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2.0 Alternatives Considered and Selected Alternative

2.1 Alternatives Considered in the Draft Environmental Impact Statement

Over the course of the National Environmental Policy Act (NEPA) process, the Federal Highway Administration (FHWA) and CDOT evaluated a range of reasonable alternatives to address the Purpose and Need for the I-270 Corridor Improvements Project (project) along the I-270 corridor and meet the goal of minimizing environmental and community impacts. Alternatives development was informed by public, agency, and stakeholder input and considered a range of improvement strategies, including additional travel lanes, operational and safety enhancements, transit supportive elements, and bicycle and pedestrian connectivity improvements.

The alternatives development and screening process is documented in the Draft Environmental Impact Statement (EIS) Chapter 3.0 and Appendix B, Alternatives Development Technical Report, and remains valid except as updated in Chapter 2.0, Changes Since the Draft EIS and Errata, of the Final EIS.

2.2 Alternatives Eliminated During Screening

The reasonable range of alternatives was evaluated through a multiphase screening process based on the project's Purpose and Need and goal.

The Level 1 screening included an initial evaluation to determine if the alternative has the potential to be responsive to the project's purpose and need. Those alternatives that had the potential to address two or more needs were carried forward to Level 2 Screening.

Alternatives determined to not have the potential to address at least two elements of the project's Purpose and Need were not retained for Level 2 screening. The Bicycle, Pedestrian, and Transit Enhancements Alternative was eliminated as a standalone alternative because it does not adequately address safety, travel time and reliability, transit on the corridor, and freight operations. Most of the elements from this alternative were incorporated into the retained alternatives for Level 2 screening.

Level 2 screening included a comparative analysis of alternatives to identify the alternatives that best meet the Purpose and Need and the project goal to minimize environmental and community impacts resulting from the project. The following build alternatives were considered but eliminated from further study:

- **Bicycle, Pedestrian, and Transit Enhancements Alternative.** This alternative focused on bicycle, pedestrian, and transit improvements within the community without modifying mainline I-270; as a result, it did not resolve corridor congestion, safety issues, or freight needs, and was therefore eliminated during Level 1 screening.
- **Minimal Build Alternative.** This alternative proposed replacing aging bridges and pavement and implementing targeted safety improvements but did not add any additional capacity; because it did not adequately address recurring congestion, travel time reliability, or freight operational need, it was eliminated in Level 2 screening.
- **Two Express Lanes that Accommodate Transit Alternative.** This alternative focused on community bicycle, pedestrian, and transit improvements while converting the two existing general-purpose lanes into Express Lanes with differential tolling and without adding capacity to I-270; it was eliminated in Level 2 screening due to feasibility constraints related to converting general-purpose lanes to tolled lanes, and because it did not demonstrate a reasonable potential to outperform the Two General-Purpose Lanes and One Lane that Accommodates Transit Alternative in meeting the project's Purpose and Need.
- **Two General-Purpose Lanes and One Transit-Only Lane Alternative.** This alternative added a dedicated transit-only lane while retaining two general-purpose lanes, which resulted in degraded overall corridor performance and provided limited safety and freight benefits. This alternative was eliminated in the Level 2 screening because other alternatives that also scored high on the ability to improve transit speeds on the corridor scored better on the potential to reduce crashes, improve travel time and reliability, and improve freight operations.
- **Three General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative.** This alternative proposed an eight-lane configuration that added both a general-purpose and an Express Lane which increased weave/merge complexity and expanded the overall footprint. It provided diminishing operational benefits due to bottlenecks at I-25/US 36 and I-70, and it was therefore eliminated in Level 2 screening.
- **Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit Alternative.** This alternative introduced an eight-lane configuration with two Express Lanes, resulting in higher environmental and right-of-way (ROW) impacts, offering only moderate freight benefits, and providing excess capacity relative to demand; as a result, it was eliminated in Level 2 screening.

The No Action Alternative was also screened and even though it does not meet the Purpose and Need, it was retained for full evaluation as a baseline for comparison as required under NEPA.

