening remarks.

MS. MYKLEBUST: All right. Good morning. Thank you for coming -- okay. Don't touch the mic. Good morning. Thank you for coming to join us on this sunny, kind of warm day. I have heard the breakfast burritos from La Casa Del Rey are amazing. So while we're chatting up here, please take a moment to grab

one of those.

I am Jessica Myklebust as said previously, Transportation Director for CDOT Region 1. Region 1 is where the I-270 project falls. Your time matters and your participation matters, which is why a lot of you are here today. And I want to begin by acknowledging the community members, the residents, the business owners, and the partner agencies who have stayed engaged throughout the I-270 process. We really appreciate you and all the time you've given us.

For a project of this scale and impact, CDOT believes that showing up, listening, and being transparent is not optional. It is essential. Today's public hearing reflects that commitment. The I-270 corridor plays a critical role in Colorado's transportation system. It connects industrial areas, regional distribution centers, and the interstate network supporting freight movement that is vital to the regional and state economy.

At the same time, I-270 runs through long established neighborhoods and communities. CDOT recognizes that any conversation about change raises important and very legitimate questions. Our project is not simply about moving traffic. It is about

safety, reliability, access, and connectivity for everyone who uses or lives near the corridor.

This project is part of CDOT's 10-year vision plan, which focuses on strategic investments that improve safety, resilience, and multimodal options statewide. For I-270, that means examining how to modernize the corridor to reduce crashes, to improve travel time and make your trip time more reliable, to support the movement of goods and freight and to strengthen transit, bicycle, and pedestrian connections.

The goal is to address today's challenges while planning responsibly for the future of this region. From the beginning, CDOT and the Federal Highway Administration have approached the project deliberately and transparently. The environmental review process began in about 2020, almost six years ago with many of you with continued engagement, and it started as an environmental assessment.

As our work progressed, it became clear that the complexity of the corridors and the concerns raised by agencies, stakeholders, and the public required a more comprehensive review. In 2022,CDOT made the decision to pause the environmental assessment, share all of our findings with the public,

and move forward with an environmental impact statement, EIS. That was not the fastest path, but we knew that it was the right one.

The draft EIS you will hear about today represents years of technical analysis, coordination, and public involvement. The EIS evaluates a broad range of alternatives and potential impacts and includes mitigation commitments intended to avoid, minimize, or address impacts wherever possible.

Air quality has been a central focus throughout this process. The I-270 corridor is influenced by many factors beyond the roadway itself. As part of the draft environmental impact statement, project level air quality analysis have been conducted in accordance with federal requirement. In response to community concerns and state law, CDOT also has conducted additional state required air quality and greenhouse gas analyses that go beyond what is included in the federal environmental review.

These analyses are documented in separate state air quality and greenhouse gas technical reports and help inform commitments and transparency as the project moves forward. We do have copies of all of these state and federal reports on the back table if you want to take a peek at those. There are people

back there who can help guide you through the documents.

Through this process, CDOT has evaluated a range of alternatives, including different design approaches and ways to manage traffic within a constrained footprint. Based on that evaluation, CDOT has identified a preferred approach that includes express lanes in both directions. Express lanes are part of the preferred alternative because they provide a practical way to improve safety and travel time reliability while balancing the many demands on the corridor.

Express lanes support transit and high occupancy vehicles. They offer flexibility for freight movement and help the transportation system function more efficiently over the long term. I want to personally thank everyone who has participated in this process. And, again, thank you for being here on a Saturday morning.

If you've participated by attending meetings, submitting comments, asking us tough questions, or sharing your local knowledge about your community, your involvement has directly shaped our work and it continues to matter.

This meeting is not the end of the

conversation. It is an important milestone. The draft environmental impact statement is a key step in sharing information, gathering feedback, and assuring the decisions ahead are informed, balanced, and accountable. CDOT believes in this project and we believe just as strongly in a partnership in community trust.

Thank you again for attending the I-270 meeting today, and thank you again for your comments and dialogue that we're going to have after the presentation. I will now turn it back over to David Merenich. He is the I-270 Project Director, and he is going to walk through a few more details of the draft environmental impact statement.

MR. MERENICH: All right. Thank you, Jessica. So first of all, I'd like to say that EIS is performed under the umbrella of the National Environmental Policy Act, commonly referred to as NEPA. It is a procedural law that requires agencies with federal funding to consider the environmental impacts of their actions.

There are three general phases to NEPA planning. Number one, the development of a proposed action; two, an environmental analysis; and, three, project implementation. The preferred alternative is

based on an approved NEPA process supported by technical analyses that remain valid under current federal law, regulation, and policy.

We are currently in the environmental analysis phase with the release of this draft EIS. An EIS is the most rigorous level of environmental review under NEPA. Please note that the draft DEIS does not represent CDOT or federal highway administrations final decision on the project. Jessica also mentioned that.

So your input today will help inform the decisions made during the NEPA planning process. Now that we know a little bit more about what a draft EIS is, let's take a look at how the draft EIS is organized. The draft EIS is organized into six chapters supported by technical reports and appendices that contain more detailed analysis.

The executive summary, which we've handed out today, provides an overview of the project alternatives and major findings. Chapters one through three cover the project background, purpose and need, and the range of alternatives considered. Chapter four includes the environmental analysis across numerous resource areas, such as air quality, noise, wildlife, water quality, and community impacts.

Chapter five includes mitigation commitments for the preferred alternative, and chapter six summarizes public and agency involvement throughout the project. Stacia is going to talk a little bit more about that later. All of these materials are publicly available online and in hard copy at designated repositories. We also have them all here today at the back tables there, so we encourage you to speak with our experts and learn a little bit more.

With that overview in mind, let's start talking about some project details by walking through the project limits. I-270 runs through Denver and Commerce City and serves residential neighbors, industrial areas, and major employment centers. I-270 is a critical connector for freight and regional travel making its performance important not only locally, but across the broader transportation network.

The study area includes the entire six and a half mile segment of I-270 from the I-25/US 36 interchange on the west to west of I-270 and -- excuse me. From the I-25/US 36 interchange on the west to the I-70 on the east. It encompasses interchanges at I-76, York, Vasquez, and Quebec.

So now that we reviewed the project limits and its importance, let's review the purpose and need. CDOT has worked heavily with stakeholders to understand, develop, refine the purpose and need of this project. A lot of people that I see here today I've worked with over the last 18 months working on this project.

And the purpose of this project is to modernize the I-270 corridor so it can safely and reliably meet the current and future transportation demands. To support that purpose, the draft EIS identifies several transportation needs that must be addressed along the corridor.

Improving safety is a major need as the crash rates on I-270 are higher than that on the similar corridors due to narrow shoulders, short ramps, and other outdated design features. Addressing travel time and reliability is essential given recurring congestion and unpredictable trips that are expected to worsen with continued regional growth.

Enhancing transit performance is important since buses currently operate the same congested lanes as general traffic resulting in delays and unreliable schedules. A reliable lane is the first step to expanding future transit on this

corridor and to allow current RTD routes, like in Flatiron Flyer 5 to utilize I-270 instead of making a lengthy detour via I-25 and I-70.

Better bicycle and pedestrian connectivity is needed because limited crossings and outdated facilities restricts safe access between neighborhoods, trails, and transit stops. Supporting freight operations is also a key need as I-270 is an important freight and hazardous materials route where congestion and constrained geometry create operational challenges on a daily basis.

In addition to the purpose and the needs of this project, the DEIS also identifies a separate key project goal; to minimize the environmental and the community impacts resulting from the proposed project. I'd like to point out, and Derrick will talk about this a little bit later, there are no residential or business acquisitions needed as part of this project.

The project team evaluated a full range of alternatives to address this purpose and need. As part of the NEPA process, CDOT and FHWA, Federal Highway Administration, began by looking broadly at how different approaches could address the purpose and need for the corridor.

We considered a full range of preliminary alternatives. Three of those looked at adding no lanes to current I-270. The no action alternative, which means no improvements other than routine maintenance projects; bicycle, pedestrian, and transit only alternative; and then the minimal build alternative.

Then we took a look at three that added one lane in each direction; the three general purpose lanes alternative, two general purpose lanes plus one transit only, and then two general purpose lanes plus one express lane that would accommodate transit. Then the last two looked at adding two lanes each direction; three general purpose lanes plus one express lane, and then two general purpose lanes plus two express lanes.

Each of those alternatives were chosen based off the public input that we received from you all and were screened using evaluation criteria based on the project's transportation needs and the goal of minimizing environmental and community impacts. Alternatives -- excuse me. Alternatives that did not sufficiently meet those needs or would introduce greater impacts without proportional benefits were removed from consideration.

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From this process, two build alternatives, the three general purpose lanes, and the two general purpose lanes plus one express lane were advanced to detailed study within the draft EIS. CDOT held -- excuse me. Also the no action alternative was carried forward as well as a baseline for comparison, even though it does not meet the purpose and need. CDOT held meetings in April 2024, in January 2025 at Eagle Point Recreation Center to share that the two build alternatives and no action were carried forward into the detailed analysis.

So we're excited to share tonight that we have completed that draft analysis of those alternatives, and based on that analysis and through our work with the community, we selected a preliminary preferred alternatives within the draft EIS. The preliminary preferred alternatives is the one express lane that accommodates transits alternative.

It reconstructs the entire I-270 corridor and adds an express lane, a 4-foot buffer lane, and increased shoulders in each direction. Let's talk about some of the additional benefits of the preferred alternative for a few slides, and then after that, I'll talk a little bit more about why an express lane is the preferred alternative.

There are numerous elements that make up the express lane that serve the purpose and need of the corridor. There is a lot on this map, so I'm going to break it down on the next few slides. Key design elements modernize highway geometry, widen shoulders, lengthening ramps for safer and more efficient travel.

The dark blue line shows the added express lane in each direction between I-70 and I-25. The purple dots represent lengthened on and off ramps at York, Vasquez, and Quebec. The yellow dots represent enhanced lighting on the corridor at locations like York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez, and Quebec.

Eastbound and westbound auxiliary lanes shown there in the blue text between the on and off ramps at Vasquez and I-76 would allow vehicles, especially freight trucks, more time to reach speed to enter and exit the highway. We also propose full reconstruction of South Sand Creek Drive between 56th Avenue and Quebec.

Let's keep breaking it down. Next we'll take a deeper look at the bridges and interchanges. The project would also replace aging bridges and improve interchange operations for safer and more

efficient travel. The black circles represent interchange improvements at I-76 and Vasquez.

CDOT proposes a full interchange reconstruction as Vasquez that removes the full cloverleaf and eliminates the existing short merging and weaving issues which plague I-270. The movement from I-76 onto I-270 would be consolidated to a single entrance point reducing vehicle conflict. Meanwhile, the current single exit from I-270 to York and I-76 would become two separate exits to reduce sideswipe questions.

The blue squares show full bridge replacements at York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez over Sand Creek, and 56th Avenue. Next, let's take a look at some of the multimodal improvements that the project would provide. We've heard from the community that multimodal improvements are essential.

Project upgrades, bicycle and pedestrian facilities, all the reconstructed bridges includes new sidewalks, multiuse paths, adds RTD bus stops, and improves lighting across the corridor. Trail improvements that result in better visibility, safer crossings, and enhanced connections to the South Platte River Trail and Sand Creek Trail are also part

of this preferred alternative.

The yellow and green lines show added or improved sidewalks and trails at York, South Platte, Brighton. It shows pedestrian underpasses at Vasquez and a pedestrian overpass near the South Rose Hill neighborhood. The orange arrows show improved way finding for all the trails in the area; South Platte Trail, Sand Creek Trail, and Clear Creek Trail. The blue dot shows added RTD bus stops at Quebec.

All of these combined elements work together to improve safety, mobility, and multimodal access throughout the corridor. Let's shift gears now and talk a little bit more about the benefits of an express lane. Express lanes provide travelers with a reliable, free flowing option particularly during peek congestion. They are free for HOV 3+ car pools, motorcycles, transit, and they help prioritize high occupancy and multimodal travel.

Other vehicles, such as private drivers and trucks can choose to use the express lane by paying a toll, which gives them flexibility depending on their travel needs. The lanes are dynamically priced. Toll rates adjust in real time based on congestion to keep traffic in that lane moving. The I-25 and US 36 express lanes operate in a similar way,

so this approach builds on a proven system familiar to many front range travelers.

By shifting these vehicles into the express lane, traffic in the two existing general purpose lanes also moves more reliably. This extra express lane prioritizes moving people with less cars. Let's at look some other benefits of the preferred alternative.

This slide summarizes how the preferred alternative performs when measured against the project's purpose and need, and many of these outcomes are illustrated on the boards in the hallway. For safety, this corridor currently experiences more than 40 crashes per mile each year, which is well above the statewide average. The preferred alternative is expected to reduce crashes by approximately 15 to 20 percent. By improving merge areas, reducing weaving, and modernizing outdated features.

In terms of travel time and reliability, the preferred alternative reduces peak period delay by more than 20,000 vehicle hours per day and moves about 8 percent more peak hour trips compared to the three general purpose lane alternative. This helps stabilize traffic flow and reduce the stop and go conditions people experience today.

Transit performance also improves. Right -- by providing more reliable travel conditions, the preferred alternative reduces corridor travel times for buses to 10 minutes or less, improving schedule reliability for people who rely on transit. Freight movement is a critical function of I-270. The preferred alternative reduces peak hour truck travel times by nearly 20 minutes, improving delivery reliability for freight independent businesses and supporting the regional economy.

For people walking and biking, the preferred alternative improves connectivity by adding wider sidewalks, better lighting, and new crossings, including a new 10-foot wide bicycle and pedestrian overpass over I-270 and South Sand Creek Drive that connects the Sand Creek Greenway to North Sand Creek Drive.

With reduced congestion in I-270, more drivers are expected to choose direct routes rather than parallel roadways resulting in approximately a six percent reduction in vehicle miles traveled in greenhouse gas emissions on major sounding roadways compared to the no action alternative.

Taken together, these performance measures show how the preferred alternative addresses

safety, mobility, and connectivity challenges while supporting the long term functioning of the corridor. On the next slide, we'll discuss a little bit more about how this project would be funded.

The estimated total cost of the preferred alternative including preconstruction and construction costs is $806 million and will be delivered through a combination of state and federal funding sources. We've spent $41 million on the corridor since 2020, which includes projects like resurfacing the bridge decks, bridge rail protection projects, bridge shoring projects, environmental studies, and preliminary design of the corridor, especially the phase one bridges, which we will talk a little bit more later on.

The construction costs of the preferred alternative is estimated at $725 million. We estimate that it will cost $350 million just the rebuild I-270's current bridges, pavement, and other deteriorating infrastructure back to the exact same configuration that we see today. So where is that extra $375 million going to build out the preferred alternative?

It's being invested in features that directly improve safety, reliability, and quality of

life for the people who use and live near this corridor every day. That includes wider shoulders so emergency responders can reach crashes faster and clear incidents sooner, reliable express lanes that incentivize carpooling and transit and help keep traffic moving during peak hours, and truck acceleration lanes between Vasquez and I-76 to reduce dangerous speed differentials and rear end crashes.

The funding also allows us to reconfigure two of the corridor's most severe bottlenecks at I-76 and Vasquez, locations that consistently contribute to congestion, crashes, and unpredictable travel times. Investments in upgraded cameras and traffic technology mean faster incident detection and better realtime traffic management.

Beyond drivers, the project adds meaningful multimodal improvements including, which we've already talked about, the pedestrian overpass at South Rose Hill and the underpasses at Vasquez, new bus stops at Quebec, and safer connections across the entire corridor. It also includes required and requested mitigation such as noise walls, water quality ponds, air quality monitors to protect nearby neighborhoods during and after construction.

Community enhancements, like aesthetic

improvements, travel demand management, and support for local agency projects, including a 60th Avenue underpass, the needed the tier bridges at the railroads are also a part of this investment.

In short, this funding is about building a corridor that works better in emergencies, is safer for all users, moves people and goods more reliably, and responds directly to what the community told us they need. Key state funding sources include Senate Bill 1, strategic funds, the statewide bridge and tunnel enterprise, and other state transportation programs.

Federal funding includes competitive, discretionary grants which support regionally significant projects like I-270. Colorado transportation investment office also plays a role in financing and operating the express lanes allowing toll revenue to help support construction, operations, and long term maintenance.

Because the full preferred alternative cannot be funded all at once, construction will be delivered in three phases. This next slide will show how that phasing works. Preconstruction began in 2020, and included activities like design, NEPA evaluation, and the preventive maintenance.

Construction will be sequenced in three phases to allow the highest priority needs, particularly the aging bridges and key structural elements to be addressed first, while additional funding IS secured for the remaining corridor improvements.

Phase one focuses on replacing several of the corridor's oldest and most structurally deficient bridges, including I-270 over the South Platte River, I-270 over Burlington Ditch, I-270 over Brighton, and I-270 over 60th. Phase two reconstructs the I-270 mainline, the I-270 Vasquez interchange, York Street, and 56th Avenue bridges.

Phase three completes the remaining corridor improvements, including Vasquez Boulevard bridge over Sand Creek, upgrades to Sand Creek Drive and the frontage road, and a new bicycle and pedestrian overpass. Construction is anticipated to begin in late 2026 or early 2027, and is expected to take approximately five years depending on funding, availability, and construction conditions.

This next part is key. We've heard a lot from people that they're worried about what this construction will do to their communities. Throughout construction, CDOT will maintain at least two lanes of traffic in each direction during daytime hours with

only nighttime closures scheduled strategically to minimize construction. Regular updates, including detours, lane closures, the construction sequencing will be available on the project website to help keep the public, residents, businesses, and emergency responders informed.

So next we'll discuss the environmental impacts on this corridor that we have identified in the DEIS. I'll hand this portion of the discussion to Derrick Rosenbach, CDOT's Environmental Program Manager.

MR. ROSENBACH: Thank you, David. The build alternatives prioritize avoidance and minimization of environmental impacts by maintaining the highway water within the existing transportation corridor, thereby preventing any residential or business displacements and reducing permanent land acquisition.

Furthermore, the design of the build alternatives avoid adverse effects to the historic properties and minimizes impacts to recreational trails through the use of temporary detours, protective measures, rather than trail closures. Despite many of these efforts, some impacts will be unavoidable when widening the highway to address critical safety congestion and freight mobility needs.

For example, the build alternatives involve more improved service areas, encroachment into flood plains, minor noise increases, and the loss of some wetlands and wildlife habitat. To address these impacts, the build alternatives incorporate mitigation measures, such as upgrading the drainage system with moderate water quality features, recommending a noise wall near the South Rose Hill neighborhood, replacing wetlands where possible and planting native vegetation. For more information on the environmental impact's project, please visit our boards and subject matter experts in the hallway.

Now, we'll briefly discuss other impact analyses that CDOT performed to adhere to state requirements. CDOT developed three reports that examine the environmental effects on resources that are separate from the federally required draft EIS. They include the air quality technical report, the greenhouse gas technical report, and the community analysis technical report.

All three state reports are available on the project website and are available at local facilities such as the Commerce City Civic Center and Adams County Government Center. These documents are open for public comment during the same 60-day comment

period as the draft EIS.

Now, I will hand it over to Stacia Sellers, who will discuss the public involvement that has occurred for the project as well as the recommendations CDOT has received from the community thus far. Stacia?

MS. SELLERS: Thank you, Derrick. Public involvement has been a core part of this project from the beginning. CDOT and FHWA followed best practice engagement methods, which include informing, consulting, involving, collaborating, and empowering stakeholders. Our bilingual outreach teams attended or hosted nearly 200 community events meeting people where they are.

That includes at neighborhood meetings, community centers, business visits, fairs and festivals, trail heads, and other locations across the corridor. Across these events CDOT heard the residents, Businesses, commuters, freight operators, local governments, and advocacy groups.

More than 1,000 comments were submitted during earlier stages of the NEPA process and that feedback directly influenced key project decisions. Public input helped shape the purpose and need, refine alternatives, identify community priorities, and

ultimately elevate the environmental review from the environmental assessment to the EIS.

The public hearing is a continuation of that commitment to transparency and two-way communication. Now that we've covered how the community has been involved, we'd like to summarize the commitments that the state has made to meet key community needs.

The project team gathered community ideas through public meetings, stakeholders workshops, and other engagement activities. A community enhancement subcommittee made up of stakeholder working group members representing neighborhoods across the corridor reviewed public input and helped prioritize and recommend enhancements.

