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5.0 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).

5.1 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 EIS, including the project's Purpose and Need, the range of reasonable alternatives, environmental concerns and analytical approaches, and public involvement strategies. Public and agency input played a central role in shaping the scope and direction of the project. Feedback contributed to the decision to elevate the level of environmental review from an Environmental Assessment (EA) to an EIS, informed enhancements to outreach strategies to better serve corridor communities, and directly influenced key decisions, such as defining the project's Purpose and Need and refining the alternatives development and evaluation process.

5.2 Draft EIS Public Review and Comment Period

The Federal Highway Administration (FHWA) and CDOT published the Draft EIS and issued the Notice of Availability in the Federal Register on November 21, 2025, initiating a 60-day public comment period that 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 5-1 for the full list of outreach techniques and when they were implemented.

Table 5-1. 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. In total, 227 submissions were received, of which 396 unique comments were derived. All comments received were reviewed by the project team. Responses to substantive comment topics are included in Section 5.4, and any resulting revisions are documented in the Errata (Chapter 2.0) of this Final EIS.

5.2.1 Public Hearings

The three public hearings were all held at Adams City High School and included Spanish and American Sign Language interpretation services, light meals, a children's activity table, 28 bilingual information boards, a presentation, a public hearing period, professional stenographers to transcribe oral comments, and project staff to answer questions.

Thursday, January 8, 2026

This hearing was held from 5:00 in the afternoon (p.m.) to 8:00 p.m. Nineteen people signed into the meeting; two people provided comments to the stenographers; 13 people

provided oral comments during the public hearing period; and six comment forms were submitted.

Saturday, January 10, 2026

This hearing was held from 9:00 in the morning (a.m.) to 12:00 p.m. Twenty-two people signed into the meeting; 12 people provided oral comments during the public hearing period; and four comment forms were submitted.

Tuesday, January 13, 2026

This hearing was held from 5:00 p.m. to 8:00 p.m. Forty-two people signed into the meeting; 17 people provided oral comments during the public hearing period; and one comment form was submitted.

5.2.2 Informational Webinars

The two informational webinars were held on Zoom from 5:00 p.m. to 6:00 p.m., and included an informational presentation presented in English and Spanish and a question-and-answer period. American Sign Language interpretation was also included.

Wednesday, January 7, 2026

Thirteen members of the public logged in to this webinar, and seven questions were asked and answered.

Thursday, January 15, 2026

Fifteen members of the public logged in to this webinar, and seven questions were asked and answered.

5.3 Approach Used to Summarize and Respond to Comments

At the close of the 60-day public comment period on the Draft EIS, 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. NEPA encourages all interested parties to submit comments as often as they wish. 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.

Following 23 Code of Federal Regulations (CFR) 771.125, not every comment receives a response. This document only responds to overarching concerns raised in substantive comments received on the Draft EIS. Generally, a comment is considered substantive if it raises, debates, or questions a point of fact or analysis.

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

- 1) Requires clarification or modification of an alternative or mitigation measure.
- 2) Requires development of an alternative that was not previously considered.
- 3) Identifies absence of analysis that should have been done; or identifies needed improvements, flaws, or modifications to the analysis that was done.
- 4) Recognizes an issue that is out of scope for the project, but which warrants a response.
- 5) Identifies an issue or contextual error that can be resolved through clarification.
- 6) 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.

In general, comments received during the public review period were largely supportive of moving the project forward and recognized the need to address congestion through added capacity. The majority of commenters expressed support for one of the Build Alternatives. A smaller number of comments favored alternatives that were ultimately eliminated during screening, including options that proposed adding two lanes rather than a single lane.

In addition, some commenters did not support capacity-expanding alternatives and requested that a new alternative be evaluated. This alternative was submitted by a few commenters during the public review period. More information about this alternative is provided in Section 5.4.3, ALT4.

A summary of the overall concerns raised in the substantive comments received (sorted by topic) is provided below in Table 5-2. Responses are found in Section 5.4 according to the page numbers listed in the far right column.

Table 5-2. Topics Raised within the Substantive Comments Received on the Draft EIS

Comment Topic	Page Number
General Topics	
GEN1 - Scope of the Purpose and Need Statement	5-7
GEN2 - Draft EIS Review Period	5-8

GEN3 - Colorado Open Records Act (CORA)	5-8
Outreach	
OUT1 - Lack of Outreach during Project Development	5-9
Alternatives Analysis	
ALT1 - Alternatives Development and Determining Reasonable Alternatives	5-10
ALT2 - Alternatives that Add Two Lanes	5-10
ALT3 - Alternatives that Focus on Safety and Innovation instead of Expansion	5-11
ALT4 - Two Express Lanes that Accommodate Transit Alternative	5-11
ALT5 - Express Lanes Community Impacts	5-13
ALT6 - Consideration of Increased Transit Options and Services	5-14
ALT7 - Consideration of Increased Bicycle and Pedestrian Facilities	5-15
ALT8 - Bicycle and Pedestrian Overpass	5-16
ALT9 - Preferred Alternative and Vasquez Boulevard	5-16
Impacts and Mitigation Measures	
IMP1 - Greenhouse Gases, Climate Change, Health, Environmental Justice, and Equity	5-17
IMP2 - Mitigation Measures	5-18
IMP3 - Mitigation Measures for Traffic Management during Construction	5-19
IMP4 - Noise Modeling and Noise Walls	5-20
IMP5 - Air Quality - Increased Impacts	5-22
IMP6 - Air Quality - Modeling Methodology	5-23
IMP7 - Air Quality - Mitigation	5-24
IMP8 - Recreational Resources, including Section 4(f) and Section 6(f)	5-25
IMP9 - Wildlife Crossings	5-26
IMP10 - Water Quality	5-27
Property Impacts	
PROP1 - Property Acquisitions	5-28
Transportation and Traffic	
TRANS1 - Traffic Forecasting and Modeling	5-28
TRANS2 - Induced Demand and Travel Demand Forecasting	5-30
Construction and Contracting	
CON1 - Contracting Requirements	5-31
Funding Strategies	
FUND1 - Project Funding	5-32

5.4 Responses to Substantive Comments on the Draft EIS

A list of comment topics was prepared and responded to as a way to capture substantive topics. As listed in Table 5-2, these topics include general topics, outreach, alternatives analysis, impacts and mitigations, property impacts, transportation and traffic,

construction and contracting, and funding strategies. All comments received are included in Appendix C of this Final EIS.

5.4.1 General Topics

GEN1. Scope of the Purpose and Need Statement

Comments were received that expressed concerns about the limited scope of the Purpose and Need statement for the project by not prioritizing local residents' quality of life and improving health and environmental conditions. In general, the purpose and need for a transportation project focuses on the underlying reasons for proposing the transportation project, and, typically, those reasons are based on meeting a transportation need. The purpose and need of a project is essential in establishing a basis for the development of the reasonable range of alternatives required in an EIS and assists with the identification and eventual selection of a preferred alternative. According to FHWA's guidance in Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the concept of purpose and need that was established by the Council on Environmental Quality (CEQ) does not substantively change. SAFETEA-LU requires a clear statement of identified objectives that the proposed project is intended to achieve for improving transportation conditions. The objectives should be derived from needs and may include, but are not limited to, the following outlined in SAFETEA-LU:

- Achieving a transportation objective identified in an applicable statewide or metropolitan transportation plan;
- Supporting land use, economic development, or growth objectives established in applicable Federal, State, local, or Tribal plans;
- Serving national defense, national security, or other national objectives, as established in Federal laws, plans, or policies.

