



I-270 Corridor Improvements

Final Environmental Impact Statement and Record of Decision - I-270 Corridor Improvements Project



Appendix D

Two Express Lanes that Accommodate Transit Alternative Technical Report

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Acronyms and Abbreviations

Acronym	Definition
ATM	Active Traffic Management
BNSF	BNSF Railway
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
CTIO	Colorado Transportation Investment Office
Draft EIS	Draft Environmental Impact Statement
DRCOG	Denver Regional Council of Governments
EIS	Environmental Impact Statement
FF5	Flatiron Flyer 5
FHWA	Federal Highway Administration
Final EIS	Final Environmental Impact Statement
HCNWA	Healthy Communities No-Widening Alternative
I-25	Interstate 25
I-270	Interstate 270
I-70	Interstate 70
I-76	Interstate 76
ISRRPP	Interstate System Reconstruction and Rehabilitation Pilot Program
mph	miles per hour
MPO	metropolitan planning organization
NEPA	National Environmental Policy Act
project	Interstate 270 Corridor Improvements Project
ROW	right-of-way
RTD	Regional Transportation District
SEA	Systems Engineering Analysis
STRAHNET	Strategic Highway Network
US	United States
US 36	United States Highway 36
USC	United States Code
VPPP	Value Pricing Pilot Program

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1.0 Introduction

The Federal Highway Administration (FHWA) and CDOT are preparing an Environmental Impact Statement (EIS) to evaluate potential improvements to the I-270 corridor under the I-270 Corridor Improvements Project (project). FHWA and CDOT are the lead agencies for this National Environmental Policy Act (NEPA) process. On November 21, 2025, the Draft Environmental Impact Statement (Draft EIS) was published in the Federal Register with a public comment period ending January 20, 2026.

Prior to publishing the Draft EIS, CDOT received a letter from the GreenLatinos on November 11, 2025, submitting a new alternative for consideration. Information from November 11, 2025, was resubmitted during the Draft EIS comment period on December 22, 2025. Lastly, the GreenLatinos submitted comments on the Draft EIS on January 20, 2026, including additional information about the new proposed alternative.

As part of the submissions from November 2025, December 2025, and January 2026, the new alternative was referred to as the Healthy Communities No-Widening Alternative (HCNWA). The mainline configuration of the alternative proposes converting the existing general-purpose lanes on I-270 to tolled Express Lanes. For consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is referenced as the Two Express Lanes that Accommodate Transit Alternative throughout this technical report.

This Technical Report documents the development, evaluation, and screening of the Two Express Lanes that Accommodate Transit Alternative submitted during the Draft EIS public comment period. This Technical Report supplements but does not replace Appendix B, Alternatives Development Technical Report. This Technical Report summarizes:

- The Two Express Lanes that Accommodate Transit Alternative as submitted;
- Assumptions made prior to screening; and
- Level 1 and Level 2 Screening Results.

2.0 Background and Context

I-270 in Colorado is a controlled-access interstate highway, with two through lanes in each direction between Interstate 25 (I-25)/United States Highway 36 (US 36) and Interstate 70 (I-70) in central Denver and Commerce City (Figure 1). It has a posted speed limit of 55 miles per hour (mph). The project limits include the I-270 interchanges with Interstate 76 (I-76), York Street, Vasquez Boulevard, and Quebec Street. The project will tie into the I-25/US 36

and I-70 system interchanges, but improvements to these interchanges are part of projects on I-25 and I-70 and will be designed and approved separately.

Figure 1. I-270 Corridor Improvements Project Limits (I-25 to I-70)



2.1 Overview of the Alternatives Development Process

The I-270 EIS evaluated a reasonable range of alternatives developed to address the project's Purpose and Need, including safety, travel time reliability, transit operations, freight mobility, bicycle and pedestrian connectivity, and minimizing environmental and community impacts.

The Level 1 and Level 2 screening methodology is described in Section 8.0 of Appendix B, Alternatives Development Technical Report. The same screening framework was applied to the Two Express Lanes that Accommodate Transit Alternative.

2.2 Purpose and Need

The purpose of the project is to implement transportation solutions that modernize the I-270 corridor to accommodate existing and forecasted transportation demands. The project needs are:

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

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

3.0 Description of the Two Express Lanes that Accommodate Transit Alternative

The Two Express Lanes that Accommodate Transit Alternative recommends modifying the existing facility, incorporates several elements of the Draft EIS Build Alternatives and proposes, including additional system level improvements. The following summarizes the Two Express Lanes that Accommodate Transit Alternative in a manner that matches the alternative summaries in Section 7.0 of Appendix B, Alternatives Development Technical Report. The summary below also includes a discussion of elements that were proposed as part of the alternative but have been excluded for the purposes of alternative screening.

Figure 2 illustrates this alternative's mainline and interchange improvements. Bicycle, pedestrian, trail, and transit improvements for the Two Express Lanes that Accommodate Transit Alternative (from Figure 14 in Appendix B, Alternatives Development Technical Report) are also shown in Figure 2.

Figure 2. Two Express Lanes that Accommodate Transit Alternative


3.1 Mainline Improvements

- Converting the two existing general-purpose lanes in each direction to two managed Express Lanes in each direction along the same alignment. The Express Lanes would be managed with differential tolling that “would reduce congestion, keep freight trucks off residential streets, and prioritize transit.”
- Widening shoulders to meet standard requirements.
- Adding emergency turnouts and turnarounds.

- Adding one continuous auxiliary lane in each direction between the I-76 and Vasquez Boulevard on-ramps and off-ramps.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 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. Current statewide policy applies surcharges to vehicles with four or more axles using Express Lanes due to their additional pavement loading and operational impacts. While freight exemptions may be feasible, implementing a corridor-specific exemption would require the Colorado Transportation Investment Office (CTIO) to procure specialized tolling equipment and expand back-office processing capacity to administer and verify exemptions for a single facility. If freight exemptions were to ultimately be determined to be feasible and consistent with statewide policy, freight exemptions would be evaluated comprehensively across all Express Lane alternatives, following completion of the EIS, when tolling strategy details are refined rather than applied solely to the newly submitted alternative.

The Two Express Lanes that Accommodate Transit 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. This element has not been advanced for further consideration.