2.3 Alternatives Fully Evaluated in the Draft EIS

The No Action Alternative and two Build Alternatives were advanced for full evaluation in the Draft EIS. The No Action Alternative consists of continued routine maintenance and completion of programmed improvements identified in the Denver Regional Council of Governments 2050 Metro Vision Regional Transportation Plan. It does not include additional capacity on I-270 and would retain the existing configuration of two general-purpose lanes in each direction.

Build Alternatives evaluated in the Draft EIS include:

- **Three General-Purpose Lanes Alternative:** This alternative includes:

Mainline Improvements

- Providing three general-purpose lanes in each direction
- Widening shoulders to meet current standards
- Restriping of the westbound I-270 to northbound I-25 off-ramp to provide dual-exit lane capacity
- Adding emergency turnouts and turnaround
- Adding one continuous auxiliary lane in each direction between the I-76 and Vasquez Boulevard on-ramps and off-ramps

Interchange Improvements

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

Bridge Improvements

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

- Replacing the existing Vasquez Boulevard bridge over Sand Creek to meet current bridge standards and accommodate this project's bicycle and pedestrian improvements

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 and guiding bicyclists and pedestrians to the nearest Regional Transportation District (RTD) bus stops, major road connections, or distances to the next trailhead to avoid out-of-direction travel

Trail Improvements

- 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 and 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 and 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

Transit Improvements

- Adding four new bus stops with connecting sidewalks and curb ramps on Quebec Street and South Sandcreek Drive near the I-270/Quebec Street interchange to improve access to RTD routes 88 and 37
- **Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative:** This alternative includes:

Mainline Improvements

- Providing two general-purpose lanes and one Express Lane in each direction. Transit vehicles and high-occupancy vehicles (three or more people) could travel in the Express Lane, free of charge. Other travelers, including freight trucks, who choose to pay a fee could also use the new Express Lane.
- Remainder of mainline improvements identified in the Three General-Purpose Lanes Alternative

Interchange Improvements

This alternative includes the same interchange improvements identified in the Three General-Purpose Lanes Alternative.

Bridge Improvements

This alternative includes the same bridge improvements identified in the Three General-Purpose Lanes Alternative.

Bicycle, Pedestrian, Trail, and Transit Improvements

This alternative includes the same bicycle, pedestrian, trail, and transit enhancements identified in the Three General-Purpose Lanes Alternative.

For the project design year of 2050, both Build Alternatives improve travel time, safety, and freight movement relative to the No Action Alternative and include the same bicycle/pedestrian and interchange improvements.

The Draft EIS preliminarily identified the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative as the Preferred Alternative based on results of the detailed analysis in the Draft EIS. For more information on the preliminary identification of the Preferred Alternative, refer to Section 3.4 and Appendix B of the Draft EIS.

2.4 Selected Alternative

Based on the analysis presented in the Draft EIS, the updates provided in the Final EIS, and the project file developed throughout the NEPA process, FHWA has selected the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative (Selected Alternative) for implementation.

The Selected Alternative consists of reconstruction of the I-270 corridor to provide the improvements identified above.

The basis for FHWA's identification of the Selected Alternative is described in Section 2.4.1.

2.4.1 Basis of Decision

FHWA and CDOT identified the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative as the Selected Alternative based on consideration of the project's Purpose and Need, public and agency comments received on the Draft EIS, and evaluation of environmental, engineering, and cost factors. The Final EIS (incorporating the Draft EIS and Errata) provides the technical basis for this decision. FHWA's decision is based on several key considerations, including:

