



2035 Statewide Transportation Plan Amendment

May 2011



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**A Message from the Transportation Commission and the
Colorado Department of Transportation**

The Transportation Commission and the Colorado Department of Transportation (CDOT) are pleased to announce the release of this Amendment to the 2035 Statewide Transportation Plan (2035 Plan). This Plan Amendment serves as a supplement to the existing 2035 Plan, providing current information to you as transportation stakeholders regarding poignant issues that we face in maintaining the state's transportation system.

Since the adoption of the 2035 Plan in 2008, CDOT has implemented statewide transportation projects benefiting the traveling public through funds received from the American Recovery and Reinvestment Act (ARRA) and Funding Advancements for Surface Transportation and Economic Recovery Act (FASTER). ARRA funds have directly generated or sustained an average of over 2,000 jobs per month through implementation of over 133 projects. FASTER funds provide a much needed dedicated funding source to address deficient bridges, roadway safety, and transit needs throughout the state. Coupled with the creation of the Division of Transit and Rail and the adoption of the Bicycle and Pedestrian Policy Directive, CDOT has demonstrated its commitment to definitive action in facing the tough challenges for the state's multimodal transportation system.

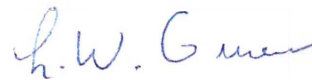
Despite these recent accomplishments, CDOT's funding gap has continued to grow in size since the 2035 Plan was adopted, due to many factors including rising costs, funding shortages, population growth, and aging infrastructure. The state continues to face tough choices regarding program and project priorities to provide for the safety of the traveling public. In the 2035 Plan, CDOT estimates that the cost to maintain its transportation infrastructure is approximately \$176 billion through 2035, \$53 billion more than anticipated revenues. This funding gap does not account for expansion improvements, nor does it fulfill Colorado's vision for the state's transportation system set forth in the 2035 Plan. Without new funding sources, trade-offs must be made that will affect us all. Such trade-offs may require changes to the quality of the traveling experience including increased congestion, poor pavement condition, and limited snow removal.

The viability of Colorado's transportation system depends on conscientious decision-making, efficiencies and innovation to improve transportation in Colorado and address these tough choices ahead. CDOT and the Transportation Commission are already working on several initiatives that will play prominently in the next plan update, including sustainability and livability, greenhouse gas emissions reduction strategies, and the further development of a performance-based planning approach to better evaluate the economic benefits of transportation and enhance planning and policy decisions to reflect statewide trends. These initiatives involve partnerships with other agencies, which play an integral role in a more collaborative approach to innovating the way we address today's transportation challenges.

Looking ahead, CDOT will continue to work with the public to address new transportation opportunities and challenges. We look forward to working together to move toward our collective vision for the state's multimodal transportation system.



Donald E. Hunt, Executive Director
Colorado Department of Transportation



Les Gruen, Chairman
Colorado Transportation Commission



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1 Purpose and Introduction

The Colorado Department of Transportation (CDOT) 2035 Statewide Transportation Plan Amendment (Plan Amendment) is a supplement to the [2035 Statewide Transportation Plan “Moving Colorado: Vision for the Future”](#) (2035 Plan). In general, an amendment supplements an existing plan, while an update involves development of a new document that replaces the existing plan document. While CDOT is not required to update the Statewide Transportation Plan on a set schedule, this amendment was developed to maintain consistency with regional planning processes and to serve as a bridge between the 2035 Plan and the next plan update set for adoption by 2015. Given current economic and financial uncertainties, CDOT and its planning partners determined that an amendment to the existing plan would enable CDOT to achieve these goals, while using limited resources wisely.

As the needs of the state’s transportation system continue to grow, available revenue has not been sufficient to meet those needs in recent years. The cost to maintain the existing transportation system (without additional improvements) is estimated to be \$176 billion during the time horizon of the 2035 Plan; however, estimated revenues during that same time period only total \$123 billion. This funding gap means that CDOT and the other government entities responsible for maintaining the transportation system will have to develop new ways to make dollars stretch further and make difficult choices, including changes to the level of service provided, to investment priorities, or both.

In the years since the adoption of the 2035 Plan, CDOT has completed more than 235 construction projects, and provided continued maintenance to a system of over 9,100 centerline miles. During that same time, several important changes to the organization have improved CDOT’s ability to provide a multimodal transportation system. These changes include the formation of a Division of Transit and Rail and a groundbreaking new Bicycle and Pedestrian Policy. The new division is responsible for the planning, development, operation, and integration of rail systems in the statewide transportation system. CDOT’s Bicycle and Pedestrian Policy is intended to integrate the needs of bicyclists and pedestrians into the planning, design and operation of transportation facilities.

This Plan Amendment includes the following sections:

- **Transportation Planning Processes** – A brief overview of the long-range planning processes.
- **2035 Plan Amendment Process** – A brief overview of the reasons for and approach to preparing this Plan Amendment.
- **Financial Outlook** – An overview of current funding, changes in funding sources, and the current funding gap (i.e., gap between existing needs and available resources).
- **Metropolitan Planning Organization (MPO) Regional Transportation Plan (RTP) Updates and Amendments** – An overview of key changes made in updates or amendments to the MPO 2035 RTPs.
- **Public Involvement** – An overview of public involvement activities conducted as part of the Plan Amendment process.
- **Recent Accomplishments** – A summary of recent CDOT accomplishments since the 2035 Plan.
- **Emerging Issues in Transportation Planning** – An overview of significant emerging transportation planning issues, including sustainability and livability, air quality, greenhouse gas (GHG) emissions reduction, and performance measures.

- **Looking Ahead** – An overview of the next update to the statewide transportation plan.
- **Conclusion** – A summary of key points.

This document includes a number of links to web resources. A full listing of these resources is available in Appendix A.

2 Transportation Planning Processes

This section outlines CDOT's transportation planning processes, which includes RTPs that are incorporated into a single Statewide Transportation Plan. These plans outline a long-range (minimum of 20 years) vision for the future of transportation in each region and across the state. In order to implement these visions, CDOT and its planning partners develop transportation improvement programs that assign funding to specific projects in the short-term (6 years). CDOT determines how much funding will be available to complete projects using a resource allocation process. Each of these transportation planning processes is discussed in more detail in the following subsections.

Additional information on the transportation planning process is available at the CDOT Planning Section website at www.coloradodot.info/programs/statewide-planning.

2.1. Statewide and Regional Long-Range Transportation Plans

The state of Colorado is required by law to develop a 20-year Statewide Transportation Plan that incorporates RTPs developed by the state's 15 [Transportation Planning Regions](#) (TPRs) and MPOs¹. CDOT, in coordination with the rural TPRs, is responsible for the development of the ten rural TPR RTPs. The MPOs are responsible for developing their plans.

Of Colorado's 15 TPRs, five are MPOs for urban areas with populations greater than 50,000. The remaining ten TPRs are considered rural TPRs. MPOs in Colorado include the Denver Regional Council of Governments (DRCOG), Grand Valley MPO (GVMPO), North Front Range MPO (NFRMPO), Pikes Peak Area Council of Governments (PPACG), and the Pueblo Area Council of Governments (PACOG).

The 2035 Plan was adopted by the [Colorado Transportation Commission](#) in March 2008, and it outlines a comprehensive, multimodal transportation vision for the state of Colorado. It provides a statewide perspective that reflects the policies of the Colorado Transportation Commission and integrates the needs, revenues, and costs identified in all 15 RTPs. As a multimodal plan, all modes of transportation are included—highway, transit, freight, aviation, and bicycle/pedestrian. The 2035 Plan is corridor based and covers approximately 350 corridors statewide. [Corridor Visions](#) address all transportation

The state's transportation system is managed by CDOT under the direction of the Colorado Transportation Commission. The Commission is comprised of 11 commissioners who represent specific districts. Each commissioner is appointed by the Governor, confirmed by the Colorado Senate, and serves a four-year term.