The project's Purpose and Need was developed and presented in draft form for review and input at public meetings in October 2023, April 2024, and January and February 2025. It was also reviewed and discussed during agency coordination meetings in June 2023 and November 2023. The purpose of the project is to implement transportation solutions that modernize the I-270 corridor to accommodate existing and forecasted transportation demands.

The identified transportation needs are as follows:

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

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

GEN2. Draft EIS Review Period

Some comments raised questions about CDOT's public comment process during the Draft EIS comment period, including concerns that the public comment period was too short or that some people were not properly notified. The comment period for the Draft EIS was originally scheduled for 45 days; however, in response to requests for additional time submitted prior to the publication, the review period was extended by 15 days, for a total of 60 days. The comment period began on November 21, 2025, and ended on January 20, 2026. An additional 15 days were added to the review period based on the following factors:

- The public comment period was scheduled to occur over the end-of-year holidays. CDOT extended the comment period to account for the holidays.
- To advertise the public comment period, public hearings, and virtual public meetings, social media posts were included on CDOT, Adams County, and Adams County District 14 channels; over 80 organizations, community groups, and businesses in the Denver metropolitan area received an information toolkit with graphics to share; information was provided on both English and Hispanic radio stations; over 58,000 postcards were mailed to nine area zip codes; flyers to approximately 400 homes in the Rose Hill neighborhood were delivered; advertisements were included in church bulletins; an article was included in the Commerce City Connected newsletter; events were posted on the Front Porch website; banner ads were placed in the Commerce City Sentinel; social media posts were included in numerous Nextdoor groups; and both English and Hispanic media outlets included information on the project and event dates/times.
- CDOT has conducted extensive outreach to the local community and other stakeholders over the last six years and, in particular, since 2023, when the EIS process began. This outreach has included virtual and in-person public meetings; listening sessions; attendance at community events and festivals; email updates; meetings and presentations with community groups, elected officials, and other interested organizations; community office hours; business outreach and interviews; freight and trucking industry outreach; volunteering at community events; stakeholder workshops; and providing quarterly updates to Cooperating and Participating Agencies.
- The Draft EIS was set up to facilitate public review by providing the Executive Summary in both English and Spanish.
- Comments have been (and continue to be) received that the environmental study process has gone on too long as it is time to move forward.

For more information on public outreach during the Draft EIS review period, refer to Section 5.2 of the Final EIS.

GEN3. CORA Requests

Comments were received that CORA requests submitted during the public comment period for the Draft EIS on November 23, 2025, were not responded to, and there would be no way to provide comments in time without the information. Two of the items in the requests that were available as part of the Draft EIS were provided on November 24, 2025. The remaining CORA request items were provided to the requestors on December 23, 2025.

5.4.2 Outreach

OUT1. Lack of Outreach during Project Development

Comments were received that indicated people in the affected community hadn't heard about the project, and that CDOT's outreach efforts were lacking. CDOT and FHWA began a NEPA process in 2020, initially anticipating an EA. While virtual engagement during the EA process between 2020 and 2022 provided valuable input, constraints of the COVID-19 pandemic limited the potential of outreach. Moving into 2023, CDOT determined a more detailed environmental review was needed and requested that an EIS be prepared. Through the EIS, CDOT committed to expand outreach efforts and strengthen community relationships through increased public participation.

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

The PIP was developed as a flexible document that was adapted based on the project and public needs and effective approaches to public involvement. The community study area was developed based on Census block groups within 1 mile of the project area. Outreach techniques for local communities were informed by best practices and recommendations from Appendix F, Public and Agency Involvement Technical Report, of the Draft EIS. Additional practices and recommendations were provided by the U.S. Environmental Protection Agency (EPA) and direct community input. Due to the large percentage of Spanish speakers in the project area and requests from community organizations, FHWA and CDOT developed an Outreach Plan. The purpose was to generate interest in the project and engage residents in the project area along with influential community leaders, organizations, and other agencies.

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

For details on the information dissemination methods used and events attended/held, refer to Appendix F, Public and Agency Involvement Technical Report, in the Draft EIS. For information on public involvement during the Draft EIS public comment period, see GEN2 above and Section 5.2 of the Final EIS.

5.4.3 Alternatives Analysis

ALT1. Alternatives Development and Determining Reasonable Range of Alternatives

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

Alternatives evaluated in the Draft EIS include one additional lane in each direction that would be either a general-purpose lane or Express Lane. Additional alternatives that would maintain the same number of travel lanes as the existing conditions, which would add two additional lanes, and that would add a lane for transit-only also were considered but eliminated (see Appendix B of the Draft EIS, Alternatives Development Technical Report).

A Preferred Alternative was preliminarily identified in the Draft EIS. See Chapter 3, Alternatives Considered, of the Draft EIS for information on how and why the Preferred Alternative was preliminarily identified and Section 2.2, Selected Alternative, of the Record of Decision (ROD) for information on why the Selected Alternative was selected. The plans, impacts, mitigations, and permitting requirements for the Selected Alternative are also discussed in the ROD.

ALT2. Alternatives that Add Two Lanes

Comments were received that requested one of the alternatives that added two lanes instead of one lane be implemented because I-270 hasn't seemed to have been updated since it was built. The Draft EIS acknowledges that I-270 has long-standing congestion and safety issues and has not kept pace with regional growth.

Alternatives that added two lanes in each direction were evaluated during the screening process; however, they did not advance to detailed analysis because they did not perform as well as other alternatives when evaluated across the full set of project criteria. While these alternatives provided the greatest increase in capacity, they also introduced the largest roadway footprint, resulting in greater environmental impacts, larger right-of-way (ROW) needs, and additional conflict points that could affect safety. Additionally, adding two lanes would create a substantial mismatch with the facilities at either end of the I-270 corridor (Interstate 25 [I-25]/United States Highway 36 [US 36] at the northwest end and

Interstate 70 [I-70] at the southeast end), where connecting highways and interchanges cannot accommodate that level of additional traffic without major reconstruction. This mismatch would create new bottlenecks and reduce the overall effectiveness of the added capacity. Other alternatives were found to better balance improvements to safety, travel time reliability, transit operations, freight movement, and environmental considerations while remaining compatible with the constraints of the surrounding network, and therefore, advanced for further study.

ALT3. Alternatives that Focus on Safety and Innovation instead of Expansion

Comments were received that suggested moving forward with safety and innovation improvements rather than expansion. The Minimal Build Alternative emerged based on stakeholder feedback received during the October 2023 public meeting. Participants at that meeting requested an alternative to evaluate the potential to meet the Purpose and Need with an alternative that would focus on safety improvements on I-270 and bicycle, pedestrian, and transit enhancements rather than adding capacity. This alternative was developed to include reconstruction of the existing four-lane interstate without adding lanes, addressing infrastructure deterioration, and improving safety through measures, such as widened shoulders, upgraded ramps, and the reconstruction of aging structures. It would include safety improvements, such as widening shoulders and redesigning the Interstate 76 (I-76), York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. It also incorporated improvements from the Bicycle, Pedestrian, and Transit Enhancements Alternative to enhance multimodal connectivity.

The Minimal Build Alternative does not address traffic congestion on the interstate as well as the other alternatives, and therefore, has the potential to experience increased safety issues and travel times and decreased reliability. In addition, it would not improve transit speed or freight operations as well as the other alternatives.