- **Purpose and Need.** The Selected Alternative most effectively improves travel time and reliability, corridor safety, and freight operations, while also providing transit advantages through a managed Express Lane that maintains reliable speeds and reduces conflict points compared with unmanaged capacity additions.
- **Public and Agency Input.** FHWA and CDOT considered comments on safety, reliability, freight, and community outcomes, including requests to avoid interchange bottlenecks and to strengthen multimodal connections. The Selected Alternative responds by using a single Express Lane per direction (rather than wider cross-sections) and by incorporating a comprehensive bicycle, pedestrian, and transit package.
- **Environmental Factors.** Most environmental resources are projected to experience similar impacts under both Build Alternatives. Slight differences in impacts are projected for air quality, water quality, and visual resources. The Selected Alternative generally results in lower emissions, primarily due to reduced congestion and smoother traffic flow, for criteria pollutants and mobile source air toxics. The Selected Alternative has an additional 5 acres of impervious surface area due to the 8-foot buffer required for the Express Lanes. The Selected Alternative introduces more visual elements, including tolling infrastructure, like overhead signs and cameras.
- **Engineering Factors.** Both the Selected Alternative and the Three General-Purpose Lanes Alternative incorporate the same core reconstruction and safety improvements. Compared to the Three General-Purpose Lane Alternative, the Selected Alternative better aligns with the statewide Express Lane system by providing continuity with Express Lanes on US 36, I-25 and I-70, avoiding lane drops and merge conflicts that create bottlenecks and associated safety concerns. This is reflected in how the Three General-Purpose Lanes Alternative provides additional general-purpose lane capacity but fewer operational, safety, and travel time benefits than the Selected Alternative.
- **Cost.** The Selected Alternative's capital cost is comparable to—and only modestly higher than—the Three General-Purpose Lanes Alternative, primarily due to the Express Lane buffer and Intelligent Transportation Systems/tolling needs; however, it can leverage a potential toll revenue stream to support delivery and operations, offering a more robust long-term funding approach.

2.5 Environmental Considerations and Required Findings

2.5.1 Environmentally Preferred Alternative

While both Draft EIS Build Alternatives include the same bicycle and pedestrian enhancements and bridge/interchange reconstructions, the Selected Alternative is environmentally

preferable on balance because it achieves improved operations, resulting in reduced congestion-related emissions and fewer conflict points, without the additional footprint and merge complexity associated with construction of two additional lanes.

Compared to the Three General-Purpose Lanes Alternative, the Selected Alternative provides greater travel time reliability, improved transit performance, and slightly lower emissions due to more effective congestion management. By avoiding end-of-corridor bottlenecks and maintaining reliable speeds, the Selected Alternative reduces stop-and-go traffic conditions that contribute to increased vehicle idling, emissions, and crash potential.

The Selected Alternative also minimizes ROW requirements and associated environmental and community impacts relative to wider configurations considered during screening. Based on consideration of the context and intensity of impacts and the comparative performance of the reasonable alternatives, FHWA has determined that the Selected Alternative is the environmentally preferable alternative.

2.5.2 Section 4(f) Determination

The Draft EIS evaluated whether the Selected Alternative would result in a “use” of land protected under 49 USC Section 303/23 USC Section 138 (Section 4(f)), including public parks and recreation areas, wildlife and waterfowl refuges, and historic properties within the project study area (see Draft EIS Chapter 4.0, Section 4.15; Appendix E17). Per 23 Code of Federal Regulations (CFR) 774.17, a Section 4(f) use occurs when: (1) land is permanently incorporated into a transportation facility; (2) there is a temporary occupancy of land that is adverse under 23 CFR 774.13(d); or (3) there is a constructive use per 23 CFR 774.15. In addition, FHWA may determine that a project results in a *de minimis* impact, which is a type of Section 4(f) use that, after consideration of avoidance, minimization, mitigation, and enhancement measures, is found not to adversely affect the activities, features, or attributes that qualify the property for Section 4(f) protection (23 CFR 774.17).

Section 4(f) resources identified for analysis in the Draft EIS included: (a) historic properties eligible for or treated as eligible for the National Register of Historic Places within the Area of Potential Effects (APE); and (b) recreation resources in the study area, such as the South Platte River Trail, Sand Creek Trail, Clear Creek Trail, and access features (e.g., Dahlia Trailhead). Other nearby parks and open spaces were also evaluated for Section 4(f) applicability and potential effects.

