



I-270 Corridor Improvements Project - State Environmental Reports Responses to Substantive Comments

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Acronyms and Abbreviations

Acronym	Definition
APCD	Air Pollution Control Division
CCR	Code of Colorado Regulations
CDOT	Colorado Department of Transportation
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CRS	Colorado Revised Statutes
DRCOG	Denver Regional Council of Governments
EIS	Environmental Impact Statement
EO	Executive Order
EPA	United States Environmental Protection Agency
FHWA	Federal Highway Administration
GHG	greenhouse gas
HOV	high occupancy vehicle
I-270	Interstate 270
MOVES	Motor Vehicle Emissions Simulator
MPO	metropolitan planning organization
MSAT	mobile source air toxic
NAAG	Noise Analysis and Abatement Guidelines
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NOx	oxides of nitrogen
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
project	I-270 Corridor Improvements Project
SB	Senate Bill
State Reports	State Environmental Technical Reports
VOC	volatile organic compound

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1.0 Public and Agency Involvement

Over the course of the development of the I-270 Corridor Improvements Project (project), CDOT conducted extensive coordination with federal, state, local, and Tribal agencies and engaged corridor communities through a broad range of outreach activities. CDOT held or attended more than 200 outreach events, such as fairs, festivals, community office hours, stakeholder workshops, and bilingual liaison activities, to maintain ongoing two-way communication with residents, businesses, and corridor users. Additional details are provided in Chapter 6 and Appendix F of the Draft Environmental Impact Statement (EIS) (Federal Highway Administration [FHWA] and CDOT 2025).

1.1 Influence of Stakeholder Engagement on Project Development

Community members, organizations, and agencies have submitted thousands of comments throughout the National Environmental Policy Act (NEPA) process reflecting a wide diversity of perspectives. All comments received have been reviewed by project team members, incorporated into the project as appropriate, and are part of the project file. These comments addressed all aspects of the Draft EIS and the three State Environmental Technical Reports (State Reports): the Air Quality Technical Report, the Greenhouse Gas Technical Report, and the State Community Analysis Technical Report. Comments on the EIS addressed the project's Purpose and Need, the range of reasonable alternatives, and environmental concerns and analytical approaches. Comments on the State Reports focused on air quality and greenhouse gas (GHG) analysis and community enhancement commitments. Public involvement strategies were a common theme across all four documents. This feedback informed key EIS decisions. It also helped shape the state air quality, GHG, and community analyses and enhancement commitments documented in the State Reports.

1.2 State Reports Public Review and Comment Period

CDOT published the State Reports concurrently with the Draft EIS on November 21, 2025, which lasted for 60 days and concluded on January 20, 2026. During the comment period, CDOT solicited written and verbal comments from the public, agencies, community organizations, and other interested parties through multiple engagement channels. In-person public hearings were conducted on January 8, January 10, and January 13, 2026, at Adams City High School, providing opportunities for attendees to review informational displays (in English and Spanish), listen to an overview presentation, ask questions of project staff, and provide comments either verbally, in writing, or through professional onsite stenographers. Attendance at these hearings totaled more than 80 participants.

In addition to the public hearings, CDOT held two informational webinars on January 7 and January 15, 2026, each offering English and Spanish presentations and real-time question-and-answer sessions. A combined 28 participants attended the webinars, and questions covered topics such as community outreach, construction impacts, traffic modeling, air quality, and project phasing.

To advertise the public review and comment period, including information on when the public hearings and meetings would be held, CDOT used multiple outreach techniques. Outreach techniques included distribution of 58,212 postcards to nine project area zip codes, delivery of flyers door to door to approximately 400 homes adjacent to I-270, multilingual media outreach, social media announcements, a project website announcement, and direct communication with community organizations. See Table 1-1 for the full list of outreach techniques and when they were implemented.