The Preferred Alternative focuses heavily on reconstructing outdated interchanges, lengthening merge distances, and replacing end-of-life bridge structures, in addition to adding an Express Lane. Bridge replacement is a core component of the project because many structures are approaching the end of their useful life and require modernization regardless of the lane configuration. Freight mobility and transit reliability are key elements of the project's Purpose and Need. The Preferred Alternative also allows transit vehicles and high-occupancy vehicles to use the Express Lane, free of charge, and is designed to improve reliability for buses and other high-person-throughput travel. Additional potential innovative elements, such as connected vehicle technology, will be considered through the System Engineering Analysis process as design progresses for the Preferred Alternative. This does not impact the alternative selection process during NEPA.

Refer to Appendix B, Alternatives Technical Report, of the Draft EIS for more information.

ALT4. Two Express Lanes that Accommodate Transit Alternative

During the Draft EIS comment period, CDOT received a new alternative and related comments supporting the I-270 Healthy Communities No-Widening Alternative. For

consistency in nomenclature with all previously identified and evaluated alternatives, this alternative is being referred to as the Two Express Lanes that Accommodate Transit Alternative.

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

The Two Express Lanes that Accommodate Transit Alternative proposes converting the existing general-purpose lanes on I-270 to Express Lanes and includes interchange, shoulder, bridge, and multimodal improvements like those incorporated in the Build Alternatives. Several elements included in the submittal were reviewed but not advanced as part of the evaluated alternative. Freight toll exemptions were not included because they would be inconsistent with Colorado's statewide Express Lane policies where freight would be subject to tolls, resulting in an isolated transition area within the broader Express Lane network. While the Colorado Transportation Investment Office (CTIO) acknowledged that implementing an exemption could be feasible, it would require corridor-specific tolling and administrative systems. Use of automated license plate reader technology on local streets to restrict diversion traffic was not advanced because CDOT does not have jurisdiction over local roadways and cannot restrict vehicles from using those facilities. Wildlife or "land bridge" crossings were not carried forward due to the absence of documented wildlife crash patterns on the corridor, the corridor's exclusion from CDOT's prioritized wildlife crossing list, and the substantial ROW and cost implications.

Several other elements described in the submittal are being addressed separately as corridor-wide community enhancements rather than as alternative-specific features. These include expanded air quality monitoring and public reporting, evaluation of green buffers and landscaping to mitigate visual and noise effects, and commitments to study the feasibility of expanded regional transit services. These elements would apply independent of the selected Build Alternative.

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

Although Express Lanes would be expected to improve travel time reliability for transit vehicles and for users who choose or are able to use the Express Lanes, users diverted from I-270 would shift travel to other facilities where reliability outcomes are uncertain. In addition, because I-270 functions as a designated hazardous materials route, oversized and overweight load route, nuclear route, and part of the Strategic Highway Network (STRAHNET), freight operators have limited viable alternatives. Without added capacity, converting existing lanes to Express Lane operations could increase costs and reliability risks for essential freight movements without corresponding improvements in throughput.

In terms of physical footprint, the Two Express Lanes that Accommodate Transit Alternative would not add continuous through lanes but includes continuous acceleration and deceleration lanes. As a result, its footprint would be greater than the No Action and Minimal Build alternatives and smaller than widening alternatives that add capacity.

Implementation would require federal authorization to toll existing Interstate lanes, as 23 USC Section 129 does not allow conversion of existing toll-free Interstate lanes to fully tolled facilities. The submittal refers to the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP); however, neither program can be implemented solely through the I-270 NEPA process. ISRRPP allows a limited number of states to toll existing Interstate facilities for reconstruction or rehabilitation purposes, subject to strict eligibility criteria and FHWA approval. Participation in ISRRPP is discretionary, capped nationwide, and not guaranteed; acceptance would require a separate federal application and approval process independent of this project's NEPA review. FHWA has indicated that ISRRPP has typically been applied in rural contexts for large-scale interstate reconstruction.

VPPP allows states to test value pricing strategies intended to manage congestion and influence travel behavior. Use of VPPP would also require FHWA approval and compliance with federal tolling requirements, and it does not broadly authorize conversion of existing general-purpose Interstate lanes to permanent toll lanes through this project alone. VPPP has generally been applied in urban contexts as part of broader, regionally coordinated congestion-pricing efforts.

However, while neither pilot program can be implemented solely through the I-270 NEPA process, the Preferred Alternative would not preclude CDOT and regional partners from pursuing a broader, regionally coordinated tolling pilot under either ISRRPP or VPPP in the future through the appropriate federal and metropolitan planning processes.

Consistent with ISRRPP and VPPP requirements, CDOT consulted with DRCOG to evaluate regional planning implications. The analysis indicates that the alternative would shift traffic from I-270 to other interstate facilities and to the local network, resulting in measurable system-level effects that must be considered within the region's long-range transportation framework.

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

ALT5. Express Lanes Community Impacts

Concerns were raised in the comments about how Express Lanes aren't equitable for the local community. Refer to response IMP1 for information about equity.

ALT6. Consideration of Increased Transit Options and Services

Some comments showed support for considering an increase in transit options and services rather than freeway expansion. Exclusive transit lane alternatives were evaluated during the screening process but were eliminated because they did not adequately address the project's Purpose and Need for corridor-wide safety, travel time reliability, and freight operations, and would have reduced capacity available to general traffic and freight on a facility that already operates over capacity.

The Preferred Alternative supports transit performance by allowing buses to operate in the Express Lane, free of charge, which maintains steady speeds using dynamic pricing and limited access points, consistent with managed lane operations on other Colorado highways. This results in:

- Priority access: Buses can bypass congestion using the Express Lane, improving travel times and schedule reliability.
- Improved rider experience: More consistent and reliable transit service makes transit a dependable option for commuters and other riders.
- Support for future growth: Enhanced reliability that helps justify future transit service expansion.

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

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

Comments have included adding both regional and local transit routes throughout the area. Stakeholder feedback has emphasized a transit need between northwest Aurora/Central Park, Westminster/Boulder, and Commerce City/Westminster. Based on existing origin-destination information, the highest observed travel volumes are between Commerce City and Brighton, followed by Commerce City and Central Park, and then Westminster and Boulder.

RTD's service planning thresholds, which look at how many riders would be needed to add service, are 3,000 weekday riders, with 5,000 riders preferred for regional routes and 1,000 to 1,500 riders per day for local routes. When considering the low regional transit mode share, which is generally five percent or less in the Denver metropolitan area, even the most active origin-destination locations are unlikely to produce enough transit ridership to meet RTD's service thresholds for new service. However, the analysis does reveal meaningful travel flows that present opportunities to improve or augment existing local and connecting transit services (CDOT 2025). As corridor improvements move forward and reliability improves, demand may grow for regional transit connections. This analysis provides a foundation for identifying incremental data-informed transit enhancements that reflect both observed travel patterns and community priorities. CDOT will continue conversations with RTD throughout implementation of the project.

For more information on transit, see the Transit, Bicycle, and Pedestrian Technical Report in Appendix D of the Draft EIS.