Finally, the Two Express Lanes that Accommodate Transit Alternative refers to complementary vehicle management technologies, including dynamic speed limits, advance queue warnings, and related/connected vehicle concepts. These features have not been evaluated as a discrete element of the Two Express Lanes that Accommodate Transit Alternative, because CDOT is separately considering Active Traffic Management (ATM) and potential connected vehicle technologies as part of ongoing design development for the Selected Alternative. As design progresses, a Systems Engineering Analysis (SEA) will be conducted to determine whether ATM or related technologies are warranted. Because this

¹ The auxiliary lane improvement was included in the alternative as described in the January 2026 Comment Letter but not in the December 2025 Comment Letter.

evaluation will occur after identification and selection of the Selected Alternative, these technologies do not influence alternative screening or selection under NEPA.

3.2 Interchange Improvements²

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

3.3 Bridge Improvements

- Reconstructing bridges that are at, or will be reaching, the end of their useful life (bridges carrying travel lanes on I-270 include widening to accommodate additional lanes, consistent with the corresponding Build Alternatives)³
 - Replacing the existing York Street bridge over I-270 to meet current bridge standards, accommodate an additional travel lane in each direction on York Street, include a 10-foot multi-use path and a 5-foot sidewalk, and enhance lighting.
 - Replacing the existing I-270 bridges over the South Platte River Trail to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on the South Platte River Trail, and enhance lighting.
 - Replacing the existing I-270 bridges over the Burlington Ditch to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting.
 - Replacing the existing I-270 bridges over Brighton Boulevard to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on Brighton Boulevard and future bicycle and pedestrian improvements by others, and enhance lighting.
 - Replacing the existing I-270 bridges over East 60th Avenue and the BNSF Railway (BNSF) crossing to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting.
 - Replacing the existing I-270 bridges over East 56th Avenue to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements, and enhance lighting.

² The January 2026 Comment letter notes that “The DEIS and Appendix B identify discrete geometric and operational deficiencies—including short weave and merge segments, deficient lane separation, closely spaced ramps, insufficient 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.”

³ The critical bridge replacements were included in the alternative as described in the December 2025 Comment Letter but not in the January 2026 Comment Letter.

3.4 Bicycle and Pedestrian Enhancements⁴

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

The Two Express Lanes that Accommodate Transit Alternative includes several suggestions for bicycle and pedestrian improvements, stating the alternative would include “increasing the number of pedestrian overpasses,” noting that these additional crossings “should be land bridges, which allow people, animals, and plants to cross.” These land bridges have been eliminated from further consideration as part of this alternative as (1) CDOT has an existing prioritized list for wildlife crossings and I-270 is not on that list, (2) CDOT does not allow people to use wildlife crossings, and (3) there is not an identified pattern of wildlife crashes indicating a need for a wildlife crossing.

3.5 Trail Enhancements⁵

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

⁴ Per the January 2026 Comment Letter, the alternative “would adopt the bike and pedestrian connectivity package common to the Build Alternatives.”

⁵ Per the January 2026 Comment Letter, the alternative “would adopt the bike and pedestrian connectivity package common to the Build Alternatives.”

- 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.

3.6 Transit Enhancements

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

The Two Express Lanes that Accommodate Transit Alternative proposes that CDOT works with RTD to develop and implement new or expanded transit routes along the corridor and support these services with mobility hubs, micro-transit and on-demand transit, shared micro-mobility options, enhanced bicycle and pedestrian infrastructure, and potential expansion of Bustang service from new mobility hubs near I-25 to Denver International Airport. In addition, the Two Express Lanes that Accommodate Transit Alternative recommends funding broader transit and multimodal projects in Adams County, including projects identified in Denver Regional Council of Governments' (DRCOG) plans that currently lack funding, and characterizes these investments as potential mitigation for the project.

Under NEPA, alternatives evaluated in the Draft EIS must be reasonably confined to improvements within the defined study area and within CDOT's and FHWA's jurisdiction. Transit service changes on local streets, regional route restructuring, and funding commitments for projects outside the corridor are not within CDOT's unilateral authority and therefore cannot be incorporated as elements of a Preferred Alternative. While CDOT coordinates with RTD on corridor design and transit operations, decisions regarding new routes, service levels, and regional funding allocations are made through RTD's independent planning and budgeting processes.

Separately, CDOT recognizes the community's interest in improved regional transit connectivity and has included additional transit elements as state community enhancement commitments. See State Environmental Reports on the project website (<https://www.codot.gov/projects/studies/i270study/deisandstatereports>).

The concept of new mobility hubs alongside I-270 was also reviewed during the alternatives development process. Constructing new mobility hubs on the corridor would require full property acquisition and potential displacements and introduce additional environmental impacts. Coordination with RTD indicated that projected transit demand along this segment does not support the need for new mobility hubs on I-270. Furthermore, RTD has indicated that adding stops to the Flatiron Flyer 5 (FF5) service is projected to reduce travel time competitiveness and overall attractiveness of the route, potentially decreasing ridership rather than improving it.

3.7 Additional Alternative Elements

The Two Express Lanes that Accommodate Transit Alternative also specifies several additional elements that do not align with the categories outlined in the Appendix B, Alternatives Development Technical Report, and have been summarized here.

The Two Express Lanes that Accommodate Transit Alternative includes a list of public health and safety improvements, specifying “(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.”

Air quality monitoring and mitigation measures are addressed in the Draft EIS and associated technical analyses. These actions are being implemented independent of the Two Express Lanes alternative and are not unique to that concept.

With respect to connectivity, the I-270 project includes numerous improvements designed to enhance access and mobility for all users. Proposed bridge reconstructions accommodate local multimodal plans; a new pedestrian overpass is included; the South Platte Trail is being reconfigured to improve safety and continuity; new Vasquez Boulevard underpasses and trail connections are incorporated; and improvements are planned at 56th Avenue and the Dahlia Trailhead to enhance access and connections. These improvements are part of the overall build alternatives framework and are not specific to the submitted alternative.

CDOT has also committed to additional enhancements as part of the State Environmental Reports. Refer to the project’s website to view the state’s community enhancement commitments included in the State Environmental Reports.

4.0 Alternatives Evaluation and Screening Results

As summarized in Section 8.0 of Appendix B, Alternatives Development Technical Report, the project conducted three levels of screening before preliminarily identifying the Preferred Alternative.