Table 1-1. Public Review and Comment Period Outreach

Date(s)	Outreach Method	Target Audience	Message Summary
Multiple dates	CDOT, Adams County, and Adams District 14 social media posts	Local followers of agency social media accounts	Information on release of Draft EIS, public hearings, and how to comment
12/15/25	Email toolkit distributed to partner organizations	80+ metro-area organizations, community groups, and businesses	Details on public meetings and how to provide comments
12/15/25	Media outreach to KBNO and KNRV Spanish-language radio stations	Spanish-language radio listeners in the project area	Details on public meetings, purpose of the project, and how to provide comments
12/15/25 and 12/29/25	Media outreach to KOA and KCFR radio stations	Local radio listeners in the project area	Details on the meetings and how people can provide comments
12/16/25	Direct mail postcards distributed to nine project-area zip codes	Residents in nine project-area zip codes	Details on three in-person and two online meetings
12/16/25	Door-to-door flyer distribution	Residents in the Rose Hill neighborhood adjacent to I-270	Details on public meetings and how to provide comments
12/28/25, 1/4/26, and 1/11/26	Church bulletin advertisement	Assumption Catholic Church community in Welby and surrounding areas	Call for public comments, with link to website
12/29/25	Article in <i>Commerce City Connected</i> newsletter	Commerce City residents	Details on public meetings, purpose of the project, and how to provide comments
12/31/25	CDOT Facebook post	Followers of CDOT Facebook page in the project area	Details on public meetings, purpose of the project and how to provide comments

1/4/26-1/8/26	Online banner advertisements in <i>Commerce City Sentinel</i>	Readers of the <i>Commerce City Sentinel</i> in the project area	Details on public meetings and the project
1/4/26	Event posting on the <i>Front Porch</i> community website	Residents in northeast Denver and northwest Aurora	Details on public meetings and the project
1/5/26	Spanish-language media outreach to Univision, Telemundo, and El Comercio de Colorado	Spanish-speaking television viewers and newspaper readers in the project area	CDOT press release
1/5/26	Radio interview on KNRV	Spanish-language radio listeners in the project area	Details on public meetings, purpose of the project, and how to provide comments
1/6/26	Nextdoor social media post	Nextdoor neighborhood groups in the project area	Details on public meetings, purpose of the project, and how to provide comments
1/8/26	CDOT Facebook event posting	Residents of Commerce City and north metro communities	Details on public meetings, purpose of the project, and how to provide comments

CDOT accepted official comments via an online comment form, email, voicemail, and postal mail throughout the 60-day comment period. All comments received were reviewed by the project team. Responses to substantive comment topics related to the State Reports are included in Section 1.4.

1.3 Approach Used to Summarize and Respond to Comments on the State Environmental Reports

At the close of the 60-day public comment period, the Project Team compiled all comment submissions received, reviewed them to identify topics within each comment submission, and assigned a team member to provide a response to each comment topic. Team members included both CDOT and consultant staff. By identifying topics within each submission, it allowed the Project Team to identify substantive comments and comments that were received by multiple commenters. Some submissions contained no substantive comments; others contained many separate substantive comments. FHWA and CDOT considered all comments, whether one person or 100 people submitted a particular comment. Receipt of a large or small number of comments expressing a particular idea, preference, or opinion does not make the expressed view more or less valid.

The consideration of public comments is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Commenters may, therefore,

include business owners or employees; people from outside the project area, including those living in other counties; children; and people who submit multiple comments. Every substantive comment and suggestion has value, whether expressed by one commenter or many.

The response to comments on the State Environmental Technical Reports is following a similar format as the response to comments on the Draft EIS, which followed 23 Code of Federal Regulations (CFR) 771.125, which indicates that not every comment receives a response. This document only responds to overarching concerns raised in substantive comments received. Generally, a comment is considered substantive if it raises, debates, or questions a point of fact or analysis.

For the State Report comments, the following criteria were used to determine whether a comment was substantive:

1. Requires clarification or modification of a methodology or community enhancement.
2. Identifies absence of analysis that should have been done; or identifies needed improvements, flaws, or modifications to the analysis that was done.
3. Recognizes an issue that is out of scope for the project, but which warrants a response.
4. Identifies an issue or contextual error that can be resolved through clarification.
5. Identifies procedural issues or other issues requiring a response.

Comments received during the public review period were tagged by topic and reviewed to identify substantive comments. While some comments were not considered substantive, responses were included where clarification was warranted, particularly for issues raised frequently. Substantive comment topics were identified and addressed collectively; individual responses were not provided for every comment.