¹ Federal law requires a minimum 20-year time horizon. Statewide Transportation Plans and RTPs typically maintain a longer time horizon of between 25 and 30 years.

modes and include strategies aimed at meeting each corridor's unique transportation needs.

MPOs are required by federal law to update their RTPs every 5 years, or in air quality non-attainment areas, every 4 years². The MPO 2035 RTPs were adopted in late 2007 and early 2008. In keeping with the update cycle, MPOs updated or amended their RTPs concurrently with this Plan Amendment for adoption in 2011 and early 2012. While MPOs are required to update their RTPs every 4 to 5 years, there is no such requirement for the rural TPRs.

2.2. Transportation Improvement Programs

The Statewide Transportation Plan is implemented by programming priority projects into the short-term, 6-year [Statewide Transportation Improvement Program](#) (STIP)³. The STIP identifies capital and programmatic projects by location, scope, funding sources, and program year. MPOs also develop Transportation Improvement Programs (TIPs), which are then included without modification into the STIP. Rural TPRs do not develop TIPs, and as such they work closely with CDOT to identify and prioritize projects for inclusion in the STIP. MPO RTP updates generally correspond with the required development of a new TIP every 4 years. New TIPs will be adopted by the five MPOs in 2011 and will program projects for funding in fiscal years (FY) 2012-2017. Similarly, CDOT is required to update the STIP every 4 years. The 2012-2017 STIP will be adopted in June 2011, just before the start of state FY 2012 on July 1, 2011.

2.3. Resource Allocation Process

Resource allocation is the process by which CDOT, in cooperation with the MPOs and TPRs, forecasts and allocates state and federal transportation revenues for the full time horizon of the Statewide Transportation Plan (i.e., minimum of 20 years). This includes funding totals for each of CDOT's six [engineering regions](#). Revenues are forecast for each of the 6 years covered by the TIP and STIP, with a "control total" for the full time horizon of the plan. Resource allocation is necessary to maintain fiscal constraint, which is the requirement that plans conform to reasonably expected revenues. MPOs are subject to a federal requirement for fiscal constraint, and the Statewide Transportation Plan is subject to a state fiscal constraint requirement. While the resource allocation process is part of a plan *update*, it is not necessary for a plan *amendment*. This is because a plan amendment leaves much of the original plan unchanged, including the control totals. A modified resource allocation process was completed for this Plan Amendment and is discussed in further detail in Section 2.

3 2035 Plan Amendment Process

CDOT is responsible for development of the Statewide Transportation Plan; however, there is no requirement to update the plan on a specific interval. Although not required, CDOT developed this Plan Amendment to maintain concurrency with the MPO RTPs, to incorporate and address significant changes in RTPs, and to address recent changes from a statewide perspective. The decision to develop a plan amendment instead of a plan update was the result of careful deliberation and discussion between

² MPOs in air quality non-attainment areas as defined in section 107(d) of the Clean Air Act (42 U.S.C. 7505a), or MPOs previously in non-attainment and subsequently designated in attainment, are required to update RTPs every 4 years instead of 5. In Colorado, this includes DRCOG, PPACG, and NFRMPO.

³ TIPs and STIPs are required to cover a period of 4 years. As a matter of practice, CDOT develops a 6-year STIP to include some overlap going into each 4-year cycle.

CDOT and planning partners, including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), MPOs, and TPRs. This approach was also vetted through the [Statewide Transportation Advisory Committee](#) (STAC) and the Colorado Transportation Commission. Based on these discussions, it was determined that the most prudent course of action was to develop a plan amendment, with more extensive efforts occurring during the next plan update cycle. The following several factors led to this approach:

- **Federal Transportation Authorization** – The most recent transportation authorization bill, Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), expired in September 2009. Since then, congressional action has been limited, with little progress on a new transportation authorization bill. New transportation legislation may include new planning requirements; therefore, proceeding with a plan update would have required the significant expenditure of time and resources on a plan that might not be compliant with new planning requirements in the next authorization.
- **2010 U.S. Census** – The 2035 Plan relies heavily on demographic information provided by the 2000 U.S. Census. A plan update completed before the release of 2010 Census data would be based on out-dated information that does not accurately reflect current population and demographic totals or trends.
- **Economic and Financial Uncertainties** – Transportation planning processes must frequently contend with unpredictable and unreliable funding sources; however, current economic circumstances make this more difficult than in previous planning cycles. Without a new transportation authorization bill, federal transportation funding remains in question. Thus, delaying a plan update a few years may provide the planning process with a more stable economic climate and greater certainty regarding funding levels.
- **Legal Requirements** – While MPOs are required to update their RTPs at least every 4 to 5 years, no such requirement exists for the Statewide Transportation Plan or for rural TPR plans.
- **Existing Plan** – The existing 2035 Plan is SAFETEA-LU compliant and maintains a minimum 20-year planning horizon (extending to 2035).
- **Limited Resources** – Given current economic circumstances and tight budgets, a plan update at this time would not be a prudent use of limited resources. A plan amendment allows CDOT and MPO staff to better prepare for an extensive update in the next plan update cycle.

In keeping with the plan amendment approach, CDOT developed a [modified resource allocation](#) process. This modified approach includes new revenue forecasts and allocations only for the years of the new STIP (FY 2012 to 2017), but it retains the 2035 totals consistent with the currently adopted 2035 Plan (in 2008 dollars). For the modified resource allocation, actual revenues were used for FYs 2008 and 2009, final budget numbers for FY 2010, and draft budget numbers for FY 2011 and STIP years of 2012 to 2017. Because the 2035 control totals are being left unchanged, this means that the dollars allocated for years 2018 to 2035 in the original 2035 Plan must be adjusted in this amendment to balance the changes made to allocations in 2008 to 2017.

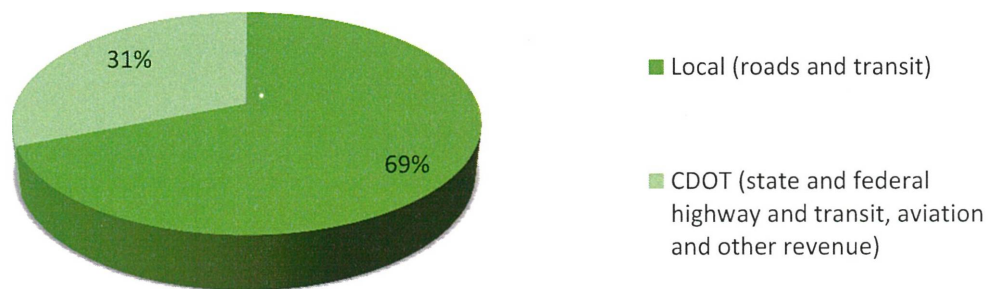
Modified Resource Allocation
(\$ in billions- deflated)



4 Financial Outlook

The 2035 Plan forecast revenues of approximately \$123 billion (in 2008 dollars) for transportation in Colorado from 2008 to 2035. This amount reflects what is reasonably expected to be available over the full time horizon of the plan. Of this, CDOT receives, manages, and allocates 31 percent of this funding⁴ for the state transportation system. This includes the State Highway System, representing more than 9,100 centerline miles that account for nearly 60 percent of the miles traveled on the state’s roadways. The remaining 69 percent is managed and allocated by local governments, primarily to local roadway projects. Local transit funding accounts for the next largest portion of transportation revenues in the state. This Plan Amendment retains the \$123 billion forecast in the 2035 Plan. It should be noted that forecasting revenues over a long time period must contend with significant uncertainties. As such, a forecast of revenue is no guarantee that funds will actually be available.

Statewide Forecast of Revenues 2008-2035
\$123 billion (2008 dollars)



⁴ CDOT uses the resource allocation process (discussed in the previous section) to determine how much funding each CDOT region receives from this overall total.

One significant uncertainty is the expiration of the current federal transportation authorization bill. Transportation authorization refers to the federal transportation authorization and funding bill that governs United States federal surface transportation spending. Authorization bills typically provide the authority and funding for a 6-year period. The most recent bill, SAFETEA-LU, authorized \$284.6 billion in federal surface transportation funding and expired September 30, 2009, but has been extended several times through continuing resolutions which maintain funding levels.

