



COLORADO

Department of Transportation

2829 W. Howard Place
Denver, CO 80204

TO: Reviewers

DATE: December 19, 2022

SUBJECT: I-270 Corridor Environmental Assessment DRAFT Analysis

The process of studying, and ultimately determining, the future of a corridor like I-270 is one of the most important steps a transportation department undertakes. Both federal and state law as well as best practice demand multiple analyses to fully vet proposals and understand alternatives. Nowhere is this more important than a corridor like I-270 which faces pressing capacity and traffic flow challenges as well as valid concerns from disproportionately impacted communities along the corridor.

Today, CDOT is posting, for transparency purposes, initial documents prepared by Jacobs Engineering in support of an Environmental Assessment (EA). These documents are not an approved draft EA. While it includes many useful analyses, such as technical appendices with information on topics like wildlife impacts and impacts to historic resources, it is not complete and CDOT believes that more work is needed both related to public outreach as well as topics like greenhouse gas impacts and mitigation measures like incorporating transit into the project as has been done with other CDOT road projects such as the expansion of US-36, which connects to I-270. No analysis will receive CDOT approval until these and other factors have been fully evaluated.

CDOT is nevertheless providing this document, in its raw, incomplete, and insufficient form, as part of CDOT's overall commitment to transparency and for the public to understand our process.

As noted above, CDOT has more work to do on modeling air pollutants. For example, CDOT intends to complete a full review of how various mitigation options such as various forms of public transit could impact traffic, economic benefits, unanticipated emissions and compliance with requirements pursuant to SB-21-260. This along with other factors must be included in a complete cumulative impact analysis.

While CDOT and many stakeholders have discussed a variety of promising mitigation options, these have not been assessed as part of NEPA in the current draft work. The Department also has received a request for an origin and destination analysis, and the results of that also need to be better integrated into how alternatives for the project are envisioned within the context of NEPA.

Nor have we completed our discussions with stakeholders and community members. While initial outreach was conducted – including virtual public meetings with online virtual displays in English and Spanish – CDOT believes that more extensive outreach is needed to fully comply with the new requirements of SB-21-260 regarding community engagement. CDOT is currently hiring a dedicated project outreach coordinator to work closely with the Department’s-Equity office on implementing this approach.

CDOT has hired a project director for I-270 and will soon be bringing on a bilingual outreach coordinator. Our environmental analysis team will be re-running our traffic and air quality models to study the impact of active transit along I-270. At the same time, our engineering staff are preparing to reconstruct several bridges along I-270 that are in extremely poor condition and simply cannot wait for the due diligence necessary to determine the larger future of I-270.

In short, much work remains and we look forward to continued community conversations and review of this work. If you would like to receive updates on our progress, announcements for opportunities to participate in public feedback sessions, or have any questions, please contact cdot_i270@state.co.us.