

September 2025



Bridging the Divide: Reclaiming Community in the Path of I-270

Communities by Design

The Architect Foundation’s Communities by Design program brings together volunteer professionals (Design Assistance Teams) and citizens to build strategies that solve the most pressing issues facing the places we call home. The program has served hundreds of communities across the country, engaging thousands of volunteer professionals with local residents to build momentum for change. The community outcomes have created international renown for re-imagined places like the Pearl District in Portland, Oregon; Santa Fe’s Railyard District revitalization and East Nashville’s tornado recovery experience. The Communities by Design methodology is well-recognized and has been widely adapted for use all over the world.

Communities all over the world are struggling to build effective strategies to address their key challenges: from climate change and equity to housing and revitalization. The Architects Foundation’s Communities by Design (CxD) program provides a ready, applicable model to overcome these challenges and provide communities with a path to success. Through decades of work in hundreds of communities with tens of thousands of volunteers and community members, CxD Design Assistance Teams have proven that communities are at the heart of solutions to the world’s most pressing issues. Design Assistance Teams are made up of volunteer architects, planners, and other professionals with expertise customized to fit the local community context.

Disclaimer

The ideas represented in the following report are those of the Architects Foundation’s design assistance team, based on our observations of the community and its existing plans; the insights gleaned from City officials and residents; and the ideas shared with us about the area and the aspirations for it during the team’s tour. This report represents our best professional recommendations in the public interest. We do not serve a client in this endeavor. The report, and the process that produced it, is a public service to the community. The ideas captured here represent three intensive days of work and the information available to us at the time of this writing. We do not expect this report to be followed as verbatim, prescriptive advice. It should be understood as a developmental tool, and we expect the community will expand and amend these ideas as it moves forward.



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Introduction

The DAT Project

The current design assistance team effort began in May 2025, when a steering committee formed from representatives of the community and local advocacy groups submitted an application to the Architects Foundation titled, “I-270 Community Air Quality and Transportation Improvement.” The application was provisionally accepted, and a small team completed an initial visit in June 2025 to understand the project scope and begin building a national team with customized expertise fit to the project area.

Purpose

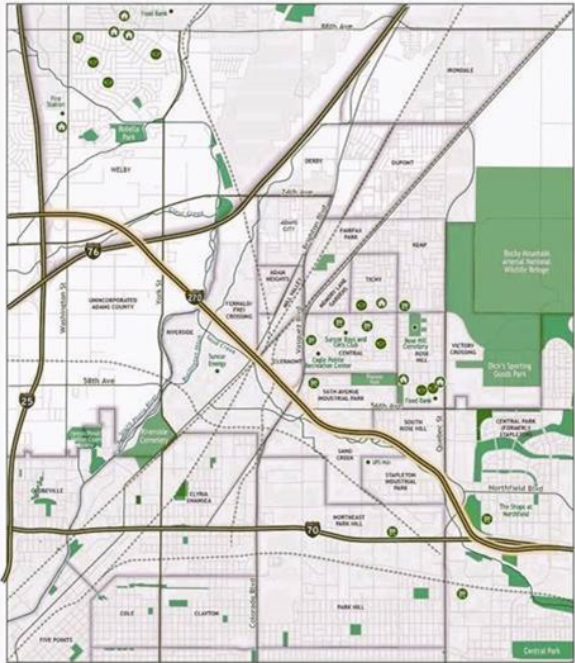
A broad project scope was identified in the community’s application to the Architects Foundation. As the application stated, the project goal was “to improve the environment, health, and wellbeing of largely low income, Latino, and Indigenous communities along the I-270 corridor. These communities include North Denver’s Globeville and Elyria-Swansea neighborhoods as well as Commerce City, which together include roughly 50,000 people across 20 square miles.” The area was collectively referred to as “North Denver.” As the application observed, “the North Denver

communities face enormous environmental burdens from a range of sources. The region urgently requires reductions in air pollution and improvements to infrastructure that benefit, rather than burden, the people who live there.”



CDOT I-270 Study

The ongoing CDOT study of I-270 was identified as a central focus and catalyst for this process. As the project application observed, “In 2020, CDOT and FHWA began a National Environmental Policy Act (NEPA) process for a proposed expansion of I-270 expansion, initially anticipating an Environmental Assessment (EA). After push-back from community and environmental groups, including GreenLatinos, CDOT later determined that a more detailed environmental review was needed and requested an Environmental Impact Statement (EIS) be initiated. In August 2024, FHWA published a Notice of Intent (NOI) to complete an EIS, which began a two-year timeline to complete the NEPA process. A draft EIS is expected in late 2025. We want to submit to CDOT a community-based alternative before the draft EIS is released. CDOT’s planning process focuses on a 6.5-mile stretch of I-270, which runs from Adams County towards Boulder County in Commerce City and North



Denver. The highway runs diagonally on the southeast-northwest axis and connects I-70 and I-25. Every day, more than 100,000 vehicles travel the highway, with 8 to 17 percent of daily traffic coming from freight trucks. The corridor lacks safe and efficient walking, cycling, and public transportation options for residents and businesses near the highway. The study area for the DAT project, however, is broader than CDOT’s focus. Problems such as air pollution and congestion on the I-270 corridor will not be solved by looking myopically at the corridor. These problems must be addressed in the context of the transportation system for users—including local residents and through traffic. A broader look will also aid in addressing related problems, such as residents’ limited options for safe, affordable, and clean transportation.”

Why I-270 & Why Now?

The Architects Foundation accepted the application for a design assistance team project with recent history in mind. In 2012, the Communities by Design program was approached by local Denver architects with concerns about the CDOT I-70 process. At the time, they reached out to national program staff to inquire about a potential design assistance team project to bring alternative thinking to that process. Our program staff consulted with local partners about the possibility, noting that given a history of bad experiences and mistrust in the most impacted neighborhoods surrounding I-70, it was important to have institutional stakeholders (most notably CDOT) agree to be open to considering the process outcomes in order to avoid building false public expectations for potential solutions that would not be considered, thereby reinforcing historic injustices. In their outreach to CDOT, it was determined that this would not be possible, and the effort was abandoned. We can now look back and reflect upon what happened in the I-70 experience with lessons learned in mind. When the Foundation accepted the application for assistance surrounding the I-270 process, we did so with the knowledge that this process would need to be held



on an expedited schedule with imperfect circumstances given the existing CDOT timetable for release of a Draft Environmental Impact Statement by December of 2025. Therefore, an initial visit was scheduled immediately upon acceptance of the community’s application in June, and the community process was scheduled for August.

On July 28, 2025, CDOT representatives responded to an invitation from GreenLatinos to participate in the process, declining the invitation while maintaining that they would review the outcomes of the process:

“Thank you for your invitation to the upcoming meeting. While CDOT appreciates the offer, CDOT respectfully declines GreenLatinos’ invitation to attend one-on-one meetings with the DAT. The GreenLatinos’ letter states that the DAT is prepared to discuss granular and technical details. The technical details of the I-270 Corridor Improvements NEPA process will be shared with the public via a Draft Environmental Impact Statement (DEIS) and associated reports that are open to public comment in fall 2025/winter 2026. The DEIS and associated reports will then be discussed in detail during a public hearing, also in fall 2025/winter 2026. The DEIS and associated reports will undergo an extensive review process before they are ready for publication. Simply stated, it is premature to discuss detailed technical analysis with any individual stakeholders prior to publishing the DEIS, the associated reports, and conducting the public hearing. CDOT would not share anything with the DAT that is not already publicly available on the I-270 Corridor Improvements website (<https://www.codot.gov/projects/studies/i270study>). CDOT is continually open to feedback and ideas from community stakeholders and encourages GreenLatinos to continue their DAT process. Although CDOT will not attend the DAT meetings, we accept GreenLatinos request to incorporate the DAT alternative into the NEPA analysis.”

The Role of the Design Assistance Team

While the I-270 study was a focus of the design assistance team’s work, the intention of this process was to apply a much broader scope. It sought to build an understanding for the important community context in which the CDOT project is taking place, as well as the surrounding factors and dynamics and their impacts on communities. The design assistance team (see appendix for a team roster) is an interdisciplinary group of professionals from around the country that were assembled specifically for this process. They were deliberately chosen from outside the state of Colorado. They were not paid for their service to the community. They were not engaged in any business development activities. It is also important to note that the design assistance team did not serve a client. They were not another consultant team hired by a developer, institution or government agency. As a group of independent outsiders, their efforts are all made in public service to the community and the recommendations offered in this report are done so in the public interest. The team’s role in this process included the following key components:

- To review dozens of existing plans and background documents about the area.
- To observe conditions in the area and gain an understanding of the physical framework for the area, the issues facing the community and its opportunities.
- To listen to resident experts share their experience and knowledge about existing conditions, community values, priorities and aspirations for the future.
- Finally, to apply their best professional expertise in the public interest, using information learned through the process about community priorities in order to develop a set of strategies that respond directly to the needs, values and desires of the community.

Una vista de los suburbios del norte mirando hacia el centro de Denver.

REUNIÓN COMUNITARIA

Agosto 6th & 8th

I-270 Corridor Project

¡Tarjetas de regalo gratis de \$45!

(Limitado a uno por hogar, primeras 50 personas, 8/8/25 Solo evento)

¿Le preocupa la calidad del aire y el impacto medioambiental a lo largo de la I-270? Mientras el CDOT continúa planificando la ampliación del corredor de la I-270, dando prioridad al tiempo de viaje y al aumento del tráfico de mercancías, esta es una oportunidad para añadir su voz a un diseño alternativo impulsado por la comunidad.

¡Escanee para registrarse!

Asamblea Pública

Miércoles 6 de agosto de 2025

6:00-8:00 pm

(CENA GRATIS)

Presentación comunitaria

Viernes 8 de agosto, 2025

6:00-8:00 pm

(CENA GRATIS)

South Adams County Fire Station

Sala Comunitaria

2810326 Walden Street

Commerce City, CO

80022

GREENLATINOS COLORADO

Locando por la Liberación Ambiental

¿Preguntas? Colorado@greenlatinos.org

A view of the northern suburbs looking toward downtown Denver.

COMMUNITY MEETING

August 6th & 8th, 2025

I-270 Corridor Project

Free \$45 Gift Cards!

(Limited to one per household, first 50 households)

Do you care about Air Quality and Environmental impacts along I-270? As CDOT continues to plan for the expansion of the I-270 corridor, prioritizing travel time and increased freight traffic, this is an opportunity to add your voice to a community driven Alternate Design.

Scan to RSVP for these Free Community Events!

Town Hall

Wednesday, August 6th, 2025

6:00-8:00 pm

(FREE DINNER)

Community Presentation

Friday, August 8th, 2025

6:00-8:00 pm

(FREE DINNER)

South Adams County Fire Station

Community Room

2810326 Walden Street

Commerce City, CO

80022

GREENLATINOS COLORADO

Locando por la Liberación Ambiental

Questions? Colorado@greenlatinos.org



Community Event and Process

From August 6-8, 2025, a community process was organized with participation from city officials, residents and stakeholders. It included the following key elements:

- A tour of the project area, led by local steering committee members and neighborhood residents, which featured the ‘toxic triangle’ area as well as neighborhoods in Commerce City and North Denver and the I-270 span.
- A series of meetings with key stakeholders about the area.
- A public workshop.
- A community presentation to share initial findings, analysis and recommendations. The team worked to integrate information collected from these sessions to perform an analysis of existing conditions and potential scenarios and produce a series of recommendations, captured in this report.

Problem Statement

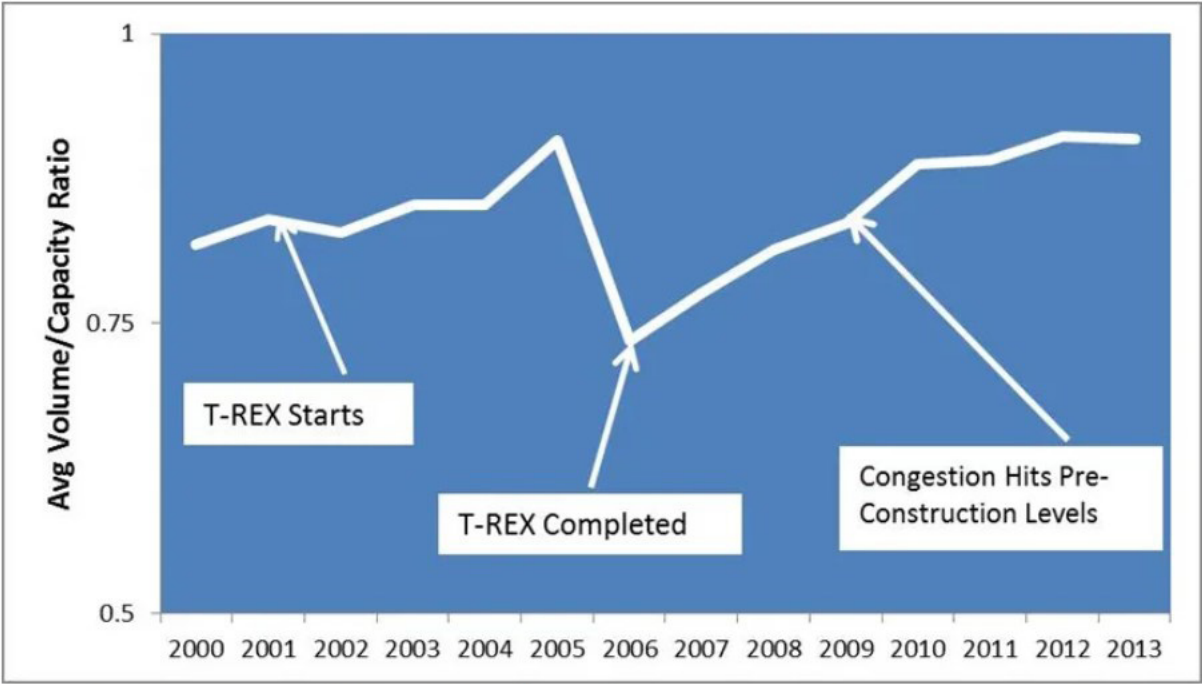
This initiative responds to the project application’s central focus “to improve the environment, health, and wellbeing of largely low-income, Latino, and Indigenous communities along the I-270 corridor.” In the context of the I-270 corridor communities, there are several key actions that can be taken, including the following:

- Implementing transit improvements to reduce the congestion pressure on I-270
- Providing reliable transportation alternatives to single-occupancy-vehicle trips on I-270
- Reducing pollution and financial burdens of transportation in North Denver
- Exploring complementary pedestrian and cycling alternatives and/or supplements to transit

The Body of Evidence on Road Expansion

The transportation planning experience of the past several decades has demonstrated time and again an undeniable fact of roadway capacity projects. Capacity projects are often proposed as a solution to traffic congestion that will improve fuel efficiency and reduce greenhouse gas (GHG) emissions. However, research has consistently shown that adding capacity to roadways does not alleviate congestion over the long term and people end up driving more. In 2021, the [Rocky Mountain Institute](#) developed an induced travel calculator tool to measure the impact of Colorado’s road expansion projects. According to their statewide study, “traffic will increase by a range of 2 to 8 million VMT [Vehicle Miles Traveled] per year for every new

highway lane-mile added in Colorado’s urbanized areas. More densely populated areas with busier roads tend to fall on the upper end of the range. Taking the midpoint to conservatively represent a statewide impact, each Colorado lane-mile added translates to about 400 more cars and SUVs on roads every year and generates annual carbon pollution equal to about 200,000 additional gallons of gasoline.” These findings were consistent with similar studies elsewhere. For one example, see the [National Center for Sustainable Transportation Policy Brief](#). There is plenty of additional research in the field that is complementary to these studies.



Source: Southwest Energy Efficiency Project, <https://www.swenergy.org/how-to-improve-i-25-traffic-without-spending-big-bucks>

In the Denver region, there is plenty of experience to reinforce the conclusion that roadway expansion does not relieve congestion long-term. The T-REX, the Denver area’s massive interstate expansion on I-25, was a \$1.2 billion project that took six years to complete, and it relieved congestion for only five years before traffic returned to pre-construction levels.

The Need to Overcome Policy Inertia

Despite longstanding research on the outcomes of roadway expansion projects and regional experience with precedent projects, the I-270 corridor communities are once again presented with the possibility of a highway expansion. Unfortunately, this is not an uncommon condition across the country. Many transportation agencies are caught in a policy inertia whereby there is a tendency to perpetuate conventional solutions or maintain established policies, even when circumstances have changed or evidence has demonstrated their inability to deliver intended outcomes or desired goals. It is often further complicated by the complex requirements and constraints attached to funding mechanisms for such projects. However, this project certainly represents an opportunity to make an important change before it is too late, and detrimental impacts are locked in for the foreseeable future.

Beyond I-270 Expansion

CDOT’s two proposed I-270 alternatives (three general-purpose lanes alternative and two general-purpose lanes and one express lane that accommodates transit alternative) fail to address expressed community needs, which include the following:

- Making it safer for people and emergency services to get around quickly
- Incorporating alternative modes of transportation (bikes, buses, micro-mobility)
- Reducing traffic and keeping trucks outside of neighborhoods

- Reducing pollution in the air and water

The process should also address:

- Flaws in the engagement and outreach
- Displacement and gentrification pressures
- Improving connectivity on local streets to help people get where they need to go

The team has identified seven core areas of opportunity that should be pursued to meet community needs:

- Engagement Framework
- Truck Congestion
- Street Network/Connectivity
- Alternative Modes
- Mitigation of Air and Water Pollution
- Public Safety
- Anti-Displacement
- Partnerships

The remainder of this report addresses these areas of opportunity in sequence.