A summary of the overall concerns raised in the substantive comments received (sorted by topic) is provided below in Table 1-2. Responses are found in Section 1.4 according to the page numbers listed in the far right column.

Table 1-2. Concerns Raised within the Substantiative Comments Received on the Draft EIS

Comment Topic	Page Number
Travel Demand Modeling	
TRANS1 - Transportation and Traffic Forecasting and Modeling	5
Impacts and Mitigation Measures	
IMP1 - Air Quality, GHGs, Climate Change, Health, Environmental Justice, and Equity	6
IMP2 - Noise and Visual Barriers	7
IMP3 - Air Quality - Modeling Methodology	8
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IMP5 - Air Quality - New National Ambient Air Quality Standards (NAAQS) Violations and Flawed Analysis	11
IMP6 - Mobile Source Air Toxics	12
IMP7 - GHGs - Flawed Analysis	12
IMP8 - Air Quality - Mitigation and Enhancements	14
IMP9 - Air Quality - Monitoring and Enhancements	15
Funding	
FUND1 - Community Enhancement Funding	16

1.4 Responses to Substantive Comments on the State Environmental Technical Reports

A list of concerns was prepared and responded to as a way to capture the substantive topics that were commented on. As listed in Table 1-2, these topics include travel demand modeling, impacts and mitigation measures, and funding. All comments received are included in Appendix C of the Final EIS (FHWA and CDOT 2026) and comments on the State Reports are included in Appendix A of this document. The Draft EIS and its associate technical reports, Final EIS, and State Reports can all be found on the project website at <https://www.codot.gov/projects/studies/i270study>.

1.4.1 Travel Demand Modeling

TRANS1. Transportation and Traffic Forecasting and Modeling

Comments were received indicating that there were flaws with the project's transportation and traffic analysis process that need to be corrected. Once those flaws are corrected, commenters indicated that the air quality and GHG analyses needed to be redone.

CDOT provided a detailed response to the traffic and transportation concerns raised through the public comment period on the Draft EIS. That response is located in Section 5.4.6, Transportation and Traffic, of the Final EIS. That response provides the rationale for why the traffic and transportation analysis in the Draft EIS is valid. Since the air quality and GHG analyses are based on the traffic and transportation analysis, no updates are needed.

1.4.2 Impacts and Mitigation Measures

IMP1. Air Quality, GHGs, Climate Change, Health, Environmental Justice, and Equity

Comments were received that indicated the Federal Highway Administration (FHWA) and CDOT refused to consider air quality, GHGs, climate change, health, environmental justice, and equity.

On January 20, 2025, President Trump signed Executive Order (EO) 14148, Initial Rescissions of Harmful Executive Orders and Actions, and EO 14154, Unleashing American Energy. These two EOs revoked EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (January 20, 2021), and EO 14008, Tackling the Climate Crisis at Home and Abroad (January 27, 2021). Subsequently on January 29, 2025, Secretary Duffy signed a Memorandum for Secretarial Offices and Heads of Operating Administrations, Implementation of Executive Orders Addressing Energy, Climate Change, Diversity, and Gender. The Council on Environmental Quality (CEQ) published an Interim Final Rule on February 25, 2025, and a Final Rule on January 8, 2026, removing the CEQ's NEPA implementing regulations (90 Federal Register 10610 and 91 Federal Register 618). As a result of these actions, FHWA will not include GHG emissions and climate change analyses in the federal environmental review process. Any purported GHG emissions and climate change impacts will not be considered in the federal decision. Accordingly, no GHG emissions or climate change analyses are included in the project's NEPA analysis.

In addition, these EOs revoked EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023). Subsequently on January 21, 2025, President Trump signed EO 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity. This EO revoked EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994). As a result of these actions, all federal environmental justice requirements are revoked and no longer apply to the federal environmental review process. FHWA, Federal Transit Administration, and Federal Railroad Administration's Joint NEPA regulations (23 CFR 771) and the agencies' Interim Final Guidance on "Section 139 Environmental Review Process: Efficient Environmental Reviews for project Decision making and One Federal Decision" (December 17, 2024) do not require an environmental justice analysis. Accordingly, no analysis of environmental justice is included in the Draft EIS. Any purported environmental justice impacts will not be considered in the federal decision. Social, economic, and community impacts will continue to be disclosed where applicable in accordance with 23 CFR 771. As a result of EO 14148, EO 14154, EO 14173, and the removal of the CEQ's regulations, all federal GHG, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, no environmental justice-related topics, including equity, are included in the project's NEPA analysis.