ALT7. Consideration of Increased Bicycle and Pedestrian Facilities

Comments were received that the project should focus on increasing bicycle and pedestrian facilities throughout the region instead of expanding I-270. The Bicycle, Pedestrian, and Transit Enhancements Alternative was developed in response to this comment that was received throughout the project development process. The alternative focuses on improvements to bicycle, pedestrian, and transit connections in the community, in lieu of additional highway capacity. This alternative only partially meets the Purpose and Need for the project (see GEN1) and was eliminated as a standalone alternative. It does not adequately address safety, travel time and reliability, transit on the corridor, or freight operations. The majority of the elements from this alternative were incorporated into the retained Build Alternatives.

The Preferred Alternative includes the following bicycle and pedestrian improvements:

- Improving the York Street I-270 ramp terminal intersections with crosswalks, curb ramps, and pedestrian indicators at the ramp terminal traffic signals.
- Adding a new 5-foot sidewalk on the west side and reconstructing a 6-foot sidewalk on the east side of Brighton Boulevard under I-270.
- Reconstructing East 56th Avenue under I-270 and adding an on-street bicycle lane, a 10-foot multi-use path, and 6-foot sidewalk connecting to existing sidewalks.
- Improving the intersection at East 56th Avenue and South Sandcreek Drive to include curb ramps, crosswalks, and lighting that meet current standards.
- Improving the intersection at East 56th Avenue and Eudora Street to include curb ramps, crosswalks, and lighting that meet current standards.
- Adding attached sidewalks on the west side of South Sandcreek Drive. The new sidewalks would be 8 feet wide from Quebec Street to East 47th Avenue Drive and 6 feet wide from East 47th Avenue Drive to East 49th Avenue, with a pedestrian crosswalk across East 47th Avenue Drive connecting the two segments.

- Improving wayfinding at key locations, guiding bicyclists and pedestrians to the nearest RTD bus stops, major road connections, or distances to the next trailhead to avoid out-of-direction travel.
- Reconfiguring the South Platte River Trail crossing under I-270 to improve bicycle and pedestrian visibility around tight curves and increase vertical clearance from the I-270 overpass.
- Improving bicycle and pedestrian visibility on the Sand Creek Trail by straightening out tight curves, adding a center stripe, and enhancing lighting at the Vasquez Boulevard bridge over the Sand Creek Trail.
- Adding a multi-use path with bicycle and pedestrian underpasses crossing under two freeflow interchange ramps on the east side of Vasquez Boulevard through the interchange with enhanced lighting.
- Adding a multi-use path on the east and west sides of the Vasquez Boulevard bridge over Sand Creek, connecting users from the East 56th Avenue and Vasquez Boulevard intersection to a new connection to the Sand Creek Trail.
- Adding a multi-use trail spur, connecting the proposed north-south Vasquez Boulevard multi-use trail to the East 56th Avenue and South Sandcreek Drive intersection.
- Adding a multi-use path in the southeast corner of East 56th Avenue and South Sandcreek Drive.
- Adding a 10-foot-wide bicycle and pedestrian overpass over I-270 and South Sandcreek Drive approximately halfway between East 56th Avenue and Quebec Street.

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

ALT8. Bicycle and Pedestrian Overpass

Comments were received that the 10-foot-wide bicycle and pedestrian overpass that would be built should be an underpass instead. The overpass would connect the Sand Creek Trail south of I-270, cross over South Sandcreek Drive and I-270, and connect with North Sandcreek Drive at East 53rd Way north of I-270. This location was identified as the best location for a new crossing between Vasquez Boulevard and Quebec Street because it would provide a direct connection between the adjacent neighborhood and the trail system. However, the area south of I-270 is within the Sand Creek floodplain and is subject to severe drainage and flooding conditions. As a result, construction of a bicycle and pedestrian underpass is not feasible due to engineering and safety constraints.

ALT9. Preferred Alternative and Vasquez Boulevard Interchange

Comments were received that the project needs to look at safety issues, poor bridge conditions, and outdated interchanges that don't allow enough room to merge onto the highway. Comments also indicated that the Vasquez Boulevard interchange, in particular, is the bottleneck in the corridor and something should be done to address that interchange.

The Preferred Alternative focuses on correcting documented safety deficiencies, reconstructing aging bridges, modernizing outdated interchanges, and bringing the corridor

up to current standards. The Preferred Alternative includes widening shoulders to meet current design standards, which generally provide full-width inside and outside shoulders intended to support emergency response, disabled vehicles, and traffic incident management. Providing wider shoulders is specifically intended to reduce the need for full lane closures during incidents and to improve responder safety.

The Preferred Alternative also includes adding a lane in each direction that will be operated as an Express Lane. Please see Section 3.4 of the Draft EIS for information on why the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative was preliminarily identified as the Preferred Alternative.

Improvements to the I-25/I-270 system interchange, including the flyover ramps to northbound I-25, are acknowledged as critical to corridor performance; however, those facilities are being addressed through separate, previously approved projects on I-25 and US 36 and have been assumed in the I-270 analysis but are not redesigned as part of this EIS. The Preferred Alternative does include restriping the westbound I-270 to northbound I-25 ramp to provide two lanes.

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

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

5.4.4 Impacts and Mitigation Measures

IMP1. Greenhouse Gases, 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 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 greenhouse gas emissions and climate change analyses in the federal environmental review process. Any purported greenhouse gas emissions and climate change impacts will not be considered in the federal decision. Accordingly, no greenhouse gas emissions or climate change analyses are included in this 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 (FTA), 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 greenhouse gas, climate change, and environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this NEPA analysis does not consider public comments regarding greenhouse gases, climate change, or environmental justice.

However, the State of Colorado requires consideration of air quality, greenhouse gases, climate change, and disproportionately impacted communities under Senate Bill (SB) 21-260, which is codified in Colorado Revised Statutes 43-1-128. For those analyses, refer to the State Environmental Reports posted on the I-270 Corridor Improvements Study website (<https://www.codot.gov/projects/studies/i270study>).

IMP2. Mitigation Measures

Comments were received that questioned mitigation, and whether it would be implemented. There was concern noted in multiple comments about impacts during construction related to traffic management.

Per the CDOT NEPA Manual (CDOT 2024), prior to mitigation, CDOT always makes its best effort to:

- Avoid the impact altogether by not taking a certain action or parts of an action
- Minimize impacts by limiting the degree or magnitude of the action and its implementation

However, if avoidance or minimization is not feasible, then mitigation measures may be implemented, including:

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted resource
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- Compensating for the impact by replacing or providing substitute resources or environments

As discussed in 23 CFR 771.109(b)(1) and 23 CFR 771.109(b)(2), CDOT and FHWA are responsible for ensuring the implementation of the mitigation measures committed to in the decision document unless FHWA approves their “deletion or modification in writing.” When entering into project agreements, FHWA must ensure that CDOT constructs the project in accordance with and incorporates all committed mitigation measures from the decision document. Therefore, any mitigation measures included in the decision document for a project must and will be completed.

Many of the mitigation measures to which CDOT has committed are typical mitigation measures that would be part of any project. One example includes best management practices (BMPs), which are effective, feasible (including technological, economic, and institutional considerations) conservation practices, and land and water management measures that avoid or minimize adverse impacts to natural and cultural resources. BMPs may include schedules for activities, prohibitions, maintenance guidelines, and other management practices. Physical BMPs may include items, such as wind barriers, to reduce the spread of dust from the site.

Additionally, many of the resources evaluated involve regulatory items or procedures that need to be followed and may include mitigation requirements. Typical BMPs and regulatory items are included in the estimate to construct the project and are not called out separately unless there is specific reason for doing so. The majority of these items are captured within the specifications/construction plans for the project.