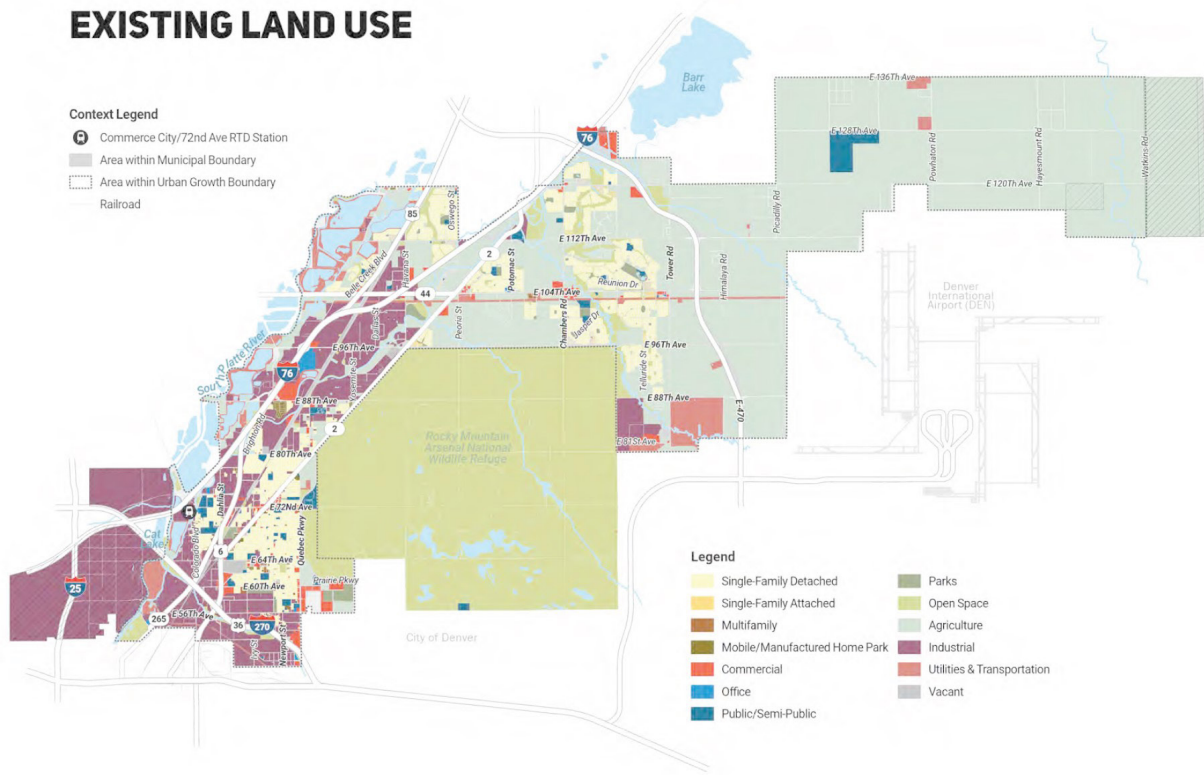
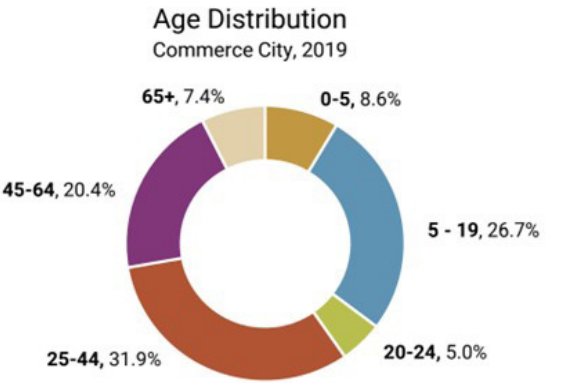
Community Snapshot

This section provides an overview of the existing community conditions in Commerce City. Historically, Commerce City has been known for its unique industrial footprint, cultural diversity, and proximity to the largest land-based, urban wildlife refuge in the United States. The 2020 Census estimates its population at approximately 62,000. Nearly half of the population (30,505) identifies as Hispanic or Latino.

Commerce City has experienced considerable growth over the last twenty years, and it is expected to continue.

While the senior population has become larger over time, there is a concentration of younger residents in the City. Approximately one third (35.3%) of the population is under the age of 19 and another third (36.9%) of the population is between 20-44.

In Commerce City, most (62.3%) of families are married couples with children. The racial and ethnic composition of residents in Commerce City is predominantly White (51.3%), followed by Hispanic or Latino (48.9%), Black/ African American (4.2%), Asian/Pacific Islander 3.3%), and American Indian and Alaska Native 1.7%).



The median household income in Commerce City is \$124,884. While there is a low percentage of people living in poverty (6.3%), significant disparities exist within Commerce City, particularly in areas with older development in proximity to industrial land uses and interstates 70, 25, and 270. Covering nearly 26 square miles, Commerce City contains a mix of residential, commercial, industrial, open space, public, and agricultural land.

The City (and region's) rapid growth signal an opportunity to powerfully shape land use decisions in ways that directly benefit all residents. Today, Commerce City is navigating the challenges of growth, from increased congestion and the threat of displacement for existing residents, to the direct impacts of poor air quality from mobile and stationary sources, which can cause respiratory and cardiovascular diseases, cancers, and premature death.

The people of Commerce City also recognize the importance of managing growth in ways that support safer access for all road users, improved infrastructure, and more efficient and reliable travel options. Community residents will directly benefit from the creation of healthy, safe, and sustainable transportation and infrastructure systems in Commerce City. While there are opportunities to build on the walkability across the City, areas with the older and denser development can benefit from improved network connectivity, sidewalk amenities, and micro-mobility and micro-transit opportunities, which can boost transit ridership along major corridors,

As plans move forward for the expansion of I-270, now is the time for public agencies to lead with intention. This project presents a critical opportunity to build lasting community trust and strengthen public engagement through inclusive, transparent processes. We urge transportation and planning agencies at the City, County, Regional, and State levels to come together—collaboratively and holistically—to design solutions that enhance neighborhood connectivity and ensure

equitable access for all. Let's seize this pivotal moment to deliver long-term benefits that reflect the needs and voices of the communities most impacted.

Engagement Framework

Civic Context

Current institution and community relationships can only be described as adversarial. Mistrust permeates the relationships, leading to poor communication, conflict and controversy that drive continual decline in trust and lead to mutually destructive relationships. While some officials have worked with and on behalf of the community (including Commerce City councilmembers Renee Chacon and Kristi Douglas), failed prior efforts to improve community conditions have damaged trust and built frustration across the neighborhoods most impacted by environmental justice issues. Long-term

success must be predicated upon changing the nature of existing relationships between key institutional stakeholders and residents across the communities of the I-270 corridor. The state has often forfeited its credibility/legitimacy by aligning with corporate polluters against the interests of local communities.

The Reality of Mistrust

It is a reality that is captured and reinforced in both existing plans and a litany of public statements over the years. Repeated bad experiences have validated community mistrust of institutions so often that it has become integral to local identity. As the Commerce

City Sustainability Plan acknowledges, “an atmosphere of distrust, anger, and uncertainty exists amongst community members.” Similarly, the GES People’s Survey, A Story of Displacement, offers this assessment: “The compelling story of the people of Globeville, Elyria and Swansea (GES) like many of our region’s communities of color, is under threat of being erased... we are losing our community to an outside vision, that roots out the current people from the place they have embraced. The “public” investments hailed as “improving the community” are creating a crisis of displacement.” The report goes on to note that, “Our elected officials, who have continually chosen to ignore warnings from the community, now look to us for “solutions”. If they are sincere in their concern and care, our displacement, driven by the impacts of their projects, would be more than an afterthought--and preventing displacement would be their biggest priority.”

In locally reported news, the sentiments are also consistent. In 2021, a [CPR news story](#) on the I-270 project quoted a local resident as follows, “I don’t feel that we’ve had people really looking out for us. People who should have been really keeping an eye on our community when it came to the air quality, when it came to the water quality, when it came to the basics. Don’t just talk about it, but actually do something that is showing us that you’re serious about respecting us as a community.” A separate Colorado Sun article quoted local leader Renee Chacon’s observation that “Commerce City has been the sacrifice zone for corporations like Suncor for so long, the abuse to my community has been normalized and even expected to happen for Colorado’s economy.”

Addressing Conflict and Mistrust

Addressing the key components that are feeding continual conflict between communities who call this area home and institutions who operate here will require substantial work to address the lack of transparency and accountability that have permeated interactions with communities along the I-270 corridor. There are



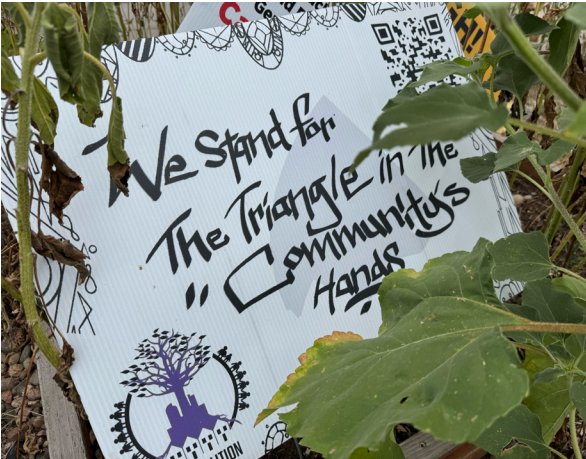
few mechanisms in place to facilitate dialogue through an intermediary or lay the groundwork for shared understanding. However, each successful process can serve as a building block toward greater trust if it provides the community with greater influence over decision making and reasonable confidence that the outcomes reflect local values and contributions.

Examples of controversial incidents that have fomented and sealed community mistrust include the following:

- (Sept 2024) The Magellan Pipeline Company files a permit application for expanded tank farm operations and receives preliminary approval without any public input. It later withdraws the proposal for a tank farm expansion project across from the Dupont Elementary School following community outrage.
- (2022) Suncor refinery disruptions led to a shutdown and severe pollutant releases that were exponentially above the levels allowed by state air permits. However, it resulted in no fines given regulatory exemptions.
- (2019) When Suncor operations experienced a disruption that resulted in clay-like dust covering the neighborhood, Suncor’s response to the community was to offer free car washes.
- (2018) CDOT settles lawsuit on I-70 expansion with \$600,000 in commitments, including for an independent health study for the Globeville, Elyria and Swansea neighborhoods as well as funds for air testing and monitoring and tree planting and landscaping.
- (2017) CDOT updates air quality analysis for I-70 expansion project with new projections that predict it will be much less impactful than previous estimates, but does not share data sets publicly, causing widespread skepticism in the community. As a representative from the Sierra Club's Rocky

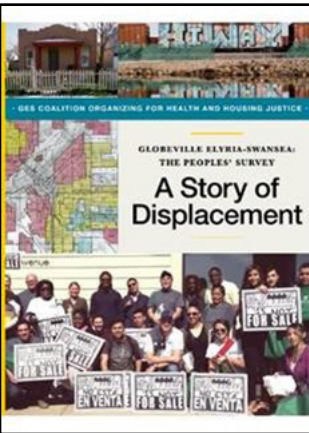
Mountain Chapter [charged](#), “The process is so corrupt that they come out with the exact number they need no matter what the standard is...They’re coming in 34 percent lower. It’s not marginal. A third of the entire project emissions disappeared. How can that be?”

- (2017) When the plans for the National Western Center Authority board were initially unveiled, they included two community representative positions, but only one of those had voting power, cementing a lesser status for community members until push-back led to full voting rights being added.



In the face of insufficient public sector enforcement of environmental regulations, communities have been forced to take matters into their own hands time and again to achieve community needs. They have often found themselves in an adversarial position toward both industry and government agencies:

- In 2024, Earthjustice, representing GreenLatinos, Sierra Club, and 350 Colorado, was compelled to file suit against the Suncor Refinery for air pollution violations after years of the government failing to take the strongest action possible against the refinery. In 2023, GreenLatinos, 350 Colorado



and Earthworks filed suit against the Colorado Air Quality Control Commission to try to force the commission to strengthen its permitting rules under the state’s Environmental Justice Disproportionate Impacted Community Act.

- In 2024, in the face of a “surprise” tank farm expansion proposal from Magellan Pipeline Company, local organizations held community forums with residents to spread the information and organize opposition. As one representative of Cultivando reportedly [noted](#), “We’re here to inform our community. No one else is going to do it. We know Magellan didn’t, we know that the (state air pollution division) didn’t. And so our role is to inform the community, make sure their voices are heard.”
- In 2023, Cultivando was awarded \$1.8 million from the 2020 Suncor settlement to perform independent air monitoring work from state agencies in Commerce City. Their monitoring collected data at shorter rates than traditional systems, finding significantly different outcomes than official studies. The monitoring discovered high pollutant spikes missed by traditional monitors.
- Local organizations filed a lawsuit against CDOT’s I-70 widening project, eventually winning concessions through a settlement, which included \$550,000 for a community health study for GES neighborhoods. As one advocate [noted](#) upon the settlement, “This is all we asked for in the very beginning. We asked for the study, and we were refused the study. Sadly we had to go to court in order to get this outcome.”
- In 2016, the Globeville, Elyria-Swansea Coalition Organizing for Health and Housing Justice released its own study, Globeville Elyria-Swansea: The Peoples’ Survey, A Story of Displacement, based on interviews with 500 residents, to highlight the incredible stress facing the neighborhoods and to offer a series of key recommendations independent of government agencies.

People Want a Greater Voice

“When it comes to protecting clean air, we want all Coloradans to have a seat at the table.” – *Michael Ogletree, Director of the state’s Air Pollution Control Division*

This community setting is critical context that should inform public process design. In communities where conflict and mistrust are present, more robust public participation methods are necessary. Communities need to have greater influence on the process and the decision making in order to build trust in the process outcomes. Communities here are clearly demanding a greater role. As one CPR News headline reads, “Globeville Elyria–Swansea Isn’t Interested In Gentrification. They Want Change On Their Terms.” In fact, a quick search of public comments reveals that residents repeatedly express a desire for a greater voice in decision making:

- “I am concerned about the inequities that exist in CC. I’d love to see efforts supported in the lower and middle CC areas, led by residents of these areas with the history and lived experience to guide priorities.” – Commerce City resident quoted in the Sustainability Plan
- “How can we change these patterns of discrimination, segregation, redlining, all of these things that have happened in the past? They’re not just going to change without the real impacted neighbors being involved in a meaningful way.” – GES resident, as quoted in a CPR News segment, 2019
- “We have value too. We matter too.” – Commerce City resident during the design assistance team process

Building an Informed Decision Through the EIS

An Environmental Impact Statement is a report mandated by the National Environmental Policy Act of 1969 (NEPA), to assess the potential impact of

actions “significantly affecting the quality of the human environment.” As the Council on Environmental Quality notes, “NEPA requires Federal agencies to consider the effects of their actions on the environment, including interrelated social, cultural, and economic effects. Citizens often possess helpful information about the potential environmental, social, and economic effects that proposed Federal actions may have on people, places, and resources.” The creation of NEPA was fueled by community reaction to the detrimental impacts of the Interstate Highway System that was built mid-century, where citizens’ views had been largely ignored in designing the routes.

The Physical Context for Decision-Making Along I-270

The combined impacts of unconstrained industrial activity, weak regulatory action, and regional sprawl have produced a notorious designation for this area: one of the most polluted zip codes in America. Land, water and air are all facing challenges and are often compromised by pollutants. In 2017, a national study came to that conclusion after comparing localities across risk factors for superfund sites, brownfields, polluters and poor air quality, the 80216–zip code, which includes Globeville Elyria–Swansea and portions of Commerce City, ranked last. This reality has profound consequences for public health and quality of life in the communities that call this area home. While environmental conditions are not the only contributing factors to the complex challenges residents face in forging healthy lives, they are certainly important realities that need to be addressed. Local Health Impact Assessment reports underline the urgency of addressing health disparities across the region, finding that residents of Globeville and Elyria–Swansea experience “higher incidence of chronic health conditions such as cardiovascular disease, diabetes, obesity, and asthma,” than other city neighborhoods. One local report cited a study which observed that between 2013 and 2017, “approximately one in 100 locals were hospitalized for asthma-related conditions,

a figure at least 75% higher than the state average.” According to the Colorado Department of Health and Environment, life expectancy in Globeville is only 72.8 years, while it rises to a peak of 85.9 years in Hilltop. Such an extraordinary gap in life expectancy begs the question, “How can the community best address the conditions in which residents of this area are inhibited from living longer, fuller lives?” Industrial legacies – and contemporary operations – have significant impacts on the environment throughout the project area. According to one report, the Risk-Screening Environmental Indicators (RSEI) model found that Commerce City had experienced over 400 releases by 84 facilities.

The Air Quality Crisis. According to the Colorado Department of Public Health & Environment, the EPA reclassified the Denver Metro/north Front Range area in 2022 to a “severe” non-attainment area under the 2008 ozone standard. This represented a downgrade from its previous designation of “serious” non-attainment and includes a required deadline to meet the 2008 standard by July 20, 2027, based upon 2024–2026 ozone data. A [2019 study](#) by the University of Washington’s Institute for Health Metrics and Evaluation estimated that ambient ozone pollution is responsible for 814 deaths annually in Colorado. The Regional Air Quality Council, which monitors regional pollution levels, recorded concentrations of ozone [measured](#) by Front Range monitoring stations that exceeded EPA limits on 41 different days in 2024. This represents its highest number since 2021 and is worse than all but two ozone seasons over the past 11 years. Similarly, the 2025 “State of the Air” report from the American Lung Association found that, “People in the Denver metro area are breathing some of the most [ozone-polluted air](#) in the U.S.” The region was classified as the sixth most polluted in the nation, with the main culprits cited as regional growth patterns, automobile use and the gas industry. Current trends indicate a strong probability that the state will miss its legally required targets. As Colorado Newsline observed in 2024, “On at least one count, certainty has been achieved: Barring a miracle,

Colorado will certainly fail to meet EPA ozone standards for the three-year cycle ending in 2027, just like it failed to meet them for 2024.”

The Climate Crisis. The State of Colorado has bold GHG Reduction Targets, as set forth in state law and the Colorado Priority Climate Action Plan of 2024. Transportation is the major outlier in statewide climate goal compliance as well. As with air quality struggles, climate goals are falling short due to challenges with reducing emissions from the transportation sector. Though state law [requires Colorado](#) to cut its emissions 26 percent below 2005 levels by 2025, 50 percent by 2030, and 100 percent by 2050, an analysis from environmental think-tank RMI found that current policies only achieve 79 percent of the 2025 target and 84 percent of the 2030 target. While other major sectors such as buildings, industry and even oil and gas and electricity are on course to at least approach the interim markers, projections for the transportation sector found that it will only achieve 9 percent of its 2025 goal and 41 percent of its 2030 target. According to Colorado Climate Action, “Transportation is the #1 source of Colorado’s Greenhouse Gas (GHG) emissions.” Colorado needs to reduce transportation-related emissions by about 12.7 million metric tons by 2030. Studies reveal that even with the mass adoption of electric vehicles, the state would only realize about two-thirds of the goal. Other interventions will be necessary to achieve success. It is clear that regional growth and land use policy and its resulting consequences for development have exacerbated automobile use and its impact on the environment.