These recommendations were organized into nine community commitments, each one associated from the allocations. CDOT is committed to engaging with the public on a monthly basis to provide updates for the progress of these commitments and the use of allocated funds.

CDOT is committed to engaging with the public on a monthly basis to provide updates on the progress of these commitments and the use of allocated funds. The structure for this ongoing engagement is

expected to evolve over time to remain flexible, community led, and responsive to changing needs, priorities, and circumstances.

Now that we've covered how the community feedback translated into the project commitments, I'll pass this back over to our moderator Mandy to walk through the oral comment process and the reminder of other ways you can submit your official comment during the public comment period. Thank you.

MS. WHORTON: Okay. We are now ready to begin the oral comment period. As a note, we are in the official comment period, which does extend until January 20th, and the oral comment period is one way that you can provide comments on the project and on the draft environmental impact statement. But all comments that you provide are all treated equally.

We are grateful to those of you that chose to be here today and for those that are going to choose to speak. Before we begin, I'll walk through a few guidelines to ensure everyone who wanted to speak has the opportunity and that CDOT can respond effectively to your comments on the project.

There is a speaker sign up. I have right now 11 people signed up. If you did not see the speaker sign up, you can go back out and sign up to

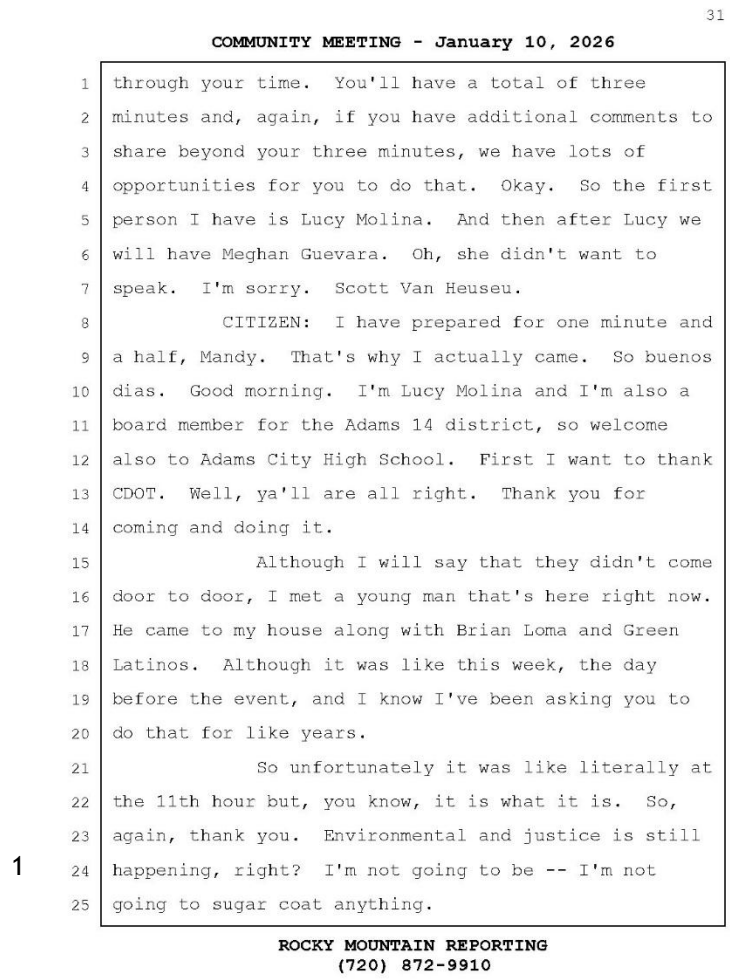
speak. So I'm going to call the people that I have in order, and when I call your name, you will come up to the microphone. You'll have three minutes to provide your comments.

To ensure fairness, your time cannot be transferred to others and I'm going to let you know when you're about halfway through your comments. This is a listening session so CDOT is here to listen and receive your comments and will not be responding during this period.

This is your time. If you need more time, you can submit written comments or you can continue your comments privately with the court reporter who is available over on that end of the cafeteria. These options are all considered equally in the project records. And, lastly, we ask that your comments remain respectful and focused on the project.

All right. Now we're ready to begin oral comments. As I said, I'm going to call each speaker by name. I'll call the first speaker, and then let you know the next person who is going to be up to speak. The timer is going to count down to 90 seconds, that's going to be halfway through your time, and then we'll start it again.

I will remind you when you're halfway



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through your time. You'll have a total of three minutes and, again, if you have additional comments to share beyond your three minutes, we have lots of opportunities for you to do that. Okay. So the first person I have is Lucy Molina. And then after Lucy we will have Meghan Guevara. Oh, she didn't want to speak. I'm sorry. Scott Van Heuseu.

CITIZEN: I have prepared for one minute and a half, Mandy. That's why I actually came. So buenos dias. Good morning. I'm Lucy Molina and I'm also a board member for the Adams 14 district, so welcome also to Adams City High School. First I want to thank CDOT. Well, ya'll are all right. Thank you for coming and doing it.

Although I will say that they didn't come door to door, I met a young man that's here right now. He came to my house along with Brian Loma and Green Latinos. Although it was like this week, the day before the event, and I know I've been asking you to do that for like years.

So unfortunately it was like literally at the 11th hour but, you know, it is what it is. So, again, thank you. Environmental and justice is still happening, right? I'm not going to be -- I'm not going to sugar coat anything.

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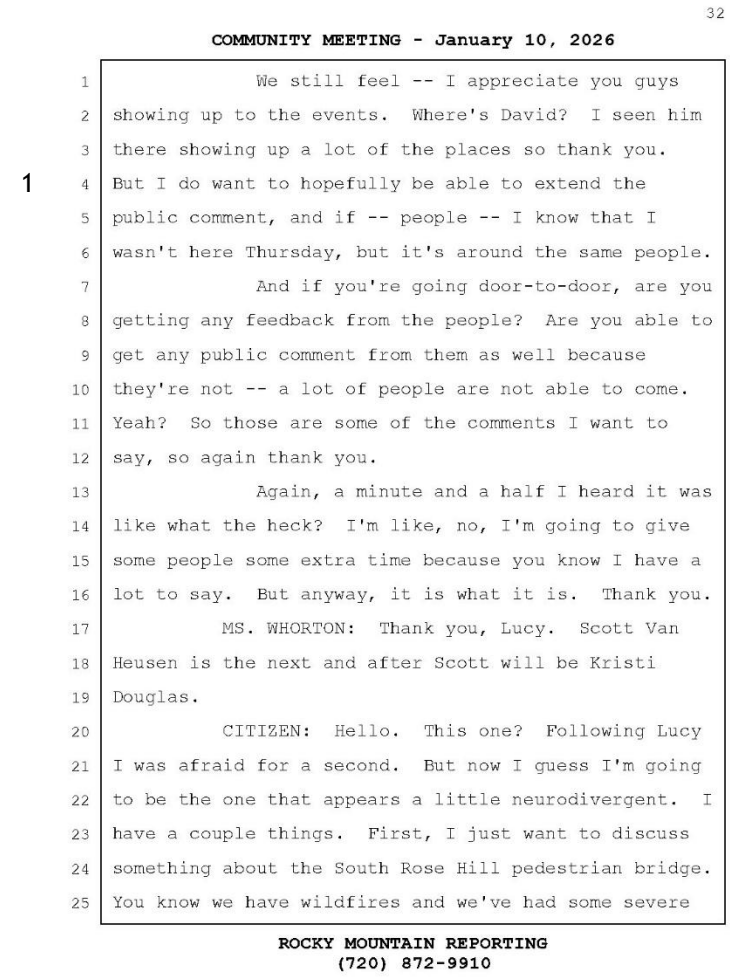
Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

However, air quality, greenhouse gas, and disproportionately impacted communities analyses are required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128. These analyses are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).



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We still feel -- I appreciate you guys showing up to the events. Where's David? I seen him there showing up a lot of the places so thank you. But I do want to hopefully be able to extend the public comment, and if -- people -- I know that I wasn't here Thursday, but it's around the same people.

And if you're going door-to-door, are you getting any feedback from the people? Are you able to get any public comment from them as well because they're not -- a lot of people are not able to come. Yeah? So those are some of the comments I want to say, so again thank you.

Again, a minute and a half I heard it was like what the heck? I'm like, no, I'm going to give some people some extra time because you know I have a lot to say. But anyway, it is what it is. Thank you.

MS. WHORTON: Thank you, Lucy. Scott Van Heusen is the next and after Scott will be Kristi Douglas.

CITIZEN: Hello. This one? Following Lucy I was afraid for a second. But now I guess I'm going to be the one that appears a little neurodivergent. I have a couple things. First, I just want to discuss something about the South Rose Hill pedestrian bridge. You know we have wildfires and we've had some severe

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Response to Comment 1

A Public Involvement Plan (PIP) was developed and implemented when the Environmental Impact Statement (EIS) process began in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within 1 mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the United States Environmental Protection Agency and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development.

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS. For information on public involvement during the Draft EIS public comment period, see Section 5.4.1, GEN2, of the Final EIS and Section 5.2 of the Final EIS.

issues recently with wildfires. And Sand Creek is a huge nature area. If there's a fire along Sand Creek, I would prefer not to have to go across a pedestrian bridge to evacuate. I'm sure the wildlife wouldn't like that either. They wouldn't even know where to find it.

We also have a lot of industry, some it toxic. If that's burning and someone needs to get from north to south, from south to north, I'm not going on top of a bridge. If there's a tornado, bridges aren't exactly where I want to be either. Lightning. What about hazardous material on 270 that spills, that catches fire, or that's gas? I don't want to be on a bridge. I really, really strongly recommend we have an underpass not an overpass. 1

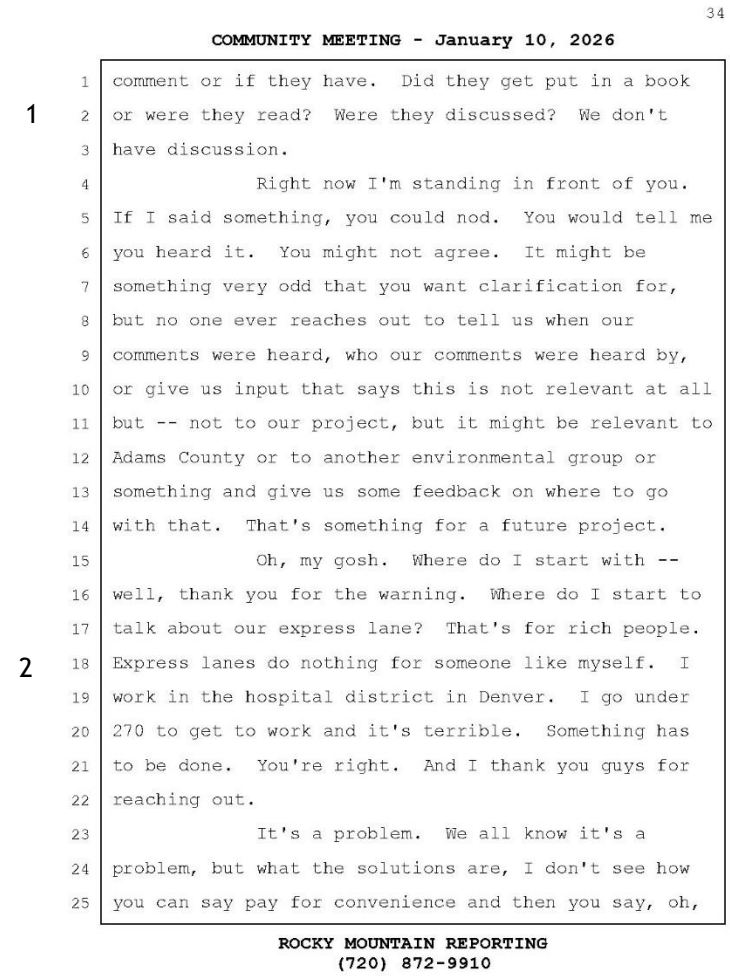
There is no way to cross 270 from Quebec to Vasquez, and if you put an overpass that gives us one access, only one. And that shouldn't be above 270, especially if that's where a spill or a fire is. That was the first thing that's more important I wanted to say.

Second thing, transparency of the topics that we all discuss. I've been to many of the planning during your outreaches, and I've submitted many comments, but I have no idea who ever heard my

Response to Comment 1

Wildfire evacuations were not considered as part of the project. The project does add additional connectivity options for crossing from the north and south sides of I-270.

The overpass would connect the Sand Creek Trail south of I-270, cross over South Sandcreek Drive and I-270, and connect with North Sandcreek Drive at East 53rd Way north of I-270. This location was identified as the best location for a new crossing between Vasquez Boulevard and Quebec Street because it would provide a direct connection between the adjacent neighborhood and the trail system. However, the area south of I-270 is within the Sand Creek floodplain and is subject to severe drainage and flooding conditions. As a result, construction of a bicycle and pedestrian underpass is not feasible due to engineering and safety constraints.



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comment or if they have. Did they get put in a book or were they read? Were they discussed? We don't have discussion.

Right now I'm standing in front of you. If I said something, you could nod. You would tell me you heard it. You might not agree. It might be something very odd that you want clarification for, but no one ever reaches out to tell us when our comments were heard, who our comments were heard by, or give us input that says this is not relevant at all but -- not to our project, but it might be relevant to Adams County or to another environmental group or something and give us some feedback on where to go with that. That's something for a future project.

Oh, my gosh. Where do I start with -- well, thank you for the warning. Where do I start to talk about our express lane? That's for rich people. Express lanes do nothing for someone like myself. I work in the hospital district in Denver. I go under 270 to get to work and it's terrible. Something has to be done. You're right. And I thank you guys for reaching out.

It's a problem. We all know it's a problem, but what the solutions are, I don't see how you can say pay for convenience and then you say, oh,

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Response to Comment 1

All comments received throughout the Environmental Impact Statement (EIS) process have been logged into a spreadsheet and read by the appropriate project team members. Many comments have led to additions to the project, such as locations of where bicycle and pedestrian improvements are needed.

Response to Comment 2

The Preferred Alternative does include an Express Lane as you noted. The Express Lane was identified as best meeting the Purpose and Need for the project. Please see Section 3.4 of the Draft EIS for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

but that helps you poor people who don't pay for that because it moves the rich people into their own lane. Now you can have a little more room. Give me the reach people's lane too. Let me go into all lanes. You know, that's not the way to do it. If you want to call it an express lane, that's cool, but what it is is paying for convenience and that's not appropriate.

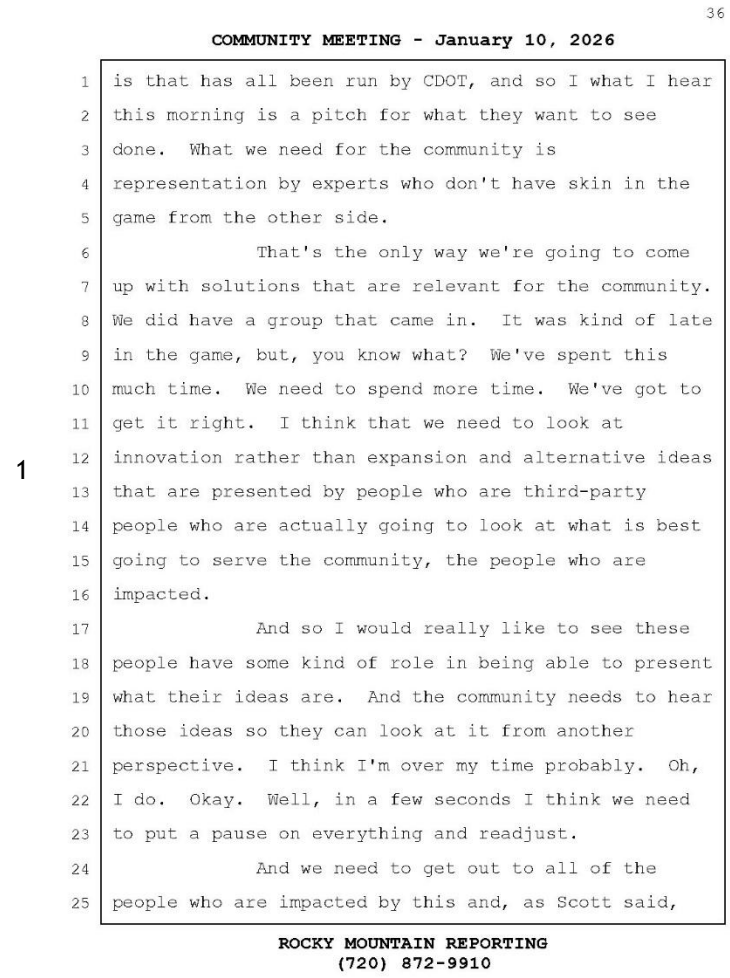
MS. WHORTON: I want to make sure everyone has a chance to speak, so I'm going to cut you off.

CITIZEN: Well, I guess I'm being dismissed. Thank you.

MS. WHORTON: We'll have Kristi and then Steve Douglas. And then I still have a couple people after that.

CITIZEN: Good morning, everyone. I am so happy to see the turnout that we have right now. I want to see this expand and grow so that every voice is heard. I appreciate that CDOT has given us the opportunity to weigh in because usually we don't have that opportunity. My name is Kristi Douglas. I believe I forgot to tell you who I was or who I am.

And this didn't happen with I-70. And so they came to us and said what did we do wrong last time? And I got to tell them that there was no community engagement. What's missing this time though



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is that has all been run by CDOT, and so I what I hear this morning is a pitch for what they want to see done. What we need for the community is representation by experts who don't have skin in the game from the other side.

That's the only way we're going to come up with solutions that are relevant for the community. We did have a group that came in. It was kind of late in the game, but, you know what? We've spent this much time. We need to spend more time. We've got to get it right. I think that we need to look at innovation rather than expansion and alternative ideas that are presented by people who are third-party people who are actually going to look at what is best going to serve the community, the people who are impacted.

And so I would really like to see these people have some kind of role in being able to present what their ideas are. And the community needs to hear those ideas so they can look at it from another perspective. I think I'm over my time probably. Oh, I do. Okay. Well, in a few seconds I think we need to put a pause on everything and readjust.

And we need to get out to all of the people who are impacted by this and, as Scott said,

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Response to Comment 1

The Minimal Build Alternative focuses on safety improvements on I-270 and bicycle, pedestrian, and transit enhancements rather than adding capacity. This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

The report you mention is an alternative submitted by the GreenLatinos during the Draft Environmental Impact Statement (EIS) public comment period. This alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative in the Final EIS.

FHWA and CDOT evaluated the Two Express Lanes that Accommodate Transit Alternative using the project's Purpose and Need and the Draft EIS's Levels 1 and 2 screening criteria (see Appendix D of the Final EIS).

The Two Express Lanes that Accommodate Transit Alternative relies on policy-based tolling intended to reduce corridor volumes rather than add capacity. While lower volumes on I-270 could improve operations for users who remain on the facility, regional modeling

conducted in coordination with the Denver Regional Council of Governments indicates that a substantial reduction in corridor traffic would redistribute vehicles to other interstate facilities and to the local roadway network. This redistribution could increase congestion and crash exposure on adjacent corridors and local streets.

Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain. In addition, because I-270 functions as a designated hazardous materials route, oversized and overweight load route, nuclear route, and part of the Strategic Highway Network (STRAHNET), freight operators have limited viable alternatives. Without added capacity, converting existing lanes to Express Lane operations could increase costs and reliability risks for essential freight movements without corresponding improvements in throughput.

In terms of physical footprint, the Two Express Lanes that Accommodate Transit Alternative would not add continuous through lanes but includes continuous acceleration and deceleration lanes. As a result, its footprint would be greater than the No Action and Minimal Build alternatives and smaller than widening alternatives that add capacity.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 United States Code Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 National Environmental Policy Act (NEPA) process. ISRRPP allows a limited number of states to toll existing Interstate facilities for reconstruction or rehabilitation purposes, subject to strict eligibility criteria and FHWA approval. Participation in ISRRPP is discretionary, capped nationwide, and not guaranteed; acceptance would require a separate federal application and approval process independent of this project's NEPA review. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction.

VPPP allows states to test value pricing strategies intended to manage congestion and influence travel behavior. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone. VPPP has generally been applied in urban contexts as part of broader, regionally coordinated congestion-pricing efforts.

However, while neither pilot program can be implemented solely through the I-270 NEPA process, the Preferred Alternative would not preclude CDOT and regional partners from pursuing a broader, regionally coordinated tolling pilot under either ISRRPP or VPPP in the future through the appropriate federal and metropolitan planning processes.