Comments received during community outreach efforts were considered by CDOT and reasonable and feasible mitigation ideas were incorporated into the project as appropriate. Refer to Chapter 5.0, Measures to Minimize Harm and Environmental Commitments, of the ROD for a list of mitigation measures committed for the project.

CDOT has also developed additional enhancement commitments beyond those required in this NEPA document. Refer to the State Environmental Reports posted on the project website for information on those commitments.

IMP3. Mitigation Measures for Traffic Management during Construction

There was concern noted in multiple comments about impacts during construction related to traffic management. Traffic management during construction will involve developing and communicating traffic management plans, minimizing lane closures during peak travel times, establishing safe and well-signed work zones, and providing temporary access or detours when necessary. Alternative routes will be identified, evaluated for capacity and implemented in advance of construction activity. This will be communicated at least two weeks in advance to impacted residents and businesses.

A comprehensive public information plan will inform residents, businesses, and travelers about disruptions well in advance of any lane closures or highway restrictions. CDOT is committed to multilingual, multi-channel outreach, including project website updates, mailers, roadway signage, social media, outreach to local schools for any major closures, community events and partnerships with local organizations. The goal is to ensure that no community member first learns of a closure while already in traffic or late for work or school. Once construction begins, CDOT will have a full-time public information team dedicated to this project, and the public information plan will remain flexible to best meet the community's needs.

CDOT recognizes that small businesses and essential service providers depend on predictable traffic patterns and reliable access. Construction schedules and detour plans will take into account the needs of businesses operating within the project corridor. Advanced notice of closures and rerouting will be provided with sufficient lead time to allow businesses to plan and adapt, including those relying on delivery and logistics operations. Clearly designated trucking routes will be communicated to logistics companies and through the Colorado Motor Carriers Association and posted well in advance to prevent confusion and unsafe routing through residential streets.

IMP4. Noise Modeling and Noise Walls

Substantive comments received raised concerns that the noise modeling was done incorrectly, and that mitigation was not evaluated correctly.

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). Thorough analysis was conducted for each alternative through the corridor.

The I-270 corridor contains both noise-sensitive and non-noise sensitive receptors. Portions of the land in the corridor, such as industrial areas, manufacturing, retail facilities, warehousing, and government-managed lands, amongst other land uses, are not considered sensitive to traffic noise. These areas are not evaluated for noise impacts, and were therefore, not considered for validation readings.

Per the CDOT NAAG, the presence of a trail is not considered a noise-sensitive receptor; there must be a location where users would congregate, such as at a trailhead, rest area with benches, or scenic viewing areas. All relevant noise-sensitive trail and greenway receptors were accounted for in the noise analysis.

The original draft noise analysis performed under the previous EA process collected nine noise readings and was used as a basis of the analysis for the Draft EIS existing conditions model. These readings were collected in neighborhoods and recreational areas where noise impacts may occur. To validate the EA model for the Draft EIS analysis, an additional three noise readings were collected in residential and recreational areas, which validated the original analysis performed using the first nine points. Fifteen minutes is considered a sufficient reading duration per the CDOT NAAG because the noise meters obtained a steady-state reading.

Modeling the "loudest hour" was completed for existing (2023) and design year (2050) conditions and reflects the worst case of anticipated noise volumes. For the Preferred Alternative, trucks were assumed to rarely utilize the inner Express Lanes, which was accounted for in the models. Assessing a lane split for trucks in general-purpose lanes in 2050 is not feasible, as the traffic noise modeling does not quantify lane-by-lane usage of specific vehicle types.

Auxiliary lanes are included and accounted for on highways and ramps in the noise model.

Per FHWA and CDOT guidance, the loudest hour of noise is analyzed to determine noise impacts. Due to the anticipated additional congestion levels in 2050 without mitigation, the loudest hour in the No Action and Build Alternatives will occur midday when traffic is free-flowing in both directions.

The Draft EIS Noise analysis does not imply there are minimal impacts to noise; it notes there are no substantial impacts to noise, which is defined as a greater than a 10 decibel (dB) increase in noise over existing conditions. Noise is expected to increase by 0.2 dB to 4.6 dB for the Three General-Purpose Lanes Alternative and by 0.2 dB to 4.7 dB for the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative over the No Action Alternative. The Draft EIS analyzes all receptors impacted by noise for abatement when it meets the criteria established by FHWA and the CDOT NAAG.

CDOT must consider noise mitigation measures if the noise level at a sensitive receptor, such as a residence, meets or exceeds the threshold for the specific land use. Before recommending mitigation (generally, in the form of noise walls) CDOT must determine if mitigation is feasible and reasonable.

For a noise wall to be determined feasible, there are three criteria that must be met:

- It must provide at least a 5-dBA (A-weighted decibel) reduction for at least one impacted noise receptor.
- It also must not reduce safety, such as reducing sight distance.
- It must be possible to construct it with reliable and common engineering practices.

CDOT has determined that—for Colorado terrain and weather conditions, including common high wind events—20 feet is the maximum allowable noise wall height without compromising structural integrity under typical construction design specifications.

For a noise wall to be determined reasonable, there are three criteria that must be met:

- As a result of the noise wall, at least one noise receptor must experience a 7-dBA noise reduction.
- A Benefitted Receptors' Survey must be performed, and more than 50 percent of the responding owners and residents must support the construction of the noise wall. The required survey will be deferred until the final design phase of the project.
- The cost-benefit index must be no more than \$6,800 per dBA per receptor.

If a noise wall fails to meet all the feasibility and reasonability criteria, the wall cannot be recommended. If a single criterion for feasibility or reasonability is not met, analysis for

that particular noise mitigation ends. If a wall does meet all feasibility and reasonability requirements, it will be recommended pending completion of the Benefitted Receptors' Survey with 50 percent approval by owners and residents.

A noise wall north of I-270 and south of North Sandcreek Drive near the South Rose Hill Neighborhood was both feasible and reasonable. This barrier was determined to meet the initial criteria to be considered for noise abatement and is recommended to be constructed.

Per the CDOT NAAG, construction noise is considered temporary and modeling construction noise is not required. Measures will be taken to minimize noise during construction. Construction noise mitigation measures can be found in FHWA's Highway Construction Noise Handbook. CDOT would require the developer to use BMPs, such as limiting vehicle idling, to reduce noise during construction.

This project also will abide by the appropriate noise ordinances as they pertain to construction noise. The project occurs in unincorporated Adams County, Commerce City, and the City and County of Denver. While unincorporated Adams County does not have a noise ordinance, local noise ordinances exist for Commerce City and the City and County of Denver. When the local ordinance and State statute both apply, at any given time of day, the more stringent requirement applies.

Nighttime construction activities are anticipated with this project. Per City and County of Denver, a variance may be granted from construction restrictions, if it can be demonstrated that a construction project will interfere with traffic or jeopardize public safety, if completed during daytime hours. CDOT and the Contractor should coordinate with Commerce City and City and County of Denver prior to commencement of any construction activities outside of allowable hours.

See Appendix E, Traffic Noise Technical Report, of the Final EIS for details on the noise analysis and recommendations.

IMP5. 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 National Ambient Air Quality Standards (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 (RTP) which has demonstrated compliance with the associated motor vehicle emissions budgets for volatile organic compounds (VOC) and oxides of nitrogen (NO_x), which are ozone precursors, in the Denver Metropolitan/North Front Range state implementation plan for ozone.