However, the State of Colorado requires consideration of air quality, GHGs, 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 analyses, refer to the State Reports on the project website.

IMP2. Noise and Visual Barriers

Substantive comments received raised concerns that the I-270 corridor is primarily a commercial and industrial corridor rather than a residential one. Comments noted that noise and visual barriers are expensive and that money could go towards other improvements that the highway needs. In addition, comments included that barriers provide limited mitigation benefit, they obstruct mountain views, and they reduce natural light. In addition, it was noted that they would be a detriment to the businesses along the corridor because they would impact visibility from I-270 to commercial properties and result in meaningful economic harm to local businesses by reducing customer traffic. Comments suggested that barriers be removed from consideration for the project.

Noise impacts and mitigation measures were analyzed in accordance with CDOT's Noise Analysis and Abatement Guidelines (NAAG) (CDOT 2020) per federal regulations (23 CFR 772). 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. For detailed information about noise modeling and mitigation measures, please see Section 5.4.4, IMP 4 - Noise Modeling and Noise Walls, of the Final EIS.

CDOT has also worked with the Community Enhancements Subcommittee to the Stakeholder Working Group to develop additional community enhancements for the project. Visual barriers to screen industrial areas from nearby neighborhoods is one community-recommended enhancement. At this time, this is a potential community enhancement that CDOT could implement to support the associated commitments (Commitment #1 and Commitment #2). These examples are framed as screening industrial areas from nearby neighborhoods, not as barriers oriented toward or impacting commercial properties facing the interstate. Importantly, these are examples of the types of enhancements that could be pursued, not specific improvements that CDOT has decided to implement at specific locations.

Final decisions about which enhancements are implemented under these commitments will be made through a community-led process that considers feasibility, cost, equity, and community benefit, the same criteria used to develop the commitments. Commercial impacts of the kind described, including effects on visibility, signage, and access, are relevant considerations in that evaluation.

CDOT developed a four-step process for identifying, evaluating, and advancing community enhancements in partnership with residents and local organizations. The first step included reviewing previous enhancement requests received through public meetings, stakeholder workshops, and other forums. Supplemental enhancements were identified that weren't already included in the project as a project element or mitigation.

The next step included forming the Community Enhancements Subcommittee from the Stakeholder Working Group. The subcommittee's purpose was to review the listed supplemental enhancements and develop a package of community-driven recommendations that would become part of the project's commitments and be released for public review.

The third step included finalizing recommendations from the subcommittee for the Stakeholder Working Group and preparing materials for public review. Nine broad commitments were developed that encompass community priorities and provide flexibility to adapt to evolving community needs and priorities.

The last step included developing a Community Analysis Technical Report that shared the nine commitments during the public review period in order to solicit feedback from the public on the community-recommended enhancements. See the Community Analysis Technical Report on the project website for more information.

CDOT has reviewed comments received on the enhancements and commits to continuing the community engagement process to finalize the enhancements moving forward.

IMP3. Air Quality - Modeling Methodology

There were comments with concerns about the methodology used for the air quality modeling for the emissions inventories not being adequate for a project-level analysis, including study area, inputs, and model version. Comments assert that the agencies failed to assess reasonably foreseeable impacts in light of recent and impending federal regulatory and statutory changes, which threaten to greatly increase tailpipe emissions, including GHG emissions, oxides of nitrogen (NO_x), particulate matter (PM), and criteria and other pollutants. In addition, there were concerns related to no modeling being completed for construction emissions.