Based on the full evaluation, CDOT determined that the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a reasonable potential to outperform the Preferred Alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit in meeting the project's Purpose and Need. Accordingly, the alternative has been eliminated from detailed analysis.

they need to be heard, and we need to have a discussion. So rather than coming up and presenting like this, why don't we all sit in a circle and we'll pass the microphone around and talk to each other.

If you want a copy of this report from the AIA that I received, please let me know. I will send you that link. It's about 50 pages long. I'm halfway through it, but I really want to look at everything before I weigh in on what my suggestions are. But we need to slow this down a little bit.

I know there's been 18 months that have been put into this, but a few more months to really look at what real solutions are I think are necessary. Thank you.

MS. WHORTON: Thank you. Next we have Steve Douglas, and I do have seven more people after this, so if we can stick to the three minutes, that would be great so everyone gets a chance to be heard.

CITIZEN: Thank you. My name is Steve Douglas, Mayor of Commerce City. I'm not here to speak for Commerce City. I'm here as a resident as well, and also part of the group that met for 18 months. I-270 corridor has reached a point where doing nothing is no longer acceptable. The infrastructure we rely on today no longer meets our

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regional safety, mobility, environmental, and community needs.

Every year we delay this action, we increase the risk and drive up long-term costs for the public. And I understand that you've heard from speakers before that we need to have more discussion, but we still could start on this project and incorporate those changes.

The draft environmental impact statement lays out a clear path forward and places 12 aging bridges, replacing the Vasquez bridge interchange, and improvement on operations as far as the ramps. I also want to indicate that not only does CDOT corridor -- there's 270 corridor is very important to our community, but also the roads outside of 270, those need to be improved before this project starts. York street, parts of Vasquez, and in Colorado Boulevard.

Those are daily currents with impact on our daily lives. I would say design all the lanes as E-470 as the standard committed to delivering the same level of community benefits, mitigating neighborhood investments for residents and businesses along this corridor as they did for Elyria-Swansea on I-270 -- I'm sorry, I-70.

What I mean by that is the impact this is

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Response to Comment 1

Please see Chapter 5.0 of the Record of Decision for the list of mitigation and other commitments for the project.

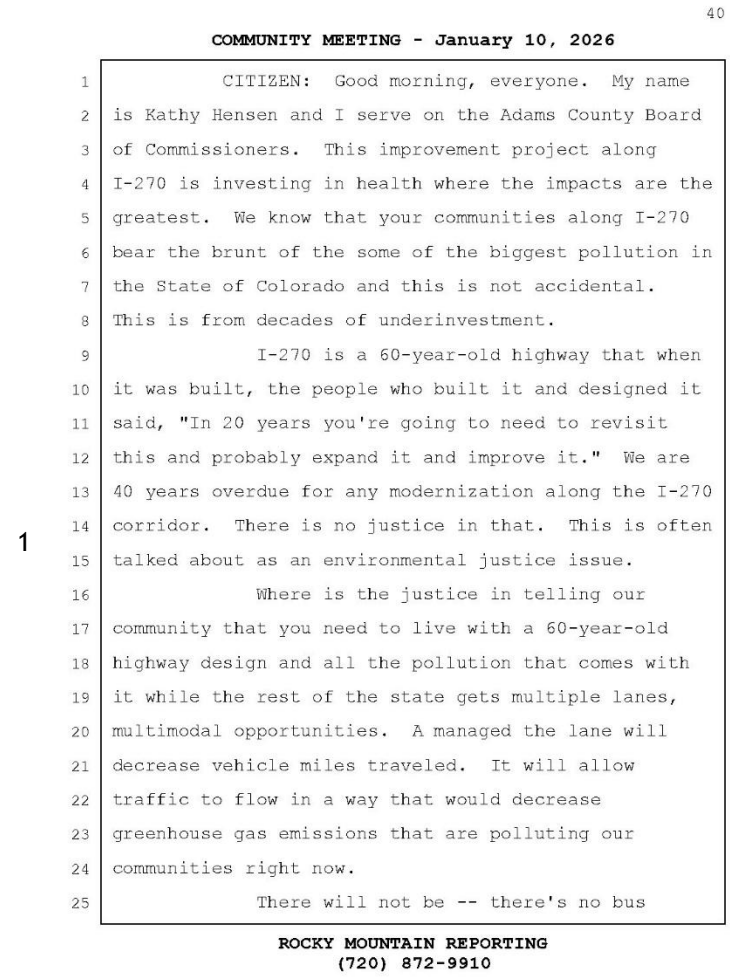
Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

going to have in the corridor just to keep the vehicles moving, don't charge the citizens of Commerce City or the businesses along that corridor the cost to go through this toll. Lay down on everyone going through, because this is a passthrough -- through our city.

So give the benefit, community benefit, for our residents and businesses along the corridor. That would -- stands to be huge impact and this is the first time I've been informed that there will be a dynamic pricing toll. Based on experience driving on I-25 and Highway 36 Boulder fluctuation in toll pricing throughout the day can create confusions to drivers.

You start out at $1.25 and then in the morning it changes to $8.65. That is not acceptable. Is this my second? This is the second one? Okay. Anyway, I appreciate the time that's given here on and Thursday. I did make the statement that CDOT made a presentation here in the city. As the Mayor, I want to make sure our citizens are heard and I appreciate you giving me three minutes instead of a minute and a half. Thank you.

MS. WHORTON: Okay. Next, I have Kathy Hensen, and then after that Maricela Espinal.



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CITIZEN: Good morning, everyone. My name is Kathy Hensen and I serve on the Adams County Board of Commissioners. This improvement project along I-270 is investing in health where the impacts are the greatest. We know that your communities along I-270 bear the brunt of the some of the biggest pollution in the State of Colorado and this is not accidental. This is from decades of underinvestment.

I-270 is a 60-year-old highway that when it was built, the people who built it and designed it said, "In 20 years you're going to need to revisit this and probably expand it and improve it." We are 40 years overdue for any modernization along the I-270 corridor. There is no justice in that. This is often talked about as an environmental justice issue.

Where is the justice in telling our community that you need to live with a 60-year-old highway design and all the pollution that comes with it while the rest of the state gets multiple lanes, multimodal opportunities. A managed the lane will decrease vehicle miles traveled. It will allow traffic to flow in a way that would decrease greenhouse gas emissions that are polluting our communities right now.

There will not be -- there's no bus

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Additional analyses related to air quality, greenhouse gas, and disproportionately impacted communities are required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128. See the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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service right now. If we don't add a managed lane, there's no opportunity for multimodal transit and an increased bus transit to the residents of our community who are disproportionately impacted by the pollution caused by this highway.

This also means that we want to see other improvements, not just a lane. This is not just about 1
adding a lane. Modernizing these corridors must be climate smart and health focused. That means we want to see expanded air quality monitoring, vegetated 2
buffers, trees and plant life along there to mitigate noise and air pollution.

We want to see improved storm water systems, noise mitigation, including that noise wall mentioned previously, and indoor air quality protections for homes, schools --

MS. WHORTON: Time.

CITIZEN: -- and community facilities near the corridor. Justice delayed is justice denied, and there's been no justice along 270 while we bear the brunt of twice the freight of every other highway in this state.

We need to bring -- this is an opportunity to bring Commerce City, Adams County, and this whole south region into the 21st century to serve

Response to Comment 1

The Preferred Alternative includes an additional lane, which will be operated as an Express Lane as well as safety, interchange, transit, and bicycle and pedestrian improvements.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

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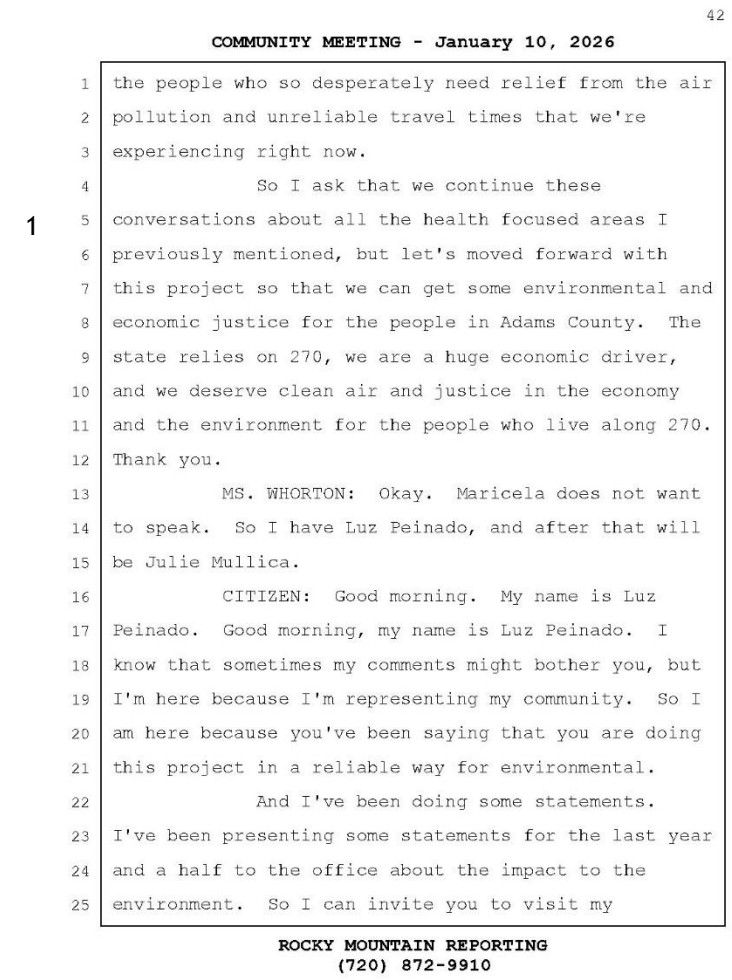
Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall was determined to meet the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures.



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the people who so desperately need relief from the air pollution and unreliable travel times that we're experiencing right now.

So I ask that we continue these conversations about all the health focused areas I previously mentioned, but let's moved forward with this project so that we can get some environmental and economic justice for the people in Adams County. The state relies on 270, we are a huge economic driver, and we deserve clean air and justice in the economy and the environment for the people who live along 270. Thank you.

MS. WHORTON: Okay. Maricela does not want to speak. So I have Luz Peinado, and after that will be Julie Mullica.

CITIZEN: Good morning. My name is Luz Peinado. Good morning, my name is Luz Peinado. I know that sometimes my comments might bother you, but I'm here because I'm representing my community. So I am here because you've been saying that you are doing this project in a reliable way for environmental.

And I've been doing some statements. I've been presenting some statements for the last year and a half to the office about the impact to the environment. So I can invite you to visit my

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Response to Comment 1

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community and you can see how the roads are full of oil, how they're cutting the trees. So they tell me that those are municipal problems, but I know those are municipal, state, and federal problems.

So what is your excuse now saying that this is not part of your job? The law is very clear. The law is for everybody. So we generate $250 million, our community generates $250 million and we're not getting any attention from our county. We're not getting any attention from our state. We're not getting any attention from the federal government. So you're telling me today that you are reliable, that you're going to respect. I don't believe it. Thank you.

MS. WHORTON: Okay. I have Julie Mullica, and then we have Daniel Price, and then I have three more after that.

CITIZEN: All right. I'm not going to touch it. Good morning. My name is Julie Duran Mullica. I'm the Adams County Commissioner. I'd like to thank CDOT for being here today and creating the space for this conversation. And I'd also like to thank the community members who showed up this morning to share their time and their voices with us.

I want to talk about I-270 not as a

Response to Comment 1

Comments noted.

transportation project but as a corridor that shapes daily life for thousands of people across Commerce City, north Denver, and Adams County. For many families, this isn't an abstract planning exercise. It's a drive the work. It's the school dropoff. It's the noise outside their homes, and it's the time lost sitting in traffic.

And right now, this is one of the most unreliable and outdated corridors in the metro area. When it breaks down, everything around it -- everything around it fills up. Workers are late, businesses lose productivity, and stress goes up for everybody.

I want to be clear. I support the preferred alternative. I think it's a strong step forward. But for Adams County, this is a yes/and moment, not a yes/but. Yes to improving mobility and freight movement. Yes to making sure this project also delivers the health, safety, and quality of life improvements for the communities that live along this corridor.

We also have to talk about transit. Transit can only truly work on this corridor if we build the infrastructure to support it and that starts with a managed lane. A managed lane is what makes

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reliable, fast, and frequent transit possible. I'm deeply committed to advocating for transit on this corridor moving forward, but that future begins with building the right foundation now.

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We see a real opportunity here to do things better and smarter than we've done in the past. This can't be a 20th century solution to a 21st century problem. The community wants to see cleaner and quieter freight movement, smarter traffic management, real noise and air mitigation, and safer, more usable connections for transit, bikes, and pedestrians.

2

I also want to share that I've had several meetings with Green Latinos and other community advocates. Thank you for reaching out and having those conversations with me. And I genuinely believe that there's a path forward for us to move together. That path requires listening, trust, and making sure community concerns continue to shape this project, and its design and how it's delivered.

Adams County will continue to be at the table to make sure health improvements are not an afterthought but a core part of this project. I also want to acknowledge that this is all hard work. Balancing regional mobility, with funding realities,

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Response to Comment 1

The Preferred Alternative includes an additional lane in each direction, which will operate as an Express Lane that accommodates transit. Throughout the Environmental Impact Statement (EIS) process, CDOT has coordinated with the Regional Transportation District (RTD) on additional regional and local transit services in the community. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision. Please see Section 5.4.4, IMP2, of the Final EIS for additional information on what is considered federal mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities

analyses required as part of Senate Bill (SB) 21-260 and codified in Colorado Revised Statutes (CRS) 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

and community impacts is not simple. My ask today is keep the community at the center of the process, keep listening, be ambitious, and let's build something that we all could be proud of.

Not just because it moves traffic, but because it makes life better for the people who live here. Thank you so much for your partnership and thank you for everybody in this room who has showed up to advocate today. I look forward to hearing your stories and working with you moving forward.

MS. WHORTON: Okay. I have Daniel Price and then Owen Orr. And then there's two more after that.

CITIZEN: Hello, my name is Daniel. I live up the street. Our community is referred to as the Atlas of the state's and region's energy system and distribution network. And if you recall from Greek mythology, Atlas was a titan that was enslaved by the gods and forced to hold up the heavens for eternity.

And that's kind of how it feels sometimes living in our neighborhood with a lot of outside gods determining our future, sort of making decisions for us. You can look no further than our most recent local elections in Commerce City with severe irregularities and election interference that occurred courtesy of developers and oil and gas.

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From the Atlas perspective, myself, I have a few points, three points. So congestion pricing. I actually respectfully disagree with the Mayor. I think for residents having a reduced fee would be appropriate, but I would not abdicate your taxing authority to subsidize commuters who come into our community and pollute our community.

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I respect that they work here and contribute to our tax base, but I don't think it's a good precedent to set. I think the private sector should subsidize their own workers if that's something they choose to do. Two, I want to speak about trees. I really support the commissioner's ideas of buffers to mitigate the worst harms of pollution that our community is constantly dealing with.

2

The city actually is conducting its first ever tree canopy assessment currently and we've discovered that our city has a 3.8 percent tree canopy, which is well below the 15 percent tree canopy that neighborhoods have that are proposed for healthy communities.

And thinking about innovative ways of using rain gardens or capturing rain, I don't know what the return flow requirements are for storm water with all this pavement, but I would love to see

Response to Comment 1

Unique tolling considerations for the I-270 corridor, including pricing structure, eligibility, exemptions, enforcement methods, and operational policies, have not been finalized and are not decisions made through the Environmental Impact Statement (EIS) process. These elements would be evaluated and determined in subsequent project development phases following completion of the EIS, consistent with CDOT policy, FHWA requirements, and additional public and stakeholder coordination.

Response to Comment 2

Please see Chapter 5.0 of the Record of Decision for the list of required mitigation and other environmental commitments for the project.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

similar to Brighton Boulevard having some in ground gardens that capture some of that runoff and are then used to promote vegetation that can mitigate the toxic pollution.

And, lastly, I just want to say five-year timeline for the construction; that's a long project to have going on in our neighborhood. And I know you've listed a lot of mitigation efforts that the department will be conducting. And I just really want that to be vigilant and make sure that for those five years that you're protecting our community with best practices.

So as James Carville famously did not say in 1992, it's the pollution, stupid. That's what we're worried about. Thank you.

MS. WHORTON: Okay. I have Oren -- let's see, Owen Orr, then Jackie Valdez, and then the last speaker will be Gerarado Trejo. Sorry. We have a couple more, so you won't be the last one.

CITIZEN: Good morning. Thank you all for your time. My name is Owen Orr. I also want to thank our elected officials for representing their constituents and for CDOT with this incredibly diligent, thoughtful process. That is not a light undertaking, and I really appreciate the diverse

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Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.

consideration, the environmental impact, the community impact, and the overall economic benefit that this will help promote when it is completed.

I got the flyer for this because I own a house at 70th and Colorado Boulevard, and I really enjoy hopping on the South Platte Trail, going along the Santa Fe Greenway, that connectivity to nature in what is really the heart of the city, the heart of Commerce City is so important to us Coloradans, right? So I just really appreciate the coordination with those natural elements of this important connector.

This 270 corridor is obviously an underserved and outdated piece of infrastructure in the Denver area. I am involved with the ownership group of several commercial properties directly fronting 270 and can attest to that. There is significant primary employment along this corridor that needs to be protected. That is where the people of this area go to work to make a living and build great communities.

I don't know -- I am not an expert on all the environmental impacts and the pollution impacts and those details, but what I am an expert in is serving local businesses through the properties we own and manage. And I can say that protecting the

visibility to those properties fronting 270 is critical to those business's success. And even last year we actually built the project next to the TA Truck Stop, one of the first projects to get built of like kind in a very long time.

We look forward to attracting and keeping incredible local businesses and that direct unimpeded visibility will be critical to those businesses' success. This is not a residential corridor like 25 and 36 where these large noise walls. There are no more than 10 homes abutting 270 by my count. I'm not a surveyor, but if you talk to those residents, I think they would agree or at least say the same thing they've said to me that they appreciate the lesser disruption to them, the better.

So I would just point that out that difference of this being a commercial corridor, not a residential corridor. My main concern with the proposal is the noise walls, and would say that the noise walls are a critical value add, value engineering to take out of this project to preserve cost, to preserve visibility into the businesses that call the 270 corridor home while still honoring the neighborhoods that are there and the communities at large.

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Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

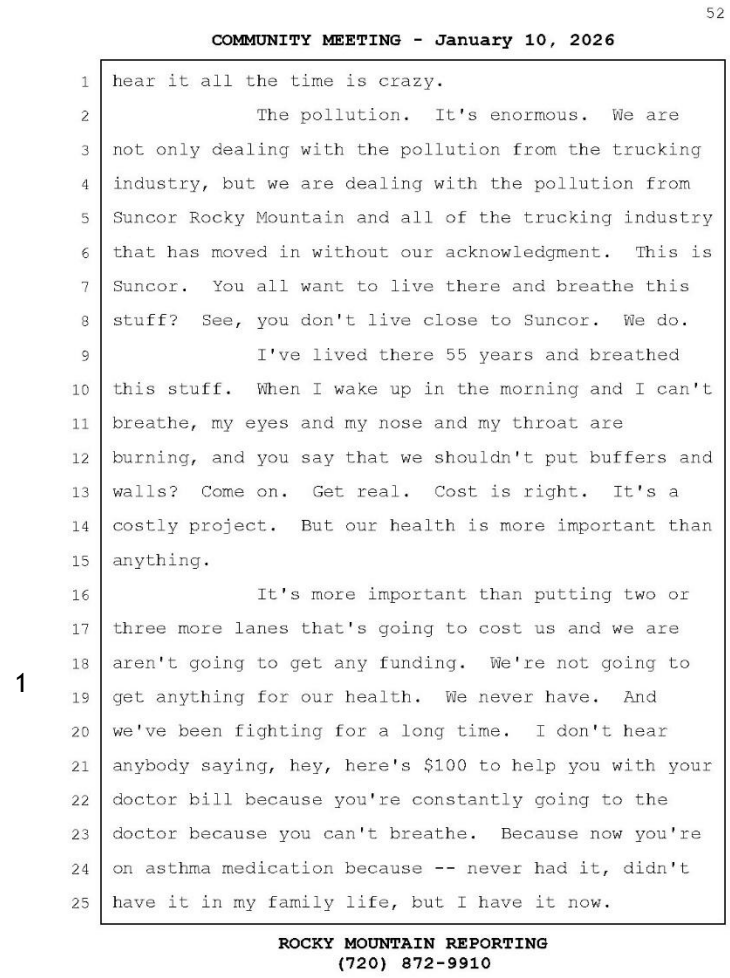
CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

So thank you for the consideration of this project. I Look forward to it proceeding and just ask that the noise walls be taken out of consideration to preserve cost and the businesses that call this area home.