- Concept Screening to Evaluate Responsiveness to Purpose and Need (Level 1)
- Refinement and Qualitative Evaluation (Level 2)
- Detailed Quantitative Evaluation (EIS)

4.1 Level 1 Screening

As summarized in Section 8.1 of Appendix B, Alternatives Development Technical Report, the Level 1 Screening included an initial evaluation to determine whether the alternative has the potential for each alternative to be responsive to the project’s Purpose and Need.

Purpose and Need criterion determined which alternatives have the potential to address two or more needs that should be carried forward to Level 2 Screening. Alternatives determined to not have the potential to address at least two elements of the project’s Purpose and Need

were not retained for Level 2 Screening. Elements of alternatives that were not retained in Level 1 Screening were further evaluated to include in other alternatives for Level 2 Screening. Table 1 summarizes and highlights the results of Level 1 Screening.

Table 1. Level 1 Screening Results

Alternative	Responsive to Purpose and Need?	Retained?
No Action	N/A	Retained for comparison to build alternatives.
Bicycle, Pedestrian, and Transit Enhancements	Partial - Alternative partially addresses project needs	Eliminated as a standalone alternative. Does not adequately address safety, travel time and reliability, transit on the corridor, and freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.
Minimal Build	Pass - Alternative addresses the project needs	Retained
Three General-Purpose Lanes	Pass - Alternative addresses the project needs	Retained
Two General-Purpose Lanes and One Transit-Only Lane	Pass - Alternative addresses the project needs	Retained
Two General-Purpose Lanes and One Express Lane That Accommodates Transit	Pass - Alternative addresses the project needs	Retained
Three General-Purpose Lanes and One Express Lane That Accommodates Transit	Pass - Alternative addresses the project needs	Retained
Two General-Purpose Lanes and Two Express Lanes That Accommodate Transit	Pass - Alternative addresses the project needs	Retained
Two Express Lanes that Accommodate Transit Alternative	Pass - Alternative addresses the project needs	Retained

4.2 Level 2 Screening

As summarized in Section 8.2 of Appendix B, Alternatives Development Technical Report, Level 2 Screening included a comparative analysis of alternatives to identify the alternatives that best meet the purpose and need and meet the project goal to minimize environmental and community impacts resulting from the project. Table 8 summarizes the results of the Level 2 Screening, and the subsequent sections provide additional information about the comparative analysis of the alternatives for each screening criterion.

4.2.1 Traveler Safety on the Corridor

Additional information on the Level 2 safety screening is in Section 8.2.1 of Appendix B, Alternatives Development Technical Report. Each alternative was assigned a ranking of low, moderate, or high based on its expected safety performance:

- **High** - Alternatives with six lanes received a high ranking due to the projected ability to balance the need to accommodate additional traffic and the introduction of new conflict points.
- **Moderate** - Alternatives with eight lanes received a moderate ranking as eight-lane facilities are typically designed for traffic volumes of 150,000 vehicles or more per day. The eight-lane facilities introduce the greatest number of new conflict points, increasing the potential for crashes while adding additional capacity that exceeds projected demand.
- **Low** - Alternatives retaining the existing four-lane configuration received a low ranking because four-lane alternatives cannot adequately handle the projected traffic volumes, leading to higher congestion and crash rates, particularly as traffic exceeds the capacity.

Screening criteria were developed to compare alternatives based on differences in corridor configuration, recognizing that many foundational safety improvements (such as auxiliary lanes, upgraded shoulders, and standard acceleration and deceleration lanes) are common across all build alternatives, including the Two Express Lanes that Accommodate Transit Alternative. Accordingly, safety criterion focused on elements that differ between alternatives, specifically the number and type of through lanes and the ability of each alternative to address congestion-related crashes on the I-270 corridor.

The screening framework did not explicitly contemplate an alternative (like the Two Express Lanes that Accommodate Transit Alternative) that converts existing general-purpose lanes to Express Lanes without increasing total lane count. Under the Two Express Lanes that Accommodate Transit Alternative, the proposed tolling strategy is intended to manage demand and reduce congestion on the corridor without adding new lanes. The “moderate” safety rating reflects the potential for managed lane operations to reduce congestion-related crashes on I-270 itself by smoothing traffic flow, while acknowledging that the evaluation was limited to safety conditions on the corridor. Table 2 summarizes and highlights the results of Level 2 Screening.

Table 2. Level 2 Screening Results

Alternative	Travel Safety (Reduce crashes)	Travel Time and Reliability (Improve travel time and reliability)	Transit on the Corridor (Improve transit speed)	Bicycle and Pedestrian Connectivity (Increase connectivity across I-270)	Freight Operations (Improve freight operations)	Natural and Human Environment (Minimize environmental and community impacts)	Recommendations
No Action	Low	Low	Low	Low	Low	High	Retained for comparison to build alternatives
Minimal Build	Low	Low	Low	Moderate	Low	High	Eliminated
Three General-Purpose Lanes	High	High	Moderate	Moderate	High	Moderate	Retained
Two General-Purpose Lanes and One Transit-Only Lane	Low	Low	High	Moderate	Low	Moderate	Eliminated
Two General-Purpose Lanes and One Express Lane That Accommodates Transit	High	High	High	Moderate	Moderate	Moderate	Retained
Three General-Purpose Lanes and One Express Lane That Accommodates Transit	Moderate	Moderate	High	Moderate	High	Low	Eliminated
Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit	Moderate	Moderate	High	Moderate	Moderate	Low	Eliminated
Two Express Lanes that Accommodate Transit	Moderate	Moderate	High	Moderate	Low	Moderate	Eliminated

However, this alternative cannot be assessed in isolation from its broader system effects. The report that was submitted as part of the comment describes a strategy of policy-based tolling designed to achieve a volume reduction of at least 25 percent to avoid adding roadway capacity. While reduced volumes on I-270 may improve operations within the corridor, diverting a substantial share of traffic would be expected to shift demand to parallel highways and local streets that are not designed to accommodate that additional traffic. This could increase congestion and crash exposure on the surrounding transportation network. When these secondary effects are considered, the alternative does not clearly achieve the intended balance among capacity, safety, and systemwide performance that the criterion was intended to evaluate.

In addition, converting the existing general-purpose lanes to Express Lanes would substantially alter the operational transitions at both ends of the corridor, potentially introducing new bottlenecks and congestion at connections to adjacent facilities.