Following this evaluation, FHWA determined that the Selected Alternative would involve several Section 4(f) properties. As described in the subsections below, FHWA concluded that any Section 4(f) uses associated with the Selected Alternative qualify as *de minimis* impacts, while other activities qualify for the temporary occupancy exception and therefore do not constitute a Section 4(f) use. For each property, the applicable Section 4(f) determination, a summary of the nature and extent of impacts, the relevant regulatory information, and coordination with the Officials with Jurisdiction (OWJ) are summarized consistent with 23 CFR 774. These determinations reflect the findings disclosed in the Draft EIS and updated coordination completed for this combined Final EIS/Record of Decision (ROD).

2.5.2.1 Historic Properties

Section 4(f) Finding: *de minimis*

The Selected Alternative would require permanent and/or temporary easements from 10 of the 11 National Register of Historic Places-eligible properties identified within the APE. These easements would result in minor, localized, and temporary effects that would not adversely affect the historic features, attributes, or activities that qualify these properties for protection under Section 4(f). All disturbances would be limited in scope, occur within previously developed transportation corridors, and be restored or repaired consistently with commitments developed through Section 106 consultation. Details regarding impacts to historic properties, consultation, and mitigation are detailed in Appendix E17 of the Draft EIS.

CDOT coordinated with the Colorado State Historic Preservation Office (SHPO) on behalf of FHWA throughout the Section 106 consultation process. Following publication of the Draft EIS, minor changes to the environmental footprint modified easement requirements for the Burlington Ditch (5AM.465.9), Suncor (5AM.4044), DP/UP Segment-Greeley Line (5AM.472.41), and CB&Q/BNSF Segment-Brush Line (5AM.464.21). As a result, CDOT reopened Section 106 consultation with SHPO on February 5, 2026. In that consultation, CDOT requested concurrence on updated effects determinations and notified SHPO that FHWA intended to apply a *de minimis finding* under Section 4(f) for the affected historic properties. On February 17, 2026, SHPO concurred with CDOT's determination that the revised undertaking would result in No Adverse Effect to the affected historic resources and confirmed that the proposed *de minimis* finding remains valid and appropriate for the project.

Based on the completed Section 106 consultation and SHPO concurrence, FHWA signed a *de minimis* finding for the project on August 20, 2025, as documented in the Draft EIS (Appendix E-17, Attachment D). Additional consultation was conducted following the minor changes to the environmental footprint as noted above. As a result, FHWA signed a subsequent *de minimis* finding on March 17, 2026. The updated consultation record is provided in Appendix A of this ROD.

2.5.2.2 Recreational Resources

Public involvement for the proposed *de minimis* findings for recreational Section 4(f) resources was conducted during the Draft EIS public review period. Public hearing/open house meetings were held on January 8, 10, and 13, 2026. Project exhibits and the public comment form described impacts to recreational Section 4(f) resources, proposed avoidance, minimization and mitigation measures, and solicited feedback regarding the effects on the South Platte River Trail, Sand Creek Trail, and Dahlia Trailhead. The materials were also made available on the project website throughout the public review period. No comments were received regarding the proposed recreational Section 4(f) *de minimis* findings. Written concurrence from the OWJs is provided in Appendix A of this ROD. FHWA documented the project's *de minimis* finding in correspondence dated June 8, 2026, which is available in Appendix A of this ROD.

South Platte River Trail

Section 4(f) Finding: Temporary Occupancy Exception

Impacts to the South Platte River Trail include temporary closure of approximately 500 feet of trail under I-270 to support bridge replacement and realignment of approximately 900 feet of trail to meet current design standards and address existing vertical clearance, grade, and curve deficiencies. A temporary trail would be provided during construction and would experience several overnight closures. Details regarding impacts to the South Platte River Trail, consultation, and mitigation are detailed in the Draft EIS in Appendix E17.