Greenhouse Gas Transportation Planning Standards

In 2021, Colorado’s Transportation Commission approved new GHG Transportation Planning Standards to reduce emissions and improve air quality. Colorado boasted that it was “the first state in the country to address the role of transportation planning in providing more travel options that reduce greenhouse gas (GHG) emissions, improve air quality and reduce smog.” The



Denver Climate Project



Do More. Do Less. Do Something.

GHG Transportation Planning Standards require CDOT and Metropolitan Planning Organizations (MPOs) to determine the total GHG emissions expected from future projects and take actions that ensure that plans achieve set GHG emissions reductions targets. The goal is to reduce GHG emissions by 1.5 million metric tons by 2030. Officials estimated that the standards would shift over \$6 billion by 2050 toward a suite of more climate friendly investments, including transit, bike and



pedestrian facilities. Since the standards were enacted, CDOT has canceled plans for multiple other highway and road widening projects. There are additional pressures that should bring added urgency to such projects moving forward, including several dynamics within the state’s GHG emissions modeling. There are some trending data points that are notable within key components of their model. For instance, CDOT uses a 20% projection on work-from-home rates statewide. In

2023, Colorado had the highest percentage of work-from-home with 37% of workers reported at least one day a week from home. According to a 2024 national analysis of Census data, the Denver metro region had the third highest rate of fully remote workers in the country. Approximately 22.3% of the regional workforce was fully remote. However, the analysis also indicated that the rate had contracted by 6% between 2021-2023, a national trend that is likely to continue. This illustration speaks to some potential built-in risk in the existing model. A separate study found that trend continued in 2024, with a 12.8% office building visit growth year-over-year from July 2023 to July 2024. This may have important ramifications for current emissions modeling. The modeling also assumes transformational land use policies that result in far more compact communities than current practice suggests – another point of risk.

CDOT Statement of Purpose & Need for I-270: An Acknowledgment of Impact

The Statement of Purpose and Need for the I-270 study is revealing in that it acknowledges the unique environmental burdens that this project carries and the reality that this project will result in further impacts to the community. In addition to describing the purpose to “modernize the I-270 corridor to accommodate existing and forecasted transportation demands,” the Statement includes the following:

“In addition to addressing project needs, CDOT, the Federal Highway Administration (FHWA), and participating agencies have established a key project goal: to minimize environmental and community impacts resulting from the project. The project planning and decision-making process will consistently remain mindful of this environmental goal.”

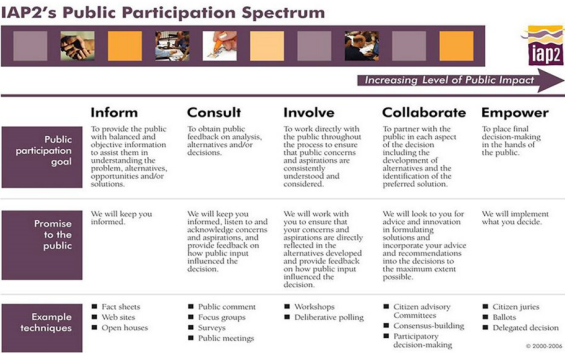
Applying an Appropriate Standard to Contextual Realities

This statement infers an awareness that the project carries extraordinary environmental risk given that it

is occurring not only within an EPA-classified severe non-attainment area under the 2008 ozone pollution standard, but within a project area that has the highest concentration of air pollutants in a region of severe non-attainment. Therefore, the project’s contribution to negative air quality cannot be measured by an all-things-being-equal qualification. It must be assessed by its additional contribution to an environment that is **already compromised**. This knowledge comes with special burdens of environmental care because even marginal negative contributions to air quality here represent tipping points on top of already over-burdened residents. An otherwise minor contribution from the project must be considered differently given this context.

A Framework for Engagement: IAP2 Core Values for the Practice of Public Participation

- Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
- Public participation includes the promise that the public’s contribution will influence the decision.
- Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.
- Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
- Public participation seeks input from participants in designing how they participate.
- Public participation provides participants with the information they need to participate in a meaningful way.
- Public participation communicates to participants how their input affected the decision.



CORE VALUES

IAP2 Federation's Core Values for Public Participation professionals define the expectations and aspirations of the public participation process. Processes based on the Core Values have been shown to be the most successful and respected.

1 Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.

2 Public participation includes the promise that the public's contribution will influence the decision.

3 Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision-makers.

4 Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.

5 Public participation seeks input from participants in designing how they participate.

6 Public participation provides participants with the information they need to participate in a meaningful way.

7 Public participation communicates to participants how their input affected the decision.

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A Credible Methodology

The IAP2 methodology represents a reputable framework that is utilized all over the world. It is utilized in multiple Colorado jurisdictions already. It is cited by the EPA as guidance as well. Therefore, in the context of this process, it provides a credible Community Engagement Framework from which to assess work to date. The IAP2 Spectrum provides a matrixed tool to describe an escalating succession of public participation that is tied to specific public promises and corresponding techniques. One of the main challenges in this field of work concerns the gap between institutional preferences and public preferences, particularly in mistrust contexts. While the public prefers to work at the Collaborate or Empower levels, institutions commonly

have comfort at the Inform and Consult level, leading to civic frustration and conflict. High mistrust communities require more robust public participation processes and more public influence over decision making in order to rebuild trust.

Colorado Law Requires Enhanced Planning, Modeling & Engagement

The NEPA statute is not the only regulatory requirement that is relevant to the I-270 process, as Colorado Revised Statute (CRS) Section 43-1-128, (c) requires that “To minimize the adverse environmental and health impacts of planned transportation capacity projects and address inequitable distribution of the burdens of such projects, it is necessary, appropriate, and in the best interests of the state and all Coloradans to require the department and metropolitan planning organizations, which are the state's primary transportation planning entities with responsibility for selecting and funding transportation capacity projects, to engage in an enhanced level of planning, modeling and other analysis, community engagement, and monitoring with respect to such projects as required by this section.”

CDOT Public Involvement Plan

To their credit, CDOT issued a Public Involvement Plan for this project that includes a commitment to meet an “enhanced” standard. As the PIP declares, “Community outreach for the I-270 EIS will elicit a unique approach to increase inclusive and meaningful public involvement. The approach will focus on developing trust in neighborhoods that historically do not see governmental agencies as credible, as well as identifying and addressing barriers that may limit meaningful participation from these residents.” The PIP also declares that “Individuals who are affected by but historically underrepresented in infrastructure development projects, are low income, low literate, and/or have limited English proficiency or need other special accommodations to participate meaningfully in the project will need comprehensive and innovative support services and outreach techniques. Thoughtful

and unique techniques should be used to address the needs of these Environmental Justice communities...” This public promise to the community infers that more robust methods than open houses or webinars will be necessary to achieve success. It commits to “a unique approach” that will “increase inclusive and meaningful public involvement” and develop trust in neighborhoods that “historically do not see governmental agencies as credible.” It is an ambitious commitment that comes with expectations of robust public process work that utilizes methods where community influence is enhanced. Furthermore, in section 1.5.3 of the PIP, CDOT commits to adjusting course in the event of low turnout, stating that “If participation is low, CDOT will work with its bilingual community liaison, Environmental Justice and Equity Office, community insiders, and other community leaders to adjust or develop new techniques to encourage meaningful participation.” These public commitments represent established process standards by which to assess work to date.

Assessing the I-270 Public Involvement to Date

As CDOT maintained in a July letter to representatives of GreenLatinos,

“Since initiating the EIS process, CDOT has conducted extensive outreach and engagement to understand the needs of those most affected by the Project, including residents, businesses, and corridor users. CDOT stands firmly behind the outreach and engagement that it has conducted throughout the NEPA process. Since May 2023, CDOT has participated in nearly 200 community outreach activities, including, but not limited to, listening sessions, community office hours, attendance and participation in community fairs/festivals, public meetings, community presentations, Stakeholder Workshops, and local business interviews. These efforts have reached residents, businesses, corridor users, and advocacy groups, many of whom have expressed strong support for timely improvements to I-270. Many people have expressed that this Project is long overdue. We have thoroughly recorded our outreach and engagement

Public Involvement Plan

I-270 Corridor Improvements Environmental Impact Statement
Identification Number FHWA-CO-EIS-24-001
Federal Project No.: STU 2706-046, CDOT Project Code: 25611

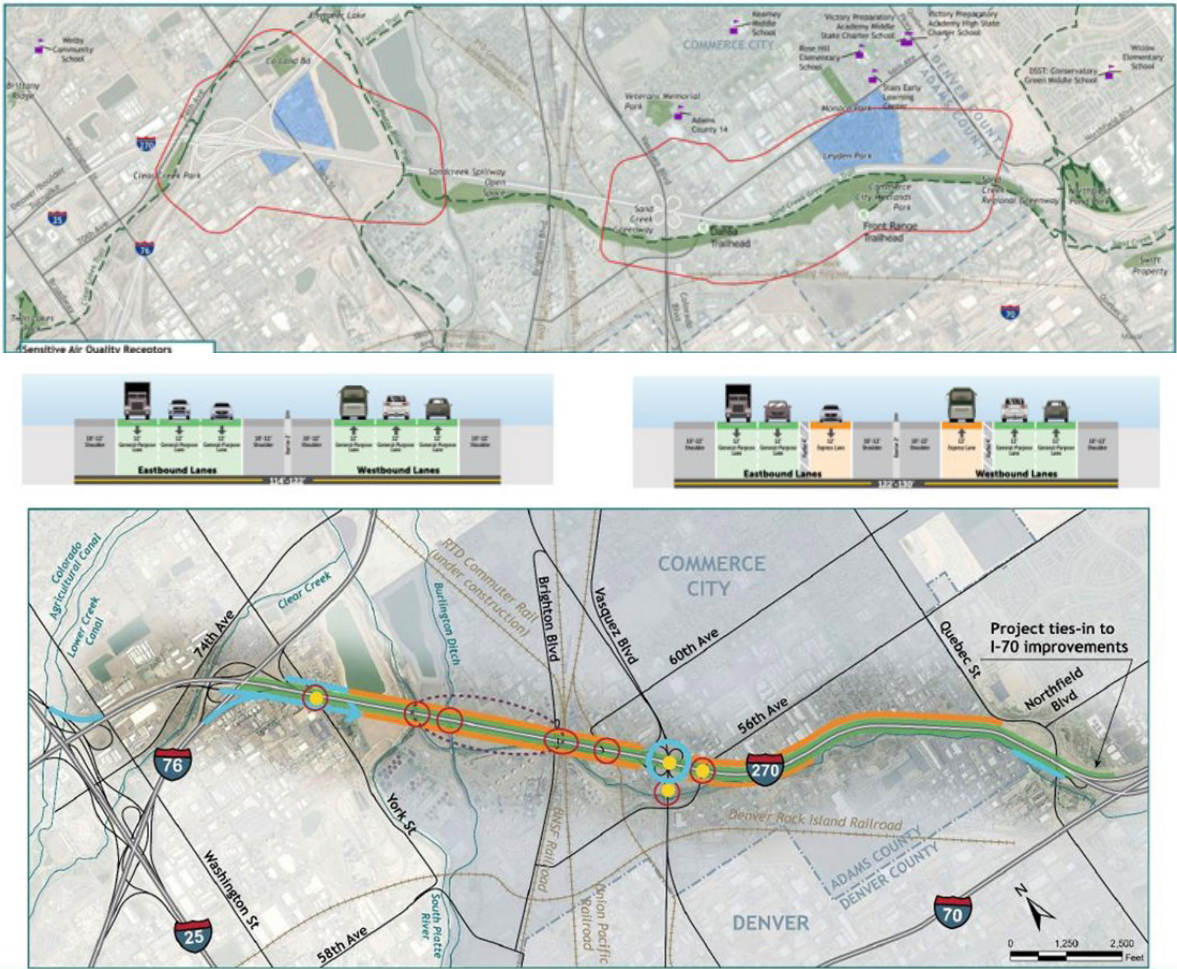
July 2024

Traducción al español disponible, para solicitarlo mande un correo electrónico a cdot_i270@state.co.us.

efforts and continue to host widely advertised public meetings that inform and benefit residents, businesses and employees, and users of the corridor. All our efforts have been transparent and have resulted in hundreds of comment cards being filled out, among other forms of feedback. CDOT strongly believes its outreach efforts for this Project are very much in alignment with community needs, and we will continue to prioritize attending community-led events.”

This statement and the aforementioned commitments in the PIP form a basis by which the process can be objectively assessed against work to date and comparative processes in the field.

Please share your input on proposed air quality particulate matter modeling locations



The Importance of Data-Informed Decision-Making

Given the Colorado requirement for an “enhanced level of planning, modeling and other analysis, community engagement, and monitoring,” the team found it troubling that existing public information about components of the project is not complete. For instance, air quality monitors for the project don’t even assess

the entire corridor. While CDOT maintains that it has used state funds to “conduct extensive environmental analyses that far exceed federal standards, especially related to Air Quality and Disproportionately Impacted Communities,” the team suggests that more transparency in the collection of data is warranted given the history of controversies surrounding air quality monitoring data in the project area and the fact that

it represents a hot spot in a severe non-attainment region. Communities have remained at odds with official studies on air quality data for years and have contracted with third parties that have conducted more extensive monitoring efforts that led to different conclusions, thus reinforcing distrust of data from agencies. In fact, a 2021 headline from CPR News highlighted this challenge: “CDOT Pledges To Track Air Quality As Part Of I-270 Rebuild, But Pollution-Choked Commerce City Residents Are Skeptical.” It is a critically important data set for this study, and the team believes it deserves greater attention to the entire corridor. In addition, some of the public information that has been shared over proposed solutions has led to confusion. For instance, some versions of alternative solutions’ cross sections have included auxiliary lanes in their proposals and some have not, creating confusion about whether they are included in designs. It is important moving forward to ensure that publicly released information represents a full and accurate representation to maintain trust with the community.

Public Participation Needs an Upgrade

The team finds that there are both quantitative and qualitative concerns with the existing public process to date.

Quantitative Issues

As CDOT reports, the agency has collected “hundreds of comment cards” during the process thus far. In a project area that includes approximately 50,000 residents and a highway segment that has over 100,000 drivers daily, this is insufficient data to inform any decision that might reflect credible community sentiment. CDOT also reports that it has conducted nearly 200 community outreach activities, reflecting significant inefficiency in its process given that 200 activities have yielded an average of less than 5 comment cards each – and likely closer to an average of two. While there are additional interactions from the open house events via sticky note exercises with maps, they more accurately form the beginning of data collection efforts rather than a

complete set that is broad and representative of the community, particularly given the reported numbers of participants.

October 10, 2023 public meeting: 80 participants

Fall/Winter 2024, 8 community listening sessions: N/A

April 2024, 2 in-person public meetings: 77 participants

April 18, 2024, webinar: 41 participants

January 2025, 2 in-person public meetings, 112 participants

January/February 2025, 2 webinars, 41 participants

Even assuming that there were no repeat participants above, the number only totals out at 351. Assuming a total collection of less than 1,500 comments, this is insufficient data.. As CDOT states in its PIP, a key goal of the process is to work with community partners to “obtain comments from a broad cross-section along the corridor.” Thus far, there is a small sample of the population from which to gather data on community sentiment. It does not compare well to other public processes (see examples below). Especially in an environment of high mistrust, more engagement is a necessary precondition for decision making.

Qualitative Issues

Public participation is not the responsibility of the community – it is CDOT’s responsibility, as articulated in the Public Involvement Plan, and data collection from the public process should meet the same technical rigor as transportation modeling or air quality measurements.

The small data sets generated by engagement to date raise potential concerns about representation issues and the possibility that unrepresentative groups are producing skewed input that can be misinterpreted. This dynamic is well-researched and documented in land use decision-making, for instance. Relying on a small, less representative public can lead to decisions that do not

reflect the public will or serve the public interest, thereby deepening community outrage and mistrust toward institutions and leading to opposition to a decision that is perceived as illegitimate and lacking community influence. These concerns could be reinforced by how data collection has occurred with open-ended comment collection or via narrow framing of priorities. For instance, meeting summaries report items such as “While we received a total of 34 different responses, the most common concerns included congestion and safety,” and may well reflect the outcome of forcing a false choice between “congestion” and “public health.” In fact, the two issues are interlinked and should be considered together. Separating them as distinct from one another could lead to simplistic design solutions that ignore contextual realities. Integrating them as co-priorities changes the potential design solutions entirely. When they are re-framed as co-priorities, the question becomes “what design solutions serve both improved air quality and public health outcomes and improved mobility?” That yields different solutions than determining that “congestion” is the problem, with a subset goal to simply “mitigate the impacts” of solving for congestion. Assigning sole importance to congestion and safety over equal consideration for other priorities can lead to community push-back on preferred solutions because they don’t reflect shared thinking. In addition, the preferencing of particular inputs over others contributes to the appearance that the agency is not engaged in authentic engagement but is pursuing a pre-determined agenda that aligns with its own preferences. In other words, it reinforces the mistrust dynamics cited by CDOT in its own Public Involvement Plan.

Using Deliberative Methods

Given the criteria for public participation represented in Colorado law and the CDOT Public Involvement Plan, the public promise and corresponding expectations from communities are set quite high for this process. However, applying the IAP2 Core Values to participation to date reveals some concerns. There is evidence that residents want a greater voice and more influence

over decision-making given existing levels of mistrust. Input and Feedback mechanisms are not sufficient in a mistrust context. Open houses and surveys are insufficient methods by themselves in an environment of mistrust. More robust methods – especially those that include deliberative approaches – would lead to shared points of view, shared understanding, and better outcomes. Many quality public processes today are incorporating both broad engagement and data collection methods and representative, deliberative

Top community priorities for I-270 Corridor Improvements Project heard so far



I-270 Corridor Improvements

- Be able to reliably plan my trip and arrive at my destination on time.
- Travel faster through the corridor most of the time, even if travel times are unpredictable.
- Merge easier and safer at interchanges.
- Better ability for freight trucks to safely operate in the corridor.
- Better ability for emergency response agencies to get to and clear incidents.
- More engagement with the most-impacted communities.
- Improve transit, walking and biking infrastructure, and wayfinding in adjacent neighborhoods.
- Better understand and address air, soil, and water quality impacts.