For these reasons, the alternative received a “moderate” score: it demonstrates greater potential to reduce congestion-related crashes on the I-270 corridor than the No Action or Minimal Build Alternatives, but it does not perform as strongly as the Two General-Purpose Lanes and One Express Lane that Accommodates Transit or the Three General-Purpose Lanes Alternative, which more effectively balance corridor traffic flow, interchange operations, and broader system safety considerations without the same potential for secondary negative impacts.

4.2.2 Travel Time and Reliability on the Corridor

The Travel Time and Reliability on the Corridor criterion relied on high-level operational analyses using deterministic traffic modeling to provide a comparison of expected peak hour travel times between alternatives on the corridor (see Section 8.2.2 of Appendix B, Alternatives Development Technical Report).

Overall, the preliminary analysis showed that more lanes do not automatically translate to faster travel times. In fact, the impact of travel time and reliability depends on how well the added capacity aligns with overall traffic flow, especially at merging points. Projected travel time savings and opportunities to provide a more reliable corridor travel time resulted in a high, moderate, or low rank for each alternative (as reflected in Section 8.2.2 of Appendix B, Alternatives Development Technical Report):

- **High** - Six-lane alternatives (three lanes in each direction) that add capacity through either an Express Lane or an additional general-purpose lane that best matches capacity flow into and out of the corridor to adjacent facilities and showed the greatest potential to improve both travel time and reliability, earning a high ranking.
- **Moderate** - Eight-lane alternatives (four lanes in each direction) provide more capacity than the merging points at the ends of the corridor can handle, creating new bottlenecks. This added congestion reduced reliability and travel time savings and resulted in a moderate ranking for these alternatives.
- **Low** - Four-lane alternatives (two lanes in each direction) do not adequately address congestion, leading to longer travel times and low reliability, which resulted in a low ranking.

Using the travel time and reliability screening framework summarized from Section 8.2.2 of Appendix B, Alternatives Development Technical Report, the Two Express Lanes that Accommodate Transit Alternative would most reasonably receive a low score. However, the high-level operational modeling indicated that the conversion of the existing general-purpose lanes to Express Lanes would be expected to improve travel time and reliability for users able to access the Express Lanes.

The Two Express Lanes that Accommodate Transit Alternative received a “moderate” score for travel time and reliability in the Level 2 screening because, while Express Lane operations (as described in the submittal) could improve travel time reliability within the I-270 corridor for users who remain on the facility, the alternative does not add overall capacity and relies on targeted volume reductions to achieve travel time and reliability gains.

Converting existing general-purpose lanes to Express Lanes would create more predictable travel conditions for users who choose or are able to use the Express Lanes. However, the stated strategy of reducing corridor volumes through tolling implies that a portion of current or future corridor users (who would otherwise use I-270 under the No Action Alternative) would be diverted to other regional facilities or local streets. For those users, the alternative does not provide a reliable trip on the corridor itself but instead shifts their travel to other parts of the network where reliability outcomes are uncertain.

In addition, operational transitions at the corridor termini could introduce new bottlenecks that affect reliability approaching and departing the corridor. As a result, the Two Express Lanes that Accommodate Transit Alternative demonstrates improvements relative to No Action for certain users who remain on I-270, but does not provide corridor-wide reliability benefits comparable to the Two General-Purpose Lanes and One Express Lane that Accommodates Transit and the Three General-Purpose Lanes Alternative, which improves travel time reliability while maintaining broader access for non-tolled users to the corridor.

4.2.3 Transit on the Corridor

In Section 8.2.3 of Appendix B, Alternatives Development Technical Report, the ability for different alternatives to provide capacity enhancements that benefit transit operations, reliability, and travel times resulted in a high, moderate, or low ranking for each alternative:

- High - Alternatives that provide transit lanes or Express Lanes that can be used by transit vehicles will improve transit operations (e.g., travel time and reliability) beyond general-purpose lane operations and rank high.
- Moderate - Alternatives that provide additional general-purpose lane capacity are expected to improve transit operations equivalent to general-purpose operations, but do not provide the same level of continuous reliability that a dedicated transit lane or Express Lane, received a moderate ranking.
- Low - Alternatives that do not add any capacity or transit-specific improvements were ranked low, as they fail to address the existing congestion and unreliable travel times, offering no significant benefit to transit operations.

The Two Express Lanes that Accommodate Transit Alternative would receive a “high” score for providing Express Lanes that can be used by transit vehicles.

4.2.4 Bicycle and Pedestrian Connectivity Across I-270

Section 8.2.4 of Appendix B, Alternatives Development Technical Report, outlines the following criteria for evaluating the bicycle and pedestrian connectivity across the corridor.

- High - No alternatives ranked high because not every considered bicycle and pedestrian improvement that stakeholders recommended was included in the alternatives.
- Moderate - Alternatives that provide new and improved bicycle and pedestrian crossings of I-270 rank moderate.
- Low - Alternatives that do not improve bicycle and pedestrian crossings and do not add new crossings rank low.

The Two Express Lanes that Accommodate Transit Alternative would receive a “moderate” score in Level 2 screening for bicycle and pedestrian connectivity because it incorporates the same bridge reconstructions, trail improvements, and multimodal accommodations that are common to all build alternatives, but does not introduce additional corridor-specific crossings or connectivity enhancements beyond those already included in the project baseline. Reconstructed overpasses would accommodate local multimodal plans, and improvements such as underpasses, trail reconfigurations, and enhanced connections at key locations would improve safety and continuity across the corridor.

The alternative submittal also referenced additional concepts, such as wildlife or “land bridge” crossings, and other expanded connectivity elements. These concepts were not advanced for further consideration because they would require substantial additional right-of-way (ROW), introduce substantial cost and environmental impacts, and are not supported by identified wildlife movement data or crash patterns indicating a corridor-specific need for such infrastructure. In addition, these elements extend beyond the transportation purpose and need defined for the project. As a result, while the alternative improves connectivity relative to No Action through reconstruction and modernization of existing crossings, it does not materially exceed the connectivity benefits of the Two General-Purpose Lanes and One Express Lane that Accommodates Transit and the Three General-Purpose Lanes Alternative, warranting a “moderate” rating in this category.