In the time since the adoption of the 2035 Plan, two state legislative changes were enacted into law that have had significant impacts on transportation revenue sources—Senate Bills 09-228 and 09-108.

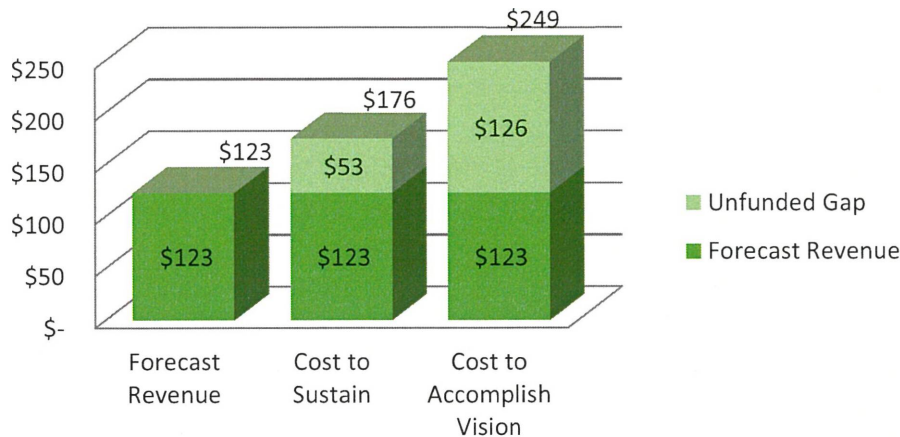
- **Senate Bill 09-228** - This bill eliminated certain funding transfers⁵ from the state's General Fund to CDOT and replaced them with another funding structure. This structure provides CDOT with up to 2 percent of gross General Fund revenues (from the state's General Fund) for 5 consecutive years if certain statewide economic and fiscal conditions are met. The Colorado Office of State Planning and Budgeting (OSPB) estimates that the conditions for a transfer will occur in FY 2012. The Colorado Legislative Council estimates that these conditions will not occur until FY 2014 or later. According to the 2009 State Fiscal Impact Note, SB 09-228 is estimated to provide transfers of roughly \$170 million to \$230 million per year when in effect. However, this will only partially replace funds lost from the bill's elimination of other funding transfers.
- **Senate Bill 09-108** - The Funding Advancements for Surface Transportation and Economic Recovery (FASTER) Act provides CDOT and local governments with a new funding source that is stable, predictable, and separate from the state's General Fund. Through modest increases in vehicle registration fees and other funding mechanisms, CDOT and local governments will receive funding dedicated to repairing structurally deficient bridges and making important road safety improvements across the state. FASTER also provides \$15 million per year for state and local transit-related improvements. It has been estimated that this act will result in revenues to CDOT and local governments of roughly \$179 million in FY 2010, increasing to roughly \$250 million by FY 2012. Additional information on FASTER appears in Section 6, Recent Accomplishments of this Plan Amendment.

The 2035 Plan outlined the growing gap between available resources (i.e., revenue) and the resources required to maintain Colorado's transportation system. The 2035 Plan forecast that between 2008 and 2035, \$123 billion in revenue would be available for transportation in Colorado. The cost to sustain our state's existing transportation system at current levels of performance was estimated at \$176 billion, and the cost to accomplish the vision outlined in the 2035 Plan at \$249 billion⁶. This reflects funding gaps of \$53 billion and \$126 billion, respectively.

⁵ Senate Bill 09-228 eliminated funding transfers provided by Senate Bill 97-01 and House Bill 02-1310.

⁶ All figures are in 2008 dollars.

Estimated 2035 Funding Gap (2008 \$ in billions)



This funding gap has only grown in size since the 2035 Plan was adopted. The continued growth of this funding gap is the result of several factors, such as:

- Diminished value of the gas tax** - Because the gas tax is a flat rate per gallon and gasoline sales have declined in recent years, the amount of funding collected from the gas tax has also declined over that time period. Also, the value of those dollars has diminished due to inflation. The federal gas taxes have not increased since 1993, and state gas taxes have remained unchanged since 1991; therefore, there is less revenue available from this funding source, and that trend is likely to continue.
- Increasing costs** - Since the beginning of the decade, the cost of maintaining, repairing, and rebuilding the state’s transportation system, according to the [Colorado Construction Cost Index](#), has increased nearly 50 percent⁷.
- Population growth** - As Colorado’s population continues to grow, the demands on our state’s transportation system will grow as well, requiring more capacity and more frequent (and sometimes more expensive) maintenance efforts.
- Aging System** - Transportation infrastructure is built for a particular lifespan, and as each element of the system comes closer to the end of its lifespan, maintenance costs increase and eventually more costly replacement becomes necessary.

In 2007 Governor Ritter convened the Transportation Finance and Implementation Panel to evaluate the state’s transportation needs and identify long-term programs and sustainable funding sources. The Panel recommended an *additional* \$1.5 billion in funding annually for the state transportation system. In contrast, over the past 2 years CDOT’s annual budget has averaged \$984 million.

⁷ Based on the 2000 Colorado Construction Cost Index compared to 2009.

While funding provided by Senate Bill 09-108 (FASTER) represents an important first step in addressing the state's transportation funding gap, resources remain insufficient to maintain the existing transportation system, let alone meet future needs. The costs of providing and maintaining Colorado's transportation infrastructure are significant⁸:

- The average cost to construct one new lane of highway for 1 mile is approximately \$645,420.
- The average cost to reconstruct one lane of highway for 1 mile is approximately \$572,725.
- The average cost to resurface one lane of highway for 1 mile is approximately \$263,495.
- In FY 2010, CDOT spent more than \$6,353 per lane mile for maintenance activities including pavement repairs, minor resurfacing, and sweeping (excluding snow and ice removal). Expenditures on maintenance activities still fall significantly short of the level of spending required to maintain existing conditions.
- In FY 2010, CDOT spent more than \$66 million, or roughly \$9.75 per lane mile, on snow and ice removal.

The years ahead will require difficult choices. In the absence of new funding sources, trade-offs must be made. This may require changes to the level of service provided, investment priorities, or both. Examples of these trade-offs are:

- The level of service Coloradans are accustomed to on our state's roads may decline. Level of service describes how well drivers can get from one destination to another and includes factors such as traffic congestion, pavement condition, and snow and ice removal.
- Fewer dollars may go to capacity improvements, and more to maintenance activities.
- Roads may face closures due to weather as funding for snow and ice removal is reduced or prioritized for higher volume roadways. The cost of snow and ice removal varies by the number and magnitude of storm events in a given year.
- Funding for surface treatment may need to be prioritized among all the roads in the state highway system, meaning that some roads would receive more attention and some would receive less.
- Strategic projects may be subject to significant delays or reductions in scope.

These issues are already featuring prominently in discussions of Colorado's transportation system, and will only grow in significance in coming years. These and other tough choices will undoubtedly be a primary point of emphasis in the next plan update.

A recent trend in transportation funding is competitive grant-based programs. A competitive grant-based system requires government agencies to apply for funds on a project-by-project basis. A recent example of a competitive grant-based program is the Transportation Investment Generating Economic Recovery (TIGER) program. TIGER grants were awarded on a competitive basis for capital investments in surface transportation projects having a significant impact on the nation, a metropolitan area, or a region. More than \$78 billion in applications were received for \$2.1 billion in funding. In February 2010, Colorado was awarded \$10 million in TIGER I funds for a bus rapid transit and managed lanes project on US 36.

⁸ Averages are for 2010 and calculated based on statewide costs.