MS. WHORTON: Okay. And as a reminder, this is not a question and answer, so we are going to move on to the next speaker, who is Jackie Valdez. And then after Jackie will be Gerarado and then I have Rene Bullock.

CITIZEN: Good morning, everyone. I was going to come up here and be as nice as I possibly can, but I can tell you after that comment, that the walls need to be taken out of consideration, I think that's the most, how would I say it nicely, stupid thing I've ever heard in my whole entire flippin' life.

I've lived in this area for 55 years. I live at Brighton Boulevard and Colorado Boulevard and 68th, and I can tell you everything that goes on on 270, we hear. We deal with the pollution. We deal with the trucking industry. We deal with the cars. We deal with everything. So to sit there and say that we should consider taking that out without even thinking about the people that do live close to it and



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hear it all the time is crazy.

The pollution. It's enormous. We are not only dealing with the pollution from the trucking industry, but we are dealing with the pollution from Suncor Rocky Mountain and all of the trucking industry that has moved in without our acknowledgment. This is Suncor. You all want to live there and breathe this stuff? See, you don't live close to Suncor. We do.

I've lived there 55 years and breathed this stuff. When I wake up in the morning and I can't breathe, my eyes and my nose and my throat are burning, and you say that we shouldn't put buffers and walls? Come on. Get real. Cost is right. It's a costly project. But our health is more important than anything.

It's more important than putting two or three more lanes that's going to cost us and we are aren't going to get any funding. We're not going to get anything for our health. We never have. And we've been fighting for a long time. I don't hear anybody saying, hey, here's $100 to help you with your doctor bill because you're constantly going to the doctor because you can't breathe. Because now you're on asthma medication because -- never had it, didn't have it in my family life, but I have it now.

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Response to Comment 1

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the United States Environmental Protection Agency's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All

priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft Environmental Impact Statement (EIS).

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision. Please see Section 5.4.4, IMP2, of the Final EIS for additional information on what is considered federal mitigation.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

So I want you guys to think about something. Yes, this project needs to happen, but don't sit and say we need to think about the cost of not putting up the walls or anything else for that matter because you don't live in that area. And I'm telling you, when my grandson and I drove on the 270 project -- before the 270 project happens, we drove on 270 with the window down a little bit during the summer time taking him over to the school.

I had a mask on because I told my grandson I want to make sure that you have a mask on because you're around a lot of people and I don't want to get sick. He forgot his mask that morning, so all of a sudden, we're seeing this. And I could smell it and he starts hollering, "Nanny, I can't breathe. My noise and my throat and my chest is hurting."

This is a child. This is a child, people. And we got to stand up. Yes, they are here to help us, but we've got to stand up for our communities. We've got to stand up for our children that is in the near future. Not right just now and not for the trucking industry, because I'm so fed up with hearing that. It's unbelievable.

Let's worry more about the trucking industry than our own lives. It's a bunch of bull.

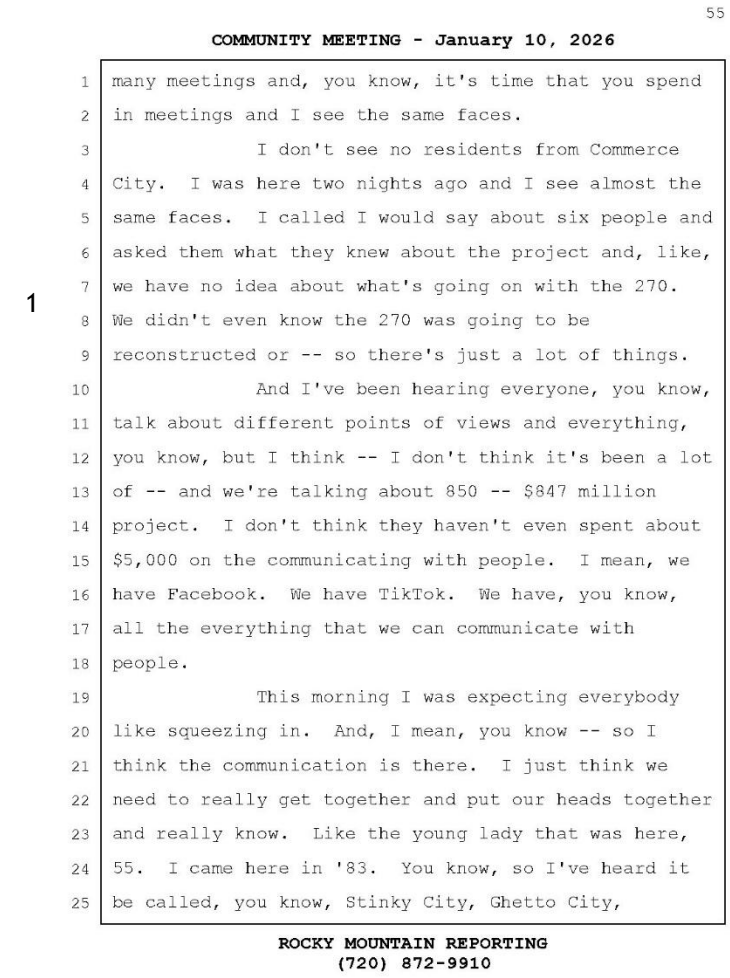
Start standing up and doing your jobs and making sure that we have breathable air and that we have a community that we can say we're proud of living in. Am I right?

Whose -- the ones that live here that live around this mess, you going to sit and tell me we don't want to be proud of our community? Fifty-five years I've lived here. And I've heard a lot of people say a lot of bad things about Commerce City. It hurts me but it's the truth. I do thank these guys because they are the ones here that are here trying to help us.

Five years for this program is kind of crazy but, hey, as long as they say and do what they say they're going to do, there ain't going to be a problem. Thank you.

MS. WHORTON: Okay. I have Gerarado Trejo. I keep messing that up. Sorry. And then I have Rene Bullock after that, and that will conclude our oral comment period.

CITIZEN: Good morning, everyone. My name is Gerry Trejo. I wasn't going to talk. I wasn't feeling too well. My little medical situations, but I think it's -- you know, just my point of view. I don't know what you guys think. But I've been to too



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many meetings and, you know, it's time that you spend in meetings and I see the same faces.

I don't see no residents from Commerce City. I was here two nights ago and I see almost the same faces. I called I would say about six people and asked them what they knew about the project and, like, we have no idea about what's going on with the 270. We didn't even know the 270 was going to be reconstructed or -- so there's just a lot of things.

And I've been hearing everyone, you know, talk about different points of views and everything, you know, but I think -- I don't think it's been a lot of -- and we're talking about 850 -- $847 million project. I don't think they haven't even spent about $5,000 on the communicating with people. I mean, we have Facebook. We have TikTok. We have, you know, all the everything that we can communicate with people.

This morning I was expecting everybody like squeezing in. And, I mean, you know -- so I think the communication is there. I just think we need to really get together and put our heads together and really know. Like the young lady that was here, 55. I came here in '83. You know, so I've heard it be called, you know, Stinky City, Ghetto City,

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Response to Comment 1

A Public Involvement Plan (PIP) was developed and implemented when the Environmental Impact Statement (EIS) process began in 2023. To maximize public engagement, the project team employed a range of outreach methods tailored to different community groups. The I-270 EIS outreach process utilized innovative strategies and commonly used tools to encourage widespread participation.

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within one mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the United States Environmental Protection Agency and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

CDOT's intentional efforts to engage local populations are reflected in the scope of outreach approaches, information dissemination methods, and public input opportunities. These methods and approaches have been adapted and expanded over the course of the project development to focus on project awareness through in-person engagement at community events and sustained involvement through regular stakeholder workshops. This has ensured affected community members are represented and engaged in the project and have a voice with other decision makers in providing authentic and meaningful community input to support the project development.

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS. For information on public involvement during the Draft EIS public comment period, see Section 5.4.1, GEN2, of the Final EIS and Section 5.2 of the Final EIS.

whatever. I'm happy I'm here. This is my city.

So it kind of hurt me when, you know, people say -- when I spoke to the Spanish speaking people are like, no, I mean, even if we could go, we're not going to go. Nobody listens to us. How can we get to that community? I think here we have like maybe I think 40 or 50 percent Spanish speaking community, you know.

And basically my point is, you know, residents need to know. I mean, I know it's called Commerce City, but there's a lot of residents that just basically don't know. And if you don't know, you just don't know. Thank you.

MS. WHORTON: Okay. And our last speaker is Rene Bullock. Oh, there you are.

CITIZEN: Good morning. My name is Rene Bullock. I'm the Executive Director of the Commerce City Chamber of Commerce. I have lived in this community longer than most people. I was teaching aerobics for the rec center before the rec center was built, when we were teaching over at the schools and everything. I have been here and I've watched it develop.

Commerce City started out as a commerce community with trucking. Commerce City started out

Response to Comment 1

Comments noted.

with Suncor before it was Suncor, before it was Conoco, when Oriental Oil was here. In 1930, that's when the refinery opened up. The refinery didn't move into Commerce City. Commerce City moved around the refinery.

So when you hear people talk about what is happening here and what they're doing to it and how it's doing this to different people, maybe they'd better check their information because that's not how it was built. I was on I-70 committee starting in 2003 when they were going through the proposition to redo I-70 through that community.

A lot of you don't know that 270 is a hazardous material route because between Quebec Street and Colorado Boulevard, no hazardous material can move on I-70, so it has to move on 270. We have people here that say they're so educated about what they know about it, and they don't know anything about it. We have people that are here that you would think that they're up for a Golden Globe Award because they get up here and do dramatics instead of information.

I was on this committee for the full 18 months and other committees that met for 270. There are groups that came in halfway and wanted us to start the whole process over again because they weren't

there for the beginning. How many races do you know that if you aren't winning, you get to tell everybody let's start over because I wasn't there when you started the race. This is not how we do it.

What we do is we have community groups and the community was invited to all the groups. The mayor was there for a lot of the meetings. There are people here that were there for a lot of the meetings, and they act like they don't know what was going on. The community was invited. It was put out in the community all over the city and we had people attend those -- we had people -- sometimes we had 40-50 people at the table.

So don't let anyone kid you that there wasn't any outreach. There was outreach. I would rather have a bridge over 270 than an underpass. If you want to go back to 2013 when it flooded --

CITIZEN: Time.

CITIZEN: -- and Sand Creek was all the way up on Sand Creek Boulevard and almost going over 270. I was there -- I was on the city counsel then. We made beds over at Adams City High School for the people that were put out of their homes because of the flooding.

CITIZEN: Time.

CITIZEN: Oh, wait. You didn't tell time for her. I mean, I understand my time is up but nobody stopped her when she was talking and she went another minute over her time. So, Scott, if you want to say it, be equitable. Don't just say me --

UNIDENTIFIED MAN: That's what I'm saying. She stopped me. I'm sorry.

CITIZEN: Okay. But she didn't stop Jackie. And neither did you yell at Jackie. But I'm not going to -- I will sit down. I've said my piece.

MS. WHORTON: Okay. That is the end of our oral comment period. There -- we do still have a few minutes left if there's anybody who -- we can stay longer if there's any questions that people have. We do have the boards out in the back. Please fill out a comment form. Lots of good information here tonight.

And please -- there are a lot of burritos left, so please take some of those home. We are glad that you were able to be with us tonight. Thank you. This morning.

WHEREUPON, the within proceedings were concluded at the approximate hour of 11:10 a.m. on the 10th day of January, 2026.

* * * * *

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
COUNTY OF DOUGLAS)

I, RIANNA R. ELMSHAEUSER, Registered Professional Reporter, Federal Certified Realtime Reporter, and Notary Public ID 20194034675, State of Colorado, do hereby certify that the said proceedings were taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 13th day of January, 2026.

My commission expires June 4, 2028.

_____ Reading and Signing was requested.

_____ Reading and Signing was waived.

__X__ Reading and Signing is not required.

Rianna R. Elmshaeuser, RPR, FCRR

COMMUNITY MEETING - January 13, 2026

COLORADO DEPARTMENT OF TRANSPORTATION I-270 IMPROVEMENT PROJECT

REPORTER'S TRANSCRIPT OF:
COMMUNITY MEETING - January 13TH, 2026

PURSUANT TO NOTICE, the proceedings of THE COMMUNITY MEETING were taken at Adams City High School, 7200 Quebec Parkway, Commerce City, Colorado 80022, on January 13, 2026, at 5:35 p.m., before Rianna R. Elmshaeuser, Registered Professional Reporter, Federal Certified Realtime Reporter, and Notary Public within Colorado.

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WHEREUPON, the following proceedings were taken.

* * * * *

MR. MERENICH: Good evening, everybody. The presentation is going to start in a minute or so. But before we get started, Hilda, our Spanish translator, will be checking that the translation devices are working and that everyone that needs one has one. All right. I think we're all set. Thank you so much for taking the time to join us for tonight's public hearing presentation for the I-270 corridor improvements project.

My name is David Merenich. I serve as the I-270 program director, and I've been responsible for leading the environment impact statement, or EIS, for this project. Before we get started, I'd like to hand it off to Mandy Whorton to review the order of events for tonight's webinar so everybody knows what to expect. She'll be our moderator for the evening.

MS. WHORTON: Good evening. Thanks everyone for coming tonight. I really appreciate your being here. As Dave said, before we begin, a few housekeeping notes. Bathrooms are down the hall over here. Exits out this way and out where you came in.

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And we have food here at the tables so feel free to get up, get some food.

And then informational boards out in the hallway as well as a number of staff that can help answer questions. And then if you would also silence your cell phones as we're about to begin the presentation.

So tonight's presentation is an informational presentation. This is not a question and answer session, so we will -- CDOT is here to listen. This is the time for you all to be able to give comments and for CDOT and Federal Highway Administration to hear those comments.

All comments will be responded to in the final environmental impact statement after consideration of all the comments that have come in for the comment period. So there are -- okay. So tonight's speakers, we're going to have opening remarks from the CDOT Executive Director and we will hear from David Merenich, the I-270 Project Director that you just heard from. Derrick Rosenbach who is the project's Environmental Manager, and Stacia Sellers, who is the Project Communication Manager.

Again, we will be doing the welcome first and then after the presentation, we will begin the

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formal comment process. So just a couple things on the oral comments. Oral comments is an opportunity at this hearing to provide comments at the microphone. It is available to you and we encourage those of you who have come here to speak tonight to be able to use that comment form to your -- if that is what's comfortable for you.

All comments that are received, though, do receive the same weight, and if you prefer to provide oral comments and you don't want to speak at the microphone, we have a court reporter over in that corner. You can see her there with the black shirt and pony tail. And she can record any oral comments that you might have and those will become part of the official record as well.

In addition, we have an online comment form, an email, a project hotline, and regular old mail that you can send to David. And his contact information is in the How To Connect form. So those are all valid ways to provide comments and we encourage you to provide them in whatever way is most comfortable for you.

So we are going to start the presentation portion and I'm going to turn it over to Director Shoshana Lew.

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CITIZEN: It's a little bit hard to hear back here.

CITIZEN: Yeah.

MS. LEW: Good evening. Can everyone hear me?

CITIZEN: Yes, thank you.

MS. LEW: Hi, my name is Shoshanna Lew. I'm the Executive Director for the Colorado Department of Transportation, and I appreciate everybody being here. Your time matters and participation matters. And I want to acknowledge all the members of the community, residents, business owners, and partner agencies who have stayed engaged throughout the I-270 project. For a project of this scale and impact, CDOT believes that showing up at events like this matters. Listening, being transparent matters and that tonight's public hearing is one of several opportunities to do that over the stage of the process.

We're providing both in-person and virtual versions of this event to accommodate people's different needs in terms of participation. The I-270 corridor plays a critical role in Colorado's transportation systems. In connects industrial areas, regional distribution centers, the interstate network, supporting freight movements that is vital to the

regional and state economy.

At the same time, I-270 runs through long-established neighborhoods and communities. We recognize that any conversation about change raises a lot of considerations that we need to think about; safety, reliability, access, connectivity for everyone who lives near or around and uses the corridor. This project has been part of CDOT's 10-year plan for many years.

Focusing on strategic investments that improve safety, resilience, and multimodal options statewide. For I-270, that means examining how to modernize the corridor, reduce crashes, improve travel time and reliability, support freight operations, strengthen transit and other multimodal transportation, and provide better use for all of these different users for the corridor. The goal is to address today's challenges while planning responsibly for the future of this very busy and multifaceted corridor.

From the beginning, CDOT and Federal Highway Administration have approached this project deliberately and transparently. The environmental review process began in 2020 with an environmental assessment. As the work progressed, it became clear

that the complexity of the corridor and concerns raised by agencies, stakeholders, and some members of the public required a more comprehensive review.

So in 2022, CDOT made the decision to pause, share findings openly, and then move forward with a full environmental impact statement. This was not the fastest path, but we believe it was the right one and we appreciated the feedback that led us there. So the draft EIS, environmental impact statement, you will hear about tonight represents years of technical analysis, coordination, and public involvement.

It evaluates a broad range of alternatives, potential impacts and includes mitigation commitments that we worked on with members of the community that are intended to avoid, minimize, and address impact wherever possible. Air quality has been a central focus throughout this process. The I-270 corridor is influenced by many factors beyond the roadway itself, and as part of the draft environmental impact statement, the project level air quality analyses were conducted in accordance with federal requirements as this is a federally directed process.

In response to community concerns at state law, CDOT also and separately conducted a state

required air quality and greenhouse gas analysis that is, again, separate from the federally required environmental review. These two analyses are documented in separate reports that help inform our commitments to transparency as the project moves forward.

Through this process, CDOT, again, evaluated a range of alternatives including different design approaches and ways to manage traffic within a constrained footprint. Based on that evaluation, CDOT identified a preferred alternative that includes express lanes in both directions. It's really very similar to what exists on US 36 as you're driving towards Boulder. Very similar as the roadways are contiguous in a lot of ways.

Express lanes are part of the preferred alternative because they provide a practical way to improve safety and travel time reliability while balancing many demands of the corridor. They support transit and high occupancy vehicles, again, an approach that has worked really well on US 36; offered flexibility for freight movements and helped the transportation system function more efficiently over the long term, including that they improve travel times, not just in the express lanes but also in the

general purpose lanes. So you have the choice of whether to pay for the express lane or use the general purpose lanes.

I want to sincerely thank everyone who has participated in the process, whether by attending meetings like this one, submitting comments, asking hard questions, sharing your knowledge through every part of the process. And, again, you're being here tonight matters because this is an important step. So thank you again for being here and continuing to engage in this conversation. And I will now turn it back over to Dave, who is going to walk us through the details of the draft environmental impact statement.

MS. WHORTON: Before we do that, I failed to let you know two important things. If you want to speak tonight, there's a sign up at the front -- the front table there, so please do sign up so that we know how many people we have. We have about a dozen now signed up to speak, and you're going to have three minutes to provide your comments. And I'll go over the rest of the oral comment period at the end. But I just wanted to alert you if you wanted to sign up to speak, please do that at the front desk.

MR. MERENICH: I'll do my best to speak directly into the microphone here. But I'd like to

thank Director Lew and Mandy for getting us started tonight. All right. So what is a DEIS? DEIS is performed under the umbrella of the National Environmental Policy Act, commonly referred to as NEPA. It is a procedural law that requires agencies with federal funding to consider the environmental impacts of their actions.

There are three general phases to NEPA planning; the development of a proposed action, an environmental analysis, and project implementation. The preferred alternative is based on an approved NEPA process supported by the technical analysis that remains valid under current federal law, regulation, and policy.

We are currently in the environmental analysis phase with the release of this public draft EIS. An EIS is the most rigorous level of environmental review under NEPA. Please note that the draft EIS does not represent CDOT or the Federal Highway Administration's final decision on the project. I wanted the make that very clear. Director Lew also mentioned that.

So your input today will help inform the decisions made during the NEPA planning process. Now that we know a little bit more about what a draft EIS

is, let's take a look at how the draft EIS is organized. The draft EIS is organized into six chapters supported by technical reports and appendices that contain more detailed analysis.