The temporary occupancy associated with construction of the Selected Alternative satisfies the criteria of 23 CFR 774.13(d). The duration of the temporary occupancy would be less than the time needed for construction of the project and would require only temporary construction easements, with no change in ownership of the trail property (criterion 1). The occupancy is minor in scope and includes temporary trail closure, bridge replacement activities, and trail improvements that would enhance accessibility, increase vertical clearance, improve sight distances, and provide new connections to the Sand Creek Regional Greenway (criterion 2). Trail continuity would be maintained during construction through a temporary trail, and overnight closures would occur only outside Adams County's established trail operating hours. As a result, the project would not permanently adversely affect or substantially interfere with the activities, features, or attributes that qualify the South Platte River Trail for Section 4(f) protection (criterion 3). Following construction, all disturbed portions of the trail would be reconstructed and restored in accordance with the project mitigation commitments, and the trail would be reopened for public use (criterion 4).

Adams County Parks, Open Space and Cultural Arts, the OWJ for the South Platte River Trail, provided written concurrence on November 22, 2024, that the project meets the requirements of the temporary occupancy exception under 23 CFR 774.13(d) (criterion 5) (see Appendix A of this ROD).

Sand Creek Trail

Section 4(f) Finding: *de minimis*

The Selected Alternative would result in minor, localized, and temporary impacts associated with several construction activities along multiple segments of the trail, including permanent and temporary easements, temporary closures, and detours. These activities would not adversely affect the protected activities, features, or attributes of the trail. Impacts would be temporary, and areas of potential permanent easements are relatively small compared to the overall length of the facility. Continuity would also be maintained for users of the trail. All disturbed areas would be restored to pre-construction conditions, and access to the Sand Creek Trail would be preserved throughout construction. Details regarding impacts to the Sand Creek Trail, consultation, and mitigation are detailed in the Draft EIS in Appendix E17.

Commerce City and the Sand Creek Regional Greenway Partnership (SCRGP), the OWJs for the Sand Creek Trail, provided written concurrence supporting FHWA's *de minimis* impact determination (see correspondence dated May 8, 2026, and May 13, 2026; Appendix A of this ROD).

Dahlia Trailhead

Section 4(f) Finding: *de minimis*

The Selected Alternative results in minor, localized, and temporary impacts to the Dahlia Trailhead. Impacts are associated with constructing new sidewalk connections, temporary construction access, and brief disruptions within the parking area. These activities would not adversely affect the protected activities, features, or attributes of the trailhead. Public access would be maintained, and a portion of parking would remain available. Any event coordination would occur in advance, and all disturbed areas would be restored to pre-construction conditions. Impacts to the Dahlia Trailhead are detailed in the Draft EIS in Appendix E17.

Commerce City and the SCRGP (the OWJs for the Dahlia Trailhead) have provided written concurrence supporting FHWA's *de minimis* impact determination (see correspondence dated May 8, 2026, and May 13, 2026; Appendix A of this ROD).

2.5.2.3 Final Section 4(f) Findings for the Selected Alternative

FHWA has completed all required Section 4(f) evaluations and determinations for the resources described above, and the approvals documented herein constitute the final Section 4(f) findings for the Selected Alternative.

2.5.3 Wetland Finding

Executive Order (EO) 11990, Protection of Wetlands, requires federal agencies to avoid, to the extent practicable, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid support of new construction in wetlands, wherever there is a practicable alternative.

As documented in Section 4.5 of the Draft EIS, wetlands are present throughout portions of the I-270 corridor, primarily within drainageways, riparian areas, and open water/wetland complexes associated with Clear Creek, the South Platte River, the Sand Creek corridor, and adjacent urban drainage features. These wetlands consist of palustrine emergent wetlands, palustrine scrub-shrub wetlands, and palustrine forested wetlands, as well as areas of riparian woodland and herbaceous wetland vegetation adjacent to channelized waterways.

Wetlands and aquatic resources in the study area occur in highly developed and previously disturbed settings, influenced by existing transportation infrastructure, industrial development, and past channelization. Despite these alterations, these wetlands provide ecological functions, including limited habitat support, water quality filtration, and localized flood attenuation.