4.2.5 Freight Operations on the Corridor

Section 8.2.5 of Appendix B, Alternatives Development Technical Report, outlines the following criteria for evaluating the freight operations on the corridor. The degree to which alternatives improve freight operations and safety was closely tied to the capacity improvements included in each option. The ability for different alternatives to provide capacity enhancements that benefit freight operations, reliability, and safety resulted in a high, moderate, or low ranking for each alternative:

- High - Alternatives that provide additional general-purpose lanes offer the greatest benefit to freight operations, as they enhance overall capacity, reduce congestion, and allow for more efficient movement of goods, earning these alternatives a high ranking for the freight operations criterion.
- Moderate - Alternatives that include Express Lanes provide moderate improvements to freight operations. These moderate-ranked alternatives offer some relief to congestion

due to the Express Lanes attracting passenger vehicles out of general-purpose lanes, but do not fully address the needs of freight vehicles.

- Low - Alternatives that do not add capacity are ranked low because they fail to address existing congestion, leaving freight operators to navigate the same delays and safety risks they currently face.

The Two Express Lanes that Accommodate Transit Alternative would receive a “low” score in Level 2 screening for freight operations because it does not add capacity to support regional freight demand and relies on tolling to manage corridor volumes rather than improving physical throughput. As evaluated, freight toll exemptions have been excluded from consideration (as discussed above).

Because I-270 serves as a designated hazardous materials route, an oversized and overweight load route, a nuclear route, and part of the Strategic Highway Network (STRAHNET), freight movements on this corridor often have limited or no viable alternative routes. Without additional capacity, the conversion of existing general-purpose lanes to Express Lanes could increase operating costs and introduce reliability risks for essential freight movements without providing proportional operational benefits. Accordingly, the Two Express Lanes that Accommodate Transit Alternative does not demonstrate a clear improvement in freight performance relative to the Two General-Purpose Lanes and One Express Lane that Accommodates Transit and the Three General-Purpose Lanes Alternative and warrants a “low” rating for this criterion.

4.2.6 Project Goal - Minimize Environmental Impacts

Section 8.2.6 of Appendix B, Alternatives Development Technical Report, outlines the following criteria for evaluating the project goal of minimizing environmental impacts. Alternatives were given a high, moderate, or low ranking based on the potential to impact the surrounding environment:

- High: Alternatives with the narrowest footprint (not including widening associated with new lanes) are expected to have the least potential to disturb the surrounding environment and were given a high ranking for environmental impact, as they are more likely to minimize disruption to both natural habitats and human communities.
- Moderate - Alternatives that add one lane may involve some encroachment but are less likely to result in significant environmental harm, received a moderate ranking.
- Low - Alternatives with the widest footprint have the greatest risk of environmental and community impacts due to potential ROW expansion and disruption to adjacent areas.

The Two Express Lanes that Accommodate Transit Alternative would most reasonably receive a “moderate” score for the project goal. While the alternative does not add new travel lanes for the length of the corridor, it does include the continuous acceleration/deceleration lanes. The two alternatives that received a “high” ranking did not include any additional lanes for any portion of the corridor: the No Action and the Minimal Build. However, it would be expected to have a lower potential for ROW acquisition, habitat disturbance, and community disruption compared to alternatives that add one or more lanes for the entire length of the corridor. While localized impacts could still occur where interchange improvements are required, the overall corridor footprint would be narrower than full lane adding alternatives.

4.3 Screening Summary for Two Express Lanes that Accommodate Transit

The Two Express Lanes that Accommodate Transit Alternative scored high on the potential to improve transit speed.

Additionally, the alternative received a moderate score for the potential to impact the natural and human environment due to the smaller footprint than alternatives that added new lanes for the full corridor, but a larger footprint than the No Action and Minimal Build, due to including continuous acceleration/deceleration lanes.

The alternative would improve traveler safety relative to the No Action Alternative by addressing substandard shoulders, ramps, and pavement conditions. However, because no additional capacity is provided, congestion-related safety issues associated with high future demand would remain, and the alternative received a moderate ranking.

The alternative would provide improved travel time reliability for users able to access the Express Lanes through managed operations and pricing. However, the diversion effects of the Express Lane tolls would reduce overall travel time savings and reliability for the corridor, particularly for users unable to access the Express Lanes and the impacts to the surrounding network resulted in this Alternative receiving a moderate ranking.

The Two Express Lanes that Accommodate Transit Alternative received a moderate score for bicycle and pedestrian connectivity because it retained the same cross-corridor improvements included in the build alternatives. Additional elements identified in the submission were determined to be either already addressed in the community enhancements or outside the scope and jurisdiction of the project.

The Two Express Lanes that Accommodate Transit Alternative received a low ranking for freight operations because it does not add physical capacity to accommodate existing and projected freight volumes and instead relies on tolling to manage demand. Freight toll exemptions were not considered as part of the evaluation because such exemptions would be inconsistent with current statewide Express Lane policies.

Table 3 provides a summary of the screening results.

Table 3. Summary of Screening Results

Alternative	Traveler Safety on the Corridor (Reduce crashes)	Travel Time and Reliability (Improve travel time and reliability)	Transit on the Corridor (Improve transit speed)	Bicycle and Pedestrian Connectivity (Increase connectivity across I-270)	Freight Operations (Improve freight operations)	Environmental and Community Impact (Have potential to meet the project goal)	Recommended for Detailed Evaluation in the EIS
No Action	Low	Low	Low	Low	Low	High	Yes
Bicycle, Pedestrian, and Transit Enhancements	N/A ¹	N/A ¹	N/A ¹	N/A ¹	N/A ¹	N/A ¹	No
Minimal Build	Low	Low	Low	Moderate	Low	High	No
Three General-Purpose Lanes	High	High	Moderate	Moderate	High	Moderate	Yes
Two General-Purpose Lanes and One Transit-Only Lane	Low	Low	High	Moderate	Low	Moderate	No
Two General-Purpose Lanes and One Express Lane that Accommodates Transit	High	High	High	Moderate	Moderate	Moderate	Yes
Three General-Purpose Lanes and One Express Lane that Accommodates Transit	Moderate	Moderate	High	Moderate	High	Low	No
Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit	Moderate	Moderate	High	Moderate	Moderate	Low	No
Two Express Lanes that Accommodate Transit	Moderate	Moderate	High	Moderate	Low	Moderate	No

¹Not included in Level 2 screening. Set aside as a standalone alternative in the Level 1 screening because it does not have the potential to meet the project's Purpose and Need. Elements of this alternative will be evaluated to include in the other build alternatives.