The executive summary provides and overview of the project alternatives and major findings. Chapters one through three cover the project background, purpose and need, and the range of alternatives evaluated. Chapter four includes the environmental analysis across numerous resource areas such as air quality, noise, wildlife, water quality, and community impacts.

Chapter five includes mitigations, commitments for the preferred alternative. And chapter six summarize public and agency involvement throughout the project. All of these materials are publicly available online and in hard copy at designated repositories. We also have the DEIS at multiple locations today throughout this venue; up front and over there in the comment team corner.

So with that in mind, let's start talking about some of the project details by walking through the project limits. I-270 runs through Denver and Commerce City and serves residential neighborhoods, industrial areas, and major employment centers. I-270

is a critical connector for freight regional travel making its performance important not only locally but across the broader transportation network.

The study of the area includes the entire six and a half mile segment of I-270 from the I-25/US 36 interchange on the west to I-70, which is on the east. It encompasses the interchanges at I-76, York Street, Vasquez Boulevard, and Quebec Street. So now that we've reviewed the project limits and its importance, let's review the purpose and need.

CDOT has worked heavily with stakeholders to understand, develop, and refine the purpose and need of this project. The purpose of the project is to modernize the I-270 corridor so it can safely and reliably meet current and future transportation demands. To support that purpose, the draft EIS identifies several transportation needs that must be addressed along the corridor.

Improving safety is a major need as crash rates on I-270 are higher than on similar corridors due to narrow shoulders, short ramps, and other outdated design features. Addressing travel time and reliability is essential given recurring congestion and unpredictable trips that are expected to worsen with continued regional growth.

Enhancing transit performance is important since buses currently operate in the same congested lanes as general traffic resulting in delays and unreliable schedules. A reliable lane is the first step to expanding future transit on this corridor, and to allow current RTD routes, like the Flatiron Flyer 5 to utilize I-270 instead of making a lengthy detour around I-25 and I-70.

Better bicycle and pedestrian connectivity is needed because limited crossings or outdated facilities restrict safe access between neighborhoods, trails, and transit stops. Supporting freight operations is also a key need as I-270 is an important freight and hazardous materials route where congestion and constrained geometry create operational challenges on a daily basis.

In addition to the purpose and these transportation needs, the DEIS also identifies a key separate goal: To minimize environmental and community impacts resulting from the project. And I think we've done that. We have a lot of resource experts out here who can share a little bit more about the environmental analysis that we've done.

One key thing that I want to point out is there are no residential or business acquisitions

needed as part of this project. The project team evaluated a full range of alternatives to address this purpose and need. As part of the NEPA process, CDOT and Federal Highways began by looking broadly at how different approaches could address the purpose and need of the I-270 corridor. We considered a full range of preliminary alternatives.

Three of those looked at adding no lanes at all to current I-270. The no action alternative, which means no improvements other than routine maintenance projects, bicycle, pedestrian, and transit only alternative, and the minimal build alternative. Three then looked at adding one lane in each direction; the three general purpose lanes alternative, the two general purpose lanes plus one transit only alternative, the two general purpose lanes plus one express lane that accommodates transit alternative.

Lastly, there were two that added two lanes in each direction; the three general purpose lanes plus one express lane alternative, and then the two general purpose lanes plus two express lanes alternative. Each of these alternatives were chosen based on public input and were screened using evaluation criteria based on the project's

transportation needs and the goal of minimizing environmental and community impacts.

Alternatives that did not sufficiently meet those needs or introduce greater impacts without proportional benefits were removed from consideration. From this process, two build alternatives, three general purpose lanes and the two general purpose lanes plus one express lane that accommodates transit, were advanced for detailed study in the draft EIS.

The no action was also carried forward as a baseline for comparison even though it does not meet the purpose and need. CDOT held public meetings in April of 2024, January of 2025 at Eagle Point Recreation Center to share with the public that these two build alternatives and the no action alternative were being carried forward into detailed analysis.

So tonight we're excited to share that we've completed or draft analysis of those alternatives, and based on that analysis and through our work with the community, we selected a preliminary every preferred alternative within the draft EIS. The preliminary preferred alternative is one express lane that accommodates transit. It reconstructs the entire I-270 corridor and adds an express lane, a 4-foot buffer, and increased shoulders in each direction.

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Let's talk about some of the additional elements of this preferred alternative for a few slides, and then after that, I want to talk a little bit more about why the express lane is the preferred alternative.

So there are numerous elements that make up the express lane preferred alternative that serve the purpose and need of the corridor. There's a lot on this map, so I'll break it down in the next few slides. Key design elements include modernizing highway geometry, widening shoulders, lengthening ramps for safer and more efficient travel.

The dark blue lines show the added express lane in each direction between I-70 and I-25. The purple dots represent lengthened on and off ramp locations a York, Vasquez, and Quebec. The yellow dots represent enhanced lighting on the corridor at locations like York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez, and Quebec.

Eastbound and westbound auxillary lanes between the on and off ramps at Vasquez and I-76 would allow vehicles, especially freight trucks, more time to reach speed to enter or exit the highway, and you'll see that there in the blue text. We also propose full reconstruction of south Sand Creek Drive

between 56th and Quebec. Let's keep breaking it down. Next, we're going to take a deeper look at the bridges and interchanges.

The project would also replace aging bridges and improve interchange operations for safer and more efficient travel. Black circles represent interchange movements at I-76 and Vasquez. CDOT proposes a full interchange reconstruction at Vasquez that removes the full cloverleaf and eliminates the short exits, short merging, and weaving issues. This has been a major bottleneck that's contributed to a lot of congestion on I-270.

The movement from I-76 onto I-270 would be consolidated to a single entrance point reducing vehicle conflict. Meanwhile, the current single exit from I-270 to York and I-76 would become two separate exits to reduce sideswipe issues. The blue squares show full bridge replacements at York, South Platte, Burlington Ditch, Brighton, 60th Avenue, Vasquez over Sand Creek, and 56th Avenue.

Next, let's take a look at some of the multimodal improvements that the project would provide. The project upgrades bicycle and pedestrian facilities at all of the reconstructed bridges. It includes new sidewalks, multiuse paths, and RTD bus

stops. It improves lighting across the corridor. Trail improvements that result in better visibility, safer crossings, and enhanced connections to the South Platte Trail and the Sand Creek Trail are also part of the preferred alternative.

The yellow and green lines show added or improved sidewalks and trails at York, South Platte, Brighton. It shows pedestrian underpasses at Vasquez and a pedestrian overpass near South Rose Hill. The orange arrows show improved way finding for all the trails in the area; South Platte Trail, Sand Creek Trail, and Clear Creek Trail. And then the blue dots show added RTD bus stops that we propose at Quebec.

These combined elements work together to improve safety, mobility, and multimodal access throughout the corridor. I would like to note, since our preferred alternative would be authorized under 23 United States Code 129, these additional elements could be included within the project construction scope and repaid using express lane toll revenue. Other tolling programs that are offered by Federal Highways that don't comply with 23USC129 are much more restrictive on how toll funds can be used.

Let's shift gears now and talk a little bit more about the benefits of the express lane.

Express lanes provide travelers with a reliable, free flowing option particularly during peak congestion. They are free for HOV3+ carpools, motorcycles, and transit vehicles, helping prioritize high occupancy, multimodal travel. Other drivers, such as private vehicles and trucks, can use the express lane by paying a toll giving them flexibility depending on the their travel needs.

The lanes are dynamically priced. Toll rates adjust in real time based on congestion to keep traffic moving in that lane. The I-25 and US 36 express lanes operate in a similar way, so this approach builds on a proven system familiar to many front range travelers. By shifting some vehicles into the express lane, traffic in the general purpose lanes will also remove more reliably. The extra express lane prioritizes moving people with less cars.

Let's look at some other benefits of the preferred alternative. This slide summarizes how the preferred alternative performs when measured against the project's purpose and need, and many of these outcomes are illustrated on the board in the hallway. For safety, this corridor currently experiences more than 40 crashes per mile each year which is well above the statewide average.

The preferred alternative is expected to reduce crashes by approximately 15 to 20 percent. By improving merge areas, reducing weaving, and modernizing outdated roadway features. In terms of travel time and reliability, the preferred alternative reduces peak period delay by more than 20,000 vehicle hours per day and moves about 8 percent more peak hour trips compared to the three general purpose lanes alternative, which helps stabilize traffic flow and reduce the stop-and-go conditions people experience today. Transit performance also improves by providing more reliable travel conditions, the preferred alternative reduces corridor travel times for buss to 10 minutes or less, improving schedule reliability for people who rely on transit.

Freight movement is critical for I-270. The preferred alternative reduces peak truck travel times by nearly 20 minutes, improving delivery reliability for freight dependent businesses, and supporting the regional economy. For people walking and biking, the preferred alternative improves connectivity by adding wider sidewalks, better lighting, new crossings, a 10-foot wide pedestrian overpass at South Sand Creek Drive and that connects Sand Creek Greenway to North Sand Creek Drive.

With reduced congestion on I-270, more drivers are expected to choose direct routes rather than parallel roadways, resulting in an approximate 6 percent reduction in vehicle miles traveled and greenhouse gas emissions on major surrounding roadways compared to the no action alternative.

There will be an increase of 150,000 vehicle miles traveled on I-270 but there will be a daily decrease of 200,000 vehicle miles traveled on surrounding arterials; I-70, I-25 and I-76. That is a net decrease of 50,000 vehicle miles traveled. The arterials that we're talking about are roads like Washington, State Highway 224, York, Vasquez, 56th Avenue, and Quebec. Taken together, these performance measures show how the preferred alternative addresses safety, mobility, and connectivity challenges while supporting the long-term function of the corridor.

On the next slide, we'll discuss a little more about how the project will be funded. The estimated total cost of the preferred alternative including preconstruction and construction costs is $806 million, and will be delivered through a combination of state and federal funding sources. We have spend $41 million on the corridor since 2020, which includes project like resurfacing the bridge

decks, bridge rail protection projects, bridge shoring projects, environmental studies, and preliminary design of the corridor, especially the phase one bridges, which we'll talk a little bit about later on.

The construction costs of the preferred alternative is estimated at $725 million. We estimate that it will cost $350 million just to rebuild I-270's current bridges, pavement, and other deteriorating infrastructure back to the exact same configuration that we see today. So where is that extra $375 million going to build out the preferred alternative?

It's being invested in features that directly improve safety, reliability, and quality of life for people who use and live near this corridor every day. That includes wider shoulders so emergency responders can reach crashes faster and clear incidents sooner, reliable express lanes that incentivize carpooling and transit and help keep traffic moving during peak hours, and truck acceleration lanes between Vasquez and I-76 to reduce dangerous speed differentials and rear end crashes.

The funding also allows us to fully reconfigure two of the corridors most severe bottlenecks at I-76 and Vasquez, locations that consistently contribute to congestion, crashes, and

unpredictable travel times. Investments in upgraded cameras and traffic technology mean faster incident detection and better realtime traffic management.

Beyond drivers, the project adds meaningful, multimodal improvements including the pedestrian overpass and underpass at Vasquez, new bus stops at Quebec, and safer connections across the corridor. It also includes required and requested mitigations such as noise walls, water quality ponds, air quality monitors that protect nearby neighborhoods during and after construction.

Community enhancements like aesthetic improvements, travel demand management, and support for local agency projects including the 60th Avenue underpass beneath the timber bridges are also part of this investment. In short, this funding is about building a corridor that works better in emergencies, is safer for all users, moves people and goods reliably, and responds directly to what the community told us they need.

Key state funding sources include Senate Bill 1 strategic funds, the statewide bridge and tunnel enterprise, and other state transportation programs. Federal funding includes competitive discretionary grants, which support regionally

significant projects like I-270. Federal funding -- the Colorado Transportation Investment Office also plays a role in financing and operating the express lanes allowing toll revenue to help support construction, operations, and long-term maintenance.

Because the full preferred alternative cannot be funded all at once, construction will be delivered in three phases. The next slide shows how that phasing works. Preconstruction began in 2020 and included activities like the design, NEPA evaluation, and preventative maintenance that we talked about earlier.

Construction will be sequenced in three phases to allow the high priority needs, particularly the aging bridges and key structural elements, to be addressed first, while additional funding is secured by the remaining corridor improvement. So phase one focuses on replacing several of the corridor's oldest and most structurally deficient bridges including I-270 over South Platte River, I-270 over Burlington Ditch, I-270 over Brighton Boulevard and the railroads, and then I-270 over East 60th Avenue and the BNSF Railroad.

Phase two reconstructs the I-270 mainline, the Vasquez boulevard interchange, and the

York Street and 56th Avenue bridges. Phase three completes the remaining corridor improvements including the Vasquez Boulevard bridge over Sand Creek, upgrades to Sand Creek Drive and the frontage road, and the new bicycle and pedestrian overpass.

Construction is anticipated to begin in late 2026 or early 2027 and is expected to take approximately five years depending on funding availability and construction conditions. Throughout construction, CDOT will maintain at least two lanes of traffic each direction during daytime hours with nighttime closures scheduled strategically to minimize disruption.

We've heard from you all that a five-year construction project impacts your community a lot, so regular updates, including detours, lane closures, construction sequencing, will be available on the project website to help keep the public, residents, businesses, and emergency responders informed.

Next we'll discuss the environmental impacts on the corridor that were identified in the DEIS. I'm going to hand this portion over to Derrick Rosenbach, CDOT's Environmental Health Program Manager.

MR. ROSENBACH: Thank you, David. The build

alternatives prioritize avoidance and minimization of the environmental impacts by maintaining the highway alignment within the existing transportation corridor thereby preventing any residential or business displacements in reducing permanent land acquisition. Furthermore, the design of the build alternatives avoid adverse effects to historic properties and minimizes impacts to recreational trails through the use of temporary detours and protective measures rather than trail closures.

Despite many of these efforts, some impacts will be unavoidable when widening the highway to address critical safety, congestion, and freight mobility needs. For example, the build alternatives involve more improved service areas, encroachment into floodplains, minor noise increases, and the loss of some wetlands and wildlife habitat.

To address these impacts, the build alternatives incorporate mitigation measures, such as upgrading the drainage system with modern water quality features, recommending a noise wall near the South Rose Hill neighborhood, replacing wetlands where possible, and planting needed vegetation. For more information on the environmental impacts of the project, please visit our boards and subject matter

experts in the hallway.

Now we will briefly discuss other impact analyses that CDOT performed to adhere to state requirements. CDOT developed three reports that examined the environmental effects on resources that are separate from the federally required draft EIS. They include the air quality technical report, the greenhouse gas technical report, and the community analysis technical report. All three state reports are available on the project website and are available at local facilities such as the Commerce City Civic Center and the Adams County Government Center.

These documents are open for public comment during the same 60-day comment period as the draft EIS. Now I'll hand it over to Stacia Sellers, who will discuss the public involvement that has occurred for the project as well as the recommendations CDOT has received from the community thus far. Stacia.

MS. SELLERS: Great. Thank you, Derrick. Public involvement has been a core part of this project from the beginning. CDOT and FHWA followed best practice engagement methods which include informing, consulting, involving, collaborating, and empowering stakeholders. Our bilingual outreach teams

attended or hosted nearly 200 community events, meeting people where they are.

I would include that neighborhood meetings, community centers, business visits, festivals, trailheads, and other locations across the corridor. Across these events, CDOT heard from residents, businesses, commuters, freight operators, local governments, and advocacy groups.

More than 1,000 comments were submitted during earlier stages of the NEPA process and that feedback directly influenced key project decisions. Public input helps shape the purpose and need, refine alternatives, identify community priorities, and ultimately elevated the environmental review from an environmental assessment to an EIS. This public hearing is a continuation of that commitment to transparency and two-way communications.

Now that we've covered how the community has been involved, we'd like to summarize the commitments that the state has made to meet key community needs. The project team gathered community ideas through public meetings, workshops, and other engagement activities. A community enhancement subcommittee made up of stakeholder working group members representing neighborhoods across the corridor

reviewed public input and helped prioritize and recommend enhancements. These recommendations were organized into nine community commitments each with associated funding allocations.

CDOT is committed to engaging with the public on monthly basis to provide updates on the progress of these commitments and the use of the allocated funds. The structure for this ongoing engagement is expected to evolve over time, to remain flexible, community led, and responsive to changing needs, priorities, and circumstances.

Now that we've covered how community feedback translated into project commitments, I'll pass this back to moderator Mandy to walk through the oral comment process and then a reminder of other ways that you can submit your official comments during the public comment period. Thank you.

MS. WHORTON: Thank you. Testing. Okay. Can you all hear? Okay. Good. All right. We are ready to begin the oral comment period, and we have about 10 people signed up to speak. A few of you wrote "I don't know" or "maybe," so we'll go ahead and call you. And if you choose to come up and speak, that's fine, and if you choose to provide a comment another way, that's also fine.

If you did want to sign up to speak and you didn't see the sign in, Adrianna, if you want to just raise your hand, will come around and get you signed up to speak. And we can take sign ups through 7:30 tonight.

So before we begin, I want to walk through a couple of guidelines on the oral comment period. So the process will be that your name will be called. I'll call two people at a time so you'll know when you're on deck to speak. When your name is called, you can come up and speak. Each speaker is going to have three minutes to make their comments.

I'll remind you gently about 30 seconds -- when you have about 30 seconds left, and then if you can respect those time limits so we can make sure to hear from everybody. If you are providing comments in Spanish, the interpretation time will be added to that. So you will basically have double time so it will not cut into your time of your three-minute comment to account for the interpretation.

Just a couple of reminders. Please keep your comments respectful and focused on the project, and as a reminder, this is not a Q and A so you are going to be providing your comments. FHWA and CDOT

are here to listen and this is your time to take the center stage. So with that, like I said, I have about 10 people signed up. And if you didn't sign up and you would like to speak, just raise your hand and Adrianna will come around and find you. The first person -- well, the first person is a maybe, Shaina Oliver. Okay. She is a yes. And so after Shaina is another maybe which is Eugenia Cordova.

CITIZEN: Thank you. Sorry. Thank you for hearing our comments today. My name is Shaina Oliver. I'm a field coordinator from Moms Clean Air Force and EcoMadres in Colorado where we represent over 44,000 members in the state, and over 1 million strong nationally. Parents, guardians, and caregivers united in fighting for our children's right to breathe clean air and live in safe and healthy environments.

Today I'm testifying on behalf of Colorado parents counting on the Colorado Department of Transportation's leadership to protect community health and safety from foreseeable impacts of the I-270 project. We urge CDOT to support a no action alternative paired with increased air quality monitoring for mobile air -- mobile source air toxics.

I am also an indigenous peoples rights advocate, mother of four. My children and I are

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's (CEQ) regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act (NEPA) analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill (SB) 21-260 and codified in Colorado Revised Statutes (CRS) 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 2

The No Action Alternative does not meet the Purpose and Need for the project. Please see Section 5.4.1, GEN1, of the Final Environmental Impact Statement (EIS) for information on the Purpose and Need.

Response to Comment 3

As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Air quality monitoring during preconstruction and during construction is required by state regulation CRS 43-1-128 for this

project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the Record of Decision. Air quality monitoring will be completed in compliance with state regulation and related guidance. Refer to the State Air Quality and Community Analysis Technical Reports for additional information on air monitoring for the project, which are available on the project website.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of SB 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

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descendants of survivors of the genocide known as the Indian Removal Act, known to the -- as the long walk of the Navajo. And, you know, today we live and work on the ancestral lands of the 48 tribal nations where ancestral trails have been paved over by these interstate highways.

As indigenous people, we know environmental harms are embedded in and perpetuated by laws, policies, and systems of governments. These harms do not only impact the indigenous communities, they impact communities across the United States according to the American Lung Association's 2025 State of the Air Report.

46 percent of Americans, over 150 million people, live in places with unhealthy levels of air pollution. Nearly 35 million of those are children. Here in the Denver metropolitan area, we rank the sixth worst region in the nation for unhealthy ozone smog pollution.