The modeling assumptions for vehicle emissions rates are representative of the regulatory standards, including current federal and state laws at the time the methodology was developed. Although the federal government has proposed to roll back certain vehicle standards, these actions are currently undergoing legal challenges whose outcomes have not yet been concluded. Even with the uncertainty in the vehicle emissions regulatory environment for future vehicles, emissions will continue to be less in the future due to vehicle turnover. Additionally, it's important to note that future vehicle emissions assumptions are kept consistent in the comparative analysis of alternatives which ensures that these comparisons assess the air quality impacts relative to one another which result from an alternative's infrastructure and roadway design and resulting vehicular operational changes.

In the emissions analysis, the Motor Vehicle Emission Simulator (MOVES) model runs were conducted at the project scale consistent with the United States Environmental Protection Agency's (EPA) guidance and used a modeling approach agreed upon through interagency consultation. In this manner of running MOVES, the predicted actual congestion constrained speeds for each alternative are required to be entered through inputs into the emissions rate model at the individual link (roadway segment) level for each of the time-of-day periods considered by the regional travel demand model. The roadways included in the emissions inventory were identified through interagency coordination and are largely consistent with EPA's guidance for project-level analysis of emissions in NEPA documents (EPA 2021).

The Denver Regional Council of Governments' (DRCOG) travel demand model was adjusted to represent each alternative analyzed in individual model runs for each alternative for a project-specific forecast of travel behavior consistent with current regional planning

assumptions and other requirements of the federal conformity rule in coordination with FHWA in scoping the analysis methodology. In this manner of running MOVES, the predicted actual congestion constrained speeds are implicitly considered through inputs into the emissions rate model at the individual link (roadway segment) level for each of the 10 time-of-day periods considered by the regional travel demand model.

The emissions analysis used assumptions consistent with federal and state laws and regulations at the time of commencement. State regulation requires federal models be used in an emissions analysis for on-road mobile sources, which is EPA's MOVES model. MOVES4 is still supported for use at the federal level, and no analysis has been conducted in Colorado to date with MOVES5 as the Air Pollution Control Division (APCD) does not yet have required MOVES5 input files available for emissions modeling at the state or county level. CDOT does not perform scenario analysis of potential policy or regulatory changes. There has been a historically consistent downward trend in emissions rates for decades through implementation of numerous regulatory and market actions, such as EPA's 2010 Low NOx Rule and Colorado's use of lower volatility fuels in the Denver Metropolitan/North Front Range, which have resulted in more efficient engines, better engine controls, cleaner burning fuels and alternative vehicle technologies (FHWA 2023). It is reasonable to assume that some (or all) of these mobile source emissions improvements will continue in the future.

Air quality working group meetings were held with FHWA and EPA throughout the air quality and GHG modeling processes, which included during development of the Work Plan's methodology. FHWA and EPA reviewed and agreed with the methodology prepared. In addition, 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.

Although not required by conformity or state regulations, CDOT completed additional air quality analysis evaluating exposure gradients for carbon monoxide (CO), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}) contained in the state Air Quality Technical Report to provide additional comparative information on the project alternatives as they related to air quality. These analyses allow for a qualitative comparison between alternatives and demonstrate that the Preferred Alternative is predicted to perform the best in relation to air quality of the proposed Build Alternatives.

The state air quality analysis did not include emissions sources attributable to construction as these are temporary short-term emissions increases that cannot be accurately predicted as the specific types of equipment, including their engine configurations and fuel types, as well as their operating hours and locations along the project during construction are unknown. Consistent with the federal emissions analysis, the state-only emissions analyses are based on forecasted travel behavior in the current long-range planning year in the DRCOG region (2050) after construction activities from the project have concluded.

Refer to Appendix A, Air Quality Work Plan, of Appendix E3, Air Quality Technical Report, of the Draft EIS for further information on how the MOVES analysis was performed.

IMP4. Air Quality - Increased Impacts

Comments received included concerns about additional lanes increasing air quality impacts in the area. The study area is in attainment with all NAAQS 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 (VOC) and NO_x, which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling shows 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. PM₁₀ emissions show a slight increase from the existing conditions to the design year, with approximately 65 to 85 percent of total PM₁₀ emissions attributed to re-entrained road dust. Both Build Alternatives exhibit slightly higher PM₁₀ emissions than the No Action Alternative due to increased traffic volumes in the design year. The Preferred Alternative would result in lower emissions of PM_{2.5} and NO_x compared to the No Action Alternative in the design year.