5 MPO RTP Updates and Amendments

As stated previously, the MPOs are required to update their RTPs at least every 4 to 5 years. Each of Colorado's five MPOs has or is currently updating or amending their RTPs concurrent with the development of this Plan Amendment. This Plan Amendment, at the time of adoption, incorporates the adopted plans from DRCOG, PACOG and GVMPO. The NFRMPO and PPACG will be adopting their long-range plans in September 2011 and January 2012, respectively. Their plans will then be amended into the Statewide Transportation Plan. The following is a brief description of the MPO plan updates/amendments and the web address for the documents.

DRCOG – DRCOG adopted an update to its 2035 Metro Vision Regional Transportation Plan (MVRTP) on February 16, 2011. A public hearing was held in December 2010 following a 30-day review period. The MVRTP was updated over a year and a half long stakeholder and committee process in conjunction with the comprehensive Metro Vision 2035 Plan. A significant level of effort was put into incorporating and considering sustainability principles. Specific long-range goals related to vehicle miles travelled (VMT) and GHG reduction, single-occupancy vehicle travel, and growth in urban centers were established. The fiscally constrained element of the updated 2035 MVRTP contained the same regionally significant roadway and rapid transit projects as the previous plan. Please visit the DRCOG website for more information: [http://www.drcog.org/index.cfm?page=RegionalTransportationPlan\(RTP\)](http://www.drcog.org/index.cfm?page=RegionalTransportationPlan(RTP))

PACOG – PACOG has prepared an amendment to the 2035 Pueblo Area Long-Range Transportation Plan, which was adopted on January 24, 2008. The amendment addresses some significant changes since the 2008 adoption of the 2035 RTP, particularly new information on transportation funding changes in Colorado. It also identifies emerging issues such as GHG emissions, sustainability/livability, climate change, and land use/transportation linkages as significant topics to be addressed in the next complete Plan Update. Many chapters of the plan remain essentially unchanged and have separate brief amendment documents. A few other chapters containing the supporting socio-economic and other data for the original plan have been updated where more current information is available. The chapters and any associated amendment documents are available at: http://www.pacog.net/2035_LRTP_Page.html. The public comment period opened on November 4, 2010, and concluded on February 22, 2011 at the final public open house. The PACOG Board adopted the amendment on April 28, 2011.

Grand Valley – The Grand Valley 2035 RTP is based on a thorough review and analysis of the land use and transportation plans of the cities of Fruita and Grand Junction, the towns of Palisade, Collbran, and De Beque and the county of Mesa (which includes the rural communities of Gateway, Loma, Mack, Mesa, Powderhorn, Whitewater, and other unincorporated areas of Mesa County included in the Rural Master Plan and Clifton/Fruitvale Community Plan). The RTP is intended to facilitate regional goals and improve the transportation infrastructure and services.

A key outcome of the RTP is to identify and/or reconfirm local community transportation visions and priorities. The plan clearly defines region-wide transportation goals, needs, and priorities and supports county and city comprehensive land use plans. Projects identified through a collaborative partnership among Mesa County, Grand Junction, Fruita, Palisade, De Beque, and Collbran aid in the programming and implementation of future transportation investments. The RTP was adopted on April 25, 2011. Please visit the website for more information: <http://www.2035rtp.com>

NFRMPO – The 2035 RTP Update will incorporate two new components: the Phase I North I-25 Environmental Impact Statement and a brief technical analysis of GHG emissions. A draft document will be available in June 2011. The document will still be a corridor based plan focusing on updating information in the document without a complete overhaul.

Public involvement efforts will focus on education and information rather than receiving input on items that are not proposed to change. Public outreach will include surveys and focus groups and use of the internet. The first round of public involvement was February to March 2011 with a second round when the draft plan is released in June. It is anticipated that the Council will adopt the RTP Update in September 2011. For more information on the RTP Update process, please visit:

<http://www.nfrmpo.org/Projects/2035RTPUpdate.aspx>

PPACG – The PPACG is currently developing the Moving Forward Update. This Update incorporates information updated since 2008 and includes a discussion of emerging issues and trends. PPACG is also testing a new planning framework for the Transportation Research Board that is designed to improve collaboration among agencies and interests. PPACG will adopt the Moving Forward Update in January 2012. For more information on the update process, please visit: <http://www.movingforwardplan.org>

6 Public Involvement

The 2035 Plan Amendment provides an opportunity for CDOT to reaffirm Colorado’s long-range vision for a comprehensive multimodal transportation system, while ensuring that all stakeholders have a voice in the process. Public involvement is a key component in developing an effective Statewide Transportation Plan and STIP. As part of the development of the 2012-2017 STIP, CDOT Regions hosted [Project Priority Programming Process \(4P\)](#) meetings to discuss project selection and prioritization with each of their TPRs and/or MPOs. While the primary purpose of 4P meetings was to review the current STIP and solicit requests for new projects, they also served as outreach opportunities on the Plan Amendment. CDOT hosted over 64 county meetings, including meeting with tribal governments, followed by 20 joint and individual TPR meetings. More than 1,420 county commissioners, Regional Planning Council members, other stakeholders and citizens participated in the process, received information about the Plan Amendment and were provided with the opportunity to comment. In addition to these meetings, several other tools were used to communicate with planning partners, elected officials, and the public about the Plan Amendment, including the CDOT website and direct mail and e-mail postcard notifications.

CDOT needs active and engaged participants from a wide variety of viewpoints to ensure the long-range vision for transportation is consistent with the desires of Coloradans.

CDOT recently developed a new website (www.coloradodot.info) to provide information via the Internet, communicate complex information, and improve comment solicitation. The CDOT website enables users to access the Plan Amendment and provide comments electronically. Using CDOT’s comprehensive mailing database, e-mail and print postcards were sent to stakeholders notifying them of the availability of the Plan Amendment for a 30-day review and comment period. This low cost notification method allowed for a wide range of citizens to play an active role in the planning process. Following the conclusion of the 30-day review and comment period, CDOT reviewed and considered all comments received and provided responses as appropriate.

Targeted outreach methods were also used to ensure underserved populations statewide had an opportunity to provide comments on the Plan Amendment. The Plan Amendment document was made available in Spanish, at public offices, and on the CDOT Planning Section website. Additionally, postcard notifications were made in Spanish and distributed to Spanish-speaking outlets. A special effort was made to distribute notifications to community leaders that represent traditionally underserved populations throughout the state.

A full list of meeting dates and locations as well as locations where the Plan Amendment is available in hard copy format are listed in Appendix B.

7 Recent Accomplishments

Current resources are insufficient to maintain the existing transportation system, let alone meet future needs. In such an environment, it is especially critical that CDOT makes the best use of its limited resources. Over the past several years, CDOT has stretched limited dollars to maintain the transportation system and slow the system's rate of decline. In the two fiscal years (FY 2009 and FY 2010) since the adoption of the 2035 Plan, CDOT's annual budget has averaged approximately \$984 million. Over that period of time, CDOT has:

- Awarded more than 235 construction projects statewide, that included rock fall mitigation, roadway reconstruction and resurfacing, guardrail and snow gate installation, and bicycle and pedestrian trails.
 - Completed 88 roadway reconstruction and resurfacing projects.
 - Completed 16 bridge repair and replacement projects.
 - Addressed roadway and pedestrian and bicycle problems by completing 68 safety projects.
- Administered more than \$57 million in federal and state transit grant funds to local, regional and statewide transit infrastructure projects.

During this time, CDOT employees have also been hard at work maintaining the existing elements of the transportation system. Some of this work includes keeping roads and bridges passable in inclement weather (or reducing hours of closure), resurfacing roads to improve driver safety, and ensuring signs and travel lanes are clearly marked. CDOT's maintenance staff maintained more than 62 million square feet (or 2.2 square miles) of roadway surface and implemented preventive roadway maintenance activities that delayed the need for more costly rehabilitation and reconstruction projects.