YOUR VOICE MATTERS!

Tell us what you think.



Are there other important issues we should consider?



What investments would be most meaningful to your community?



Do you belong to or know of an organization that may have information or ideas to share?

processes to build a strong case for decision-making that is influenced by citizens.

Recommendations for CDOT

Based upon the team’s assessment of current public involvement, we recommend that CDOT consider the following:

- Surge public participation efforts now to gather sufficient community data to inform the process. The process needs more data to have any credibility when the EIS is issued. The team believes that an intensive 60-day effort could generate a wealth of data to give this process a credibly informed decision. However, doing nothing is not an option, and CDOT risks forfeiting the legitimacy of this process without timely action.
- Increase community representation where decisions are being made to improve community confidence in the process and build trust in the final decisions by giving more influence to community voices. This can be accomplished through deployment of a wider range of techniques (i.e. “Collaborate” vs. “Consult”). The team recommends Community Advisory Board mechanisms as well as Citizen Assembly models that utilize deliberation, which can help produce outcomes with widely shared agreement on project priorities and solutions.

Utilizing more robust methods such as Citizen Assemblies has been shown to produce successful community outcomes with broad support and legitimacy. The region has significant technical assistance resources present already, including organizations like the National Civic League and the CSU Center for Public Deliberation that could provide guidance to these methods.

Examples

DC Better Bus Network

The Better Bus Network initiative in Washington, DC,

provides one comparative example that demonstrates how quickly public participation can be scaled for real impact by generating significant broad-based data collection. In 2022, Metro launched the Better Bus Network Redesign project, the first comprehensive redesign of Metrobus service in its 50-year history. The two-year planning process included almost 6 months of outreach and engagement. It resulted in 45,000 interactions with participants and the collection of 33,000 comments to inform a rich data set for informed decision-making. The pace at which they generated such data also provides a model for quick, scaled data – in one span of Phase I engagement, they had 63 events covering 62 days, they engaged over 15,000 people and collected over 8,000 comments. These numbers demonstrate that it is possible to generate significant datasets quickly to inform decisions. These are numbers that are richer than CDOTs engagement by orders of magnitude and they create the conditions for decision-making that are informed by the community and have the credibility and legitimacy necessary to be welcomed with public support. For instance, they were able to report the following:

When presented with different types of trips, customers and the community...

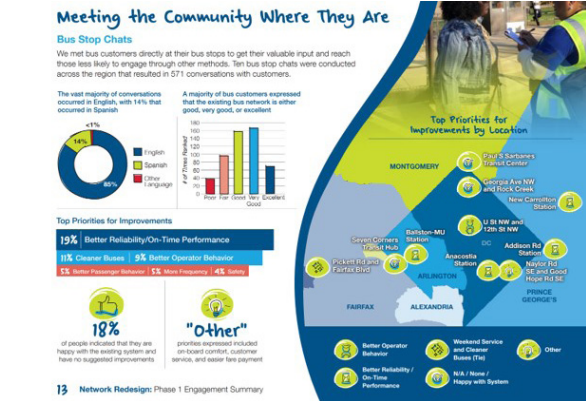
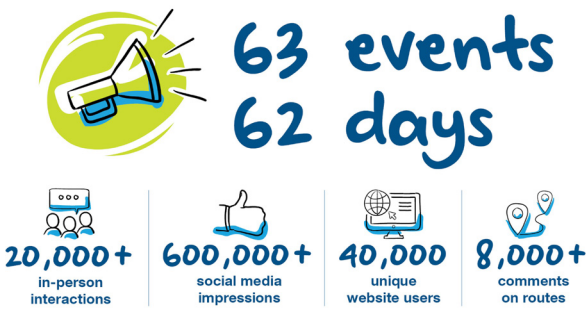
Preferred longer overall trips to avoid transfers (59%), compared to fewer people (41%) who preferred shorter overall trips with transfers;

Were nearly evenly split between preferring to walk further for more-frequent bus routes (49%) and preferring a shorter walk to less-frequent bus routes (51%);

Preferred a shorter walk to a less-direct/longer bus ride (64%) compared to fewer people (36%) who preferred walking farther for a more-direct/faster bus ride.

These data points drove decisions on route design, so they were able to state credibly that “community feedback directly influenced the development of the new bus network.”

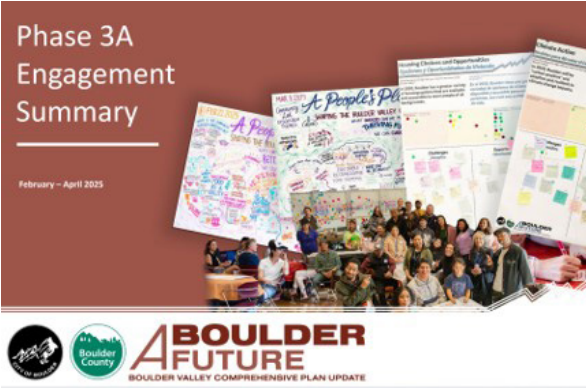
The other observation of note regards how they conducted engagement to reach numbers so different. The initiative deployed engagement teams to targeted locations across the bus network to ensure they were “meeting the community where they are” and collecting input from a geographic spectrum across the system at a range of locations, including “on board buses, at libraries, in community spaces, and more.” They used a range of formats and tools as well, including workshops, pop-up events, surveys, web and digital tools and others. The initiative employed a Community Connections Committee representing a diverse range of communities to help “extend the reach of our community engagement” as well, and produced a Digital Communications Toolkit that offered templates to help organizations disseminate information at a broad scale. This helped generate over 600,000 social media impressions during the initiative and brought over



40,000 unique users to the website.

Boulder Comprehensive Plan

Colorado is no stranger to quality public process work. In fact, a short drive up I-270 to Boulder provides a great regional example of an ongoing public process that is focused on achieving both quantitative and qualitative outcomes to inform future decisions. Boulder is currently updating the city’s comprehensive plan with a multi-faceted initiative that combines broad engagement data collection and high-quality deliberative practice. From October 2024-April 2025, their community engagement included 31 activities that generated over 4300 data points across a broad spectrum of residents. However, they are also implementing a Community Assembly model made up of a random selection of representative community members who will deliberate in detail over



several weeks to provide the initiative with a set of shared priorities and recommendations that complement their broader engagement work. This method ensures representation and demonstrates areas of broad agreement in the community, which in combination with more traditional engagement methods provides a sound basis for decision making that will have popular support.

What Can Communities Do?

Given the NEPA timeline, CDOT has little incentive to change course unless the agency believes that the status quo approach will cause significant community outrage. Nonetheless, the community should be able to hold CDOT accountable for its commitments as represented by the PIP, and leverage those statements against work-to-date to request a course correction, including the



following:

- Public Participation is CDOT’s responsibility, not the community’s responsibility. Low participation rates are not reflective of CDOT’s commitment to a “unique approach to increase inclusive and meaningful public involvement” or “special accommodations to participate meaningfully” with “Thoughtful and unique techniques.” Hold them accountable to follow through on stated commitments and demonstrate how community voice has influenced selection of alternatives and the project direction.
- Require meaningful public participation as a pre-condition to inform decision-making. Demand greater community influence in the process and more robust public participation techniques that can build public confidence in the outcomes.
- Push back against artificial timelines being imposed. For instance, there is clearly enough time to surge public participation and collect more public input before a draft EIS is released, and failure to do so adds risk for potential supplemental EIS processes should the community raise concerns about the process and decision. What would CDOT be forced to do if a community campaign of comments against the draft EIS outweighed public input into the process by a factor of two or three? It is far safer to commit to more robust participation today to collect enough data to produce more confidence in the community’s influence over the direction of the process.
- Remember, it is NEVER too late to improve the process. In fact, there are many NEPA success stories where information collected transformed approaches or led to the abandonment of misguided projects. That is the purpose of the NEPA process – to ensure that the full extent of environmental impact is understood before any action is taken.

Refinery Recommendation: Create a Community Advisory Board with Broad Representation

While the refinery operations present in the area were not a core focus of this study, it is worth noting that the lack of community dialogue – and accountability to the community – are contributing to deep mistrust of present refinery operations. One common tool used in the field to build in community engagement and representation is a Community Advisory Board. While the Colorado Department of Health & Environment maintains an Environmental Justice Advisory Board, its purview is too broad to serve as an effective mechanism for a single site. Given the high stakes and deep trust issues present regarding the Suncor refinery site, our team believes that a Community Advisory Board represents an important first step in creating structured dialogue that can improve relationships and lead to coordinated actions that address community issues. Community Advisory Boards are a common tool used to build institutional and community relationships in the industry. For example, consider Eastman (formerly Eastman Kodak, a chemical company that is now a specialty materials company) which boasts the following commitment:

“We regularly engage with Community Advisory Panels (CAPs) in the communities where we operate to connect on and address topics of shared interest like public health and safety and to form long-term, meaningful relationships. What we learn from active engagement with our CAPs helps Eastman determine how to best leverage our resources – both human and financial – to affect greater good in the communities. By forming and holding regularly scheduled meetings with 10 CAPs at our largest global manufacturing sites, our leaders continuously engage in open dialogue with a diverse set of community stakeholders and neighbors around the world. CAPs help local citizens better understand industry issues and help us understand community concerns. Ultimately, the purpose of a CAP is to look

after the communities’ interests and build trust.”

Community Advisory Boards are also regularly utilized by the refinery industry. Consider the Pine Bend Refinery in Minnesota, which created a Community Advisory Council in 1998 that “provides community members with an opportunity to discuss and make recommendations to the company regarding environmental, safety and other issues of concern to the citizens living near the refinery. Operating independently of Flint Hills Resources, the CAC serves as a community voice when Pine Bend seeks direct feedback regarding refinery operations and plans. The CAC consists of 20 community members, two voting members and one non-voting member from the Pine Bend refinery, and a non-voting member from the Minnesota Pollution Control Agency. Members serve three-year terms.” The Benecia Refinery in California has a similar mechanism called a Community Advisory Panel, whose mission statement is as follows:

- The mission of the CAP is to provide an independent advisory committee dedicated to establishing and maintaining an on-going means of communication between the community, civic leaders and the Valero Benicia Refinery
- In a way that actively identifies and addresses activities and issues of concern and interest regarding the protection of health and safety of the community and safe operation of the Valero Benicia refinery
- So that the citizens of the community and the city will be informed and confident that Valero Benicia refinery operates its business in a manner that protects the health and safety of the community and surrounding businesses including Valero.

These mechanisms are part-and-parcel of standard operating procedures for the industry.

In fact, our team found evidence that Suncor representatives have even participated in Community

Advisory Board processes in Canada. A company representative of Enbridge (an energy transport company) noted that process had exceeded their company’s expectations, observing [that](#), “Our purpose was to bring people together to have a chance to ask questions, understand about who we are and what the project is about. It really is driven by the communities and what we get to learn is what concerns them so we can help address those.”

This mechanism also has history in the community. The infamous Rocky Mountain Arsenal site utilized a Citizens’ Advisory Group to respond to citizen health concerns during the remediation management, communicating regularly about work on site as it transitioned to a wildlife refuge.



Improving the Network

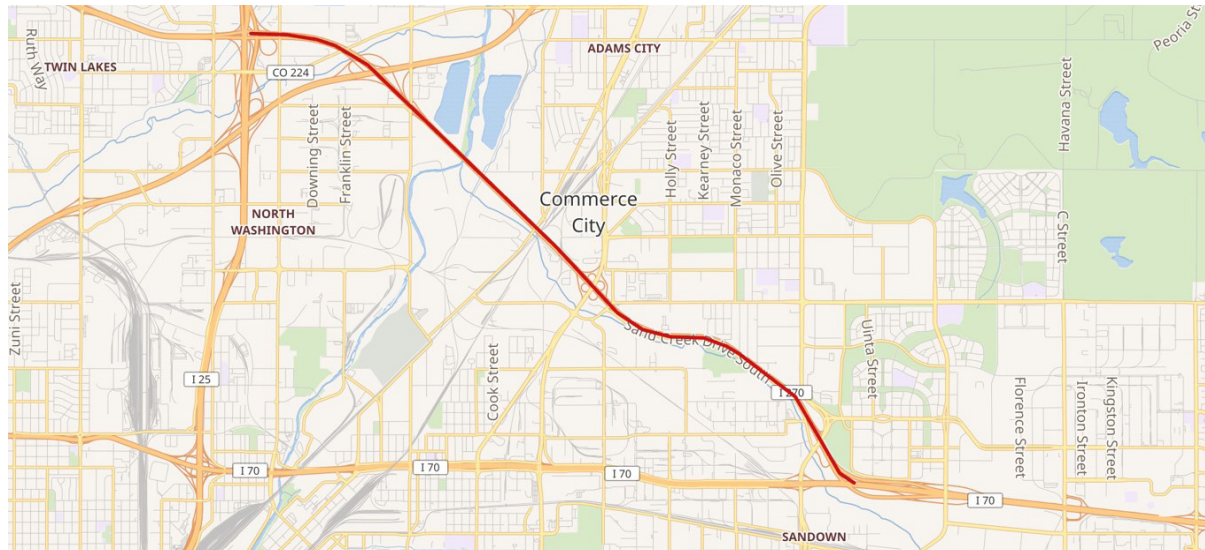
Truck Congestion

Trucks are a major concern both on the interstate (congestion, travel delay and emissions) and off it (street safety and neighborhood quality of life). Improving mobility for freight movement is a major concern – and an opportunity. Facilitating freight operations on the highway benefits the state, region and community and is a top priority. This can be substantially improved through the following actions:

- Prioritizing I-270 for freight (freight only or highly managed)
- Effective use of technology for priority operations on the highway and enforcement off
- Incentives for transition to low/no-emission trucks and infrastructure investments to enable the transition
- Clear street modal hierarchy to facilitate trucks where they belong, and prioritize other road users elsewhere

I-270 Freight Prioritization

There is no doubt that the goods movement economy is foundational to U.S. economic performance. However, heavy-duty vehicles can have high impacts on local communities when congestion forces them onto local streets. According to available data, 1 in 8 vehicles using I-270 are freight trucks. This represents a significant proportion of overall traffic. One potential solution to current congestion would be to designate the highway for freight, transit and emergency vehicle priority corridor, managing other users with policy-based tolling that targets a volume reduction of at least 25 percent to require no additional road capacity. CDOT may be able to do this as a pilot project prior to proceeding with the design of any alternative. This approach would be consistent with the goals expressed in CDOT's Statement of Purpose and Need. CDOT should take advantage of federal programs that would allow tolling on I-270, including the Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP) and the Value Pricing Pilot Program (VPPP). The VPPP in particular lends itself well to CDOT's stated goal of congestion reduction, including for I-270's



existing lanes. Connecticut’s I-95 Corridor Congestion Relief Study provides one example of this approach.

Other high traffic regions in the goods movement economy are already investing in similar approaches. The Georgia Department of Transportation (GDOT) is building the nation’s first long-haul truck-only lanes along a nearly 40-mile stretch of I-75 from just north of Macon until just south of Atlanta. The US Department

of Transportation (US DOT) is supporting the study of dedicated truck lanes along I-70 from the Interstate 435 beltway on the eastern part of Kansas City, Missouri to the Bridgeport, Ohio/Wheeling, West Virginia border. CDOT could invest in a similar solution with tolling for other users.

Deploying Technology for Priority Operations & Enforcement

The construction timelines involved in adding roadway capacity to I-270 will be significant. Given the rapidly evolving innovations in transportation technology, it would be prudent for CDOT to consider deploying technology to establish a connected vehicle corridor with appropriate infrastructure to create smart freight corridors.

Strategy: Create a Connected Corridor

Connected vehicle technology, via sensors and infrastructure, can establish smart freight corridors that improve safety, travel time and emissions reductions. Connected technology manages vehicle speeds to reduce speed differentials, provide advance notice of danger, decrease lane changing and friction in congested areas, and maintain closer vehicle spacing safely to create more road capacity without the need for added lanes. Other regions with significant goods movement economies are investing in connected corridors. For instance [TXDOT is establishing a smart freight corridor](#) around Austin, TX while GDOT is

installing smart technology on SR 307 to the Port of Savannah in anticipation of increasingly automated vehicles. Approximately 50 million tons of products move through the Denver metropolitan area annually. Connected technologies could improve both safety and efficiency with benefits for everyone. Making these critical tech investments now will allow Denver to remain competitive in the goods movement economy without compromising its commitment to climate and air quality goals.

Strategy: Automated Differential Tolling

Automated License Plate Reader (ALPR) technology has been in use for years. CDOT could implement an automated differential tolling system on the Interstate that distinguishes between users (trucks, transit, residents and HOV) and applies appropriate toll rates accordingly to manage congestion and raise public funds that can be invested in transit and related mobility needs. The strategy of a differential tolling model along I-270 would be to facilitate commercial truck movement and keep trucks on 270 (rather than local streets) while reducing I-270 passenger vehicles and encouraging higher occupancy vehicles. The system could also mitigate impact on local residents so the tolling burden would discourage single passenger vehicles from out of area while vehicles registered to zones within the area would travel for free.

Strategy: Automated Enforcement

ALPR technology can be also used on the local street network for enforcement against trucks and commuter traffic looking for "free" alternative routes from the Interstate. Enforcement revenue can be dedicated to local community improvements such as beautification and safety. For example, [San Diego, CA installed ALPR technology](#) concurrent with streetlight upgrades in 2020.