The air pollutant emissions inventory predicts a substantial decline in emissions of all pollutants in future years for all alternatives including ozone precursors, with the exception of PM₁₀ for which the project area is designated as being in attainment with the NAAQS. Refer to the state Community Analysis Technical Report for information on potential actions CDOT may take to voluntarily reduce emissions with community stakeholder input.

The modeled mobile source air toxic (MSAT) emissions decrease between the 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 (FHWA 2023). 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.

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, GHGs, and climate change. Refer to the state Air Quality Technical Report and Greenhouse Gas Technical Report on the project website for more information.

IMP5. Air Quality - New NAAQS Violations and Flawed Analysis

Comments indicated that the state Air Quality Technical Report has flaws and shows that the Preferred Alternative will cause or contribute to new violations of the NAAQS for PM_{2.5}. Flaws noted include too narrow of a study area; only modeling for 2023 and 2050; unreasonably excluding data from 2024 from the background concentration assessments, such as for wildfire events; not abiding by the federal requirements that apply to NAAQS determinations, including hotspot conformity analysis; and not explaining how the project can legally proceed with the expected PM_{2.5} NAAQS violations.

The air quality analysis was completed for the purpose of a qualitative comparison between alternatives and not for the purpose of making a federal project level air quality conformity determination. The project area is designated as in attainment with the NAAQS for PM_{2.5} and conformity does not apply. As described in the Air Quality Work Plan, the analysis methodology largely follows EPA's project-level analysis guidance. However, it is not considered to be a formal hotspot analysis under conformity for the purposes of demonstrating compliance with the NAAQS. Consistent with this guidance, the current regional long-range planning year (2050) was analyzed. The Preferred Alternative is included in DRCOG's current approved Regional Transportation Plan and associated conforming emissions budgets for ozone precursors and complies with the Denver Metropolitan/North Front Range State Implementation Plan for ozone.

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.

The modeled years were also determined through consultation between FHWA, 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.

The background concentrations used in the qualitative state air quality analysis were provided by APCD who maintains the statewide air monitoring network. They are the appropriate agency for determining the current representative background concentrations in the project area, including whether monitoring data collected by APCD under certain conditions should be excluded. Additionally, EPA provides guidance for "Additional Methods, Determinations, and Analyses to Modify Air Quality Data Beyond Exceptional Events" (EPA 2019), which specifically covers excluding ambient data that are not representative to characterize background concentrations.

As noted in the Air Quality Work Plan, several conservative assumptions were made in the modeling analysis. These include removing the direct connects with the other interstates that are included in DRCOG's current Regional Transportation Plan, and the utilization of flat terrain in the dispersion model. Complex terrain and associated atmospheric considerations are present in the project area and have been well documented in air quality planning documents in the region; however, the model did not account for this complexity.

In the emissions analysis, it was assumed that buses would utilize the Express Lanes under the Preferred Alternative as transit vehicles are permitted to use the Express Lanes statewide. Heavy-duty trucks are permitted to use Express Lanes in Colorado; however, due to the axle-based toll structure, larger vehicles rarely utilize the Express Lanes in the state. Therefore, large commercial vehicles with a higher number of axles were not assumed to travel in the Express Lanes in the analysis.

IMP6. MSATs

Comments received indicated that the MSAT analysis did not discuss or consider information that should have been used to assess and explain the foreseeable health impacts of MSATs, specifically benzene and formaldehyde.

The MSAT analysis provides a comparative analysis of emissions between alternatives, which reflects that all alternatives will have significantly lower emissions compared to existing conditions reflecting improvements in air quality as it relates to MSAT impacts. An evaluation of project-specific health impacts is not required under state regulation. The referenced benchmarks for formaldehyde and benzene were adopted recently by the Air Quality Control Commission but are still pending approval from the Colorado General Assembly. APCD does not currently have any specific timeframe on when the Colorado General Assembly may approve these values and use cases have not yet been identified. CDOT did not conduct additional analysis to translate MSAT emissions into exposure gradients, nor is that level of assessment required.