FHWA and CDOT incorporated avoidance and minimization measures during alternatives development consistent with EO 11990. As described in Section 2.1, a range of reasonable alternatives was screened, including those with differing footprints, lane configurations, and interchange concepts. Options that would have shifted I-270 outside the existing corridor were dismissed because they would introduce greater environmental impacts and ROW needs, including potentially greater wetland impacts. The Selected Alternative maintains the existing alignment of I-270 and focuses on improvements within the established transportation

corridor, reducing the extent of encroachment into wetlands adjacent to Sand Creek, the South Platte River, and Clear Creek. Bridge replacements over these waterways are designed to fit within (or close to) the footprint of existing structures, limiting disturbance to riparian and wetland areas. Construction sequencing, design refinements, and the use of best management practices (BMPs) further reduce potential impacts.

As documented in the Draft EIS, the Selected Alternative results in direct and indirect impacts to wetlands from bridge replacement, approach roadway work, auxiliary lane construction, and trail improvements in riparian corridors. These impacts include permanent fill, temporary construction disturbance, and vegetation clearing in wetland and riparian areas adjacent to Sand Creek, the South Platte River, and Clear Creek. The Selected Alternative results in approximately 2.61 acres of permanent wetland impacts and 0.31 acres of permanent non-wetland waters impacts, as well as approximately 1.63 acres of temporary wetland impacts and 3.38 acres of temporary non-wetland waters impacts related to construction staging, bridge replacement, and trail detours.

Consistent with EO 11990, FHWA and CDOT evaluated whether any practicable alternative would avoid new construction in wetlands. As described in the Draft EIS, the No Action Alternative would avoid new construction impacts but would fail to meet the project's Purpose and Need and would not correct current deficiencies in structures that already span wetland and riparian habitats. Alternatives requiring rerouting or additional new alignments outside the I-270 corridor were dismissed early in the evaluation process because they would result in greater environmental impacts, including greater wetland disturbance, longer impacts to waterways, and new ROW needs. Alternatives carried into detailed analysis minimized wetland disturbance by reconstructing I-270 within (or immediately adjacent to) the existing corridor footprint and resulted in the same impacts to wetlands. Therefore, no practicable alternative exists that would fully avoid impacts to wetlands in the project area.

Consistent with EO 11990, FHWA and CDOT have incorporated all practicable measures to minimize harm to wetlands. As described in the Draft EIS, these measures include:

- Designing bridge replacements to fit within (or near) existing spans to reduce disturbance in riparian corridors and wetland margins.
- Avoiding encroachment beyond existing ROW where feasible.
- Implementing BMPs during construction, including creation of and implementation of a stormwater management plan, erosion and sediment control, spill prevention, and protection of riparian vegetation.
- Restoring temporarily disturbed wetland areas to pre-construction conditions where feasible.

Compensatory mitigation for unavoidable wetland impacts will be provided consistent with US Army Corps of Engineers requirements under the Clean Water Act Section 404 permitting process, using mitigation banking or permittee responsible mitigation, as determined appropriate during permitting. This approach ensures no net loss of wetland function. A series of Nationwide Permits (NWP) are anticipated to permit the proposed work, including, but not limited to, NWP 14 for linear transportation projects and NWP 3 for the repair, rehabilitation, or replacement of serviceable structures.

Based on the considerations described above and the analysis documented in the Draft EIS, FHWA finds that:

- There is no practicable alternative to the construction in wetlands associated with the Selected Alternative for the project.
- The Selected Alternative includes all practicable measures to minimize harm to wetlands, including design refinements, construction BMPs, avoidance where feasible, and compensatory mitigation consistent with regulatory requirements.

Therefore, the Selected Alternative complies with EO 11990, Protection of Wetlands.

2.5.4 Floodplain Finding

Federal EO 11988, Floodplain Management, requires federal agencies to avoid, to the extent practicable, long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development, wherever there is a practicable alternative. FHWA implements EO 11988 through 23 CFR 650, Subpart A (Location and Hydraulic Design of Encroachments on Floodplains), including the standard for determining whether a project would cause a “significant encroachment.”

As documented in Section 4.7 of the Draft EIS, mapped floodplains (Special Flood Hazard Areas) are present where I-270 crosses or is adjacent to Clear Creek, the South Platte River, and Sand Creek. These floodplains occur within a highly urbanized, previously disturbed transportation and industrial corridor; proposed improvements are confined to the existing I-270 crossing locations and their approaches.