5.0 Other Considerations

In addition to the screening criteria applied during Level 1 and Level 2 evaluation, the Two Express Lanes that Accommodate Transit Alternative is subject to several implementation, legal, and programmatic constraints that were not explicitly captured in the original screening framework. These constraints were not evaluated for other alternatives because they did not apply to the alternatives advanced earlier in the EIS process. Attachment A, Supplemental Memorandum on Express Lane Planning and Tolling Considerations, provides additional background regarding Colorado's Express Lane system, statewide and regional managed lane planning efforts, applicable federal tolling authorities, and the relationship between those frameworks and the alternatives evaluated in the I-270 Corridor Improvements EIS.

5.1 State Considerations

Implementation of the Two Express Lanes that Accommodate Transit Alternative also raises state statutory and institutional considerations. Under Colorado Revised Statutes, the CTIO was established to improve capacity, accessibility, and transportation choice through the development and operation of toll facilities. Converting existing general-purpose Interstate lanes to tolled operations would require evaluation of consistency with CTIO's statutory purpose, existing tolling authorities, and requirements related to financing, rate setting, bonding, and eligible uses of toll revenues.

As previously noted, statewide toll operations are intended to function as an integrated system. Accordingly, implementation of the Two Express Lanes that Accommodate Transit Alternative would involve considerations beyond the scope of the NEPA process and could necessitate additional state-level approvals before it could be advanced.

5.2 Federal Tolling Pilot Programs

As submitted, the Two Express Lanes that Accommodate Transit Alternative proposes converting all existing general-purpose lanes on I-270 into tolled lanes without adding capacity. Standard interstate tolling authority under 23 United States Code (USC) 129 does not allow conversion of existing toll-free Interstate lanes to a fully tolled facility. Implementation of the Two Express Lanes That Accommodate Transit Alternative would require federal authorization to toll existing general-purpose lanes on the interstate system. The alternative submission references the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP) as potential mechanisms.

ISRRPP allows a limited number of states to toll existing interstate facilities for the purpose of reconstruction or rehabilitation, subject to strict eligibility criteria and FHWA's approval. The program is capped at a small number of pilot slots nationwide, and participation is discretionary. Acceptance into the program is not guaranteed and would require a separate federal application and approval process.

VPPP allows states to implement value pricing strategies to manage congestion, but it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent

toll lanes without meeting federal requirements. Use of the VPPP would also require FHWA approval and compliance with federal tolling policies.

FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale reconstruction of interstate facilities, and VPPP is generally applied in urban contexts to test congestion pricing strategies. A VPPP proposal would need to demonstrate consistency with the region's long-range transportation plan and would need to address broader interstate segments and system-level reconstruction needs rather than a single 6.5-mile urban corridor.

In addition, the allowable uses of toll revenues under either federal pilot program are more restrictive than under Colorado's existing tolling authority. Federal programs generally limit revenue use to facility reconstruction, debt service, and certain eligible improvements, whereas Colorado's toll program allows broader reinvestment within the corridor and related system improvements.

Neither pilot program is available for implementation through the I-270 NEPA process alone and, ultimately, the Selected Alternative would not preclude CDOT and regional partners from pursuing a broader, regionally coordinated tolling pilot under VPPP in the future through the appropriate federal and metropolitan planning processes.

5.2.1 Preliminary Regional Planning Implications

Consistent with the requirements of VPPP and in coordination with the modeling conducted for the alternatives evaluated in the Draft EIS, the project team consulted with DRCOG (the metropolitan planning organization [MPO] for the region) to assess potential regional planning implications of the Two Express Lanes that Accommodate Transit Alternative.

In accordance with 23 USC 135(f)(1), which requires states to develop long-range, multimodal transportation plans with a minimum 20-year planning horizon, and 23 Code of Federal Regulations (CFR) Part 450 Subparts B and C, which require that metropolitan transportation planning include a 20-year forecast for NEPA, the project team conducted a high-level regional analysis of the Two Express Lanes that Accommodate Transit Alternative. This analysis converted the existing general-purpose lanes on I-270 to Express Lanes, consistent with Express Lane operations elsewhere in Colorado, to evaluate potential system-level effects.

The results indicated that the Two Express Lanes that Accommodate Transit Alternative would redistribute traffic from I-270 to other interstate facilities and to the adjacent local roadway network, demonstrating measurable regional system impacts that warrant consideration within the context of the region's long-range transportation planning framework.

6.0 Conclusion

Level 2 screening results show that the Two Express Lanes that Accommodate Transit Alternative is not expected to have a reasonable potential to outperform the preliminary preferred alternative of Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative or the Three General-Purpose Lanes Alternative for meeting the purpose and need on the corridor. Based on these results, the Two Express Lanes

that Accommodate Transit Alternative was eliminated from detailed analysis. While not advanced for detailed analysis, the identification and selection of a Selected Alternative in this Final EIS/Record of Decision would not preclude pursuit of a regionally coordinated tolling pilot application under VPPP in the future through the appropriate federal and metropolitan planning processes.

Consistent with this analysis, there are no proposed changes to the findings of Appendix B, Alternatives Development Technical Report, and the alternatives retained for detailed analysis:

- No Action Alternative - Retained for comparison to Build Alternatives
- Three General-Purpose Lanes
- Two General-Purpose Lanes and One Express Lane that Accommodates Transit

Accordingly, the Two Express Lanes that Accommodate Transit Alternative is added to the list of alternatives that were eliminated in the Level 2 Screening from further consideration:

- Minimal Build
- Two General-Purpose Lanes and One Transit-Only Lane
- Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit
- Three General-Purpose Lanes and One Express Lane that Accommodates Transit
- Two Express Lanes that Accommodate Transit

7.0 References

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Attachment A. Supplemental Memorandum on Express Lane Planning and Tolling Considerations

Technical Memorandum

To: I-270 Project Team
From: Rachel S. Ackermann, PE, Felsburg Holt & Ullevig
Subject: 25611 I-270 Environmental Impact Statement - Supplemental Memorandum on Express Lane Planning and Tolling Considerations
Date: May 20, 2026

Introduction

The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) are evaluating improvements to 6.5 miles of Interstate 270 (I-270). The purpose of the evaluation is to evaluate transportation improvements that address the identified I-270 corridor needs related to safety; travel time and reliability; freight operations; transit operations; and bicycle, pedestrian, and transit connectivity across the corridor.