CDOT safety programs have contributed to improvements in roadway safety and a reduction in the number of fatal accidents. Roadway safety improvements typically include better signing, freshly

Examples of Recent CDOT Accomplishments

- **C-470 Bike Path Rehabilitation, Douglas County**
- **I-76 Reconstruction, Sedgwick to Nebraska state line**
- **US 40 Downtown Steamboat Springs Resurfacing, Routt County**
- **4th Street Bridge, Pueblo County**
- **Swan Mountain Recreational Path, Summit County**
- **Durango Transit Center, La Plata County**

painted road stripes, new acceleration and deceleration lanes, and identifying “hot spots” where correctable accident patterns are occurring. In addition to physical traffic safety improvements, CDOT also supports and coordinates driver education programs, such as [The Heat is On](#) and [Click it or Ticket](#), to raise driver awareness about potentially dangerous driving situations. The Heat is On campaign is focused on reducing drunk driving accidents by increasing enforcement activities to pull over drivers who are intoxicated. Preliminary data from this campaign showed a five percent decline in the number of alcohol-related fatalities between Memorial Day and Labor Day weekends in 2010 compared to 2009. The Click it or Ticket campaign focuses on increasing the number of drivers wearing safety belts.

Other recent CDOT accomplishments, including the implementation of the American Recovery and Reinvestment Act (ARRA) and FASTER, the development of a new Division of Transit and Rail, and a new Bicycle and Pedestrian Policy Directive are summarized in the following subsections.

7.1. ARRA

On February 17, 2009, President Obama signed the ARRA. As a result, Colorado received over \$500 million for transportation projects statewide. Of this, CDOT received \$386.8 million in federal highway funding and another \$12.5 million in federal transit funding (for transit projects in rural areas). The ARRA also provided additional transportation funding directly to transit agencies and the three large MPOs in the state for their prioritized projects. The primary goal of the ARRA was to quickly implement projects to create jobs and generate economic recovery. It is estimated that ARRA funded transportation projects in Colorado directly generated or sustained an average of over 2,000 jobs per month since the passage of the Act. With the designated funds, CDOT will complete approximately 133 ARRA funded projects, 115 of which are highway projects and 18 are transit projects. Additional information about ARRA is available on the [USDOT ARRA Website](#) and on the [CDOT ARRA Website](#).

7.2. FASTER

Governor Ritter and the Colorado General Assembly took an important first step in addressing the transportation funding gap with the 2009 passage of FASTER. The origin of FASTER dates back to the Colorado Transportation Finance and Implementation Panel. Although significant, the revenues FASTER generates represent only a portion of the additional \$1.5 billion in annual funding recommended by the panel. FASTER is estimated to provide over \$250 million annually for transportation improvements in Colorado through modest increases in vehicle registration fees and additional surcharges. A significant portion of these funds will flow to local governments to meet their needs, as well as provide dedicated funding to address deficient bridges, roadway safety and transit needs within the state. As of April 30, 2011, 43 safety projects and 21 bridge projects were either under construction or completed using funding from FASTER. Primary components of FASTER are:

- **Bridge Enterprise Program** - The Bridge Safety Surcharge provides funding specifically designated for Colorado’s most deficient state bridges, which are bridges that are identified by the department as *structurally deficient* or *functionally obsolete* and are rated by the department as *poor*. It also provided for the creation of a new [Bridge Enterprise](#) to oversee the repair, replacement, ongoing operation or maintenance, or any combination thereof, of a designated bridge. Revenues are to be phased in over 3 years, and have been estimated to total nearly \$95 million in the third year. To accelerate the completion of projects and take advantage of a low interest rate environment, the Bridge Enterprise completed an initial issuance of revenue bonds in 2010. Additional bond issuances are anticipated in future years.

- **Road Safety Program** - The Road Safety Surcharge provides funding for [road safety projects](#) defined in the legislation as “a construction, reconstruction, or maintenance project that the commission determines is needed to enhance the safety of a state highway, a county determines is needed to enhance the safety of a county road, or a municipality determines is needed to enhance the safety of a city street.” Annual revenue is estimated to total approximately \$122 million in FY 2010, increasing to \$144 million in FY 2012.
- **High Performance Transportation Enterprise** - The [High Performance Transportation Enterprise](#) (HPTE) was formed to aggressively pursue innovative means of more efficiently financing important surface transportation infrastructure projects. The HPTE replaces the Colorado Tolling Enterprise (CTE) and eliminates the previous prohibition on tolling existing roads, provided that all affected communities consent. The HPTE operates as a government owned business with its own board of directors.
- **Transit Funding Programs** - FASTER provides \$10 million per year to CDOT for statewide and regional transit and multimodal transportation projects. An additional \$5 million in transit funding is available through CDOT Regions for a [Local Transit Grant Program](#).
- **Planning Factors** - State law includes a series of planning “factors” that must be addressed in the Statewide Transportation Plan. FASTER added the following new factors:
 - Targeting of infrastructure investments, including preservation of the existing transportation system commonly known as “fixing it first” to support the economic vitality of the state and region
 - Safety enhancement
 - Strategic mobility and multimodal choice
 - Support of urban or rural mass transit
 - Environmental stewardship
 - Effective, efficient, and safe freight transport
 - Reduction of GHG emissions

7.3. Division of Transit and Rail

A new division within CDOT, the [Division of Transit and Rail](#), was created by Senate Bill 09-94 in 2009. The new division is responsible for “the planning, development, operation, and integration of transit and rail, including, where appropriate, advanced guideway systems, into the statewide transportation system.” The law also calls on CDOT to coordinate with other transit and rail providers and to plan, promote, and implement investments in transit and rail services statewide. Initial activities of the new Division include the development of a State Freight and Passenger Rail Plan, a Statewide Transit Plan, and an advisory committee. The plans will be integrated into the next update to the Statewide Transportation Plan.

Multimodal Transportation Planning

*A **transportation mode** is a means of transporting goods or people, such as roads, rail, biking, or walking (i.e., pedestrian), among others.*

Although better known for highways, CDOT is a multimodal agency. Two recent developments build upon this multimodal focus and include the creation of a new Division of Transit and Rail and the adoption of a Bicycle and Pedestrian policy. Both of these efforts will promote the consideration of all modes of transportation in the planning, design and maintenance of our state’s transportation system.

7.4. Bicycle and Pedestrian Policy Directive

On October 22, 2009, CDOT adopted [Bicycle and Pedestrian Policy Directive 1602](#), a groundbreaking policy that calls for the needs of bicyclists and pedestrians to be included in the planning, design, and operation of transportation facilities as a matter of routine. While CDOT strives to implement this policy for all roadways, there are three exceptions to the policy: (1) when the law prohibits bicyclists and pedestrians from using the roadway; (2) when the cost exceeds 20 percent of the overall project; or (3) when the scarcity of population in the area identifies a lack of need for those types of facilities. The policy also directs CDOT to develop a Statewide Bicycle and Pedestrian Plan, include bicycle and pedestrian design in its Roadway Design Manual, and take action related to facility maintenance, education about the policy (for cyclists and drivers), and enforcement. The Statewide Bicycle and Pedestrian Plan will be integrated into the next update to the Statewide Transportation Plan.

8 Emerging Issues in Transportation Planning

Emerging issues are important transportation issues that have grown in significance in recent years and may require more intensive examination and attention than provided in previous planning efforts. Two of the most important issues include the related concepts of sustainability and livability as well as GHG emissions reduction. Air quality relates to both of these concepts, and although not a new issue, it is an issue undergoing significant change. Performance measures are also becoming an important topic in transportation planning as states move toward performance-based planning. Many of these are issues that cross political, physical, and organizational boundaries. As such, collaborative efforts and existing partnerships with other agencies play an important role in addressing them. Examples of these collaborative efforts are:

- [Transportation and Environmental Resource Council \(TERC\)](#) - The TERC was formed in 2002 to address transportation and environmental stewardship and includes CDOT, planning partners, and state and federal agencies. The TERC's Sustainability Subcommittee is involved in the development of statewide sustainability concepts and an accompanying framework to coordinate sustainability related efforts among state and local agencies.
- [Federal Interagency Partnership for Sustainable Communities](#) - This federal initiative is intended to coordinate housing, transportation, environment, and other community elements. The partnership is discussed in more detail below. At the state level, CDOT is involved in a number of similar efforts as discussed below.
- [Colorado Sustainable Main Streets Initiative](#) - Along with several other state agencies, CDOT is a partner in this effort to bring a collaborative, integrated process to leverage technical and existing financial resources to help communities enhance the sustainability of their downtowns.
- [Regional Air Quality Council \(RAQC\)](#) - CDOT is engaged in a number of collaborative efforts with the RAQC including a diesel-idling reduction program (Engines Off! Colorado), diesel retrofit programs, and the [OzoneAware](#) program, which is an educational campaign to help citizens become more aware of the ozone produced from their own activities and how they can take steps to reduce it. The RAQC also works closely with CDOT on the development of [State Implementation Plans](#) to comply with federal air quality standards for specific pollutants, and is partnering with CDOT on transportation and land use integration efforts.