Modeling forecasts that emissions of most criteria pollutants decrease from existing conditions to the design year, which is attributed to the implementation of stringent emission standards, improved fuel efficiency, and vehicle fleet turnover. Particulate matter less than 10 microns in diameter (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 particulate matter less than 2.5 microns in diameter (PM_{2.5}) and NO_x compared to the No Action Alternative in the design year.

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.

For more information on the NEPA air quality analysis, see Section 4.2, Air Quality, and Appendix E3, Air Quality Technical Report, of the Draft EIS.

Additional analyses were completed as required by the State of Colorado, including an assessment of alternatives as they relate to each other for air quality, greenhouse gases, and climate change. Refer to the State Environmental Reports on the project website (<https://www.codot.gov/projects/studies/i270study/deisandstatereports>) for more information.

IMP6. Air Quality - Modeling Methodology

There were comments with concerns about the methodology used for the modeling conducted for the NEPA process related to the emissions inventories not being adequate for a project-level analysis, including study area, inputs, and model version. In the emissions analysis conducted for the NEPA process, the Motor Vehicle Emission Simulator (MOVES) model runs were conducted at the project scale consistent with EPA's 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 in the Draft EIS were identified through interagency coordination and are largely consistent with EPA's guidance for project-level analysis of emissions in NEPA documents (EPA 2021).

DRCOG's travel demand model was adjusted to represent each alternative analyzed in individual model runs 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 as the time of commencement. State regulation requires federal models be used in an emissions analysis and 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 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 for federal NEPA projects. 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 Metro/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 NEPA process, 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.

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.

IMP7. Air Quality - Mitigation

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 Metro/North Front Range ozone nonattainment area to reduce emissions of the ozone precursors NOx and VOCs. 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 carbon monoxide (CO) and PM₁₀ NAAQS, including oxygenated fuels and vehicle inspection and maintenance programs for CO, 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 Code of Colorado Regulations [CCR] 1001-3, Emission Control for Particulate Matter, Smoke, Carbon Monoxide, and Sulfur Oxides) and 3 (5 CCR 1001-5, Stationary Source Permitting and Air Pollutant Emission Notice Requirements) to ensure that appropriate control measures are implemented during construction to reduce emissions of most pollutants and control fugitive dust. In addition, CDOT will implement applicable air quality mitigation commitments identified in the Draft EIS in Chapter 5, Preferred Alternative Mitigation Commitments, and carried forward into the ROD in Chapter 5.0, Measures to Minimize Harm and Environmental Commitments, including construction BMPs intended to further minimize emissions and protect local air quality during project construction.

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 enhancement commitments to implement as part of the project. Refer to the State Environmental Reports on the project website (<https://www.codot.gov/projects/studies/i270study/deisandstatereports>) for more information.

IMP8. Recreational Resources, including Section 4(f) and Section 6(f)

Comments were received that indicated upgrades for overall safety and regional connectivity on the trails in the study area. Comments also disagreed with Section 4(f) designations and noise analysis.

The Build Alternatives include improvements to the South Platte Trail at I-270, including blind curve reduction, added spurs/connections, and increased clearance under I-270. The Build Alternatives also include improvements to the Sand Creek Trail. These include:

- Reconstruction of the spur from Brighton Boulevard;
- New connections from Vasquez Boulevard to the Sand Creek Trail as well as a new multi-use path along Vasquez Boulevard with grade separations;
- New connections from adjacent roadways into the Dahlia Trailhead and improvements to the Sand Creek Trail at the Dahlia Trailhead; and
- A new bicycle and pedestrian overpass over I-270 providing a connection from the Sand Creek Trail to East 53rd Way.

The defining criteria for a property to qualify for Section 4(f) protection include:

- Must be publicly-owned;
- Must be open to the public;
- Must have a primary purpose of recreation (or refuge); and
- Must be "significant" as a recreation (or refuge) resource.

According to the FHWA Section 4(f) Tutorial, a primary/major purpose is determined through the Official with Jurisdiction's Master or Management Plan. Also, according to the Tutorial (FHWA n.d.), "Lands used primarily for non-recreational purposes but where recreational activities that are incidental, secondary, occasional, or dispersed activities similar to park, recreation, or refuge activities take place are not considered Section 4(f) activities."

The Sand Creek Regional Greenway is evaluated as a multiple use land holding in the Draft EIS. According to the Section 4(f) Policy Paper Question and Answer section (FHWA 2012), "Section 4(f) applies only to those portions of a multiple-use public property that are designated by statute or identified in an official management plan of the administering agency as being primarily for public park, recreation, or wildlife and waterfowl refuge purposes, and are determined to be significant for such purposes." Commerce City's Parks, Recreation and Golf Master Plan identifies the greenway as open space with primary purposes of natural land preservation and habitat conservation (Commerce City 2024). Section 4(f) applies only to the trail and amenity areas (benches, etc.) within the Greenway property because they are maintained for recreators.

Trails, greenways, and trailheads were analyzed as part of the Traffic Noise Analysis. Based on the noise analysis, 16 separate trail locations along the corridor are expected to see noise levels increase 0.0-3.2 dB (Preferred Alternative). Two trail locations are expected to see a 0.0-2.0 dB decrease in noise. The noise analysis was conducted in accordance with CDOT's September 2020 NAAG. Noise walls were not recommended for any of the trail locations because they were not reasonable and feasible.

23 CFR 774.15 addresses constructive uses under Section 4(f). A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the property are substantially diminished.

23 CFR 774.15(f) includes situations where FHWA has determined that a constructive use would not occur. This includes situations where the impact of projected traffic noise levels of the proposed highway project on a noise-sensitive activity does not exceed the FHWA noise abatement criteria. Therefore, noise increases at the trails, greenways, and trailheads would not constitute a use under Section 4(f).

Section 6(f) requires evaluation of whether a project will result in a conversion of a Land and Water Conservation Fund (LWCF) property into a transportation facility. Noise impacts do not constitute a conversion of LWCF property.

IMP9. Wildlife Crossings

Comments were received that suggested additional crossings between the north and south sides of I-270 that would accommodate wildlife. The I-270 corridor is situated in a substantially different landscape compared to other highways where CDOT has constructed wildlife crossing structures in the state. Wildlife movements across I-270 have been



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

- Habitat is very limited in adjacent areas outside of the Sand Creek Greenway,
- There are few records of roadkill on I-270 (only 13 animals recorded in 10 years [cat, dog, coyote, and deer], which is very low compared to most other highways), and
- The area was not identified as a priority area for wildlife mitigation in the East Slope and Plains Wildlife Prioritization Study.

IMP10. Water Quality

Comments were received that questioned why quantitative water quality modeling wasn't completed and how mitigation could be developed without that information. In addition, comments noted that the project would negatively impact water quality in the area due to the increase in impervious surface and that the project should also be considering the increase in total suspended solids.

Performing water quality modeling in Municipal Separate Storm Sewer System (MS4) areas does not allow for better permanent water quality (PWQ) control measure design. CDOT has found that following the MS4 requirements are what is needed because that is what the past modeling showed was needed. In MS4 boundary areas, projects go straight to incorporating the MS4 requirements. This saves the project and taxpayers time, money, and unnecessary work.