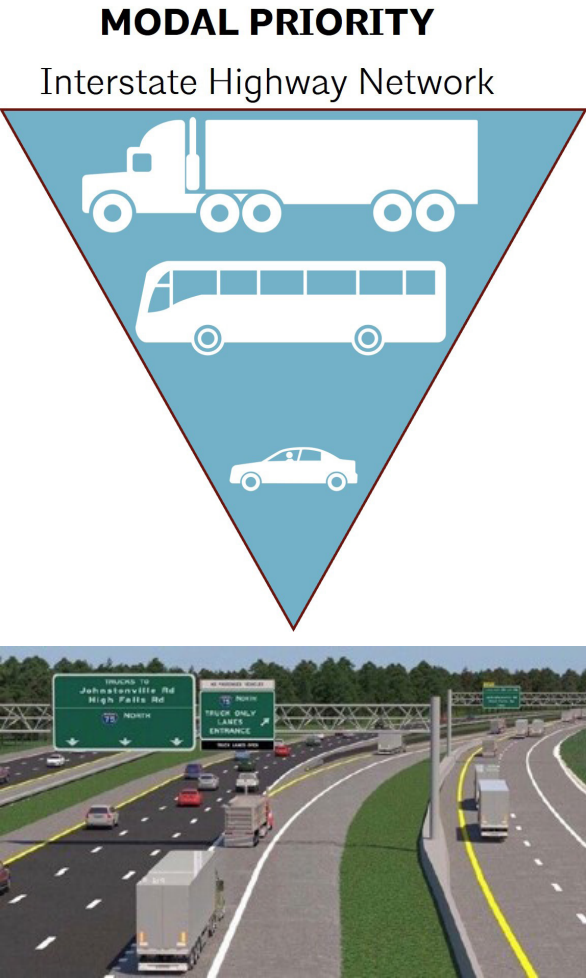
Strategy: Zero-Emission Truck Transition

The zero-emission truck transition is occurring, but it relies on concurrent infrastructure support such as electrical grid and production upgrades and hydrogen networks. As the transition to zero-emission trucks begins, the I-270 improvements must happen concurrently to promote zero-emission infrastructure for a clean freight transition.

Create Modal Hierarchy

By deploying the above strategies across state and local partners, the area can create a modal hierarchy that maximizes demand reduction and system efficiency while facilitating sustainable modal shift. For the project area, highways would serve as freight priority, while major arterial roads would serve as traffic priority and local arterials would become transit/multi-modal. The local street network would become multi-modal priority, and the green corridors would become tree/pedestrian priority. The modal hierarchy will allow the full street system to operate at its most efficient level, leading to higher performance for all by using appropriate infrastructure to meet a variety of mobility needs and accommodate all of its users.

A sustainable, integrated approach to infrastructure development will also reduce the impacts of floods and droughts, improve water quality, and increase the efficiency of energy, waste, transportation, and telecommunications systems. Upgrading outdated infrastructure—both underground and above—will also lay the groundwork for future private investment.



The Street Network

The street pattern, legibility, connectivity, and visual sense of place has been lost in Commerce City and North Denver. The area adjacent to I-270 is lacking a clear sense of movement, wayfinding, and street hierarchy necessary to improve the overall sense of place and quality of life.



Recommendations

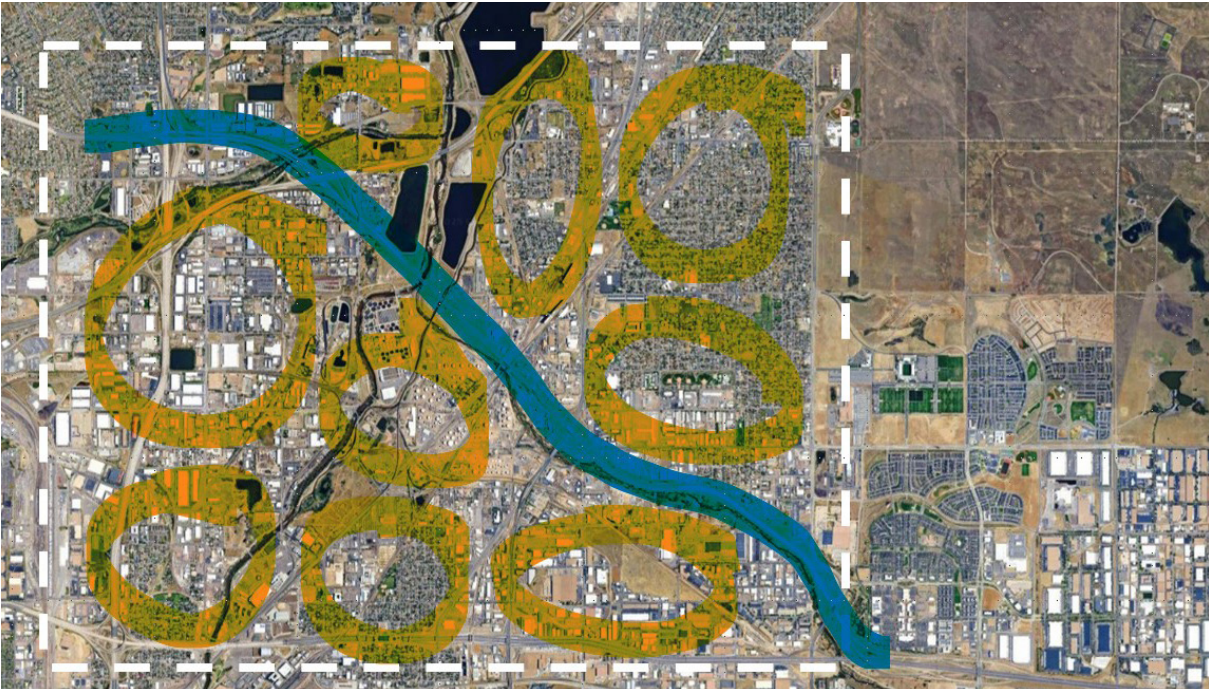
- Establish clarity – create a cohesive network of streets, arterials, and loop roads
- Introduce street signage and wayfinding to clarify movement for people and cars
- Reconnect missing links in the street grid – reinforce street character and mobility
- Improve pedestrian crossings, sidewalks and land-bridges to reconnect the street pattern
- Use technology tools to reinforce traffic management
- Create a multi-modal hierarchy for streets in the urban grid

Current Condition: "The Displaced City" (Industry + Roads)

The existing conditions in the project area can be characterized by an unhealthy amalgamation of industrial activity, roadways and pockets of homes and neighborhoods that are intermingled together without barriers or transitions. The existing mix of land uses and urban design often expose residents to living conditions that are untenable. Neighborhoods often sit side-by-side with industrial facilities and transportation infrastructure with no regard for protective urban tissue that can allow them to co-exist more effectively.

Vision/Aspiration: Garden City

The team believes that the communities of this project area would be better served by a transition toward a future version of the “Garden City.” The Garden City concept would provide residents with supportive



green infrastructure that could serve as an effective environmental greenbelt to adjacent transportation and land uses that otherwise negatively impact quality of life and public health. There has been a huge movement in recent years toward nature-based solutions in urban settings and a growing realization that investment in restoring and strengthening natural systems can support human well-being and have co-benefits that address a number of common urban challenges. By creating a system of greenbelts, urban trees and connected parks as well as public spaces, green infrastructure can provide a protective natural system that forms a barrier to industrial activity. The project area can undergo an incremental transition toward a system of green infrastructure across the area. This will more effectively support a range of healthy human mobility and activity that nourishes community while maintaining economic activity.



Strategy Example: FDOT Context-Based Solutions

The Federal Highway Administration defines Context Sensitive Solutions (CSS) as “a collaborative, interdisciplinary approach that involves all stakeholders to provide a transportation facility that fits its physical setting and preserves scenic, aesthetic, historic and environmental resources, while maintaining safety and mobility. The CSS is an approach that addresses the total context within which a transportation facility is planned, implemented, maintained and operated.” CSS is often contrasted with traditional practice that focused solely on vehicle throughput by emphasizing a more balanced approach that places transportation infrastructure within its surrounding context in a complementary manner that has co-benefits to other transportation modes and is supportive of the built environment’s role in maintaining environmental quality and other desired outcomes. In Florida, the Department of Transportation has codified a context-based approach to ensure that all projects are context-

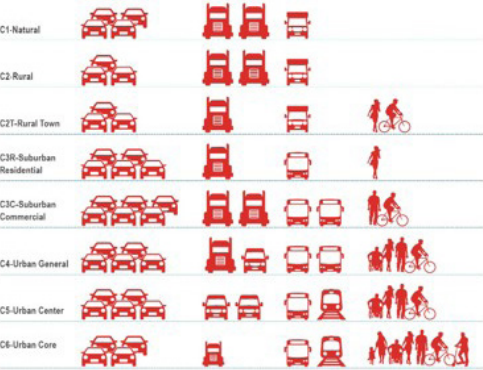
sensitive and consider the needs of all users, describing it as a “department wide shift in transportation planning, design, and decision making.” FDOT built a Context Classification Guide that includes “a roadway classification system comprised of eight context classifications for all non-limited access state roadways. The context classification of a roadway must be considered, along with its transportation characteristics and the built form to understand who the users are, what the regional and local travel demand of the roadway is, and the challenges and opportunities of each roadway user. The context classification and transportation characteristics of a roadway will determine key design criteria for all non-limited access state roadways.”



CONTEXT CLASSIFICATION AND ROADWAY USERS

The context classification of a roadway informs planners and engineers of the types of users and the intensity of use expected along the roadway. FIGURE 6 illustrates the user types and intensities expected in each context classification. For example, the C6-Urban Core Context Classification is anticipated to have more pedestrians, bicyclists, and transit users than in a C2-Rural Context Classification. Therefore, design and posted speeds towards the lower end of the speed range, signal spacing, crossing distances, lane widths, and other design elements such as bicycle facilities, on-street parking, and wide sidewalks should be provided to increase the safety and comfort of bicyclists, pedestrians, and transit users. For the C2-Rural Context Classification, vehicles and freight are primary users; the infrequent bicyclists and pedestrians are accommodated with paved shoulders or sidepaths. A state roadway in C2-Rural Context Classification is expected to have relatively higher speeds, wider lanes, and fewer pedestrian and bicycle crossings.

FIGURE 6 Expected User Types in Different Context Classifications



Alternative Modes

North Denver and Commerce City are committed to creating safe, livable, and welcoming environments for people of all ages and abilities—whether they walk, bike, drive, or use public transit. Strategic investments in sidewalks and bike facilities will enhance mobility for all residents, especially youth and those without access to cars. These improvements will also help activate commercial areas and support healthier, more vibrant communities.

Collaboration with local transportation agencies will improve bus service and route efficiency, making transit a more reliable and attractive option. Currently, driving remains the primary mode of travel in the I-270 corridor due to a lack of safe and convenient alternatives. Gaps in pedestrian and bicycle networks discourage active transportation and limit travel choices. North Denver and Commerce City will improve transportation safety through better street and intersection design, clearly marked crosswalks, and expanded sidewalk connections. Traffic-calming street designs, especially near schools and in residential neighborhoods, will help reduce vehicle speeds and improve safety. Enhanced bicycle infrastructure will provide residents with safer, easier alternatives for getting around.

The followings sections detail types of strategies that can improve bicycle infrastructure, in addition to:

- Supporting first- and last-mile connections to transit and key destinations
- Increasing bus reliability and frequency
- Enhancing bicycle connectivity within neighborhoods
- Improving walkability and adding street trees
- Embracing emerging mobility options

What is the "First and Last Mile"?

When someone takes a trip, whether to work, school, or anywhere else, it usually involves more than one step. Even if you ride the bus or train for most of your journey, you still have to get to and from the station. That first part of the trip (getting to the station) and the last part (getting from the station to your destination) are called the "first and last mile."

People might walk, bike, drive, or use a scooter to cover those parts of the trip. Even though the distance isn't always exactly a mile, the term "first and last mile" is used to describe the beginning and end of a transit journey.

While public transit agencies focus on buses and trains, they don't always control the streets, sidewalks, or bike paths that help people reach transit stops. But those connections are just as important! If it's hard or unsafe to reach a bus or train, people are less likely to use it.

The easier it is to get to and from transit, the more likely people are to choose it. That's why improving first and last mile connections, like better sidewalks, bike lanes, lighting, and signage, is a key part of making public transportation work for everyone.



Strategy: Mobility Hubs

Mobility hubs make it easier for people to get where they need to go by bringing different transportation options together in one convenient, safe, and comfortable place. These hubs are designed to help travelers easily switch between walking, biking, public transit, shared rides, and even electric vehicles—all in one location.

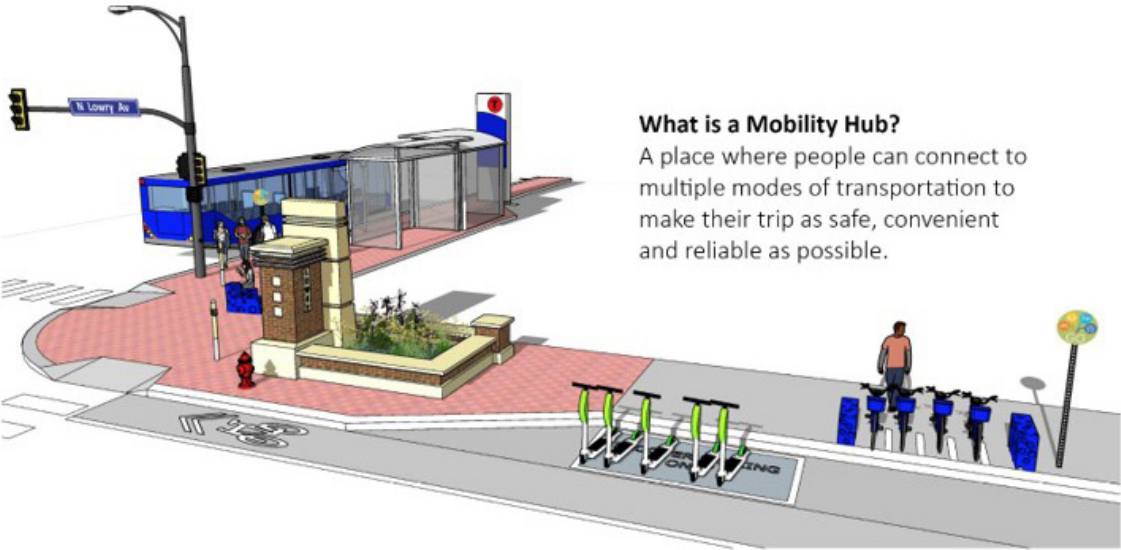
A mobility hub might include:

- Bus stops or train stations
- Bike and scooter share stations
- Rideshare or taxi pick-up and drop-off areas
- Electric vehicle charging stations
- Package lockers, small retail or vending machines
- Places to sit, get out of the sun or rain, and charge your phone

Mobility hubs are especially useful for making short connections—like getting from a bus stop to a bike share station or grabbing a scooter to reach your final destination. They often include real-time travel information, Wi-Fi, and other modern tech features to improve your travel experience.

These hubs are typically located near key transportation points like rail stations or major bus stops, and they help reduce car trips by making it easier and more appealing to use cleaner, more sustainable ways to travel.

In Commerce City, there's a chance to pilot a mobility hub near important transit and rail stations. By identifying key locations and investing in placemaking—such as adding comfortable seating, good lighting, and community-friendly amenities—the city can improve travel options for residents and visitors alike.



What is a Mobility Hub?
A place where people can connect to multiple modes of transportation to make their trip as safe, convenient and reliable as possible.

Strategy: Micro-transit/On-demand transit

Transit agencies are increasingly adopting microtransit solutions to enhance the rider experience by offering small-scale, on-demand transportation services. These services can operate along fixed routes and schedules or use flexible routing with on-demand scheduling, providing a more responsive and convenient alternative to traditional transit. Additionally, microtransit services can be integrated with public transit to provide first- and last-mile connections.

For example, an on-demand rideshare service could operate within designated zones in North Denver and Commerce City and throughout the region. Unlike conventional bus systems, microtransit typically uses smaller vehicles, such as shuttles or minibuses, and relies on smartphone apps or similar technology platforms for ride requests, routing, and scheduling. These fleets are designed to be more agile, offering service in areas that may not be well-served by fixed-route transit.

Microtransit is especially effective as a first-mile/last-mile solution, helping people connect to bus and rail lines or move within neighborhoods where traditional transit is limited. Many regions have already introduced on-demand services to supplement infrequent or sparse fixed-route systems in lower-density communities.

For instance, the City of Denver’s collaboration with RTD on the Denver Connector service that operates Globeville, Elyria, and Swansea presents a model of successful partnership to deliver mobility solutions. A complementary program that offers free rides on demand in Commerce City could prove similarly successful.

Strategy: Shared Micro-mobility

Micromobility devices help bridge first- and last-mile gaps, expanding access to jobs, healthcare, and essential services. These lightweight transportation options—such

as bicycles, e-bikes, electric scooters (e-scooters), and two-wheeled electric mopeds—are ideal for short-distance travel. Powered and adaptive micromobility devices also offer increased mobility for older adults and individuals with disabilities, as they require less physical effort than traditional bikes or scooters.

While shared micromobility options are currently limited in North Denver and Commerce City, there is a strong opportunity to introduce bike- and e-scooter-sharing programs. These services can provide flexible, on-demand transportation for short trips and last-mile connections to transit or local destinations. Shared micromobility expands the benefits of active transportation to people who may not own a bike or scooter.

Local governments and partners can support both manual and electric shared mobility options to improve access, increase ridership, and raise public awareness and comfort with these energy-efficient modes. Framing micromobility as an extension of the transit system reinforces its role in a complete transportation network. Education and outreach programs—such as safe riding workshops and basic bike maintenance classes—can further boost participation and ensure safer use.

North Denver and Commerce City could also examine the Denver Connector that operates nearby in Globeville, Elyria, and Swansea. The program offers free rides on demand within the service area but does not connect across I-270 into Commerce City. Additionally, DRCOG is currently undertaking a microtransit study: <https://engage.drcog.org/nfederalstudy>

Strategy: Enhanced Bicycle and Pedestrian Infrastructure

Bicycle and pedestrian infrastructure are essential components of active transportation networks. When paired with traffic-calming features, such as curb extensions, speed bumps, pedestrian islands, raised crosswalks, and brightly colored pavement, these

networks offer safer, more comfortable travel for people walking and biking. These design elements encourage drivers to slow down and pay attention, protecting all road users, especially those outside of vehicles.

Active transportation infrastructure, including bike lanes, sidewalks, and multi-use trails, plays a vital role in building vibrant, connected communities. These networks provide safe, reliable, convenient, and affordable options for people to get to work, school, parks, and essential services. They also support community health and cohesion by encouraging physical activity and offering low- or zero-emission alternatives to driving. As every transit trip begins and ends with walking or biking, active transportation is a key part of a complete transportation system.