- **Colorado Energy Smart Transportation Collaborative Effort** - Through a grant from the US DOT and Rockefeller Foundation, CDOT and the Governor's Energy Office (GEO) have initiated this new collaborative effort with the aim of making the state transportation system more energy efficient and sustainable. As part of this effort, CDOT and GEO will work collaboratively with a number of stakeholders from federal, state, regional and local agencies to develop a framework and tools to enhance the planning process to include transportation energy use and greenhouse gas emissions.

The following sections provide a brief outline of current CDOT activities in the areas of sustainability and livability, air quality, GHG emissions reduction, and performance measures.

8.1. Sustainability and Livability

The related concepts of sustainability and livability are increasingly being considered in transportation planning and policy. Sustainability is the concept of adopting policies and practices that meet a community's existing needs without compromising its ability to provide for future needs. Livability in transportation "is about using the quality, location, and type of transportation facilities and services available to help achieve broader community goals such as access to good jobs, affordable housing, quality schools, and safe streets."⁹

At the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Housing and Urban Development (HUD), and the U.S. Environmental Protection Agency (EPA) recently entered into an agreement known as the Interagency Partnership for Sustainable Communities. The partnership is intended "to help improve access to affordable housing, more transportation options, and lower transportation costs while protecting the environment in communities nationwide." Additionally, the USDOT recently released its [Livability in Transportation Guidebook](#), which illustrates how livability principles have been successfully incorporated into transportation planning, programming, and project design.

At the state level, CDOT is engaged in a number of efforts related to the concepts of sustainability and livability, such as:

- Ongoing efforts of the CDOT Sustainability Council, including an energy performance audit program and the development of a CDOT fuel reduction plan.
- Initiation of a CDOT green maintenance program to reduce the environmental impact of maintenance facilities and activities.
- Completion of the GreenLITES Pilot Project to evaluate and rate the sustainability of transportation project designs.
- Completion of a study to assess the potential for sustainability improvements at CDOT rest areas, and the use of CDOT facilities and right-of-way for alternative energy generation.
- Completion of a land use and transportation integration study to identify a land use and transportation scenario planning tool for use in rural communities and to develop a pilot program to follow.

⁹ U.S. Department of Transportation. *Livability in Transportation Guidebook: Planning Approaches that Promote Livability*. First Edition. ICF International: Durham, NC; 2010.

8.2. Air Quality

CDOT's [Air Quality Program](#) improves air quality by ensuring that all CDOT projects and operations comply with federal, state, and local air quality laws and regulations, and by promoting strategies that reduce emissions of motor vehicle pollutants.

CDOT Air Quality Policy Directive 1901 was approved by the Colorado Transportation Commission on May 21, 2009. The directive is a collaborative, working agreement to programmatically address *unregulated* mobile source air toxics and GHGs produced from Colorado's state highways, interstates, and construction activities. It also called for the development of a CDOT Air Quality Action Plan. Currently in development, the Air Quality Action Plan will promote a vision of sustainable fleet management and public outreach and education to further understanding of GHGs and mobile source air toxics. It will also outline proactive programs and partnerships with other agencies to reduce transportation-related GHGs and air toxics emissions and to identify strategies to reduce VMT and vehicle hours traveled (VHT).

Another important air quality development is the current EPA re-evaluation of ozone standards. EPA designated the northern Front Range (including Denver and Fort Collins) as non-attainment for ozone in 2007. It is anticipated that the EPA re-evaluation of ozone standards will result in more rigorous standards that could put the entire state of Colorado at risk for ozone non-attainment. An announcement of the new standards is expected in the summer of 2011.

The EPA regulates many **mobile source air toxics and GHGs**. Mobile source air toxics are compounds emitted from highway vehicles and non-road equipment that can negatively influence human health. GHGs are gases in the earth's atmosphere that trap heat radiating from the earth's surface. The primary GHGs produced by the transportation sector are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and hydrofluorocarbons (HFC).

EPA regulates **ground-level ozone** levels by setting a minimum standard (i.e., a level of ozone that is acceptable at ground-levels). Communities that meet this standard are considered *attainment* areas, and ones that do not are considered *non-attainment* areas. Once an area is designated as non-attainment, state and local governments within that area must develop plans showing how they will meet the standards (i.e., achieve attainment).

VMT is related to air quality because gasoline-powered vehicles produce GHG emissions, ozone precursors (e.g., volatile organic compounds and nitrous oxide), and other air toxics. Thus, reducing the number of miles traveled would reduce the amount of emissions and air toxics as well. **VHT** is a similar concept, but involves the hours traveled instead of the distance. Reducing the amount of time a vehicle must be in operation to travel a certain distance (through congestion relief, system efficiency, and other related measures) will also affect emissions and air toxics.

8.3. GHG Emissions Reduction

In the United States, transportation is the second largest source of GHG emissions, accounting for roughly 29 percent of all emissions¹⁰. A recent USDOT report to Congress, [*Transportation's Role in Reducing U.S. Greenhouse Gas Emissions*](#), outlines the issue and identifies strategies to reduce GHG emissions produced by the transportation sector. At the state level, FASTER includes a requirement that the Statewide Transportation Plan address the reduction of GHG emissions. The next federal transportation authorization bill may also have new planning requirements that address a reduction in GHG emissions. Many existing programs and efforts related to air quality and sustainability will play a role in achieving this reduction. In addition, CDOT is currently engaged in a number of activities that directly address the reduction of transportation GHG emissions. In 2011, CDOT in partnership with the GEO initiated a collaborative process with planning partners and stakeholders to develop a "framework" for incorporating a reduction in GHG emissions into planning processes in advance of the next update to the Statewide Transportation Plan. The collaborative process and framework will provide an opportunity for CDOT, GEO, planning partners and other stakeholders to examine strategies that make sense for Colorado, to develop opportunities for collaboration, and to identify next steps.

8.4. Performance Measures

Performance measures are part of a performance-based planning and management approach that includes setting clear policies and objectives, tracking performance data and trends, and forecasting to make planning and policy decisions. Performance measures are the "yardstick" by which future agency accomplishments are measured. CDOT's [*Annual Performance Report*](#) provides an example of some of CDOT's existing efforts in performance measurement. Since 1998, the Annual Performance Report has described CDOT's performance using the same 25 measures. Historically, performance measures have primarily been used to measure the performance or safety of the transportation system using measures such as the fatalities per 100 million VMT, or the minutes of delay per traveler on congested highway segments. Performance measures are becoming increasingly important in other areas of CDOT's operations, including planning. It is anticipated that the next federal transportation authorization bill will include additional requirements related to performance measures, and that performance measures will play a key role in the next Statewide Transportation Plan.