Consistent with EO 11988 and FHWA’s regulation, alternatives development emphasized reconstruction within (or immediately adjacent to) the existing interstate footprint and retaining crossings at existing locations. The Selected Alternative was refined so that bridge replacements fit within (or close to) existing spans and the hydraulic capacity of the floodplains is maintained, thereby minimizing encroachment and avoiding increases in flood risk. Construction BMPs and phasing will control erosion, sedimentation, and temporary flow interference during construction.

The project is not expected to increase base flood elevations or otherwise diminish floodplain conveyance, and it does not introduce new longitudinal encroachments beyond what exists today. During permitting and final design, CDOT will complete any required hydraulic modeling and coordination with local floodplain administrators and Federal Emergency Management Agency (FEMA)-related processes to ensure continued compliance with floodplain management requirements.

As described in Section 4.1, FHWA and CDOT evaluated a range of reasonable alternatives. Options that would have shifted I-270 outside the existing corridor were dismissed because they would introduce greater environmental impacts and ROW needs, including potentially greater floodplain disturbance. Because the Build Alternatives share the same crossing locations and have similar footprints at Clear Creek, the South Platte River, and Sand Creek, floodplain effects would also be similar. Over the short term, limited temporary impacts to floodplains would occur from the replacement of existing structures within the established transportation corridor. The No Action Alternative would avoid floodplain encroachments but

fails to meet the project's Purpose and Need. Accordingly, no practicable alternative exists that would avoid all floodplain encroachments.

Temporary impacts include the following:

- South Platte River crossing: The existing bridges that cross the river will be replaced. These structures will include new piers in the same location of the existing bridges, new abutments that will be at (or outside of) the existing abutment locations. The construction of the bridge will require temporary water diversions, crane pads within the floodplain, and possible stream crossings.
- Along Sand Creek, impacts to the flood fringe will include temporary grading for the new bridges at the Burlington Ditch, along with the two bridges spanning the BNSF Railway and Union Pacific Railroad. These improvements are anticipated to have no effect on the floodplain capacity of Sand Creek, and no stream encroachments are anticipated.

Consistent with EO 11988 and 23 CFR 650, the project incorporates all practicable measures to minimize harm to floodplains, including maintaining or improving hydraulic capacity at bridge crossings; avoiding fill in floodways, to the extent practicable; implementing construction BMPs to manage erosion, reduce sediment, and protect water quality; restoring temporarily disturbed areas; coordinating with local floodplain officials; and completing any FEMA notifications or certifications. These measures are carried forward from the Draft EIS and will be confirmed during final design and permitting.

Based on the considerations described above and the analysis documented in the Draft EIS:

- There is no practicable alternative to the Selected Alternative's encroachments within mapped floodplains at the existing crossings of Clear Creek, the South Platte River, and Sand Creek; and
- The Selected Alternative includes all practicable measures to minimize harm to floodplains, including design refinements that maintain hydraulic conveyance, construction BMPs, restoration of temporary disturbances, and compliance with applicable floodplain management requirements.

The Draft EIS analyses indicated that floodplain effects are limited, primarily consisting of bridge replacements and short-term construction activities within an established transportation corridor. The project would not increase base flood elevations, diminish floodplain conveyance, or introduce new longitudinal encroachments. Per the FEMA Flood Insurance Rate Maps, improvements will have significant encroachments at the South Platte River and Sand Creek under 23 CFR 650.105(q). Because no practicable alternative exists that avoids all encroachments while meeting the project's Purpose and Need, and because all practicable measures to minimize harm have been incorporated, the project complies with EO 11988 Floodplain Management, and 23 CFR 650, Subpart A.

2.6 Environmental Commitments

FHWA and CDOT have committed to a comprehensive list of measures to avoid, minimize, or mitigate unavoidable environmental impacts where practicable. Chapter 5.0 of this ROD contains a comprehensive list of permits and mitigations that must be carried forward through the design, construction, and post-construction phases of the project.