The I-270 corridor impacts Latino, Black, indigenous and disproportionally impact the communities, residents who live near highways and industrial zoning areas are exposed to unhealthy levels of traffic related pollution and fine particulate matter, placing our communities,

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Response to Comment 1

The study area is in attainment with all National Ambient Air Quality Standards, with the exception of ground-level ozone, which is a regional pollutant rather than a localized pollutant and isn't considered at the project scale. The project is contained in the Denver Regional Council of Governments' (DRCOG) current Regional Transportation Plan which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds and oxides of nitrogen (NOx), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the EPA's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-

butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the National Environmental Policy Act air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft Environmental Impact Statement.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

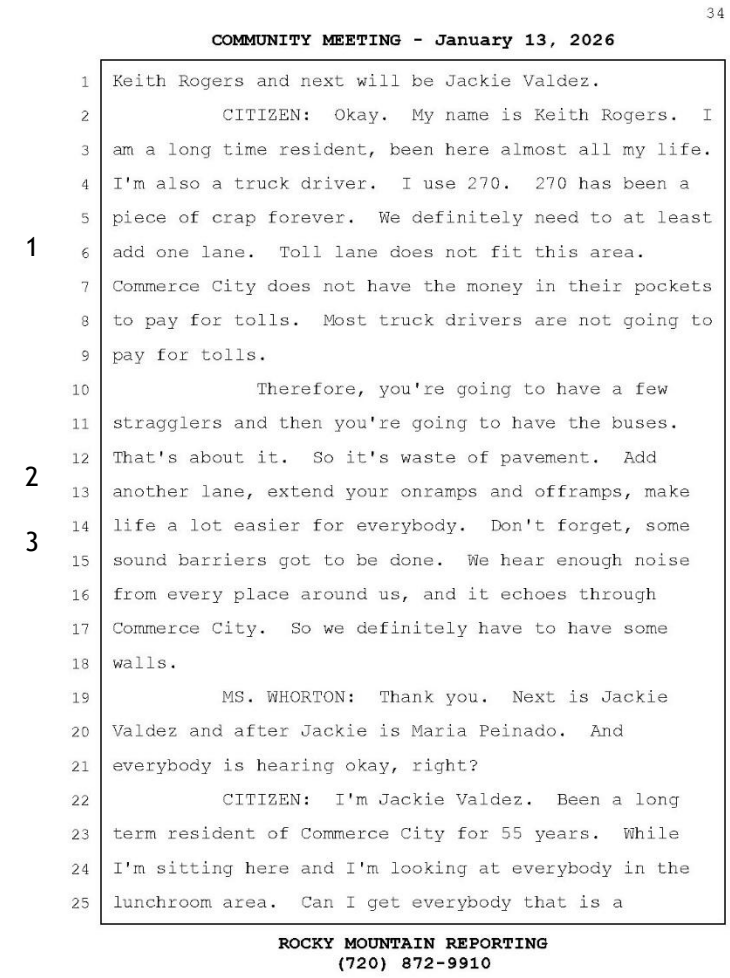
Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

especially our children at increased risk.

As a community member living with asthma, I personally face heighten risk of asthma attack stroke, and premature death due to unhealthy air quality. My youngest son, who is now 14 was diagnosed with asthma four years ago. Communities like ours already experience higher rates of the allergies, asthma, emergency room visits, infections, cognitive problems, lung cancer, heart disease, respiratory illnesses, adverse birth outcomes, and premature deaths.

Especially in highway -- expanding highways would only increase traffic pollution, safety risk, while express lanes would further create inequities and community burdens. Mom's Clean Air Force urges CDOT to protect the health and safety of communities by supporting the no action alternative, prioritizing safety focused repairs and expanding air quality monitoring with transparent public reporting to families so we can understand and respond to local air quality conditions. Thank you.

MS. WHORTON: Thank you. The next person is Eugenia Cordova, and I apologize if I butchered that name. And then after Eugenia, Keith Rogers. Unless, Eugenia, did you want to speak? Okay. We'll go to



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Keith Rogers and next will be Jackie Valdez.

CITIZEN: Okay. My name is Keith Rogers. I am a long time resident, been here almost all my life. I'm also a truck driver. I use 270. 270 has been a piece of crap forever. We definitely need to at least add one lane. Toll lane does not fit this area. Commerce City does not have the money in their pockets to pay for tolls. Most truck drivers are not going to pay for tolls.

Therefore, you're going to have a few stragglers and then you're going to have the buses. That's about it. So it's waste of pavement. Add another lane, extend your onramps and offramps, make life a lot easier for everybody. Don't forget, some sound barriers got to be done. We hear enough noise from every place around us, and it echoes through Commerce City. So we definitely have to have some walls.

MS. WHORTON: Thank you. Next is Jackie Valdez and after Jackie is Maria Peinado. And everybody is hearing okay, right?

CITIZEN: I'm Jackie Valdez. Been a long term resident of Commerce City for 55 years. While I'm sitting here and I'm looking at everybody in the lunchroom area. Can I get everybody that is a

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Response to Comment 1

The Preferred Alternative includes an additional lane in each direction throughout the corridor, which will be operated as an Express Lane because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement (EIS) for additional information on why the Two General-Purpose Lanes and One Express Lane Alternative is preliminarily identified as the Preferred Alternative.

Response to Comment 2

In addition to the Express Lane, the Preferred Alternative includes interchange improvements, which include ramp extensions.

Response to Comment 3

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

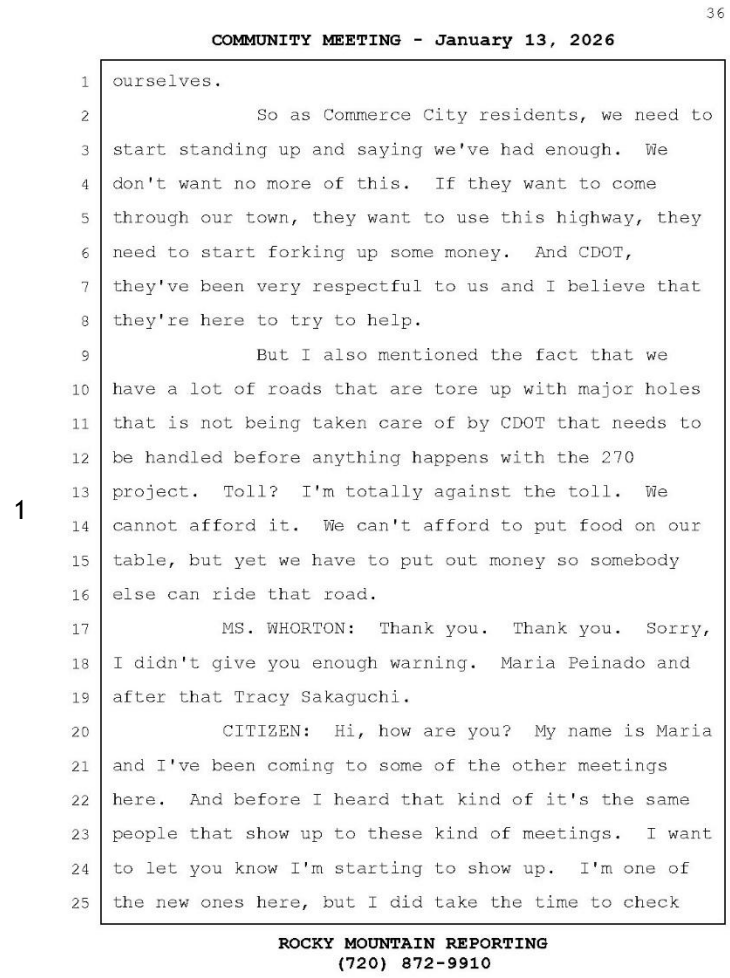
Please see Section 5.4.4, IMP4, of the Final EIS for additional information on noise impacts and mitigation.

resident to raise their hand? Okay. I see more and more of people that are representing Commerce City than I see of Commerce City.

We have dealt with so much toxified air in this area, and I'm learning more and more as I come to these meetings that for years we've been deceived. We've been deceived that Commerce City is the best opportunity to passing through. Well, we find out that all along no other highways will take anybody with any chemicals. 270 does.

Where do we reap these benefits that are coming through our town? We've never reaped anything from them. But yet here we are and I hear it all the time how we're just wanting to benefit them. I get we need the trucking industry. That's how we live. But they don't pay for everything in our community. They don't pay for our roads. Taxpayers do.

So how long are we going to stand and watch more and more trucking industry come through and everything that's being reported now is on what's happening coming through now; not what's to come. Because if we expand, it's going to be three times worse. We're going to be toxified three times worse. We're going to continue paying, but we're not going to pay for anybody else. We're going to only pay for



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ourselves.

So as Commerce City residents, we need to start standing up and saying we've had enough. We don't want no more of this. If they want to come through our town, they want to use this highway, they need to start forking up some money. And CDOT, they've been very respectful to us and I believe that they're here to try to help.

But I also mentioned the fact that we have a lot of roads that are tore up with major holes that is not being taken care of by CDOT that needs to be handled before anything happens with the 270 project. Toll? I'm totally against the toll. We cannot afford it. We can't afford to put food on our table, but yet we have to put out money so somebody else can ride that road.

MS. WHORTON: Thank you. Thank you. Sorry, I didn't give you enough warning. Maria Peinado and after that Tracy Sakaguchi.

CITIZEN: Hi, how are you? My name is Maria and I've been coming to some of the other meetings here. And before I heard that kind of it's the same people that show up to these kind of meetings. I want to let you know I'm starting to show up. I'm one of the new ones here, but I did take the time to check

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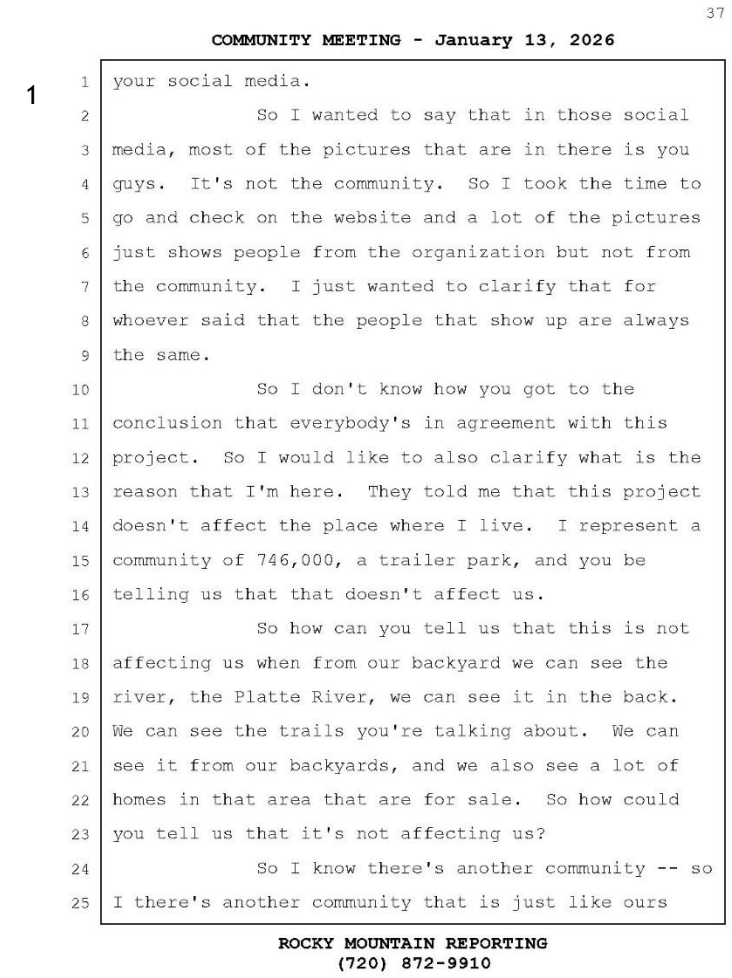
Response to Comment 1

The Preferred Alternative adds a third lane in each direction throughout the corridor that will be operated as an Express Lane because it best meets the Purpose and Need for the project. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).



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your social media.

So I wanted to say that in those social media, most of the pictures that are in there is you guys. It's not the community. So I took the time to go and check on the website and a lot of the pictures just shows people from the organization but not from the community. I just wanted to clarify that for whoever said that the people that show up are always the same.

So I don't know how you got to the conclusion that everybody's in agreement with this project. So I would like to also clarify what is the reason that I'm here. They told me that this project doesn't affect the place where I live. I represent a community of 746,000, a trailer park, and you be telling us that that doesn't affect us.

So how can you tell us that this is not affecting us when from our backyard we can see the river, the Platte River, we can see it in the back. We can see the trails you're talking about. We can see it from our backyards, and we also see a lot of homes in that area that are for sale. So how could you tell us that it's not affecting us?

So I know there's another community -- so I there's another community that is just like ours

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Response to Comment 1

Your community will not be directly affected by the project. The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

Please see the Draft Environmental Impact Statement (EIS), Final EIS/Record of Decision, and State Environmental Technical Reports for information on impacts, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

that is 10 minutes from ours. It's another trailer community that is 10 minutes from ours. I don't know if they're here or not. We're here for our community. We're representing our community, and I don't want to hear anymore that it's not going to affect us.

I think everybody knows that the worst area in Colorado -- knows that the worst area to live in the industrial area of Commerce City. We're talking about adding an express lane that is going to help with -- but you are -- I've been living in this area for 25 years. There's a lot of side roads full of holes and nobody is taking care of them. Nobody has taken care of in years. Thank you.

MS. WHORTON: Okay. Thank you. So next we have Tracy Sakaguchi and then Joanna Sandoval is a maybe. Are you here?

CITIZEN: I'm here, and I'll submit my comment on the form.

MS. WHORTON: Okay. And the next person after Tracy will be Lynn Baca. Tracy, are you here?

CITIZEN: I'm here. All right. Good evening, everyone. I'm Tracy Sakaguchi with the Colorado Motor Carriers Association. We represent approximately 600 companies in trucking that are affiliated with trucking in the State of Colorado.

Many of our member companies and their employees live right here in this community. So thank you for all you do in keeping America moving forward.

The Colorado Motor Carriers' is in full support of the EIS for Interstate 270 and the preferred alternative. This project will modernize the entire 6-mile length of I-270 and bring overdue safety improvements, support for economic development, and multimodal connections. I-270 serves as a gateway connecting northwest Denver metro communities with southeastern metro areas, including Denver International Airport, and is an important national freight corridor.

Over the past decade, I-270 has become the most heavily congested corridor in the state resulting in negative economic impacts due to excessive delays and unreliable travel time. Emergency freeway closures occur at an increasingly high rate to make the necessary repairs to failing bridges and crumbling infrastructure designed in the 1960s.

By widening shoulders, replacing decaying infrastructure, and improving roadway geometry, it will improve access for emergency response vehicles, vehicle breakdowns, new walking and biking paths.

Response to Comment 1

Comments noted.

With the new infrastructure in place, we will see relief of congestion, improved travel times, improved multimodal connections, and lower greenhouse gas emissions.

The preferred alternative addresses several safety measures that are critical to this route and we believe that these challenges will continue to persist and must be addressed. Moving forward with the EIS will not only improve safety for freight, but for all users. The Colorado Motor Carriers is in support of the I-270 final EIS. Thank you.

MS. WHORTON: Okay. So Lynn Baca, and then after Lynn will be Hugo Rodriguez.

CITIZEN: Good evening, honorable members of the CDOT administration and staff and the Federal Highway Administration. I want to thank you for holding this public comment period for the DEIS for I-270. My name is Lynn Baca. I'm an Adams County commissioner. I'm a native of Adams County. Grew up here. My mom is a graduate of Adams City High School when it was on Highway 85. My dad grew up in the Elyria-Swansea area, was a graduate of Mapleton Public Schools.

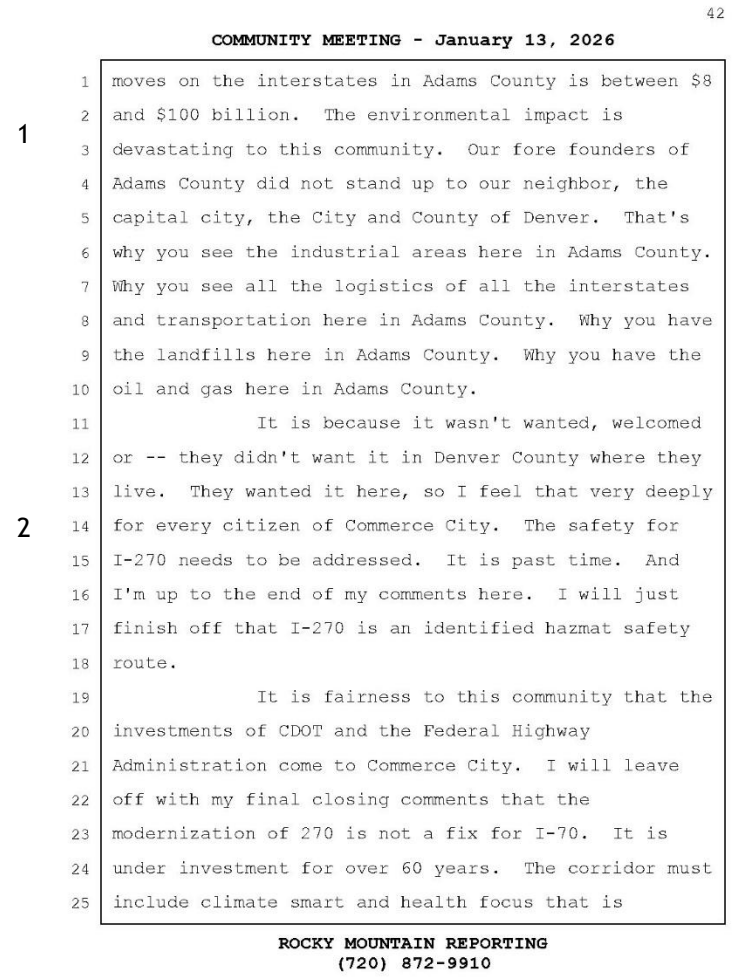
To orient you a little bit to Adams

County, we hold all of interstate system in Adams County. All of the interstates run through Adams County, including I-25, 225, I-70, 270, and Interstate 76. We also have all of the railroads at Colorado are within Adams County. We have the third largest airport in the world, sits right in the middle of Adams County, which is directly east of here by about 15 miles.

Every passenger, every traveler, every worker that goes to Denver International Airport, every piece of freight travels on 270 at some point. 270 is a connector for Boulder, all the communities up north to Aurora, which is one of our major employment centers with the Anschutz Medical Campus including the CU Health Medical School hospital system, Veteran's Hospital, and also Children's Hospital.

We are here in support of the DEIS -- the EIS for CDOT for Interstate 270. That doesn't go without the weight of what this community bears. What you have in economic impact that is on the shoulders of not only you but your ancestors, my grandfather, my parents, my cousins, my aunts and uncles, that grew up here along 270 in Elyria-Swansea, Commerce City, and unincorporated Adams County.

The economic impact is substantial. What



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moves on the interstates in Adams County is between $8 and $100 billion. The environmental impact is devastating to this community. Our fore founders of Adams County did not stand up to our neighbor, the capital city, the City and County of Denver. That's why you see the industrial areas here in Adams County. Why you see all the logistics of all the interstates and transportation here in Adams County. Why you have the landfills here in Adams County. Why you have the oil and gas here in Adams County.

It is because it wasn't wanted, welcomed or -- they didn't want it in Denver County where they live. They wanted it here, so I feel that very deeply for every citizen of Commerce City. The safety for I-270 needs to be addressed. It is past time. And I'm up to the end of my comments here. I will just finish off that I-270 is an identified hazmat safety route.

It is fairness to this community that the investments of CDOT and the Federal Highway Administration come to Commerce City. I will leave off with my final closing comments that the modernization of 270 is not a fix for I-70. It is under investment for over 60 years. The corridor must include climate smart and health focus that is

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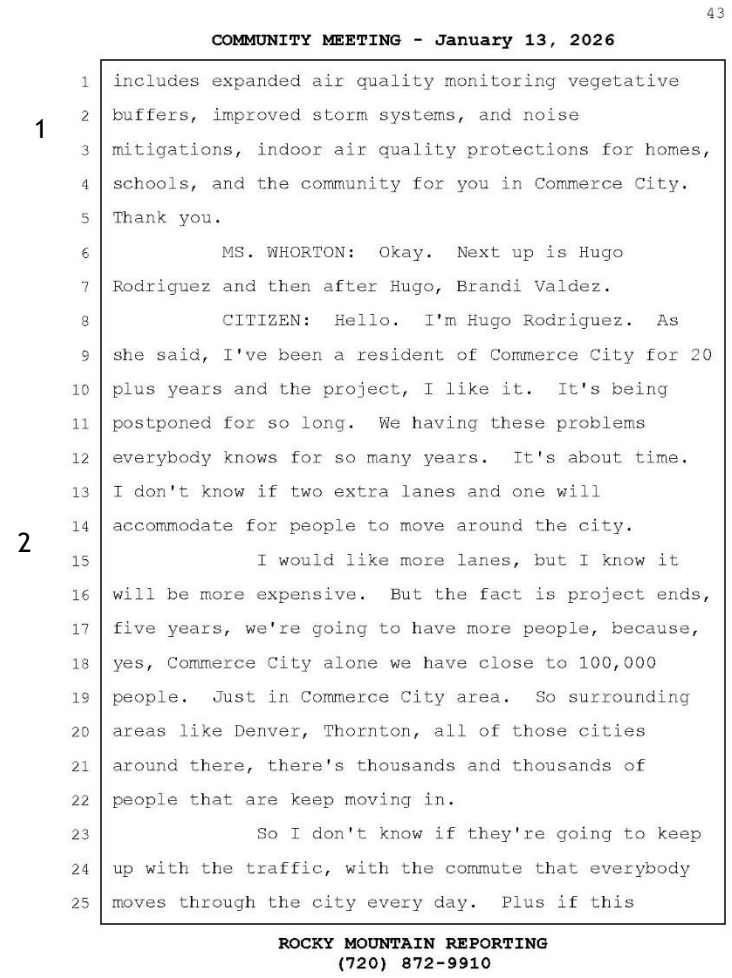
Response to Comment 1

Please see the Draft Environmental Impact Statement (EIS), Final EIS/Record of Decision, and State Environmental Technical Reports for information on impacts, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 2

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.