9 Looking Ahead

Current federal transportation law requires that MPO RTPs and statewide transportation plans maintain a minimum 20-year time horizon at the time of adoption. The next updates to the MPO RTPs, the Statewide Transportation Plan, and rural TPR RTPs will be adopted by 2015. At that point, it will be necessary to extend the time horizon of the Statewide Transportation Plan and RTPs beyond 2035 in order to maintain the required 20-year planning horizon. This means the next plan update will most likely involve the extension of the time horizon to 2040 or beyond. In contrast to this limited Plan Amendment, the plan update will involve revisiting and updating all aspects of the existing 2035 Plan. Key elements of the next plan update are:

- **New Revenue Forecasts and Resource Allocation** - The next plan update will conform to the resource allocation process described in Section 1.3. In contrast to the modified resource

¹⁰ Transportation's Role in Reducing U.S. Greenhouse Gas Emissions, USDOT, April 2010.

allocation process completed for this Plan Amendment, the plan update will include updated revenue forecasts and resource allocation for the full time horizon of the new plan. This will include revenue anticipated from FASTER and SB 09-228 and utilize a new revenue model.

- **New Federal Requirements** - The next plan update will need to address and respond to potential new requirements included in the next federal transportation authorization, such as GHG emissions reductions and performance measures.
- **Public Involvement Process** - Extensive public outreach efforts will be undertaken as part of the next plan update. This will include both conventional methods such as public meetings, as well as newer techniques such as customer surveys and interactive web-based outreach.
- **Updated Demographic Information** - The existing 2035 Plan makes use of demographic information from the 2000 U.S. Census. The next plan update will involve the use of new data from the 2010 U.S. Census.
- **State Planning Factors** - As noted previously, new FASTER legislation included additional factors to address in the Statewide Transportation Plan. The next plan update will examine these factors in detail. The FASTER factors are in addition to existing planning factors already in state law: multimodal transportation considerations; coordination with county and municipal land use planning; and development of area wide multimodal management plans in coordination with the process of developing the elements of the Statewide Transportation Plan.
- **Integration of Multimodal Plans** - CDOT is currently in the early stages of developing a Statewide Bicycle and Pedestrian Plan, a Statewide Transit Plan, and a State Freight and Passenger Rail Plan. The next update will integrate these plans into a comprehensive, multimodal Statewide Transportation Plan.
- **Funding Issues** - Absent significant changes to revenues, the funding gap and the tough choices associated with this gap will require further discussion and consideration in the next plan update.
- **Emerging Issues** - The emerging issues identified in this amendment will also feature prominently in the plan update as sustainability, livability, air quality, GHG emissions and performance measures in transportation planning continue to grow in significance. CDOT will utilize a GHG model developed to analyze different scenarios to reduce GHG emissions.

10 Conclusion

As described in the Introduction, this Plan Amendment supplements the existing 2035 Plan. It outlines and summarizes the purpose of this document, the planning process, financial outlook, and recent accomplishments and key changes since the adoption of the 2035 Plan in 2008. A plan amendment, instead of a plan update, was determined to be the most prudent course of action given several factors, with more extensive efforts occurring during the next plan update.

Colorado's transportation system continues to face challenges since the adoption of the 2035 Plan. With the economic downturn, population growth, escalating costs, increasing congestion, aging infrastructure and declining resources, trade-offs likely will be required. Tough decisions will need to be made as to how to invest the limited dollars available.

With the passage of FASTER, CDOT receives a dedicated funding source for transportation improvements that helps offset the loss of or decline in other funding sources. However, it is still not

enough to sustain, let alone fulfill, the vision the citizens of Colorado have expressed for the state's transportation system. It was estimated that between 2008 and 2035 an additional \$53 billion is necessary just to sustain existing transportation service levels in Colorado. To fulfill the vision of the citizens of Colorado and to meet community values throughout the state, CDOT will need to raise significantly more revenue than what is forecast through traditional sources.

Since the 2008 adoption of the 2035 Plan, CDOT has spent over \$1.9 billion (this includes the one-time infusion of approximately \$400 million from ARRA) on safety programs, transit, aviation, highway and bridge improvements, and operations and maintenance throughout the state. The majority of CDOT's budget is used for construction projects, highway maintenance and traffic operations. The sources of funds for CDOT are primarily federal transportation funds and the Highway Users Tax Fund (HUTF, which includes FASTER funds) accounting for approximately 85 percent to 95 percent of CDOT's revenues. Very little, if any, funds come from the state's General Fund.

Transportation planning provides the context to plan for the future of Colorado's transportation system through a collaborative process involving residents, the business community, and elected officials across the state. The vision for the transportation system will take into account the varied needs of our diverse state and will balance those needs with the funds available. Corridor visions express community values, environmental stewardship, economic development, and multimodal needs.

The next plan will address planning factors identified in the FASTER legislation, many of which CDOT has already been addressing in the planning process. CDOT will continue to move forward on efforts under way to address federal initiatives such as sustainability and livability, air quality improvement initiatives including reduction in GHG emissions, multimodal choice and connectivity, and preservation of the existing transportation system to support the economic vitality of the state.

In the years to come, CDOT will continue to use its available resources wisely to safely and effectively move people, goods, and information and provide the best multimodal transportation system for Colorado.

Appendix A – Web Resources

This document can be translated into Spanish upon request. Please forward requests to have this document translated into Spanish to Darin Stavish at darin.stavish@dot.state.co.us

Este documento se puede traducir a español a petición. Transmite por favor a cualquier petición para tener este documento traducido a español a Darin Stavish en darin.stavish@dot.state.co.us

The following are the URL addresses for the documents referenced in the 2035 Plan Amendment. A brief description of each is also provided.

[2035 Statewide Transportation Plan “Moving Colorado: Vision for the Future”](#), page 1

URL: <http://www.coloradodot.info/programs/statewide-planning/documents/2035%20Statewide%20Transportation%20Plan.pdf>

Description: The currently adopted, SAFETEA-LU compliant, 20-year long range plan for Colorado.

[Transportation Planning Regions](#), page 2

URL: <http://www.coloradodot.info/programs/statewide-planning/planning-process.html#Planning%20Regions>

Description: Transportation Planning Regions are geographically designated areas of the state comprised of municipalities and counties within its established boundaries created and approved by the Colorado Transportation Commission. There are 15 TPRs in Colorado.

[Colorado Transportation Commission](#), page 2

URL: <http://www.coloradodot.info/about/transportation-commission>

Description: The state's transportation system is managed by the Colorado Department of Transportation under the direction of the Colorado Transportation Commission. The commission is comprised of 11 commissioners who represent specific districts throughout the state.

[Corridor visions](#), page 2

URL: <http://www.coloradodot.info/content/programs/planning/2035CVCD/index.html>

Description: Corridor visions identify transportation modes and include strategies aimed at meeting each corridor's unique transportation needs.

[Statewide Transportation Improvement Program \(STIP\)](#), page 3

URL: <http://www.coloradodot.info/business/budget>

Description: The STIP identifies short-term, six-year capital and programmatic projects by location, scope, funding sources and program year.

[Engineering regions](#), page 3

URL: <http://www.coloradodot.info/about/regions.html>

Description: CDOT has divided its construction and maintenance responsibilities into six engineering regions covering the entire state.

[Statewide Transportation Advisory Committee \(STAC\)](#), page 4

URL: <http://www.coloradodot.info/programs/statewide-planning/stac.html>

Description: The STAC provides advice to the Colorado Department of Transportation and the Transportation Commission on the needs of the transportation system in Colorado and reviews and comments on all regional transportation plans submitted by the transportation planning regions and/or CDOT.

[Modified resource allocation](#), page 4

URL:

<http://www.coloradodot.info/business/budget/documents/Resource%20Allocation%20for%202035%20Plan%20Amendment%20-%20FINAL.pdf>

Description: The resource allocation process provides financial data for long and short term planning and fiscal management.

[Colorado Construction Cost Index](#), page 7

URL: <http://www.coloradodot.info/business/eema>

Description: The Colorado Construction Cost Index provides a formula for estimating construction costs in Colorado.