While there would be 128 and 133 acres of additional impervious area for the Build Alternatives, there are currently few to no PWQ control measures in the project boundary. Adding PWQ control measures that follow MS4 requirements as part of the project will have a net benefit to water quality on the adjacent waterways. The CDOT pollutants of concern, as listed in the CDOT MS4 Permit, would be captured in PWQ control measures, thus having a net benefit to water quality on the adjacent waterways. Crash fluids, tire wear pollutants, and deicer would also be captured in PWQ control measures.

Roadways do not increase suspended solids; unvegetated roadsides, disturbed areas in the basin, and increased stormwater flows increase suspended solids. The addition of PWQ control measures hold stormwater runoff from the impervious area with a calculated drain time designed to slow the water velocity to drop the sediment load. This holding time also reduces the velocity going into a water body, thus reducing the erosion within the water body as the water is slowly released.

Runoff volumes were created as part of the preliminary drainage design plans to determine where PWQ control measures should be placed at a conceptual level. Runoff volumes and

PWQ control measure locations will be finalized in final design. Treatment performance is typically completed in final design with the PWQ control measure final calculations, not at the concept/preliminary design level.

Green infrastructure and bioswales were discussed as part of identifying types and locations for PWQ control measures. Right-of-way and drainage basins, as well as maintainability and creating regional facilities were part of the process of identifying the types and locations of PWQ control measures.

5.4.5 Property Impacts

PROP1. Property Acquisitions

Concerns raised in the comments include how many properties are being acquired due to the project. The Preferred Alternative will result primarily in temporary easements, along with some permanent easements and ROW acquisition. No permanent residential or business displacements or relocations would occur as a result of the project. However, temporary business displacements may occur.

CDOT will notify all impacted owners of the intent to acquire an interest in their property. A ROW specialist and, if necessary, a translator, will be assigned to each property owner to help them understand and navigate this process.

The Fifth Amendment of the US Constitution provides that private property may not be taken for a public use without payment of just compensation. Additionally, the Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) is a federally mandated program that applies to all acquisitions of real property resulting from federal or federally assisted programs or projects, such as the implementation of the Preferred Alternative. The Uniform Act was created to provide for and ensure that just compensation for government-acquired land is applied “uniformly.” CDOT requires Uniform Act compliance on any project for which it has oversight responsibility, regardless of the funding source.

5.4.6 Transportation and Traffic

TRANS1. Traffic Forecasting and Modeling

Comments received during the Draft EIS review period raised concerns over how future traffic was forecasted and what models were used.

DRCOG, as the federally designated Metropolitan Planning Organization for the Denver region, develops and maintains the region’s travel demand model. The model is updated on a regular cycle to support the adopted long-range RTP. It is built using regional demographic and employment forecasts, adopted land use plans from local jurisdictions, roadway and transit network characteristics, and observed travel behavior data. These inputs are combined using established transportation modeling practices to estimate how people travel across the region by time of day, mode, and route.

The model relies on multiple data sources, including US Census and American Community Survey data, regional household travel surveys, traffic counts, transit ridership data, land

use plans from cities and counties, and state demographic forecasts. Local governments, transit agencies, CDOT, and other stakeholders participate in the regional planning process that establishes socioeconomic forecasts and network assumptions used in the model.

The DRCOG regional travel demand model is calibrated and validated to reflect observed real-world travel behavior before it is used for forecasting. Calibration involves adjusting model parameters so that modeled traffic volumes, speeds, trip lengths, and mode shares reasonably replicate observed base-year conditions. This process uses traffic count data, travel time data, transit ridership information, and household travel survey results. Validation compares modeled outputs to independent observed datasets to confirm that the model reproduces regional travel patterns within accepted industry standards. Only after the model demonstrates an acceptable match to existing conditions is it applied to future-year scenarios using adopted population, employment, and network assumptions.

23 CFR 450 Subparts B and C specifies that metropolitan transportation planning must include a 20-year forecast and be consistent with NEPA requirements. This ensures that traffic and transportation studies assess environmental impacts and follow a coordinated planning process. In nonattainment areas (where air quality standards are not met), conformity determinations from FHWA and FTA are required to ensure compliance.

DRCOG's model is used for a broad range of planning purposes, including development of the regional transportation plan, evaluation of roadway and transit investments, air quality conformity analysis, freight movement studies, and corridor-level project evaluations. It provides forecasts of traffic volumes, travel times, and mode share across the entire metropolitan network under long-range growth assumptions.

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

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

The regional model provides systemwide forecasts but does not capture detailed, lane-by-lane operational behavior. To evaluate corridor operations in greater detail, microsimulation models were developed using regional model outputs as baseline traffic inputs. Microsimulation models replicate individual vehicle movements along the corridor, including merging, weaving, lane changing, acceleration, and queue formation. These models incorporate geometric design features, such as ramp lengths, auxiliary lanes, and interchange configurations.

Similarly to the travel demand model, the corridor-level microsimulation model developed for the Draft EIS was first calibrated to existing traffic operations. Observed traffic volumes, lane utilization patterns, travel times, queue lengths, and merging behavior were used to adjust model parameters so that simulated conditions closely matched current field conditions. This calibration ensures that the model accurately represents how vehicles interact with specific geometry and constraints of the corridor. Once the existing conditions model reliably replicated observed operations, projected 2050 traffic volumes from the regional travel demand model were applied to the calibrated microsimulation network. This approach allows the future-year analysis to build directly on a validated representation of current operations, providing a realistic basis for comparing how each alternative is expected to perform under long-term demand. Results provide detailed information on travel times, delay, queue lengths, merge performance, and operational reliability. This analysis helps determine whether proposed geometric improvements meaningfully reduce bottlenecks, improve safety-related operational characteristics, and support transit and freight movement. Together, the regional travel demand model and microsimulation modeling provide both system-level and corridor-level insight into how the project is expected to function over the long term.

Refer to Appendix E2, Traffic Technical Report, for more information.

TRANS2. Induced Demand and Travel Demand Forecasting

Many comments received during the Draft EIS review period raised concerns about how induced demand was being included in the traffic modeling and travel demand modeling.

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

It is also important to distinguish between latent demand and induced demand. Latent demand refers to trips that are already desired but suppressed due to severe congestion, reflecting reduced mobility as well as suppressed demand. When operational conditions improve, those trips may shift back to the facility from parallel routes, different times of day, or fewer direct paths. Induced demand more broadly refers to longer-term changes in travel behavior, such as changes in trip frequency, destination, or development patterns over time. The regional travel demand model captures both effects, to the extent feasible, at a metropolitan scale by allowing shifts in route, time, and mode within the adopted land use framework. The model does not assume unlimited new growth as a result of a single corridor project; rather, it is constrained by the region's adopted population and employment forecasts.

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

The Preferred Alternative was identified in part because it balances transportation needs with the goal of minimizing environmental and community impacts. Compared to higher-capacity concepts evaluated during screening, it limits the overall footprint; avoids more extensive ROW expansion; and incorporates environmental avoidance, minimization, and mitigation measures where impacts cannot be avoided. The Preferred Alternative is not intended to eliminate all existing or forecasted congestion on I-270. The purpose of the project is broader and includes addressing documented safety deficiencies, outdated interchange geometry, substandard merge distances, aging bridges, freight mobility needs, and transit reliability within the corridor. The traffic analysis projects that under the No Action Alternative scenario, congestion would become more severe by 2050 as regional travel demand grows, resulting in longer delays and queues, increased stop-and-go conditions, higher potential for congestion-related crashes, and greater emissions associated with extended idling and repeated acceleration. The Preferred Alternative is intended to address these structural and operational deficiencies and improve overall safety and reliability, rather than assume that congestion can be fully eliminated in a growing metropolitan region.