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includes expanded air quality monitoring vegetative buffers, improved storm systems, and noise mitigations, indoor air quality protections for homes, schools, and the community for you in Commerce City. Thank you.

MS. WHORTON: Okay. Next up is Hugo Rodriguez and then after Hugo, Brandi Valdez.

CITIZEN: Hello. I'm Hugo Rodriguez. As she said, I've been a resident of Commerce City for 20 plus years and the project, I like it. It's being postponed for so long. We having these problems everybody knows for so many years. It's about time. I don't know if two extra lanes and one will accommodate for people to move around the city.

I would like more lanes, but I know it will be more expensive. But the fact is project ends, five years, we're going to have more people, because, yes, Commerce City alone we have close to 100,000 people. Just in Commerce City area. So surrounding areas like Denver, Thornton, all of those cities around there, there's thousands and thousands of people that are keep moving in.

So I don't know if they're going to keep up with the traffic, with the commute that everybody moves through the city every day. Plus if this

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Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood.

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures.

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations,

all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Air quality monitoring during preconstruction and during construction is required by state regulation Colorado Revised Statutes (CRS) 43-1-128 for this project and is also an air quality federal mitigation measure in the Draft EIS, which has been included in the mitigation and commitments included in Chapter 5.0 of the Record of Decision. Air quality monitoring will be completed in compliance with state regulation and related guidance. Refer to the State Air Quality and Community Analysis Technical Reports for additional information on air monitoring for the project, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in CRS 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website.

Response to Comment 2

The Draft EIS acknowledges that I-270 has long-standing congestion and safety issues and has not kept pace with regional growth.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (I-25/US 36 at the northwest end and I-70 at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

project comes along, I'm pretty sure it's going to be impossible, please use local contractors, not out-of-state contractors. Keep the money in the city and the state so everybody benefit from it. Thank you.

MS. WHORTON: Next up is Brandi Valdez and then Lucy Molina. Is there anybody else that wants to speak that hasn't signed up? So, Adrianna, can you go over and help Kristi Douglas over here?

CITIZEN: All right. Good evening and thank you for the opportunity to speak. My is Brandi Valdez and I'm here to talk about the 270 expansion project and more specifically the impact of highway shutdowns during construction and repair. While infrastructure improvements are necessary and long overdue, how these improvements are carried out matter just as much as the project itself.

I-270 is not just a highway. It is a lifeline for our community. It connects residents to work, children to school, and families to healthcare and business to customers. When this highway is shut down or restricted without clear, coordinated planning, the ripple effects are immediate and serious. If lanes are closed or the highway is shut down during repairs, we must ensure that safe, clear,

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Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

identified alternative routes are in place before construction begins.

These routes need to be planned with intention and not as an afterthought. We must be able to handle increased traffic without pushing congestion, safety risks, and pollution into our neighborhoods.

Equally important is the communication. The community must be well advised in advance. That means timely, multilingual notifications throughout multiple channels; mailers, signage, social media, community events, and partnerships with local organizations. People should not be finding out about these closures when we're already late for work or stuck in traffic.

We also need to consider that businesses operate within our boundary, especially small business and essential services. Many rely on predictable traffic patterns to survive. Sudden closures without proper notice or rerouting plans can result in lost revenue, delayed deliveries, and in some cases permanent closure. This is especially crucial for trucking and commercial routes.

Trucks cannot simply be rerouted into residential streets without consequences. Safety

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Response to Comment 1

Please see Chapter 5.0 of the Record of Decision for information on construction-related mitigation and commitments.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.

concerns and noise impacts must be addressed. Clearly designated trucking routes need to be communicated directly to logistics companies and posted well in advance to prevent confusion and unsafe conditions. Planning for alternative routes is not just a transportation issue. It is an equity issue.

When detours are poorly planned, it is often our most impacted communities that bear the burden. Longer commute times increase air pollution and reduce access to jobs and services. I am asking for a thoughtful planning, transparency, and collaboration. Infrastructure projects should not -- or should strengthen our communities and not disrupt them unnecessarily.

As this project moves forward, I urge decision makers to prioritize proactive communications, coordinated alternative routes and continue meaningful engagement with residents and businesses alike. With proper planning, we can improve 270 while still respecting all the people that depend on it and live in our community. So thank you for your time and consideration.

MS. WHORTON: Okay. I have Lucy Molina and Kristi Douglas, and unless anybody else wants to speak Troy Younger will be our last speaker. Looks like we

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, for more information on the EOs.

Federal mitigation and commitments are included in Chapter 5.0 of the Record of Decision.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

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have a couple more that want to sign up so Lucy then Kristi Douglas.

CITIZEN: Good evening. I am Lucy Molina, and I'm a community member. I'm also a resident, a neighbor to Suncor Oil refinery as well as the I-270. I also had the opportunity to be part of the I-270 expansion meetings and planning. So I want to say two things. Thank you to CDOT for the hard work.

I saw the work -- David, I saw you out there, bro. Okay. Two things I want to just mention here. Actually, I want to say two things. Did you guys know that Adams 14 District has now 14 electric buses and solar infrastructure? Yeah. Yeah, the future is now guys. The future is now. You know, I always speak about development without displacement, right?

Commerce City is also -- our city council last year proclaimed a climate emergency here in Commerce City. You know, the past is written to teach us. Okay? Adams County and the State of Colorado historically have made Commerce City the sacrifice of the state, right? And it's a reality we know. Not only have we been targeted by privatizers, we see some here today -- we have developers and frackers.

Now, a dangerous development is also

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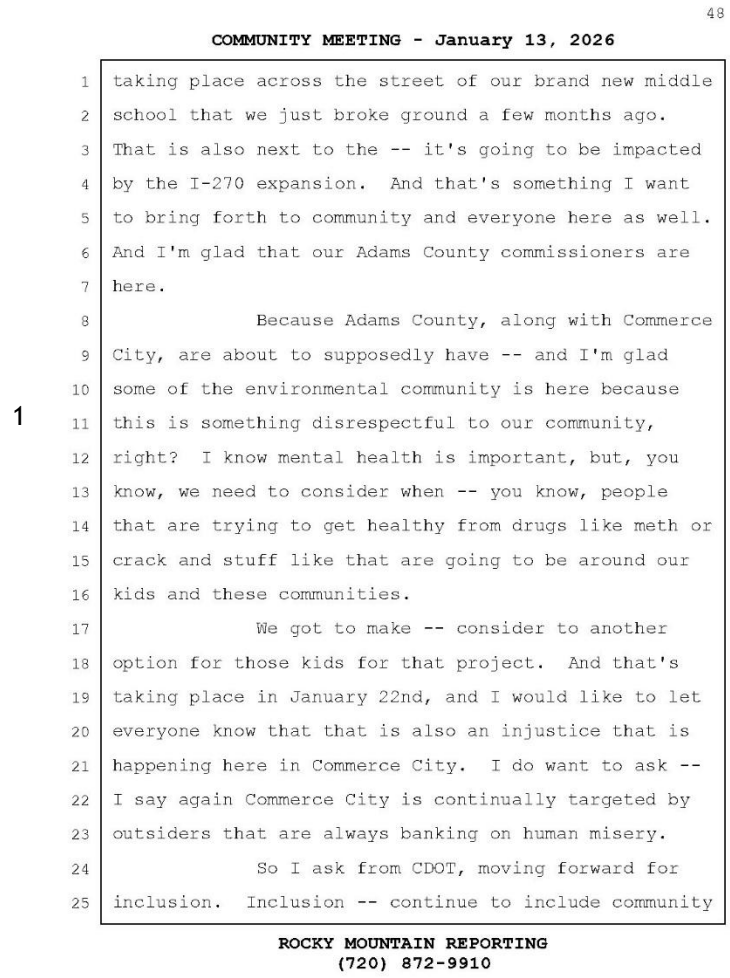

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taking place across the street of our brand new middle school that we just broke ground a few months ago. That is also next to the -- it's going to be impacted by the I-270 expansion. And that's something I want to bring forth to community and everyone here as well. And I'm glad that our Adams County commissioners are here.

Because Adams County, along with Commerce City, are about to supposedly have -- and I'm glad some of the environmental community is here because this is something disrespectful to our community, right? I know mental health is important, but, you know, we need to consider when -- you know, people that are trying to get healthy from drugs like meth or crack and stuff like that are going to be around our kids and these communities.

We got to make -- consider to another option for those kids for that project. And that's taking place in January 22nd, and I would like to let everyone know that that is also an injustice that is happening here in Commerce City. I do want to ask -- I say again Commerce City is continually targeted by outsiders that are always banking on human misery.

So I ask from CDOT, moving forward for inclusion. Inclusion -- continue to include community

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Response to Comment 1

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and the people that are clearly impacted by these projects not just the big contractors, politicians, and our gatekeepers. Okay? So, again, let's celebrate the good things also.

I want to say also that our -- for the first time after 13 years some of our elements are up turnaround, so we have a lot of positive things that are happening also here in our community and injustices. Remember that we're getting fracked in the north and we have Commerce City -- we have Suncor in the south, and we still need good drinking water. Gracias.

MS. WHORTON: Okay. A couple -- I have Troy Younger next, and a couple of you have put question marks. I'm sorry I skipped you, but we're going to have Marisela Serrano will be after Troy Younger, and I have three more signed up to speak. So, again, if you would like to speak and haven't signed up to speak, please raise just your hand and we'll get to you.

CITIZEN: All right. So she already gave my name. I'm also a long term resident. I'm not going to stand up here and play Don Quixote and shout at the air and talk about how poor we are, talk about the water. I'm not going to do any of that because we are

Response to Comment 1

CDOT commits to continued community involvement throughout the project development and construction processes.

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some resilient -- I almost did it. We are some resilient people down here.

1 We do have some issues with the highway. One of the funniest moments during the stakeholder meetings was when Mandy referred to the bridges as porous. And it got all of the locals to laugh because if you've driven over 270, you can look through the bridges and see the roads below. They are porous. Their sieves.

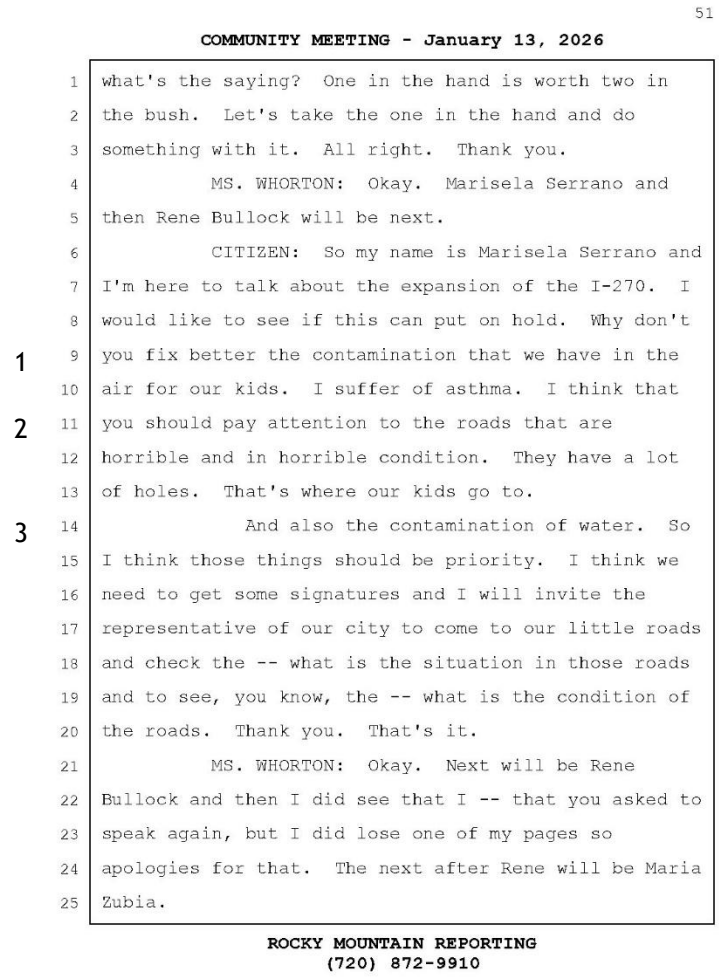
This needs to be done. The repairs need to be done and, you know, I'm just going to be totally honest with you. And I'm not saying 270 people are lying to you, but -- and it's something I've said to them. We could go four lanes each direction. It's not going to change the traffic. The growth up north is going to continue. The growth to the east is going to continue.

The purpose of 270 is to get people from north to east and east to north, and it's not going to change anything. The inclusion of a toll lane might help with emergency vehicles. It might help with bus lanes, but it's not going to change the -- it's not going to change the traffic. Traffic is going to be there. It's always going to be there like that because of the purpose of the road. So let's --

Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

The Preferred Alternative includes an additional lane in each direction throughout the corridor that will be operated as an Express Lane because it was determined to best meet the Purpose and Need of the project. Please see Section 3.4 of the Draft Environmental Impact Statement for more information on why the Preferred Alternative was preliminarily identified.



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what's the saying? One in the hand is worth two in the bush. Let's take the one in the hand and do something with it. All right. Thank you.

MS. WHORTON: Okay. Marisela Serrano and then Rene Bullock will be next.

CITIZEN: So my name is Marisela Serrano and I'm here to talk about the expansion of the I-270. I would like to see if this can put on hold. Why don't you fix better the contamination that we have in the air for our kids. I suffer of asthma. I think that you should pay attention to the roads that are horrible and in horrible condition. They have a lot of holes. That's where our kids go to.

And also the contamination of water. So I think those things should be priority. I think we need to get some signatures and I will invite the representative of our city to come to our little roads and check the -- what is the situation in those roads and to see, you know, the -- what is the condition of the roads. Thank you. That's it.

MS. WHORTON: Okay. Next will be Rene Bullock and then I did see that I -- that you asked to speak again, but I did lose one of my pages so apologies for that. The next after Rene will be Maria Zubia.

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement (EIS) for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

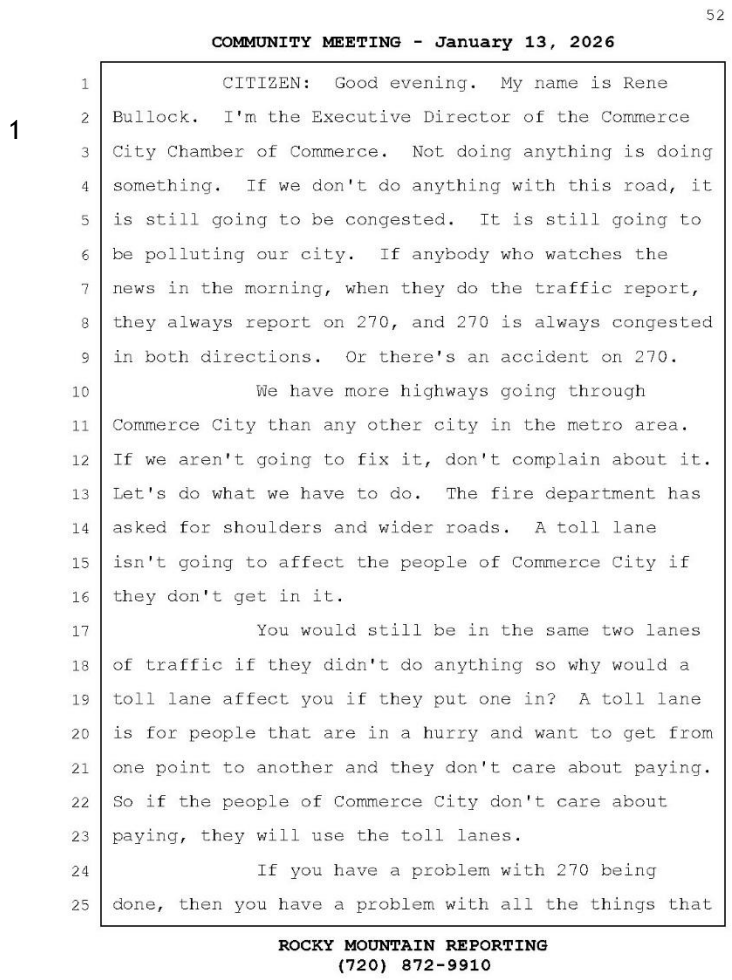
Response to Comment 2

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards.

Response to Comment 3

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no permanent water quality (PWQ) control measures in the project boundary. Adding PWQ control measures that follow Municipal Separate Storm Sewer System (MS4) requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus

having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures. Please see Section 5.4.4, IMP10, of the Final Environmental Impact Statement for additional information on water quality.



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CITIZEN: Good evening. My name is Rene Bullock. I'm the Executive Director of the Commerce City Chamber of Commerce. Not doing anything is doing something. If we don't do anything with this road, it is still going to be congested. It is still going to be polluting our city. If anybody who watches the news in the morning, when they do the traffic report, they always report on 270, and 270 is always congested in both directions. Or there's an accident on 270.

We have more highways going through Commerce City than any other city in the metro area. If we aren't going to fix it, don't complain about it. Let's do what we have to do. The fire department has asked for shoulders and wider roads. A toll lane isn't going to affect the people of Commerce City if they don't get in it.

You would still be in the same two lanes of traffic if they didn't do anything so why would a toll lane affect you if they put one in? A toll lane is for people that are in a hurry and want to get from one point to another and they don't care about paying. So if the people of Commerce City don't care about paying, they will use the toll lanes.

If you have a problem with 270 being done, then you have a problem with all the things that

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Response to Comment 1

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor up to current standards. The Preferred Alternative includes widening shoulders to meet current design standards, which generally provide full-width inside and outside shoulders intended to support emergency response, disabled vehicles, and traffic incident management. Providing wider shoulders is specifically intended to reduce the need for full lane closures during incidents and to improve responder safety.

The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative.

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you've complained about for the last 15 minutes when I've listened to it; the pollution, the air, and everything else. I say now that we have CDOT that says that they want to improve this road, that is -- runs through our city. If you didn't know this before, it is a hazardous material road. There's no truck traffic that is hazardous that can run from Quebec to Colorado Boulevard on I-70. It has to go on 270.

So if you want -- the truck traffic is going to be there anyway because this is a truck city. So if you want to shut it down, show me what the backfill is going to be for that tax money that you're getting rid of. Because if you want to get rid of 20 percent of your tax, you're going to get rid of 20 percent of your -- 20 percent of your amenities here in the city.

And if you don't believe it, just go to the city council and ask them any time what would happen if you lost the tax money from trucking in this city? Thank you.

MS. WHORTON: Okay. Maria Zubia and then Mike Kelly will be next. Sorry again for getting my papers out of order.

CITIZEN: That's all right. I was

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Response to Comment 1

I-270 functions as a designated hazardous materials route, oversized and overweight load route, nuclear route, and part of the Strategic Highway Network (STRAHNET), so freight operators have limited viable alternatives because they can't use I-70. Without added capacity, converting existing lanes to Express Lane operations could increase costs and reliability risks for essential freight movements without corresponding improvements in throughput.

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wondering. Maria Zubia. Nice to see everyone. I'm long time resident. Actually, I grew up here in Commerce City, and so I do realize that we do need infrastructure. We do need to make sure that our roads are safe. My concern is the mitigation that's going to happen before the whole highway is done. What is going to happen in between now and the time it's finished, because that's the concern for me when it comes to our schools and our small businesses.