When designed with all users in mind, active transportation networks can:

- Reduce congestion and traffic-related injuries and fatalities
- Improve access to jobs and services
- Promote healthier lifestyles through increased physical activity

- Strengthen community ties and public spaces

In North Denver and Commerce City, bicycle infrastructure is currently limited and fragmented. Few dedicated bike lanes exist, and many routes lack physical separation from vehicle traffic, reducing safety and discouraging ridership.

To support active transportation, transportation planners and Public Works can focus on developing safer, more convenient infrastructure—such as protected bike lanes, well-lit routes for evening travel, and clearly marked pedestrian paths. Employers can also help by installing bike racks, locker rooms, showers, and repair stations, making it easier for employees to choose biking or walking as their commute mode.

Ultimately, cycling and walking infrastructure represent cost-effective, inclusive transportation options that expand mobility for a broader range of residents.

Expanding and Integrating Public Transit along the I-270 Corridor

While a series of state policy shifts in recent years have placed priority on developing efficient transit-oriented

communities, participation in regional transit has been in decline. Recent studies report that RTD is plagued by low ridership, with 40 million fewer riders per year compared with six years ago. This condition reflects both national impacts on transit from the pandemic experience and local challenges to the region. In this context, the I-270 corridor presents a significant opportunity because it is where the return on transit investments is potentially most powerful outside of the city core. The I-270 interstate is currently served by only one RTD bus route (the FF5, or Flatiron Flyer 5), connecting Boulder to Aurora along US-36. The current route runs 7 times eastbound and 4 times westbound per day and only serves weekday commuters. CDOT’s 2022 Origin/Destination study found that 44% of trips on I-270 are “long distance” between US-36 and Aurora which suggests high potential for additional transit serving that route. Portions of the I-270 corridor communities fit the profile of a transit desert. These areas typically exist where transit service demand is much higher than existing public transportation service and are often characterized by accessibility challenges and barriers such as lengthy walking distances to reach facilities. While the majority of the project area currently lacks the housing densities needed to create transit propensity, it does have a high number of residents who have greater comparative transit propensity than other areas as measured by demographic data. Therefore, transit investments in the project area can potentially capture multiple types of users and serve multiple goals. First, the opportunity cost cannot be ignored. Expanding highway capacity without parallel investment in alternative modes will increase total vehicle miles traveled (VMT), offsetting any short-term congestion relief and undermining the state’s greenhouse gas reduction goals under CDOT’s GHG Pollution Reduction Planning Standard (2021). Second, improved transit services in this area not only facilitate future ridership improvement but reach transit dependent populations and likely provide significant co-benefits to family economic success, economic mobility, health, affordability and other outcomes that

are regional goals. Expanding transit options, such as regional BRT routes or express bus service connecting US-36, I-270, and I-70 would directly address mobility gaps while mitigating some emissions exposure in frontline neighborhoods like Globeville and Elyria-Swansea and south Commerce City residents, where asthma and cardiovascular disease rates remain among the highest in the region. Lastly, transit investments in this area can help create the infrastructure to encourage more compact land use over time and creating the needed densities to make transit successful. Commerce City remains one of the fastest growing jurisdictions in Colorado and was among the jurisdictions to receive “transit-oriented community” designation from the state. Therefore, it must meet the state requirements of the Housing Opportunity Goal by adjusting zoning capacity to allow for more compact development. The area is ready-made for significant and complementary investments in transit to bring about the realization of state goals. Conversely, absent investments in transit, the widening of I-270 would serve to undermine the TOD Community and Housing Opportunity Goal. Transit investments would also be consistent with the goals of CDOT’s Statewide Transit Plan, which articulates the intent to provide “enhanced transit service for transit dependent populations” and identified Adams County as a jurisdiction “exhibiting the highest level of combined transit-dependent characteristics.” It would serve the goals of the Draft Commerce City Transportation Master Plan, which notes that addressing barriers to mode shift is a public priority. Current Denver County and Adams County transit maps indicate that the I-270 study area lacks major bus and rapid transit connections. There are virtually no high-frequency or regional routes serving the corridor, reinforcing the case for coordinated CDOT-RTD action on transit solutions. Enhanced regional collaboration and coordination between CDOT, RTD, DROG and local jurisdictions could facilitate integrated service planning, shared capital investments, and eligibility for multimodal projects under existing funding programs such as the Multimodal Options Fund (MMOF) and the Transportation Alternatives Program (TAP).



Pollution Mitigation

The residents of North Denver and Commerce City are impacted negatively by both industry and the transportation network. These impacts include pollution of both air and water, which impact health and quality of life. There are several strategies that can mitigate these negative impacts. They include the following:

- Connecting the City's existing green network
- Creating green buffers between residential and industrial areas
- Creating a green buffer directly adjacent to I-270
- Utilizing green infrastructure strategies for all new development
- Installing air monitors in homes and residential areas
- Provide in-home water quality testing for residents
- Provide remediation to all vacant lots that are adjacent to or to be utilized for residential use

Connect the City's Existing Green Network

Existing parks, gardens, trails, greenways, including along the Sand Creek, and other natural areas can be connected with a public access green network. This network can enhance the quality of life for residents of the region by providing access to nature, providing wildlife habitat, promoting recreation, improving environmental conditions, and fostering social interaction.

Strategy: Green Buffers

The garden city movement was a 20th century planning movement promoting satellite communities surrounding the central city and separated with greenbelts. It is highly recommended that the residential areas in this region are separated by green belts or buffers creating a

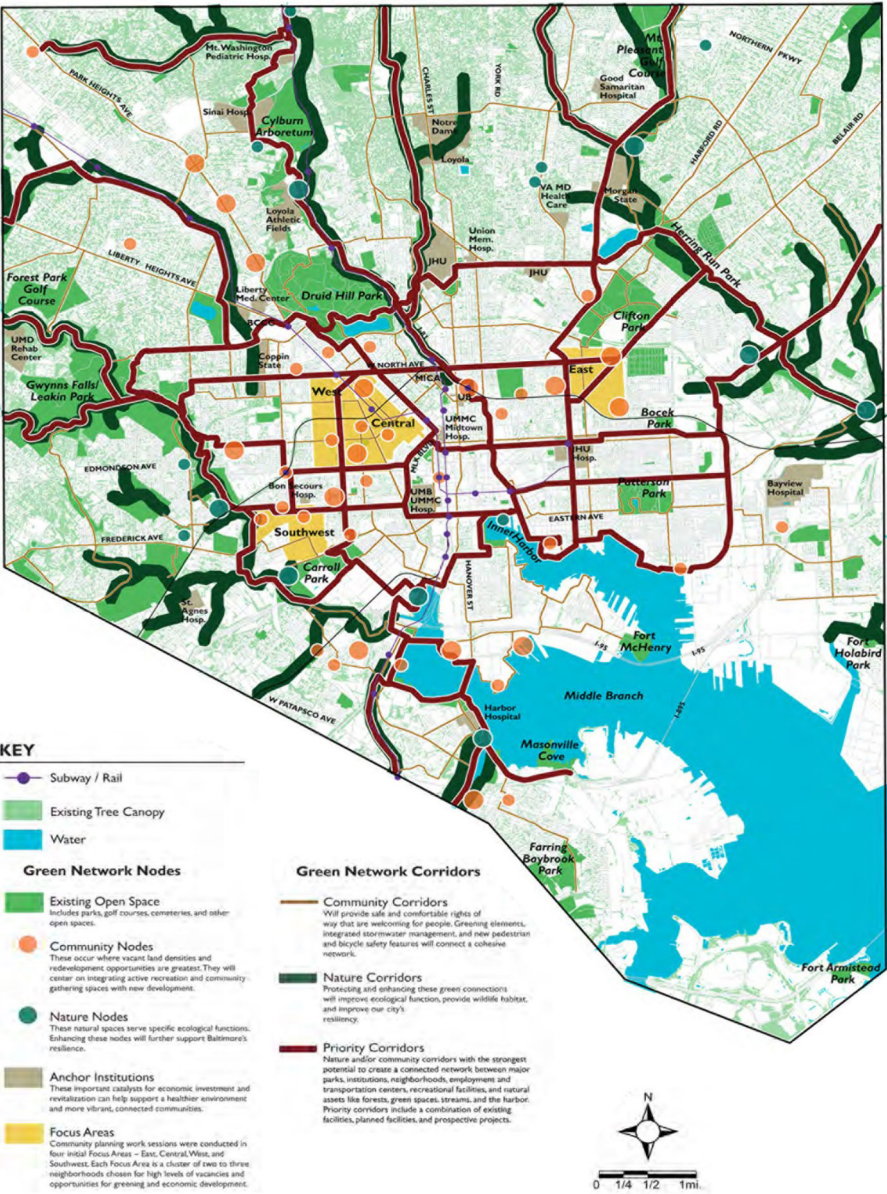
more livable and sustainable community.

Green buffers, also known as vegetative or riparian buffers, are strips of land with vegetation designed to mitigate the impact of human activities on the environment and sensitive ecological areas. They act as a natural barrier between different land uses, providing various environmental and community benefits. In North Denver and Commerce City, green buffer zones can be developed as designated strips of vegetated land or landscaped space between industrial operations and adjoining areas, such as residential neighborhoods, pedestrian scaled commercial zones, public infrastructure, or ecologically sensitive areas such as Sand Creek.

Green buffers will mitigate the flow and transmission of harmful pollutants by capturing and sequestering carbon and releasing oxygen to help mitigate greenhouse gases. They will also create useful separation, providing a sense of safety and adding aesthetic value to the community.

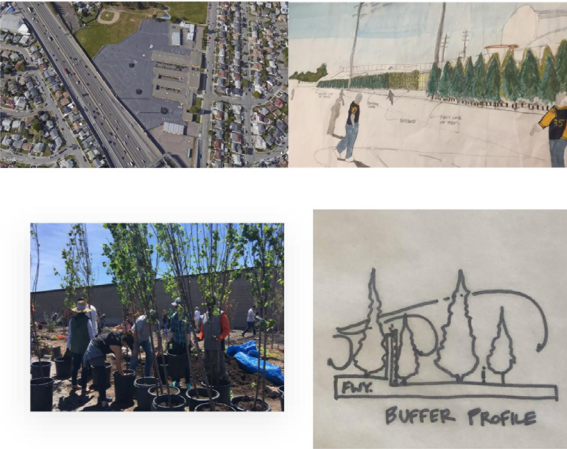


Baltimore Green Network Vision Plan



A vision of what could be.

CASE STUDY – Brookfield School/I-880 Freeway, Oakland



Graphic depictions of the Brookfield Vegetative Buffer project as designed and drawn by Air District Staff. School site adjacent to the I-880 freeway is shown referenced from a Google Earth map (top left). Photo of the Air District sponsored volunteer planting day (photo credit D. Ralston, Air District).

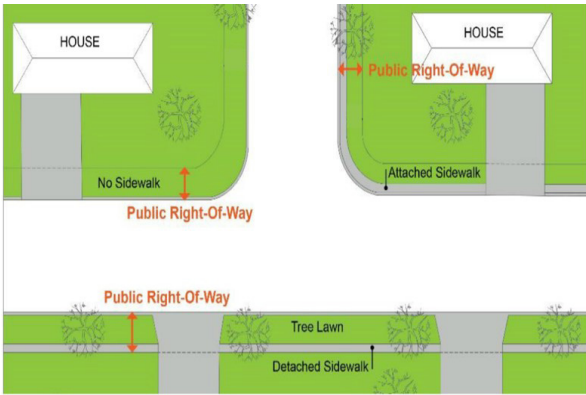
Green buffers can help reduce the negative impacts of the highway, including:

- **Air Pollution:** Plants naturally filter air pollutants and fine particulate matter from vehicle emissions, improving air quality for nearby communities and wildlife.
- **Noise Pollution:** Dense vegetation barriers can help reduce highway traffic noise, which is beneficial for both nearby residents and wildlife.
- **Stormwater Management:** Green buffers can be designed to capture and absorb stormwater runoff, filtering pollutants before they reach streams and coastal waters, according to the U.S. Environmental Protection Agency.
- **Erosion Control:** Vegetation helps stabilize slopes and prevent soil erosion.

Strategy: Street Tree Planting

Trees have beauty and symbolic meaning, and for cities and urban areas they have immense value. These include economic worth in the form of high real estate values, and high ecological and health benefits¹.

Tree planting will provide numerous benefits to the community, encompassing environmental, economic, and social improvements. These benefits include cleaner air and water, reduced urban heat, stormwater management, increased property values, and stronger social bonds. Trees planted in residential areas around homes, along the streets and large paved areas can provide shade and cooling, capture carbon dioxide, and reduce heat islands that currently exist within the community. Trees can bring nature into the area, and, importantly, visually shield residential areas from industrial views. If the right trees, ones that fit the climate, soils and moisture limits, are planted properly with room to grow they will benefit the community for years to come.



1. Moll, Gary and Sara Edenreck, editors. Shading Our Cities. American Forestry Association, Washington, DC, Island Press, 1989.



Strategy: Implement Green Infrastructure for All New Development

Green infrastructure is a tool for providing ecological, economic, and social benefits through nature-based solutions. It is a network of nature, semi-natural areas, and green spaces that deliver ecosystem services, which strengthen human well-being and quality of life. There are many existing opportunities for the implementation of green infrastructure in North Denver and Commerce City. This would include bio-swales to capture, clean



and direct storm water runoff, green roofs on office, commercial and industrial buildings to reduce heat island effect and improve drainage, and living walls to capture carbon and provide visually pleasing environments.

Strategy: Install More Air Monitors in Homes and Residential areas

Underserved communities in North Denver and Commerce City are in proximity to multiple air emissions sources, including industrial facilities and major highways. Air monitors would be extremely useful in evaluating the concentration of pollutants in the air

and assessing the air quality. This is important in determining if the air is safe for human health and the environment. (Research on Health Effects from Air Pollution, US EPA, June 11, 2025)

Although Commerce City has a PM and NO2 monitor at the Eagle Point Recreation Center near I-270, the corridor lacks a sufficient number of monitoring sites within the local impacted area, so residents and community leaders are unable to track neighborhood-

level air conditions to inform individual exposure mitigation actions and/or collective planning efforts.

To address this lack of data, a network of stationary and mobile low-cost, criteria air pollutant monitors that will continuously monitor air quality conditions in the communities with outdoor air quality risk should be developed.

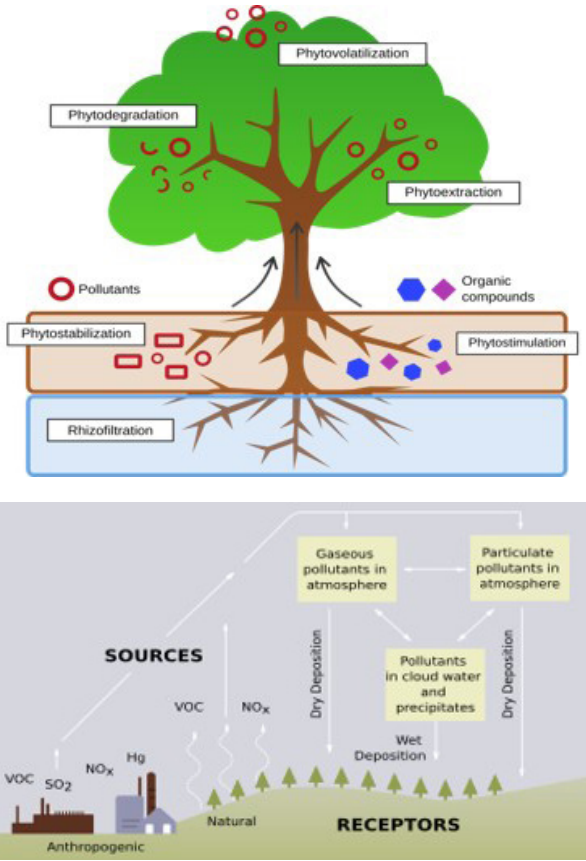
Strategy: Provide Remediation to All Vacant Lots that are adjacent to or to be Utilized for Residential Use

Phytoremediation technologies use living plants to clean up soil, air and water contaminated with hazardous contaminants. It is defined as "the use of green plants and the associated microorganisms, along with proper soil amendments and agronomic techniques to either contain, remove, or render toxic environmental contaminants harmless."²

Phytoremediation is a cost-effective, ecological technology that could be used within the community to remove, degrade, or stabilize pollutants from the Industrial sites within the area. It utilizes the natural abilities of plants to absorb, metabolize, or immobilize contaminants, in both soil and water, offering a sustainable alternative to traditional remediation methods. Many plants can be used for phytoremediation

2. Das, Pratyush Kumar (April 2018). "Phytoremediation and Nanoremediation : Emerging Techniques for Treatment of Acid Mine Drainage Water". Defence Life Science Journal. 3 (2): 190-196. [doi:10.14429/dlsj.3.11346](https://doi.org/10.14429/dlsj.3.11346) (inactive 12 July 2025).

including sunflowers, willows, poplars, mustard plants, and various grasses and ferns. The best choice depends on the specific contaminants and site conditions.



Connecting Community

Public Safety

Public safety improvements in North Denver and Commerce City would assist in the prevention of and protection from events that could endanger the public, protect residents from significant danger or physical harm These improvements are often made by the local jurisdiction or the state government to ensure the protection of citizens, persons in their territory, organizations, and institutions against threats to their well-being, survival, and prosperity.¹

Narrow shoulders are an example of an element of transportation infrastructure that reduce safe space for pedestrians and limit options for crossing, increasing exposure to traffic risks. Improvements that address this issue could include:

- Pedestrian crossings
- Land bridges
- Green Corridor crossings
- Lighting
- Safe Routes to Schools

Public safety improvements in the region could significantly contribute to the attractiveness of a location, the productivity of its people, and hence the overall success of the economy.

Strategy: Safe Route to Schools

Denver's Safe Routes to School program serves school communities to create safe, equitable environments for traveling to and from school while creating opportunities that enable physical activity and lower the obesity rate and risk for children and their families and caregivers. Utilize CDOT's Safe Routes to School (SRTS) to get

1. Maritime Domain Awareness in the Canadian Safety and Security Program” (PDF). December 2013. Archived from the original (PDF) on 2016-03-04

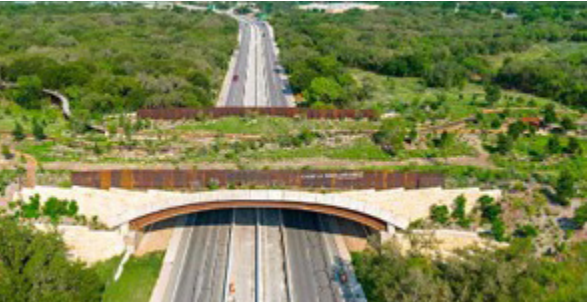


sidewalk extensions, better crossings, and air-quality-conscious design features.