5.4.7 Construction and Contracting

CON1. Contracting Requirements

Several comments were received that suggested only using local contractors—not out-of-state contractors—and to require contractors on the project to use zero emissions vehicles and equipment. In addition, comments indicated that if diesel engines must be used, then CDOT should require them to have the best available control technology installed.

CDOT and the I-270 project team will implement strategies to encourage local contractors to work on the project. CDOT has a statewide program, [Connect2DOT](#), that is designed to help small businesses become more competitive and successful in working with CDOT and other local transportation agencies. CDOT offers free unlimited consulting, free or low-cost business training, and outreach events tailored to highway and bridge construction contractors and engineering-related professional services firms.

The Draft EIS acknowledges that there will be temporary increases in noise and emissions that may result in disturbances to the area. CDOT will take steps to minimize these disturbances through creating bid specifications in the contractor selection for project construction that prioritize and maximize use of zero emissions and lower emitting engines to the extent that a fair and open competitive solicitation process is maintained. Refer to

the State Environmental Technical Reports on the project website for additional information on potential emissions reduction items.

5.4.8 Funding Strategies

FUND1. Project Funding

A breakdown of project costs for transparency was a question raised in the comments.

The Preferred Alternative is estimated to cost \$806 million in 2026 dollars, which also includes the remaining pre-construction and construction costs as well as money spent to date on NEPA and other corridor improvements. The Preferred Alternative costs approximately \$17 million more than the Three General-Purpose Lanes Alternative, primarily due to the costs to design and construct the additional 8 feet for the Express Lane buffer area and the additional Intelligent Transportation Systems (ITS) and tolling equipment costs. Although the Preferred Alternative requires a larger capital investment and increases total operating and maintenance costs, it also introduces a potential revenue stream through toll collection, which could support both capital and ongoing expenditures.

The project, covering all three phases, is within the DRCOG 2050 Metro Vision RTP and DRCOG is the federally designated metropolitan planning organization for the Denver region. The current DRCOG fiscally constrained RTP (published May 2024) lists two I-270 projects totaling \$800 million; one totaling \$500 million with a staging period of 2020-2029, and the other totaling \$300 million with a staging period of 2030-2039 and complies with the transportation conformity regulations in 40 CFR Section 93. As referenced, the project is included in the DRCOG 2026-2029 Transportation Improvement Program Identification Number: 2020-068 (<https://apps.drcog.org/TRIPS/TIPProject/2026-2029/details/52690>) and the 2050 RTP (<https://drcog.org/sites/default/files/acc/TPO-RP-50MVRTP-EN-ACC-17x11-26-04-03-v1.pdf>).

DROCG updates the 2050 Metro Vision RTP every four years and is currently updating its RTP, with anticipated completion and publication in late 2026. DRCOG's board of directors voted for unanimous adoption of the 2026 update during a January 2026 board meeting. CDOT coordinated with DRCOG to include updates to the 2026 RTP that align with the project's updated funding estimates. The updated RTP lists two I-270 projects totaling \$902 million: one totaling \$340 million with a staging period of 2025-2029, and the other totaling \$562 million with a staging period of 2030-2034.

The \$340 million allocated for the 2025-2029 staging period covers all Phase 1 construction work and provides additional funding to advance the final design of Phases 2 and 3. The \$562 million allocated for the 2030-2034 staging period accounts for Phases 2 and 3 construction.

Construction of the I-270 Corridor Improvements project will be supported through a combination of state and federal funding sources, including Strategic Colorado State Legislative funds, federal competitive grants, the Statewide Bridge and Tunnel Enterprise (BTE), and the CTIO. CDOT anticipates approximately \$150 million in Strategic Colorado State Legislative funding will be allocated towards construction of I-270 Corridor Improvements. Strategic Colorado State Legislative funds designated for the project are

included in CDOT's Vision for Colorado's Transportation System: Updated 10-Year Strategic Project Pipeline (September 2022), which identifies statewide transportation priorities. To maximize funding opportunities and ensure project delivery, CDOT is also actively pursuing federal discretionary grants to supplement Strategic Colorado State Legislative contributions and has received a federal Rebuilding American Infrastructure with Sustainability and Equity grant for the Vasquez Boulevard interchange. BTE finances, repairs, reconstructs, and replaces Designated Bridges as defined by SB 09-108 - Funding Advancements for Surface Transportation and Economic Recovery Act of 2009 (FASTER). BTE will fund nine of the 12 bridges being replaced along the corridor, including:

- Eastbound and westbound I-270 bridges over the South Platte River
- Eastbound and westbound I-270 bridges over the Burlington Ditch
- Westbound I-270 bridge over Brighton Boulevard/Union Pacific Railroad/BNSF Railway (BNSF)
- Westbound I-270 bridge over East 60th Avenue and BNSF
- York Street bridge over I-270
- Westbound I-270 bridge over East 56th Avenue
- Vasquez Boulevard bridge over Sand Creek

FASTER created the Colorado High Performance Transportation Enterprise, now doing business as CTIO, in 2009 as an independent, government-owned business within CDOT. CTIO has the legal responsibility to aggressively seek out opportunities for innovative and efficient means of financing and delivering important surface transportation infrastructure projects in the state. It has the statutory power, among others, to impose tolls and other user fees, to issue bonds, and to enter contracts with public and private entities to facilitate Public-Private Partnerships. Because the Preferred Alternative includes Express Lanes, CDOT will also seek funding support from CTIO. CTIO is conducting a toll and revenue study for the I-270 corridor to estimate the level of contribution Express Lane revenues could make toward construction, operation, and maintenance of the corridor.

Funding through CTIO would only be an option for the Preferred Alternative; CTIO funding would not be available for the Three General-Purpose Lanes Alternative.

The most up-to-date breakdown for all project costs, including NEPA, design, construction, and past bridge repair efforts, as of the end of April 2026 is shown below. This estimate will change with time and CDOT will remain transparent on project estimates and budget. Refer to Section 3.7 of the Draft EIS for the construction phasing strategy.

Phase 1 - Critical Bridges - \$307,000,000. The cost includes the following elements:

- Design and reconstruction of eight bridges
- Design and reconstruction of limited I-270 roadway
- Environmental mitigations as described in Chapter 5.0 of the ROD
- Community enhancement efforts as described in the State Environmental Reports (<https://www.codot.gov/projects/studies/i270study/deisandstatereports>)

Phase 2 - Remaining I-270 Mainline - \$402,000,000. The cost includes the following elements:

- Design and reconstruction of three bridges
- Design and reconstruction of remaining I-270 roadway, including ITS
- Design and reconstruction of the Vasquez Boulevard interchange
- Design and reconstruction of I-76 ramp improvements
- Environmental mitigations as described in Chapter 5.0 of the ROD
- Community enhancement efforts as described in the State Environmental Reports

Phase 3 - Remaining Project - \$97,000,000. The cost includes the following elements:

- Design and reconstruction of one bridge
- Design and reconstruction of Sandcreek Drive
- Design and construction of the pedestrian overpass
- Environmental mitigations as described in Chapter 5.0 of the ROD
- Community enhancement efforts as described in the State Environmental Reports