IMP7. GHGs - Flawed Analysis

Comments received indicated that the GHG analysis ignored state-level directives and known trends concerning the known impacts of emissions on health and climate. The comments further note that CDOT didn't follow the state requirement of using a discount rate of 2.5 percent or less when estimating the social costs of GHGs, so the Greenhouse Gas Technical Report inappropriately obscures and minimizes the full impact of the project's GHG emissions. Comments also assert that the report failed to consider Colorado's statewide GHG targets. Lastly, comments were received that encouraged CDOT to ensure climate goals of other agencies are not compromised.

CDOT's rule for reducing GHG emissions is 2 Code of Colorado Regulations (CCR) 601-22, Greenhouse Gas Transportation Planning Standard, which requires each Metropolitan Planning Organization (MPO) to reduce GHG emissions within their respective boundaries by analyzing the emissions impact of their long-range planning documents and to meet set emission reduction levels at the regional planning level for three future horizon years: 2030, 2040, and 2050. The Greenhouse Gas Transportation Planning Standard does not require individual transportation actions to demonstrate a reduction at the individual project level. For CDOT, the rule requires an analysis of the emissions impact of the 10-Year Plan for the non-MPO areas of the state. The Preferred Alternative is included in DRCOG's 2050 Regional Transportation Plan, which is subject to the Greenhouse Gas Transportation Planning Standard. DRCOG's Greenhouse Gas Transportation Report shows that their 2050 Regional Transportation Plan is in compliance with the Greenhouse Gas Transportation Planning Standard and achieves the necessary reductions over time (DRCOG 2024a and 2024b). DRCOG's Greenhouse Gas Transportation Report provides an analysis of the regional impacts of the existing transportation networks within the DRCOG boundary, alongside planned future projects and programming, showing GHG emissions reductions over time. The Greenhouse Gas Transportation Planning Standard intentionally provides flexibility in achieving established

emissions reduction requirements and was not intended to prevent the addition of any capacity to the transportation network.

The Preferred Alternative supports multimodal options and high occupancy vehicles (HOV) as transit vehicles are permitted to use the Express Lanes during operation and HOV3+ are permitted to use the Express Lanes at no cost. There is no state requirement that all regional planning assumptions be consistent with a project-level GHG analysis.

In addition to presenting the social cost of carbon at the 2.5 percent discount rate in compliance with legislative requirements, the state Greenhouse Gas Technical Report provides a range of carbon valuations for informational purposes, including 5 percent, 3 percent, and the most aggressive 3 percent at the 95th percentile. The state Greenhouse Gas Technical Report notes that the legislative requirement for calculating the social cost of carbon is 2.5 percent and regulation does not preclude presenting additional ranges for carbon valuation.

Refer to the Air Quality Work Plan for additional detail on how GHG emissions were analyzed in a manner that is largely consistent with EPA's project-level analysis guidance for transportation emissions in NEPA.

The state Greenhouse Gas Technical Report also includes an analysis of climate impacts on disproportionately impacted communities near the project. The state Community Analysis Technical Report also provides information on engagement with disproportionately impacted communities and additional voluntary measures that CDOT is taking in the form of community enhancements.

IMP8. Air Quality - Mitigation and Enhancements

Several comments requested air quality mitigation strategies for homes, schools, and community facilities adjacent to the corridor, including post-construction monitoring.

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. Although the analysis projects an increase in some pollutant emissions (associated with increases in vehicle miles traveled) for the Preferred Alternative compared with the No Action Alternative, several strategies have been and continue to be implemented in the Denver Metropolitan/North Front Range ozone nonattainment area to reduce emissions of the ozone precursors NO_x and VOCs. The strategies include multimodal transportation options, rideshare programs, reformulated summer season fuels, and vehicle inspection and maintenance programs.

Several strategies have also been, and continue to be, implemented to maintain attainment of the CO and PM₁₀ NAAQS, including oxygenated fuels and vehicle inspection and maintenance programs for CO and diesel smoke inspections and road dust control measures for PM₁₀.

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 CCR 1001-3, Emission Control for Particulate Matter, Smoke, CO, 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 Chapter 5, Measures to Minimize Harm and Environmental Commitments, of the Record of Decision, including construction best management practices intended to further minimize emissions and protect local air quality during project construction.