Strategy: Pedestrian Overpasses

The I-270 corridor has limited pedestrian and bicycle crossings, making it difficult for residents to safely access destinations on either side. Increasing the number of pedestrian overpasses in North Denver and Commerce City and designing them to be not only safe, but green and aesthetically pleasing would be beneficial to the environment and the community.

CDOT should consider designing a land bridge crossing to accommodate the movement of both animals and pedestrians on the corridor. A land bridge would provide infrastructure to deploy nature-based solutions for safe crossing and an environmental buffer from the highway.



Anti-Displacement & Community Stabilization Strategies

The proposed I-270 expansion threatens to exacerbate existing inequities in North Denver and Commerce City, where frontline communities already face cumulative burdens from pollution, industrial land use, and disinvestment. Without intentional strategies, highway expansion risks fueling land speculation, raising property values, and displacing long-time residents and small businesses. This chapter outlines anti-displacement strategies grounded in tools identified during the design assistance process, national best practices, and local precedents.

Why Anti-Displacement Matters

- Environmental Justice Context: Elyria-Swansea, Globeville, and Commerce City have been recognized as Disproportionately Impacted Communities (DICs) under Colorado's HB 21-1266 Environmental Justice Act. Residents already face higher asthma rates and shorter life expectancy compared to the rest of Denver.
- Market Pressures: Past highway projects, such as the I-70 Central expansion, demonstrated how infrastructure projects can accelerate speculative development and displacement.
- Policy Misalignment: Colorado's Greenhouse Gas Reduction Roadmap and CDOT's GHG Planning Standard call for reducing VMT and aligning transportation investments with equity outcomes, which highway expansion alone cannot achieve.



Strategy: Community Land Trusts (CLTs)

CLTs hold land in perpetual community ownership, ensuring affordability of homes, parks, and civic assets. In the I-270 corridor, CLTs could:

- Acquire vulnerable parcels adjacent to industrial zones to create permanent green buffer zones.
- Preserve affordable housing near transit nodes, such as the RTD 72nd Avenue Station.
- Protect schools and parks from industrial encroachment by placing them under trust stewardship.

Case Example: The Elevation Community Land Trust in Denver has successfully maintained long-term housing affordability across multiple neighborhoods, demonstrating the viability of CLTs as anti-displacement tools.

Strategy: Neighborhood Stabilization Programs

Modeled on HUD's national NSP, Colorado's program funds property acquisition, rehabilitation, and new affordable construction in vulnerable areas.

- Rehab of existing homes could include health-focused upgrades such as filtration, insulation, and noise mitigation for households along I-270.
- Vacant parcels could be developed for mixed-income housing or community facilities rather than logistics or warehousing.
- Commercial stabilization can support legacy small businesses through low-interest loans or shared commercial spaces.

Case Example: In Minneapolis, NSP resources were used to acquire and rehab foreclosed homes in Environmental Justice neighborhoods, preserving affordability while reducing blight.

Strategy: Equitable Redevelopment Incentives

Local governments can tie redevelopment incentives to community-serving outcomes.

- Denver’s Expanding Housing Affordability ordinance requires mixed-income housing in new projects.
- Commerce City could establish zoning overlays that prohibit new heavy industry near residential parcels while incentivizing mixed-use TOD near the 72nd Ave station.

Case Example: The Atlanta Beltline Equitable TOD Strategy integrates inclusionary zoning with public land banking, ensuring TOD investments do not displace low-income residents.

Strategy: Partnerships and Funding Alignment

Anti-displacement requires multi-sector collaboration:

- Adams County Open Space Sales Tax could fund parcel acquisition for buffers.
- CDOT’s Transportation Alternatives Program (TAP) and Safe Routes to School funds could improve pedestrian connections while reducing displacement pressures.
- Community Benefits Agreements (CBAs) can hold developers accountable to provide affordable housing, green space, or workforce training.

Case Example: Pittsburgh’s Hill District Master Plan established a framework for CBAs and cultural preservation to ensure development benefited existing residents.

Lessons from National and Local Precedents

- Rochester, NY – Inner Loop East Removal: Highway removal allowed land to be redeveloped into affordable housing and parks, reversing decades of disinvestment.

- Syracuse, NY – I-81 Viaduct: State DOT committed to replacing a downtown viaduct with a community boulevard, with housing and equity strategies baked into implementation.
- San Francisco – Central Freeway Removal: Reclaimed land was redeveloped into mixed-income housing and walkable streets, proving that highway alternatives can enhance affordability and equity.
- Denver – West Area Plan (2020): Introduced an Equitable Development & Anti-Displacement Toolkit, recommending tools like CLTs, renter protections, and public land banking.

Recommendations for I-270 Corridor

- Establish an I-270 Corridor Land Trust Consortium with Elevation CLT, Urban Land Conservancy, and local governments to secure vulnerable parcels.
- Adopt Anti-Displacement Zoning Overlays near RTD stations and residential areas to prevent new polluting uses.
- Leverage Funding Tools: Combine NSP funds, Adams County open space tax, CDOT TAP, and philanthropic support (e.g., Colorado Health Foundation) for coordinated impact.
- Implement CBAs for any new corridor-adjacent development, guaranteeing affordable housing, green buffers, and local hiring.
- Pilot Health-Focused Housing Rehab for households adjacent to industrial land uses to reduce pollution exposure while preserving affordability.

Partnerships

The Colorado Department of Transportation’s own framework identifies a wide set of partners as essential to transportation planning. These partnerships should not only exist as part of early outreach, they must be actively engaged throughout the process to shape solutions that address real transportation, environmental, economic, and community impacts.

The partnership matrix illustrates that each subcategory of strategies identified in the I-270 corridor requires active participation from multiple entities, with CDOT as one partner among many rather than the sole decision-maker. The Regional Transportation District (RTD) is an essential partner to all of CDOT’s work in metro area. Much of the state’s policy strategies around climate change and air quality are dependent upon establishing more connected mobility infrastructure that provides choice for citizens and decreases car dependence. Significant investments in transit infrastructure and an integrated approach to regional mobility will be critical to success.

Truck congestion solutions such as freight-only lanes or priority tolling require CDOT’s leadership in design and enforcement, but also DRCOG’s regional freight planning authority and community input to balance freight efficiency with local health and safety. Zero-emission truck transitions add a further layer of partnership with CDPHE, local businesses, and local health departments to monitor emissions and guide clean technology adoption.

Street network and connectivity improvements, including grid restoration, traffic calming, and multimodal corridors, require direct alignment between CDOT’s corridor-level designs and local governments’ land use, zoning, and complete streets programs, coordinated through DRCOG’s regional transportation planning. Community partners are essential to ensure that these interventions reconnect rather than further divide neighborhoods.



CDOT’s diagram of its Transportation Planning Partners included in the Transportation Planning in Colorado: CDOT Planning Manual (pg. 68)

Alternative mode strategies, including mobility hubs, shared micro-mobility, and enhanced bike/pedestrian infrastructure, depend on city governments (Denver and Commerce City) to implement land use and zoning changes, CDOT to integrate multimodal elements into the highway design, DRCOG for regional transit coordination, and direct community engagement to

ensure facilities meet real mobility needs.

Air and water pollution mitigation requires the broadest set of actors. Green buffer development and network connections demand local governments, Adams County open space programs, and community groups for land acquisition and stewardship. CDOT’s role is critical

along the highway right-of-way, while CDPHE must lead on siting and maintaining air quality monitors. Vacant lot remediation requires coordination across local jurisdictions, counties, and the community to repurpose sites for housing, parks, or green infrastructure.

Public safety interventions such as pedestrian crossings, land bridges, corridor crossings, lighting, and Safe Routes to Schools highlight the multi-scalar nature of responsibility. CDOT controls highway right-of-way improvements, but local governments must deliver the neighborhood street and school safety context, with health departments and community groups ensuring designs are aligned with children’s health and safe access priorities.

Finally, anti-displacement strategies are perhaps the furthest from CDOT’s traditional remit, yet they are indispensable if infrastructure projects are to meet Colorado’s statutory requirements for equity. The I-70 Central expansion through Elyria-Swansea and Globeville established a clear precedent: after years of legal challenges and community advocacy, CDOT was required to provide direct funding for neighborhood stabilization, affordable housing, and health interventions as part of the settlement agreement. That history demonstrates that transportation projects which impose disproportionate impacts on vulnerable communities inevitably require compensatory investment in housing, health, and anti-displacement measures.

For I-270, the same principle applies. Community land trusts, neighborhood stabilization programs, and legacy small business support cannot be treated as optional or outside CDOT’s scope. They must be developed in partnership with economic development agencies, city and county governments, and community stewardship organizations to ensure that the benefits of infrastructure are not captured solely by speculative market actors. Failure to plan proactively for displacement risks repeating the I-70 experience of reactive settlements that only partially repair harm

rather than embedding equity and community protection into the project from the start.

Taken together, the table demonstrates that the I-270 corridor cannot be treated as a standalone highway project. Every identified subcategory of improvement requires multi-sector, multi-level partnerships that extend well beyond CDOT’s traditional highway scope. A holistic approach that values partnership not just in project outreach, but in design, implementation, and long-term stewardship is essential. Without this, project-level decisions will exacerbate existing inequities rather than addressing the systemic regional issues of pollution, displacement, and limited mobility options that frontline communities face.

Opportunity Subcategory	Community members (residents)	City of Denver	City of Commerce City	CDOT	Adams County	Health Depts (CDPHE, Local)	DRCOG/Regional	Economic Development Agencies
Truck Congestion								
Freight-only lanes	X			X			X	
Freight-priority tolling				X			X	
Automated enforcement	X	X	X	X				
Zero-emission truck transition	X			X		X		
Street Network & Connectivity								
Street grid improvements	X	X	X	X	X		X	
Traffic calming measures	X	X	X		X			
Multi-modal corridors	X	X	X	X			X	X
Alternative Modes								
Mobility hubs	X	X	X	X			X	
Shared micro-mobility	X	X	X					X
Enhanced bike/ped infrastructure	X	X	X	X				X
Mitigation of Air & Water Pollution								
Green network connections	X	X	X	X	X			
Green buffers (general)	X	X	X		X			
Green buffers along I-270	X			X		X		
Green infrastructure (new Development)	X	X	X		X			X
Air quality monitors	X			X		X		
Vacant lot remediation								X
Public Safety								
Pedestrian crossings	X	X	X	X				
Land bridges	X	X		X				
Green corridor crossings	X	X	X		X			
Lighting	X	X	X					
Safe Routes to Schools	X	X	X					
Anti-Displacement								
Community Land Trusts (CLTs)	X	X	X		X			X
Neighborhood Stabilization Program	X	X			X			
Legacy small business support	X	X	X					X

Moving Forward

What’s Next?

The preceding report contains a series of recommendations for the communities along the I-270 corridor. As a whole, it may seem like an overwhelming task for residents facing so many stresses and challenges already. However, the key strategy is to focus on what you can do now and work incrementally toward the community transformations you’d like to see over time. In over a half-century of program work, we’ve witnessed time and again how community transformations began with volunteer projects and built momentum toward long-term visions with ever-increasing investments and policies along the way. The long-term outcome of the I-270 project will take years to unfold, but communities facing the most dramatic impacts from this project have the power to shape those outcomes with action today. It is helpful to view the project in the context of the Denver region’s 2050 focus on becoming a part of Colorado’s sustainable, net zero state. Viewing the impacts of various investments and interventions over time provides a helpful framework within which to assess which actions will be most beneficial now and to define which steps best meet the challenges of the twenty-first century.

Mile High Stakes

In 1976, the American Institute of Architects had a Regional/Urban Design Assistance Team (R/UDAT) provide recommendations and analysis on RTD’s proposal for the first line of its light rail system. It is noteworthy that the R/UDAT team rejected any transportation rationale for the RTD Rapid Transit proposal as solely a congestion relief solution then. Even in 1976, the patterns were clear about transportation infrastructure. As the team noted, “Despite the empirical evidence of congested cities, planners theorized that building a new, superior transit system would relieve congestion by diverting motorists. If you open up a new subway and people who used to drive now take the subway, how can there not be fewer cars on the road

than formerly? Indeed, there will be fewer cars on day one and on day two; but after a while more cars seem to show up on the roads to fill the “empty” spaces left by those who have shifted to transit. It happened most recently in Mexico City. When the subway opened there was a noticeable reduction in downtown traffic for about three weeks. Shortly thereafter the city reverted to its “steady-state” of traffic congestion. The same thing will probably happen to BART in San Francisco and Metro in Washington, D.C. It would cost half a billion dollars to find out if it would also happen in Denver.” In other words, it was already clear nearly a half-century ago that induced demand was an irrefutable factor in transportation planning. That statement carries some added weight today, as CDOT considers a highway-widening project at an estimated project cost of \$650 million and decides whether it will once again bet against induced demand. Looking back on the views expressed nearly half a century ago, it is hard to overlook the following prescient statement from the team:

“But Denver is not without its problems. The higher altitude causes increased motor inefficiency with greater emission of pollutants. More highways and more parking areas threaten the destruction of fragile neighborhoods. The conventional development process has brought about a system of leapfrogging suburban developments—each competing with one another—communities without amenities—isolated pockets in the region, separated by undeveloped wasteland. The Platte River, one of the most valuable natural resources of the region, has been neglected until recently. It is not the recreational delight that it could be. It is polluted and there is inadequate control of the frequent floods that damage its bed. The ecology of the elements of nature is becoming increasingly fragile. On many days the mountains can’t be seen from downtown Denver. Animal life is being squeezed out; reduced natural ground cover causes erosion. All these problems—cars, leapfrogging suburban development and ecological neglect—are destroying the very environment the people came here to enjoy.”



Regional Growth Patterns: Taming Sprawl

In fact, regional growth patterns are the culprit for much of the challenges the area now faces. As the team observed almost 50 years ago, the region was then – and is now – experiencing rapid sprawl. This pattern of development forces auto-dependency and highly inefficient infrastructure. And, if it is not brought under control quickly, it will undercut the state’s attempts to reach net zero and ozone attainment. Given projected growth, sprawl poses a major regional challenge. The current population of the Denver metro region is estimated at over 3 million people, with projections that it will grow by over a million new residents by 2040. Commerce City is a big part of that growth. In 2000, the city population was just over 22,000. Today, it has swelled to over 70,000 and Commerce City is listed as the fourth fastest growing jurisdiction in the state. These growth trends have dramatic implications for communities. The Housing In Transit-Oriented Communities Act represents Colorado’s initial steps toward directing more efficient growth, but it is not sufficient alone. It will require a new scale of regional collaboration across jurisdictions to set in place the kind of development patterns that will lead to success.

Fortunately, this region has dramatic success stories around community transformation and environmental improvement that spark optimism for the future too.

Arsenal National Wildlife Refuge

The history of the Arsenal National Wildlife Refuge speaks to the industrial legacies of the region:

“In 1942, in the wake of Pearl Harbor, the U.S. Army purchased nearly 20,000 acres – an area roughly the size of Manhattan – to construct the Arsenal for the purposes of producing biological and chemical weapons. After World War II, the Army leased the plant to private companies, who manufactured agricultural chemicals and pesticides. Cold War tensions reactivated the Arsenal, during which time sarin, a highly toxic nerve agent, was produced.

Although the Army and Shell used accepted waste disposal methods of the time, contamination of the soil, structures and groundwater still occurred. In 1962, environmentalist Rachel Carson's Silent Spring described possible effects of on-site contamination that had been apparent as early as 1954. In 1983, the EPA listed the Arsenal as a Superfund Cleanup site, identifying nearly 600 different chemicals.

The refuge represents 15,000 acres of passive use real estate, making it one of the largest urban refuges in the country.”

It is also a model for similar transformations of the future. As former Secretary of Defense William Cohen observed, "...most of all, the story of the Rocky Mountain Arsenal is a story about partnership. It's a story about a national model ... how this environmental cleanup can be brought about by close cooperation between the private sector and the public sector." One can imagine a similar level of partnership along the I-270 corridor's communities to build green infrastructure and protect communities.

South Platte River

The South Platte River represents another inspiring story of leveraging partnerships to affect environmental change. The industrial legacy along the river once led to the moniker that the river was "too thick to drink, too thin to plow." Over 50 percent of Denver’s water supply comes from the South Platte River. As a 2024 report on the health of the river noted, “As for the South Platte River, recreation is not encouraged by DDPHE. In addition to frequently elevated E. coli levels, which can make people sick, industrial runoff in the water can be higher due to the location. According to the Colorado Department of Public Health and Environment (CDPHE), this includes elevated levels of arsenic running from the outlet of Chatfield Reservoir to the Burlington Ditch diversion in Denver, and increased sulfate, cadmium and ammonia levels from Burlington Ditch to Big Dry Creek.” However, a model



partnership for the river corridor has been making a profound difference in its slowly improving health. The South Platte River Urban Waters Federal Partnership (SPRUWP) has now grown to over 100 partners inclusive of federal and state agencies, municipalities, universities, non-profit organizations and businesses. The Greenway Foundation has been a civic leader for years, making \$100 million in green investments to the South Platte River and its tributaries. The Foundation estimated this investment catalyzed more than \$10 billion in residential and commercial development as well as improved environmental performance. A total of 13 projects are currently in planning stages along the river, with funding from a 2023 \$550 million partnership with the U.S. Army Corps of Engineers. These efforts are focused on the South Platte River restoration and reduced flood risk in the future.

There is no question that the stakes for the region are mile-high, and the decisions made today will have cascading impacts over the coming decades – with either demonstrably positive outcomes, or disastrous outcomes. However, this region has repeatedly demonstrated its capacity to build broad partnerships that impact environmental outcomes and improve communities. The choice is in front of you, and you have the historic opportunity now to make thoughtful moves that position the region for success. Make them count.

Case Studies

Case Studies

The Communities by Design program has worked in other communities with similarities to North Denver and Commerce City over the years. The following case studies offer illustrative evidence that communities can reverse course on poor infrastructure decisions and achieve powerful transformations.