This memorandum supplements the Two Express Lanes that Accommodate Transit Alternative Technical Report prepared as part of the I-270 Corridor Improvements Final Environmental Impact Statement (EIS).

The EIS evaluated a reasonable range of alternatives that included safety improvements, bicycle and pedestrian improvements, and various combinations of general-purpose lanes, Express Lanes, and transit-supportive facilities. The Express Lanes alternatives evaluated in the Draft EIS were developed within Colorado's existing Express Lane implementation framework, which generally involves adding Express Lane capacity while maintaining adjacent toll-free general-purpose lanes. The Two Express Lanes that Accommodate Transit Alternative, as submitted, introduces a materially different operational and policy approach involving the conversion of existing interstate general-purpose lanes to tolled operations without adding capacity. As a result, the alternative raises additional regional planning, federal statutory, operational, and policy considerations beyond those associated with the alternatives advanced for detailed study in the EIS.

This memorandum is intended to supplement the screening analysis documented in the Two Express Lanes that Accommodate Transit Alternative Technical Report by providing the broader statewide planning, tolling, and policy context within which the submitted alternative would need to be considered.

Colorado Express Lane System & Planning Framework

Colorado's Express Lane system evolved through a combination of statewide transportation policies, regional transportation planning, corridor studies, and implementation by CDOT and the Colorado Transportation Investment Office (CTIO), formerly the High-Performance Transportation Enterprise. The statewide Express Lane program was developed in response to increasing urban congestion, limited transportation funding availability, and a growing

interest in managed lane strategies capable of improving corridor reliability, supporting transit operations, and maximizing the efficiency of existing transportation infrastructure.

Colorado's earliest managed lane facilities were initially developed as high-occupancy vehicle (HOV) or reversible transit-supportive facilities rather than fully tolled facilities. Over time, several of these facilities were converted to High Occupancy Toll (HOT) or Express Lane operations that preserved preferential access for transit and qualifying carpools while allowing dynamically priced access for toll-paying vehicles, while maintaining adjacent toll-free general-purpose lanes. Subsequent Express Lane projects expanded this approach through corridor reconstruction and capacity addition projects, including United States Highway 36 (US 36), Colorado 470 between Interstate 25 (I-25) and Wadsworth Boulevard, I-25 between downtown Denver and US 36, I-25 between US 36 and E-470/Northwest Parkway, I-25 between Berthoud and Fort Collins, I-25 from Castle Rock to Monument, and Interstate 70 (I-70) between I-25 and Chambers Road. There is also an Express Lane on I-70 in the mountains between Idaho Springs and Empire (also known as the I-70 Mountain Express Lanes) that operates only during peak travel times, which are on weekends and holidays. This implementation framework is consistent with Colorado's broader transportation policy objectives emphasizing operational reliability, bicycle and pedestrian connectivity, and preserving traveler choice.

In 2020, CDOT developed the Express Lanes Master Plan (ELMP), which evaluated potential Express Lane corridors throughout the state and identified corridors that could support future Express Lane study and development and long-range statewide planning. The ELMP evaluated corridors based on mobility performance, financial feasibility, system connectivity, bicycle and pedestrian facility integration, and operational considerations. The ELMP identified I-270 as a Tier 1 priority corridor and ranked the corridor highly based on projected mobility benefits, regional connectivity, and financial performance. The ELMP specifically recognized the importance of I-270 as a regional connector within the broader Denver metropolitan transportation network and identified the corridor as supportive of a more integrated regional Express Lane system.

Accordingly, the alternatives advanced through the I-270 EIS process (including the Selected Alternative) have included alternatives that are generally consistent with the statewide Express Lane implementation framework found in the ELMP.

Federal Tolling & Managed Lane Framework

Colorado's Express Lane system has largely been implemented pursuant to the tolling and HOT lane authorities under 23 United States Code Sections 129 and 166, respectively.

Section 129 establishes the primary federal authority governing tolling on Federal-aid highways and generally allows tolling associated with newly constructed facilities, added highway capacity, and certain reconstructed facilities. For interstate highways, Section 129 generally permits tolling where new capacity is added while maintaining the number of toll-free (general-purpose) lanes available to travelers.

Section 166 establishes the federal operational framework governing HOV and HOT lane facilities. Under Section 166, public agencies may permit toll-paying vehicles to use HOV

facilities under specified operational conditions while maintaining occupancy requirements and performance standards. Colorado's Express Lane system frequently incorporates HOT lane operations that provide preferential access for transit vehicles and qualifying carpools (generally vehicles with three or more people) while allowing priced access for other users.

Together, Sections 129 and 166 form the primary federal statutory framework under which Colorado's existing Express Lane system has been implemented. Most Colorado Express Lane projects involved adding Express Lane capacity while preserving adjacent toll-free general-purpose lanes and integrating bicycle and pedestrian transportation improvements.

The Two Express Lanes that Accommodate Transit Alternative, as submitted, differs from this implementation framework because it proposes the conversion of existing interstate general-purpose lanes to tolled operation without adding capacity. Concepts involving the conversion of existing interstate general-purpose lanes to toll operations may be eligible for and considered under separate federal tolling pilot programs, including the Value Pricing Pilot Program (VPPP) or Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP), each of which involves separate statutory eligibility requirements, regional planning considerations, and FHWA approval processes.

VPPP was established to evaluate congestion pricing strategies and innovative pricing concepts. FHWA guidance indicates that the program is generally intended for pricing concepts that cannot otherwise be accommodated under the mainstream tolling authorities contained in Sections 129 and 166. ISRRPP allows a limited number of states to toll existing interstate facilities for reconstruction or rehabilitation purposes, where traditional funding sources are insufficient.

Participation in either program would require separate federal review and approval processes, independent of the current EIS.

Importantly, FHWA's role as the lead federal agency under the National Environmental Policy Act (NEPA) is separate from federal tolling approval authorities. Advancement of an alternative through the EIS process does not independently authorize tolling of interstate facilities or supersede statutory requirements associated with federal tolling programs.