For more information, see Appendix E3, Air Quality Technical Report, of the Draft EIS.

CDOT has also conducted additional air quality analyses as part of the State of Colorado requirements and developed community enhancement commitments to implement as part of the project. Refer to the state Air Quality and Community Analysis technical reports on the project website for more information.

IMP9. Air Quality - Monitoring and Enhancements

Comments received requested that air quality monitoring be clearly connected to commitments and that the air quality monitoring approach be elaborated on and provided to stakeholders and the public to comment on. In addition, comments suggested that some of the enhancement efforts should be considered as part of the project, including efforts required by Colorado law, and not additional benefits to the community.

Air quality monitoring will be conducted above and beyond what is legally required. Mandatory monitoring will be developed and implemented in accordance with SB 21-260 (Sustainability of the Transportation System) and CDOT established guidance for complying with requirements under CRS 43-1-128 pertaining to air quality monitoring. Additional monitoring funded as community enhancements will involve input and involvement from Adams County public health department. Enhancement commitments are specifically designed to provide benefits to disproportionately impacted communities by providing air quality data beyond what is mandated by state law.

Per the state mandate, pre-construction monitoring of CO, NO₂, PM_{2.5}, and PM₁₀ and ozone will be conducted for a minimum of one month before construction commences. The project will implement a real-time air quality monitoring system for particulate matter (PM_{2.5} and PM₁₀), featuring a public-facing dashboard with opt-in alerts to ensure community transparency throughout construction. The project's monitoring plan will utilize defined air pollutant concentration thresholds to trigger project field evaluations and enact additional air quality protection enhancements as needed to control air pollution generated from project-related construction activities.

As part of SB 21-260, air quality monitoring conducted during construction will have defined action levels for the project to conduct site evaluations and enact additional air quality protection enhancements if needed to reduce impacts to nearby communities. Also, as part of SB 21-260, air quality data will be continuously reported and made available to the public. Additionally, the project is committed to air quality monitoring before the state mandated pre-construction monitoring as part of the community enhancements commitments.

CDOT is partnering with Adams County and the Love My Air monitoring program which aims to provide real-time air quality data through a network of monitors in and around the project corridor. CDOT is funding three new air quality monitors near the project area to feed data directly into the Love My Air program website dashboard and mobile application.

CDOT is actively evaluating feasible air-quality protections and community enhancement strategies for adjacent locations in coordination with the Community Enhancements Subcommittee. CDOT values partnerships to ensure these efforts effectively reach and protect local residents and intends to work with partners to implement an actionable indoor air quality enhancement plan.

Through money set aside for community enhancements, CDOT is committed to post construction monitoring. However, monitoring is focused on criteria pollutants, not GHGs, the impacts of which are a global rather than regional or localized concern.

1.4.3 Funding

FUND1. Community Enhancement Funding

Comments were received that advocated for protecting the proposed 1.5 to 2.5 percent allocation of total budget for community enhancements and trying to get grants or other state or external funding to increase the allocation where feasible. Comments were also received that indicated 10 percent of the total budget should be allocated towards community enhancements. Additional comments were received that indicated too much funding was being allocated for community enhancements when there are so many improvements needed on the highway.

CDOT commits to protecting the community enhancements budget and has slightly increased the budget to approximately 2 to 3 percent of the total project cost. After the robust outreach conducted through the EIS process, CDOT had a good understanding of the community's needs. CDOT wanted to have an impactful and meaningful commitment to the community, so past data from the Central 70 project's environmental justice commitments was used to identify an appropriate amount for this project, which was identified in the Draft EIS as 1.5 to 2.5 percent. The Stakeholder Working Group agreed with this assessment. However, after the public comment period, CDOT raised the percentage to accommodate new requests made by stakeholders in comments. In addition to this commitment, CDOT has dedicated \$7 million of standalone I-270 Strategic Colorado State Legislative funding toward multimodal improvements for 3.6 miles of Colorado Highway 224 between United States Highway 36 and United States Highway 6. CDOT will explore partnership opportunities with local agencies and non-profit groups to implement enhancements and grant opportunities to obtain additional funding.

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