San Francisco, CA: The Embarcadero

The history of San Francisco’s Embarcadero reflects the transformative change that can occur as a result of successive public processes. In 1953, the city began building the Embarcadero freeway with the intention to connect the Bay Bridge to Oakland with the Golden Gate Bridge to Marin County. However, neighborhoods impacted by the freeway construction organized successfully to block completion of the freeway, producing a petition signed by 30,000 residents. The Board of Supervisors voted to cancel seven of the ten planned freeways throughout the city, including the Embarcadero freeway. A 1.2 mile length of the freeway had been constructed, and remained in place for decades. By the 1980s, the freeway carried about 70,000-100,000 vehicles daily through that area of the city, making its closure a divisive and controversial subject.

In 1984, a design assistance team was organized to study South of Market in San Francisco. As the report noted, “The Embarcadero south of Market is about to undergo a major transformation, a transformation that will shape the reality and the perception of this part of the waterfront for the foreseeable future. The shipping activities along the waterfront have left or are leaving, and despite the best intentions of the Port Authority, will continue to decline as they have in every other similar city. This change in land use, and the associated retreat of the railroads, have left behind large tracts of vacant or under-used parcels on the land-ward side of the Embarcadero. Major projects are proposed for this

linked set of large sites, but no overall plan seems to exist to seize the opportunity to create a magnificent urban space along the Embarcadero. The projects, as far as can be seen from the available material, tend to be oriented away from the Embarcadero, leaving that street as a rather tattered urban edge to the east. The whole design orientation of these projects should be turned around, with the Embarcadero providing the major orientation for the buildings. Two major transportation-related changes offer an additional opportunity to extend the grand Embarcadero boulevard around into the Mission Bay project. The demolition of the unused portion of Route 280 structure not only removes the threat to development of the Embarcadero, but also enables that boulevard to be drawn around north of China Basin into the heart of Mission Bay, terminating in the Showplace Design Center. This opportunity, combined with the ability to relocate the Southern Pacific Station to 7th and Channel Streets, opens up the southern edge of the city in novel and exciting ways, radically transforming the perception of its urban relationships. The Embarcadero will no longer fade away into the dereliction of railroad yards, but will provide a beautiful edge to the city which will extend more than 1 ½ miles. ”

Along these lines, the team’s major recommendations on the future of the waterfront included the following:

- “Develop a unified urban design plan for the Embarcadero; reclaim the waterfront for parks and recreation, and create prime sites for housing and other developments.”
- “Re-examine the current plans for Rincon Hill, South Beach, Mission Bay, and Showplace Square; to make certain they are better related to the Embarcadero and are in concert with one another.”

In April 1986, AIA San Francisco’s Urban Design Committee “undertook the challenge as a public service and to suggest alternative solutions to those developed within the City Planning Department which

were perhaps not as visionary as possible.” As they noted, “These recommendations are meant not to focus on the problems unsolved, but on the possibilities revealed. If our work inspires you, please bring whatever influence you can to bear on the decision makers in this community to proceed with the I-280 Transfer improvements, the removal of the Embarcadero Freeway and the creation of a coherent and comprehensive urban design plan for the Embarcadero.”

As Robert Herman, then Secretary of the AIA San Francisco Board, summarized, “the Study’s impact on the city’s Plan was significant.” The final draft of the Mission Bay Plan produced by the city planning department reflected the following key recommendations from the Embarcadero Corridor Study. Nonetheless, the freeway removal remained a divisive political issue and failed to gain initial approval until a major earthquake damaged the roadway and became a demonstration in how transportation systems accommodate mobility. As a result, popular support swung toward its removal.

The impact of the freeway removal was nothing short of remarkable. The former freeway was transformed into an inviting multi-use boulevard. Over 100 acres of land along the waterfront became a public plaza and promenade. By one estimate, housing in the area increased by 51 percent and job creation rose by 23 percent. The Ferry Terminal Building, which had been vacant for years, became a spectacular public destination, redeveloped as a center for gourmet food and retail. Pier One was redeveloped as office space. Rincon Hill, an adjacent neighborhood to the Embarcadero, was redeveloped as a dense multi-use area. As one developer commented, “Because it was hemmed in on three sides by freeways, developers felt that Rincon Hill might not be the most inviting location for housing...the removal of the visual and physical barriers of a web-like freeway and 12-acre Terminal Separator...dramatically showed the potential for Rincon Hill.” South Beach, another adjacent neighborhood, also underwent a dramatic transformation, with housing,

retail, and a new baseball stadium fronting the bay. The Embarcadero has remained an important demonstration case since.

Santa Rosa, CA: The Southeast Greenway

The Santa Rosa story provides a powerful example of what community based organizations can do by rallying residents to fight for alternative visions to highway expansions. The history dates back to the 1960s, when Caltrans acquired a 4-mile strip of land to extend Highway 12. In 1989, the community won its first battle over the highway plan when Caltrans removed a bridge across Spring Lake from the Highway 12 plans after strong community opposition. In the 1990s, they won another battle when the City of Santa Rosa removed the freeway extension from its General Plan. In 2009, they launched the Southeast Greenway Campaign, an initiative to push for an alternative vision for the span becoming a greenway. In 2010, they had the UC Berkeley Graduate Urban Design Studio produce ideas for the future greenway and conducted community engagement all over the city about the initiative. In 2011, they brought an AIA design assistance team to help build a community-based vision for the greenway. In 2013, the Santa Rosa City Council added the Southeast Greenway to its strategic goals and Caltrans issued a draft Highway 12 Transportation Concept Report, stating that the land is no longer needed for a freeway extension. The work has continued for the past 12 years and has included incremental land use and zoning, fundraising for land acquisition and other key steps. Last year, Caltrans formally transferred land title for the Greenway to the City of Santa Rosa. All of this work is driven by the Southeast Greenway Campaign vision, which states, “The Santa Rosa Southeast Greenway initiative will transform a two-mile vacant corridor (the former Highway 12 Right-of-Way) into a new, 47-acre urban greenway, park, and open space in the largest city in Sonoma County. Providing amenities for all, the Greenway can become the City’s own “Central Park,” with paths for cyclists and pedestrians, picnic areas,

community gardens, pocket parks, art displays, and new opportunities for outdoor play and education. It will serve as a strategic link in our regional non-motorized transportation system, connecting Spring Lake Park with Sonoma Valley to the east and to SMART, downtown, and to the Prince Memorial Greenway and West County trails.” The Santa Rosa case demonstrates that community groups that engage the public and rally support over the long-term can win these battles and achieve their aspirations for something better.

Savannah, Georgia

In 2022, a design assistance team worked with the communities of West Savannah on a strategy for equitable development and environmental justice. The communities face a number of connectivity barriers such as canal systems, highway infrastructure, and railway infrastructure that cut them off. One of the main concerns in the area was the adjacent port industrial activity and truck traffic traveling through neighborhoods. Local leaders were able to leverage these conversations to bring in several federal grants that addressed neighborhood issues by making investments in road and rail that provided more efficient port operations and improved neighborhood connectivity while removing heavy truck circulation issues with new access points outside the communities. The case is a good demonstration of making infrastructure investments that balance economic needs while addressing community needs.

Portland, Oregon: The Pearl District

In Portland, Oregon, a derelict warehouse district with rampant vacancy and no identity was transformed during the last two decades of the 20th century into the “Pearl District,” a neighborhood known worldwide for its vibrant life and unique character. One local reflection captures the area’s transformation:

“Ever squinted your eyes and tried to imagine something that’s only in your head? That’s how it was for those

of us who looked over the rail yards and abandoned warehouses of inner northwest Portland some 20 years ago. Rundown and dilapidated, it was a sight that even the best of us squinters had trouble overcoming. And yet, slowly, a largely forgotten part of Portland’s past became an urban icon of living unlike anything the country had ever seen: A unique blend of verve and vibrancy, with more than a passing nod to Portland’s uncommon brand of originality. Today, the Pearl District has earned a worldwide reputation for urban renaissance. Diverse, architecturally significant, residential communities thrive here. Galleries rub shoulders with restaurants, shops open to parks, and no one has to squint anymore to see the magic that’s taken hold. The Pearl is the story of a vision come to life.”

In the 1980s, the Pearl District was referred to as “an abandoned place.” In 1983, the city brought an AIA design assistance team to work with the community on a vision for the future of the area. At the time, much of the prevailing though for future development of the area involved demolition of the existing fabric. The process completely changed that thinking. As one local architect recalls, the team made some recommendations that were “monumental to what has become the Pearl District today.” The central recommendation that guided what unfolded was that the district’s unique historic fabric and building stock should be preserved and leveraged rather than destroyed.

The recommendations about the public realm and public space were a key focus of efforts. As one local account recalls, “Landscape architect Peter Walker... laid out a plan for the three promised parks, connected by a wide, wood-planked boardwalk that he envisioned rising in a bridge over the railroad tracks to the upper stories of Centennial Mills, a rotting industrial hulk that preservationists hoped to be a historic icon at the Pearl’s northern edge. Walker also designed the neighborhood’s first park—Jamison Square—with a cascading fountain that, from its opening day in 2002, drew frolicking kids from throughout the city. Across the street, next to the

streetcar, one of the earliest new buildings took shape: the Pearl Court, with 199 units of affordable housing.” In addition, “In the Early Pearl, some “streets” became landscaped pedestrian corridors threaded between residential buildings.” Every investment became a commitment to place. As they write, “Instead of paving the area’s potholed roads in new asphalt, city crews replenished some streets’ original cobblestones.”

A working collaboration between city leaders and developers guided the neighborhood’s evolution. As locals describe, “what actually came to pass, was more a nuts-and-bolts collaboration between innovative, but hardened, realists.” They describe the development of a “three-part pact to steer the creation of a new urban neighborhood that would become the densest in the region and the envy of developers, mayors, and urban planning wonks worldwide.” The first move: the city would tear down the Lovejoy Ramp, regarded as a barrier dividing the future neighborhood. For that, the developers agreed to build a minimum of 87 housing units per acre through the district. If the city built a streetcar, the developers would raise the ante to 133 units per acre. Three new city parks would net at least 150 units per acre. Thirty percent of the housing, the developers and city pledged, would be affordable.”

In the early 2000s, the former five-block Blitz Weinhard Brewery was transformed with the neighborhood’s first supermarket, its first Class A office building, and the first LEED Gold condo tower in the country. The adjoining 1891 armory became the nation’s first LEED Platinum theater and historic renovation. “It was an incredible period,” recalls Al Solheim, often called the “father of the Pearl.” “Everyone was local. The developers, investors, architects, and contractors were on the street, figuring it out, building by building. We were competing. But we were also reinforcing.” Today, the results are unmistakable. The Pearl District is a global model for post-industrial design efforts in places as far away as London. The area is annually listed as among the hippest neighborhoods in the country. The case is a

great demonstration of how land use and transportation policy can integrate effectively to transform place. The local emphasis on creating pedestrian zones and connectivity across public spaces is illustrative of the kind of strategy that might serve the I-270 communities across a broader area using greenbelts and nature based solutions.

Team Roster & Acknowledgments

Cesar Arturo Vasquez Del Mercado, AIA

Arturo is an accomplished architect, urban designer, and educator with exemplary experience in practice. Arturo brings a rigorous design vision and a collaborative team-based working spirit. He has over thirty-five years of experience merging design practice, master planning, and urban design solving complex sites and programs in mixed-use, transit-oriented development, multifamily, healthcare, and education. Arturo has worked with private and public-sector entities, developers, institutions, community-based organizations, and city regulatory agencies leading teams on projects that involve a variety of alternative delivery methods including Design-Build, P3, Design Assist, and Big Room IPD.

Throughout his career, Arturo's design work, built projects, and design competitions have received numerous national and international honors and awards recognition. A life-long educator and mentor, he has taught, lectured and spoken at prominent colleges and universities in the US and abroad. Arturo is a registered architect in New York State and NCARB Certified.

Diane Jones Allen, D. Eng., RLA, FASLA, FCELA

Dr. Diane Jones Allen has established a national reputation by bridging practice and research in the areas she cares most deeply about; transportation access, sustainability, and environmental justice. These interests have led to a research and creative output that is remarkable for the holistic integration of academic productivity with successful and meaningful practice.

As Principal Landscape Architect with Design Jones LLC she became elevated to Fellow in the American Society of Landscape Architects in 2019. Design Jones LLC also received the 2016 American Society of Landscape Architects (ASLA) Community Service Award under her leadership. Diane is a Council of Landscape Architectural Registration Board (CLARB) certified landscape architect, licensed in Texas, Louisiana, Missouri, Ohio, Mississippi and Maryland.

In 2017 she became Program Director for Landscape Architecture, College of Architecture, Planning, and Public Affairs, at the University of Texas at Arlington (UTA), where she assisted the program in renewing accreditation in 2018, developing its strategic plan, increasing its enrollment and also starting a new undergraduate program, the Bachelor of Science in Environmental Design. Diane was elevated to full professor in 2020. She introduced new courses to the curriculum, including Design and Human Behavior and also instituted the Design Thesis as additional option to the Written thesis, that is a degree requirement for the Master of Landscape Architecture at UTA.

Diane served on the ASLA Blue Ribbon Panel on Climate Change and Resiliency in 2017 and has increased her research and service in this area. Diane also served on the Board of the Landscape Architecture Foundation (LAF), serving as Vice President for Education in 2021. As a result of this service she and her committee members are working on 2 papers on increasing Black

Faculty presence for journal publication. Diane is also part of one of two cross disciplinary teams that won the 2020 Skidmore Owens and Merrill (SOM) Foundation Research Prize focused on examining social justice in urban contexts. Her team is working with six Freedman's Towns along the Trinity River to combat the impacts of urban sprawl and gentrification. Her research and practice are guided by the intersection of environmental justice, identity, and sustainability in cultural landscapes, including "Nomadic" responses to "Transit Deserts," places of increasing transportation demand and limited access, as discuss in her book "Lost in the Transit Desert: Race, Transit Access, and Suburban Form" published by Routledge Press in 2017.

Monica Guerra, PhD.

Monica Guerra brings 12+ years experience driving development and implementation of policies to advance transportation equity, accessibility, and innovation. Most recently, she served as the Community Solutions Technical Assistance Lead at the US Department of Transportation, overseeing technical assistance and capacity building programs serving over 200 communities across the country. She brings an extensive background leading the development of long range planning documents and advising local governments on opportunities to align housing, public health, sustainability, and economic inclusion strategies to advance community investments and priorities. She holds a PhD in City and Regional Planning from the University of California, Berkeley.

Karina Ricks

Karina Ricks is a Partner at Cityfi, where she draws on her international, city, federal, and private sector experience to unite government, community, and companies in advancing equity, safety, climate preservation, and economic growth. Her expertise spans transportation, mobility, infrastructure, urban design, and economic development.

Karina's previous roles include Associate Administrator for Innovation at the Federal Transit Administration, founding Director of Pittsburgh's Department of Mobility and Infrastructure, and Director of Transportation Planning for Washington, DC. She has led initiatives like Universal Basic Mobility, integrated mobility payment systems, and the nation's first Mobility as a Service system, MovePGH. Karina has led both system and organizational transformations to modernize processes, better deliver projects and develop strategic roadmaps for planning, capacity building, and project funding. She is an experienced policymaker at both the municipal and federal levels. She brings entrepreneurial solutions to leverage public private partnerships for the public good.

Karina is rooted in a commitment to authentic collaboration, human centered design, and continuous learning. Karina is a Fulbright Scholar, holds a Master's Degree in City and Regional Planning from Cornell University and a pre-law degree from the James Madison College of Michigan State University. She has served as a strategic advisor to the World Bank and international observer with the Organization for Security and Cooperation in Europe (OSCE).

Amruta Sakalker, Ph.D.

Amruta Sakalker, Ph.D. is an urban policy strategist with a background in real estate and public-sector advisory, including work at HR&A Advisors. She has contributed to inclusive infrastructure and workforce strategies across California, supporting community benefits design, land use planning, and policy implementation. Her doctoral research focused on transportation governance and community stewardship, with published work on service coordination, environmental justice, and adaptive infrastructure. Amruta brings a cross-disciplinary approach to advancing equitable development, grounded in both applied practice and collaborative research.

Paola Capo

Paola Capo is Senior Manager of Disaster and Community Assistance for AIA. She strives to provide architects and communities with the resources they need to create healthier, more sustainable and equitable built environments. In her current role, she divides her time between managing the Disaster Assistance Program (assisting architects and AIA chapters before and after disaster events occur) and supports Communities by Design, a program of the Architects Foundation that matches communities with interdisciplinary expertise to achieve community aspirations. In her time at AIA, Paola has supported several other portfolios related to sustainability and climate action, including the 2030 Commitment program, the Materials Pledge, and the Committee on the Environment, with a focus on building robust programs and resources. In 2020 she completed IAP2's Foundations in Public Participation Program, and in 2019 she participated in UC Berkeley's [IN]City program to expand on her knowledge in urban design. She graduated from Georgetown University in 2017 with a degree in Science, Technology, and International Affairs, concentrating in Energy and the Environment—a degree inspired by the many places she lived growing up as an Army brat.

Joel Mills

Joel Mills is Senior Director of the Architect Foundation's Communities by Design program. The program has catalyzed billions of dollars in sustainable development across the United States, helping to create some of the most vibrant places in America today. Joel's 29-year career has been focused on strengthening civic capacity, public processes, and civic institutions. This work has helped millions of people participate in democratic processes, visioning efforts, and community planning initiatives. He has delivered presentations, training content, workshops, and public processes in over a dozen countries across 5 continents. In the United States, Joel has provided consultative services to hundreds of communities, leading participatory processes on the ground in over 100 communities across 38 states. His work has been featured in over 1,000 media stories. Joel has served on dozens of expert working groups, boards, juries, and panels focused on civic discourse and participation, sustainability, and democracy. He was a founding Board Member of the International Association for Public Participation's United States Chapter. He has spoken at numerous international events and conferences concerning democratic urbanism and the role of democracy in community success, including serving as the Co-Convener of the Remaking Cities Congress in 2013. Joel is an Academician of the Academy of Urbanism in London, UK. He is the author of numerous articles on the relationship between democracy, civic capacity, and community.

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- Civic leader Lucy Molina**
- Steering Committee Member Briana Marquardt**



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