Relationship to the Evaluation of I-270 Corridor Improvements under the EIS

The I-270 EIS was developed to evaluate transportation alternatives intended to address identified corridor needs related to safety, travel time reliability, freight mobility, bicycle and pedestrian connectivity, and infrastructure condition. Consistent with that purpose, the EIS evaluated a reasonable range of alternatives involving different combinations of general-purpose lanes, Express Lanes, transit-supportive facilities, and bicycle and pedestrian improvements. The alternatives development and screening process evaluated these concepts using corridor-focused screening criteria addressing transportation performance, environmental impacts, constructability, and consistency with regional transportation planning assumptions.

The EIS is the appropriate venue for evaluating potential corridor improvements involving additional travel lanes, adding Express Lanes, interchange modifications, bicycle and pedestrian improvements, and related operational strategies because it allows these alternatives to be evaluated comprehensively against the project's Purpose and Need, environmental impacts, operational performance, constructability, and policy consistency. The alternatives retained for detailed evaluation in the EIS were developed within the context of Colorado's existing Express Lane implementation framework and the assumptions reflected in regional transportation plans and statewide Express Lane planning efforts.

Different from the alternatives advanced for detailed evaluation in the EIS, the Two Express Lanes that Accommodate Transit Alternative relies on systemwide pricing and demand-management assumptions intended to reduce corridor traffic volumes without adding capacity. As a result, the alternative introduces broader regional operational, policy, and network considerations that extend beyond the corridor-focused screening framework developed for the EIS alternatives.

As documented in the Technical Report, the preliminary regional analysis conducted in coordination with the Denver Regional Council of Governments (DRCOG) indicated the conversion of existing general-purpose lanes to tolled operations would redistribute traffic from I-270 to other interstate facilities and adjacent local roadways. These regional system effects differ materially from operational assumptions associated with the alternatives advanced in the EIS, which generally focused on accommodating existing and forecasted corridor demand through infrastructure and operational improvements within the corridor itself.

In addition, concepts involving the conversion of existing interstate general-purpose lanes to toll operations introduce broader policy considerations related to tolling authority, pricing structures, operational enforcement, regional equity, statewide system consistency, and long-range transportation planning. These considerations extend beyond the project-specific alternatives framework developed for the EIS.

The EIS does not prohibit or preclude future consideration of alternative pricing or Express Lane concepts for the corridor. However, advancement of concepts involving the conversion of existing interstate general-purpose lanes to Express Lanes would require additional regional planning, policy development, operational analysis, stakeholder coordination, and federal approval processes beyond the scope of the EIS.

Future consideration of such concepts could occur through several potential mechanisms, including future updates to the ELMP, DRCOG Regional Transportation Plan processes, statewide transportation planning efforts, CTIO's policy development processes, future corridor planning studies, or separate NEPA and federal tolling approval processes, if pursued by sponsoring agencies or regional partners.

A conversion would also require substantial stakeholder engagement and regional coordination beyond the corridor-focused outreach conducted for the EIS. As noted in VPPP eligibility, conversion concepts have the potential to affect regional travel behavior, corridor pricing structures, transit operations, freight routing, and adjacent local roadway networks.

The stakeholder engagement framework used during development of the ELMP provides one example of how agencies could conduct this type of regional coordination. During development of the ELMP, CDOT and its partners engaged local jurisdictions, regional transportation agencies, metropolitan planning organizations, transit providers, corridor stakeholders, and members of the public to evaluate corridor priorities, operational assumptions, bicycle and pedestrian facility integration opportunities, and systemwide mobility objectives. Similarly, future DRCOG Regional Transportation Plan updates, Metro Vision planning processes, CTIO's policy development efforts, or future corridor planning studies could similarly provide forums for agencies and stakeholders to evaluate pricing strategies, operational policies, tolling structures, exemption categories, equity considerations, and regional transportation system impacts associated with alternative Express Lane concepts.

Lastly, the EIS evaluates corridor-level transportation alternatives, but does not establish detailed tolling structures, pricing methodologies, exemption categories, or operational tolling policies for potential Express Lane facilities. Instead, the EIS evaluates the transportation, environmental, operational, and bicycle and pedestrian connectivity of alternatives at a planning level sufficient to support NEPA decision-making. If an Express Lane alternative is ultimately selected, CDOT and CTIO would subsequently conduct more detailed corridor-specific analyses to establish the operational framework for the facility, including tolling policies, pricing assumptions, enforcement approaches, and revenue projections.

Following completion of the EIS, agencies would conduct a detailed Tolling and Revenue Study to support project development, financial planning, and operational implementation. That process would evaluate corridor travel demand, traffic operations, projected toll revenues, pricing strategies, enforcement considerations, toll exemption policies, traffic diversion effects, operational performance targets, and financial feasibility. Agencies would also coordinate with regional partners, transit providers, local jurisdictions, and stakeholders to refine operational assumptions and ensure consistency with statewide Express Lane policies, regional transportation planning objectives, and applicable federal and state requirements. Assumptions related to transit access and HOV exemptions are generally reasonable to evaluate at the EIS stage because those operational approaches are already incorporated into the broader existing Express Lane policy framework used throughout the Denver metropolitan area. As a result, detailed tolling structures and pricing schemes are generally developed during subsequent project development and implementation phases rather than during the corridor-level EIS process.

Conclusion

Colorado's Express Lane system reflects a long-term statewide and regional transportation strategy implemented primarily through the addition of Express Lane capacity while preserving adjacent toll-free general-purpose lanes. The statewide Express Lane implementation framework evaluated through the ELMP and reflected in Colorado's existing Express Lane system provided important context for the development and evaluation of alternatives within the I-270 EIS.

Consistent with the project's Purpose and Need, the I-270 EIS evaluated a reasonable range of corridor improvement alternatives involving different combinations of general-purpose lanes, Express Lanes, transit-supportive facilities, and bicycle and pedestrian improvements. The alternatives advanced for detailed study were developed within the context of Colorado's existing Express Lane implementation framework and applicable regional transportation planning assumptions.

The Two Express Lanes that Accommodate Transit Alternative, as submitted, introduces a materially different operational and policy framework involving the conversion of existing interstate general-purpose lanes to tolled operation without adding capacity. As a result, the alternative raises additional regional planning, federal statutory, operational, and policy considerations beyond those associated with the alternatives advanced for detailed evaluation in the EIS.

Accordingly, the Two Express Lanes that Accommodate Transit Alternative was not advanced for detailed evaluation in the current EIS. The EIS does not preclude future regional or federal consideration of alternative pricing or Express Lane concepts for the corridor through the appropriate planning, policy, and environmental review processes.