So just knowing that there's a traffic diversion prevention plan, what that's going to look like, enforcement against freight rerouteing into local streets because we see that already, signal timing adjustments for our lights, a continuity plan for our businesses that has written detour maps. That would be nice to make sure that they know where the detours are.

Heavy truck volumes, limiting the buffer between the roadway and storefronts because, as mentioned earlier, we have a lot of small businesses that are going to be impacted. Clear freight routeing, again. No informal truck detours through commercial strips including the sidestreets that go through our schools, and school specific safety.

What's going to happen especially because

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Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.

a lot of the traffic is going to most likely be rerouted down Quebec or Highway 85 and so to me those are the things that worry me more. Because regardless of what we say, I know that the state's going to do what the state's going to do. They're going to build a highway. Great. But what's going to happen in between that -- what's going on between now and when it gets finished.

And so for me, you know, I do support infrastructure investment, but support must come with enforceable protections for corridors like Quebec and Highway 85, which is Vasquez for small businesses, students, and working families already shoulder cumulative impacts. Mitigation must be specific, funded, bilingual, and contractually binding. So coordination alone is not mitigation. 1

MS. WHORTON: Thank you. So next we'll have Mike Kelly, and then after Mike, I think we'll have Annette Hawthorne and then Marisela Serrano changed her mind and is going to speak. And Kristi Douglas.

CITIZEN: Buenas noches. My name is Mike Kelly. I live in Commerce City. I'm retired. I do not live near 270, but I do use it occasionally, so I do see the congestion on the freeway. Colorado population growth is about 40 percent since 1990 when

Response to Comment 1

Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

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This mitigation will be included in the construction requirements for the project and will be contractually binding.

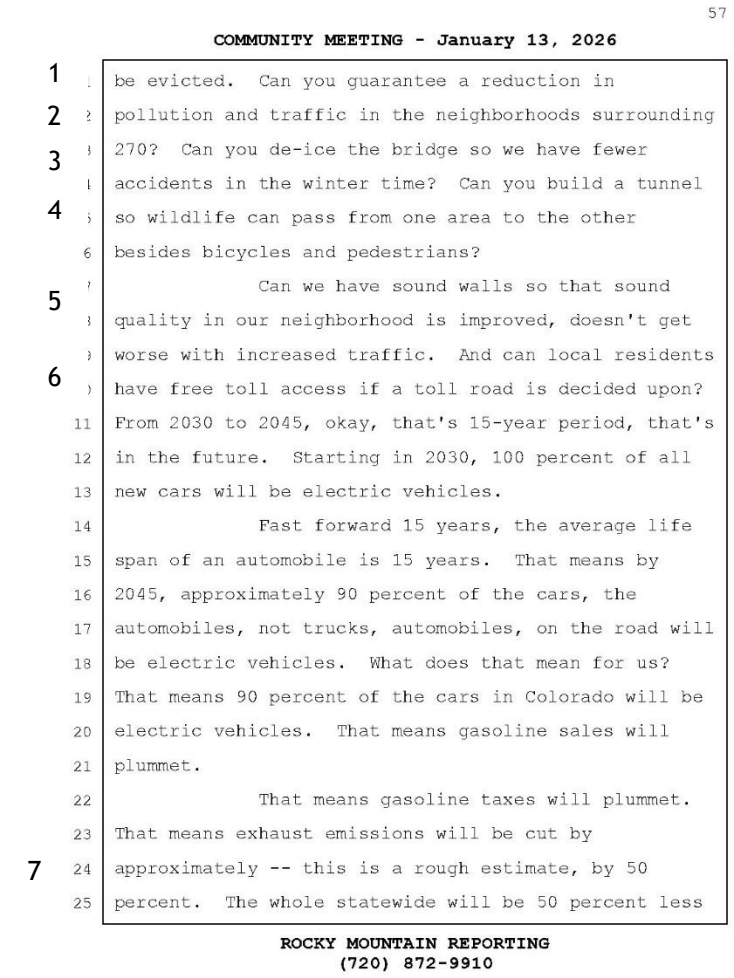
Highway 270 was finished. 40 percent. Has anybody noticed? Okay.

Meanwhile, the state budget has only grown 28 percent, and people wonder why we have potholes everywhere in the state. The main things that I see how the presentations that have come here tonight as well as a couple of nights ago.

The three lane option defines the following: Reduces crashes, replaces 12 very old bridges, widens the narrow shoulders, Lengthens the dangerous short on and off ramps, which have caused a lot of accidents, reduces traffic on the local streets. And we mean neighborhoods, not just the outlying freeways.

It reduces congestion, and based on the study, this means it's going to lower pollution because there will be more passthrough traffic than will be standstill traffic polluting the air. They're adding air quality monitoring equipment so they can actually track constantly how much pollution is being created on Highway 270.

Over 7,000 households said they do not trust the government, do not trust corporations. They do not want the environment to get worse. So we have these questions. Can you guarantee that no one will



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be evicted. Can you guarantee a reduction in pollution and traffic in the neighborhoods surrounding 270? Can you de-ice the bridge so we have fewer accidents in the winter time? Can you build a tunnel so wildlife can pass from one area to the other besides bicycles and pedestrians?

Can we have sound walls so that sound quality in our neighborhood is improved, doesn't get worse with increased traffic. And can local residents have free toll access if a toll road is decided upon? From 2030 to 2045, okay, that's 15-year period, that's in the future. Starting in 2030, 100 percent of all new cars will be electric vehicles.

Fast forward 15 years, the average life span of an automobile is 15 years. That means by 2045, approximately 90 percent of the cars, the automobiles, not trucks, automobiles, on the road will be electric vehicles. What does that mean for us? That means 90 percent of the cars in Colorado will be electric vehicles. That means gasoline sales will plummet.

That means gasoline taxes will plummet. That means exhaust emissions will be cut by approximately -- this is a rough estimate, by 50 percent. The whole statewide will be 50 percent less

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Response to Comment 1

The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and right-of-way acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

Response to Comment 2

Please see Chapter 5.0 of the Record of Decision for information on required mitigation and other environmental commitments for the project.

Response to Comment 3

CDOT will deice the interstate as needed.

Response to Comment 4

The I-270 corridor is situated in a substantially different landscape compared to other highways where CDOT has constructed wildlife crossing structures in the state. Wildlife movements across I-270 have been severed for decades since construction of the freeway and the heavy development on either side. Much of the natural wildlife habitat in the area surrounding I-270 has been replaced by commercial, residential, and industrial developments. Natural habitat is mostly limited to the Sand Creek Greenway, which is a narrow and confined corridor, and riparian areas that pass under the bridges at the South Platte River and Clear Creek. Although many bridges cross streams in the area, nearly all of these structures provide suitable passage for terrestrial and aquatic wildlife along the riparian zone. Design of the project will maintain wildlife movements along Sand Creek; however, the design does not include new wildlife connectivity features across I-270.

Response to Comment 5

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines

(NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood. Please see Section 5.4.4, IMP4, of the Final EIS for additional information on noise impacts and mitigation.

Response to Comment 6

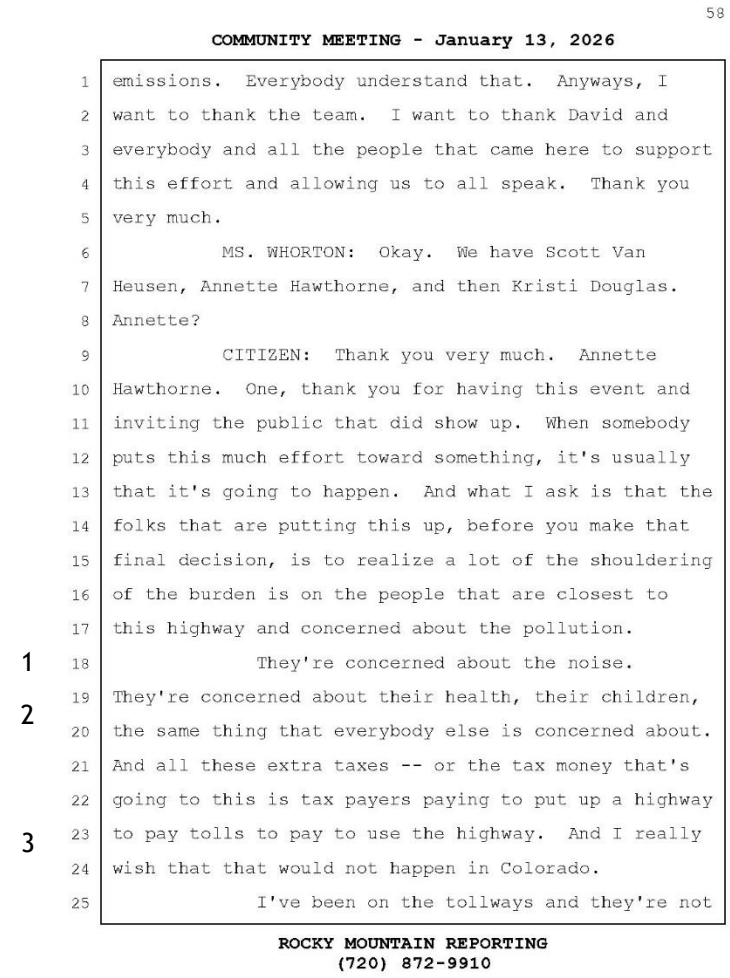
Unique tolling considerations for the I-270 corridor, including pricing structure, eligibility, exemptions, enforcement methods, and operational policies, have not been finalized and are not decisions made through the EIS process. These elements would be evaluated and determined in subsequent project development phases following completion of the EIS, consistent with CDOT policy, and additional public and stakeholder coordination.

Response to Comment 7

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (PM_{10}) emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM_{10} emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM_{10} emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of particulate matter less than 2.5 microns in diameter and NOx compared to the No Action Alternative in the design year.

The modeled mobile source air toxic (MSAT) emissions decrease between 2023 existing conditions and the design year (2050). This is consistent with the EPA's national emissions control programs that are projected to reduce annual MSAT emissions by 90 percent from 2010 to 2050. The much larger decrease in estimated emissions of diesel particulate matter between 2023 and 2050 compared to the other MSATs is most likely a result of Colorado's adoption of the Advanced Clean Trucks rule and the corresponding increase of electric vehicles in the medium- and heavy-duty truck fleets by 2050. All priority MSATs—with the exception of 1,3-butadiene—are lower under the Preferred Alternative than the Three General-Purpose Lanes Alternative, and 1,3-butadiene is the same.

For more information on the federal air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.



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emissions. Everybody understand that. Anyways, I want to thank the team. I want to thank David and everybody and all the people that came here to support this effort and allowing us to all speak. Thank you very much.

MS. WHORTON: Okay. We have Scott Van Heusen, Annette Hawthorne, and then Kristi Douglas. Annette?

CITIZEN: Thank you very much. Annette Hawthorne. One, thank you for having this event and inviting the public that did show up. When somebody puts this much effort toward something, it's usually that it's going to happen. And what I ask is that the folks that are putting this up, before you make that final decision, is to realize a lot of the shouldering of the burden is on the people that are closest to this highway and concerned about the pollution.

1 They're concerned about the noise.

2 They're concerned about their health, their children, the same thing that everybody else is concerned about. And all these extra taxes -- or the tax money that's going to this is tax payers paying to put up a highway

3 to pay tolls to pay to use the highway. And I really wish that that would not happen in Colorado.

I've been on the tollways and they're not

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Response to Comment 1

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) per federal regulations (23 Code of Federal Regulations 772). Thorough analysis was conducted for each alternative through the corridor.

Noise is expected to increase by 0.2 decibels (dB) to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft Environmental Impact Statement (EIS) analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable. One noise wall met the criteria and is recommended for implementation near the South Rose Hill Neighborhood. Please see Section 5.4.4, IMP4, of the Final EIS for additional information on noise impacts and mitigation.

Response to Comment 2

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or

environmental justice. See Section 5.4.4, IMP1, of the Final EIS for more information on the EOs.

Additional community improvements from the air quality, greenhouse gas, and disproportionately impacted communities analyses required as part of Senate Bill 21-260 and codified in Colorado Revised Statutes 43-1-128 are discussed in the State Environmental Technical Reports, which are available on the project website (https://www.codot.gov/projects/studies/i270study).

Response to Comment 3

The Preferred Alternative adds a lane in both directions throughout the corridor that will be operated as an Express Lane because it best meets the Purpose and Need. Please see Section 3.4 of the Draft EIS for more information on why the Preferred Alternative was preliminarily identified.

used near as much as they take up on the highway. A third of the traffic is not in that lane. And so folks that can afford to take those tollways, because they are just passing through, good on them. But for the people that would use it every day to make their lives easier miss that opportunity. And it would be really nice if that lane were open to the majority of the people that live in the neighborhood that would use it.

And with the -- I think the electric car thing is kind of a neat viewpoint, whoever brought that up, but that also puts extra wear and tear on our roads because those cars are heavier. They destroy our roads faster. The tires disintegrate quicker, so that adds pollution into the air even if that's not through gas. And there's also the battery issue, but that's another soap box.

So it sounds like this is probably going to happen, but please respect the folks that use -- use this road and live closest to it that they would like to be able to use all three lanes regardless of the time of day. Leave it open, let the tax payers be able to use the money that they put towards this for their benefit for the people that live in the states and the truckers and everybody else can also use it.

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Response to Comment 1

The Preferred Alternative adds a lane in both directions throughout the corridor that will be operated as an Express Lane because it best meets the Purpose and Need. Please see Section 3.4 of the Draft Environmental Impact Statement for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative is preliminarily identified as the Preferred Alternative.

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Thank you.

MS. WHORTON: Thank you. We'll have Mike Kelly, and then the last speaker will be Kristi Douglas. Sorry. I'm sorry. I have too many papers here. So, Kristi, looks like you're the last one.

CITIZEN: Thank you. It's really an honor to be closing this out tonight. I'm Kristi Douglas, and I don't live near 270, and I actually avoid it as much as I possibly can. But I sure do know a lot of people who live in that neighborhood and I know personally the negative impacts that they live with.

And so I would like to echo the comments by the last speaker. Because she nailed it. She really did. And so to me, what we need to be looking at is probably innovation rather than expansion so that we can look at alternatives to solve some of the issues that we've been hearing about tonight. Because I've heard a lot of contradictions. And we've got to face those.

So now what we have to do -- we've got a preferred alternative, which obviously that's the route that CDOT wants to go. But we've got to address all of the issues that were brought forward tonight. All I heard about was freight, and so mostly had to do with the economy. So we're putting the economy above

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Response to Comment 1

The Minimal Build Alternative focuses on safety improvements on I-270 and bicycle, pedestrian, and transit enhancements rather than adding capacity. This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

The Bicycle, Pedestrian, and Transit Enhancements Alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

ecology.

And ecology, we have to have that in order to survive, so that has to be reversed. We've got to put ecology first and then the economy because the economy is supposed to serve humanity, not for us to be burdened by making sure that the economy grows all the time.

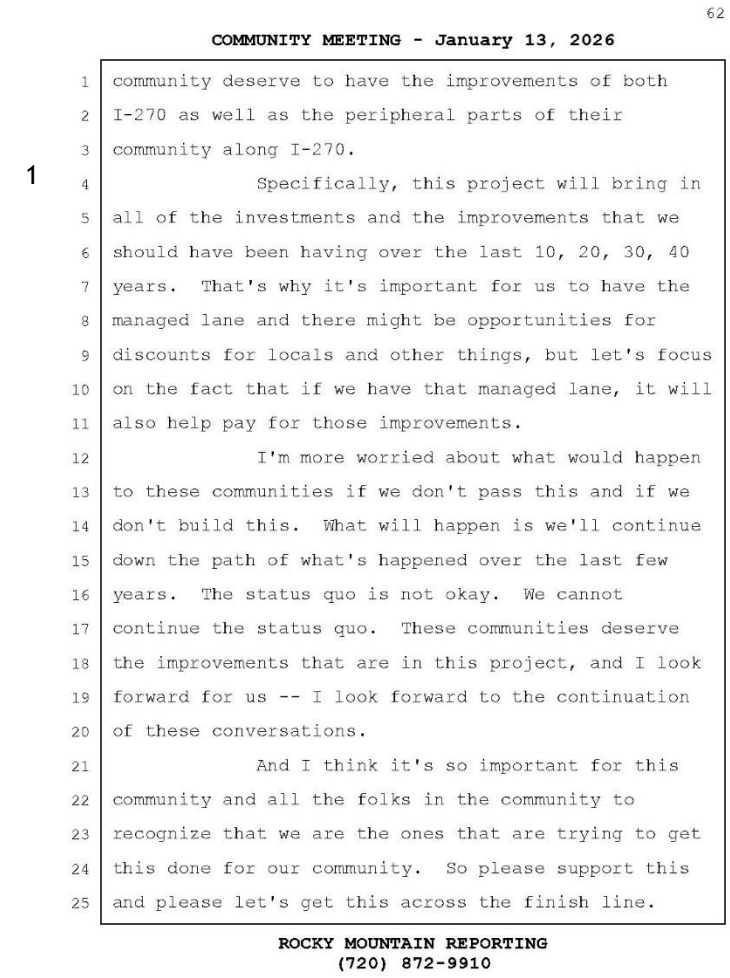
The economy should be serving us as humans, and so I ask all of you to be involved as we go along the way in improving this route that obviously serves outsiders but impacts negatively the people who live here. So please let's -- let's put people first, profits will follow. Thank you.

MS. WHORTON: Okay. And I did -- we have one more speaker Steve O'Dorisio. And is there anybody else that signed up, thought they signed up, signed up maybe that wanted to speak? Can you just raise your hand? I just want to make sure I didn't miss anybody. Okay. So Steve O'Dorisio will be the last speaker.

CITIZEN: Thank you very much. People have heard me speak in the community over the last, you know, probably 5 to 10 years about the importance of this project. The people in this community have been neglected for too long, and the people of this

Response to Comment 1

Please see Chapter 4.0 of the Draft Environmental Impact Statement for impacts related to ecology. Chapter 5.0 of the Record of Decision identifies the mitigation and commitments the project will implement related to the impacts.



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community deserve to have the improvements of both I-270 as well as the peripheral parts of their community along I-270.

Specifically, this project will bring in all of the investments and the improvements that we should have been having over the last 10, 20, 30, 40 years. That's why it's important for us to have the managed lane and there might be opportunities for discounts for locals and other things, but let's focus on the fact that if we have that managed lane, it will also help pay for those improvements.

I'm more worried about what would happen to these communities if we don't pass this and if we don't build this. What will happen is we'll continue down the path of what's happened over the last few years. The status quo is not okay. We cannot continue the status quo. These communities deserve the improvements that are in this project, and I look forward for us -- I look forward to the continuation of these conversations.

And I think it's so important for this community and all the folks in the community to recognize that we are the ones that are trying to get this done for our community. So please support this and please let's get this across the finish line.

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Response to Comment 1

As a result of Executive Order (EO) 14148, EO 14154, EO 14173, and the removal of the Council on Environmental Quality's regulations, all federal greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this National Environmental Policy Act analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice. See Section 5.4.4, IMP1, of the Final Environmental Impact Statement for more information on the EOs.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those additional analyses and enhancements that the project is committed to implement, refer to the State Environmental Technical Reports posted on the project website (https://www.codot.gov/projects/studies/i270study).

Thank you.

MS. WHORTON: Okay. That is going to close out our oral comment period. Thank you, everybody, who chose to speak tonight. If you would like to provide a comment a different way, again, there's many ways to do that. And also our staff will be available out in the hallway if you want to talk about any of the questions about the project, about any of the technical analysis.

Please take advantage of those staff and there's still plenty of food from La Casa Del Rey, which is delicious. So if anybody wants food, please grab that before you leave.

WHEREUPON, the within proceedings were concluded at the approximate hour of 7:14 p.m. on the 13th day of January, 2026.

* * * * *

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
COUNTY OF DOUGLAS)

I, RIANNA R. ELMSHAEUSER, Registered Professional Reporter, Federal Certified Realtime Reporter, and Notary Public ID 20194034675, State of Colorado, do hereby certify that the said proceedings were taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 16th day of January, 2026.
My commission expires June 4, 2028.

_____ Reading and Signing was requested.

_____ Reading and Signing was waived.

__X__ Reading and Signing is not required.

/s/ Rianna R. Elmshaeuser
_____

Rianna R. Elmshaeuser, RPR, FCRR