[2035 Metro Vision Regional Transportation Plan \(MVRTP\)](#), page 9

URL: [http://www.drcog.org/index.cfm?page=RegionalTransportationPlan\(RTP\)](http://www.drcog.org/index.cfm?page=RegionalTransportationPlan(RTP))

Description: The MVRTP addresses the challenges and guides the development of a multimodal transportation system over the next 28 years. It reflects a transportation system that closely interacts with the growth, development, and environmental elements of Metro Vision.

[2035 Pueblo Area Long Range Transportation Plan](#), page 9

URL: http://www.pacog.net/2035_LRTP_Page.html

Description: The Pueblo Area Long Range Transportation Plan is a 25+-year plan for the development of transportation programs and projects within the Pueblo area.

[Grand Valley 2035 Regional Transportation Plan \(RTP\)](#), page 9

URL: <http://www.2035rtp.com/site/>

Description: The 2035 RTP, to be adopted in March 2011, will bring together transportation, land use, and community issues in one process. The plan will identify the future transportation needs of the region, what can be afforded, and how transportation projects will be prioritized for implementation.

[North Front Range Metropolitan Planning Organization RTP Update](#), page 10

URL: <http://www.nfrmpo.org/Projects/2035RTPUpdate.aspx>

Description: The draft 2035 RTP Update is anticipated in June 2011. It will incorporate two new components: the Phase I North I-25 EIS and a brief technical analysis of GHG emissions.

[Moving Forward Updated 2035 RTP](#), page 10

URL: <http://www.movingforwardplan.org/index.html>

Description: This plan envisions a multimodal system of transportation infrastructure and services for the Pikes Peak region through 2035. PPACG is currently beginning the process of updating the plan in accordance with federal transportation and air quality requirements, and it is anticipated to be adopted in January 2012.

Project Priority Programming Process (4P), page 10

URL:

<http://www.coloradodot.info/business/budget/stip/4P%20STIP%20Development%20Guidelines%2009-09%20-%20CLEAN.pdf/view>

Description: CDOT, in cooperation with its planning partners, developed and utilizes the Project Priority Programming Process (4P) in order to prioritize projects for inclusion in the STIP.

The Heat is On and Click it or Ticket, page 12

URL: <http://www.coloradodot.info/programs/alcohol-and-impaired-driving/alcohol-and-impaired-driving.html> and <http://www.coloradodot.info/programs/seatbelts-carseats>

Description: CDOT's Office of Transportation Safety and Public Relations Office oversee programs and public awareness campaigns in an effort to address dangerous public safety issues.

USDOT ARRA Website and CDOT ARRA Website, page 12

URL: <http://www.dot.gov/recovery/> and <http://www.coloradodot.info/projects/arra>

Description: On February 17, 2009 President Obama signed the American Recovery and Reinvestment Act (ARRA) of 2009. As a result, Colorado received over \$500 million for transportation projects statewide. The purpose of these sites is to provide accountability for the spending of ARRA dollars.

Bridge Enterprise, page 12

URL: <http://www.coloradodot.info/about/bridge-enterprise>

Description: Colorado's Bridge Enterprise was created to oversee the repair, replacement, ongoing operation or maintenance, or any combination thereof, of a designated bridge.

Road safety projects, page 13

URL: <http://www.coloradodot.info/projects/faster>

Description: The Road Safety Surcharge provides funding through the Funding Advancements for Surface Transportation and Economic Recovery (FASTER) legislation.

High Performance Transportation Enterprise, page 13

URL: <http://www.coloradodot.info/about/high-performance-transportation-enterprise-hpte>

Description: The High Performance Transportation Enterprise was formed to aggressively pursue innovative means of more efficiently financing important surface transportation infrastructure projects.

Local Transit Grant Program, page 13

URL: <http://www.coloradodot.info/projects/faster>

Description: FASTER legislation provides \$10 million per year to CDOT for statewide and regional transit and multimodal transportation projects. An additional \$5 million in transit funding is available through CDOT Regions for local transit projects.

Division of Transit and Rail, page 13

URL: <http://www.coloradodot.info/programs/transitandrail>

Description: The Division of Transit and Rail was created by Senate Bill 09-94 in 2009 and is responsible for "the planning, development, operation, and integration of transit and rail, including, where appropriate, advanced guideway systems, into the statewide transportation system."

[Bicycle and Pedestrian Policy Directive 1602](#), page 14

URL: <http://www.coloradodot.info/programs/bikeped/documents/1602-0BikePed.pdf>

Description: CDOT 's Bicycle and Pedestrian Policy Directive 1602, calls for the needs of bicyclists and pedestrians to be included in the planning, design, and operation of transportation facilities as a matter of routine.

[Transportation and Environmental Resource Council \(TERC\)](#), page 14

URL: <http://www.coloradodot.info/programs/environmental/terc>

Description: The TERC was formed in 2002 to address transportation and environmental stewardship and includes CDOT, planning partners, and state and federal agencies.

[Federal Interagency Partnership for Sustainable Communities](#), page 14

URL: <http://www.epa.gov/dced/partnership/index.html>

Description: A federal initiative intended to coordinate housing, transportation, environment and other community elements.

[Colorado Sustainable Main Streets Initiative](#), page 14

URL: <http://dola.colorado.gov/sustainability/sustainable-main-streets.html>

Description: A collaborative, integrated process to leverage technical and existing financial resources to help communities enhance the sustainability of their downtowns.

[Regional Air Quality Council \(RAQC\)](#), page 14

URL: <http://www.raqc.org/>

Description: The RAQC develops and proposes effective and cost-efficient air quality planning initiatives with input from government agencies, the private sector, stakeholder groups, and citizens of the Denver metropolitan region.

[OzoneAware](#), page 14

URL: <http://www.ozoneaware.org/>

Description: An ozone awareness campaign created by the Regional Air Quality Council.

[State Implementation Plans \(SIP\)](#), page 14

URL: http://raqc.org/programs/more/state_implementation_plans/

Description: A SIP is a compliance document for federal air quality standards for specific pollutants.

[Livability in Transportation Guidebook](#), page 15

URL:

[http://knowledge.fhwa.dot.gov/cops/rex.nsf/All+Documents/80A7392C97749F508525779D00652EF5/\\$FILE/Livability_in_Transportation_Guide_072910_lowres.pdf](http://knowledge.fhwa.dot.gov/cops/rex.nsf/All+Documents/80A7392C97749F508525779D00652EF5/$FILE/Livability_in_Transportation_Guide_072910_lowres.pdf)

Description: The USDOT developed a livability guidebook which illustrates how livability principles have been successfully incorporated into transportation planning, programming, and project design

[Air Quality Program](#), page 16

URL: <http://www.coloradodot.info/programs/environmental/air-quality>

Description: CDOT's Air Quality Program improves air quality by ensuring that all CDOT projects and operations comply with federal, state, and local air quality laws and regulations, and by promoting strategies which reduce emissions of motor vehicle pollutants.

Transportation's Role in Reducing U.S. Greenhouse Gas Emissions, page 17

URL: [http://ntl.bts.gov/lib/32000/32700/32779/DOT_Climate_Change_Report - April 2010 - Volume 1 and 2.pdf](http://ntl.bts.gov/lib/32000/32700/32779/DOT_Climate_Change_Report_-_April_2010_-_Volume_1_and_2.pdf)

Description: A recent USDOT report to Congress, *Transportation's Role in Reducing U.S. Greenhouse Gas Emissions*, outlines the issue and identifies strategies to reduce GHG emissions produced by the transportation sector.

Annual Performance Report, page 17

URL:

http://www.coloradodot.info/library/AnnualReports/CDOT_FY2009%20Annual%20Performance%20Report.pdf/view

Description: The Annual Performance Report communicates to our customers the results CDOT achieves with the resources provided.

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Appendix B – Public Involvement

This document can be translated into Spanish upon request. Please forward requests to have this document translated into Spanish to Darin Stavish at darin.stavish@dot.state.co.us

Este documento se puede traducir a español a petición. Transmite por favor a cualquier petición para tener este documento traducido a español a Darin Stavish en darin.stavish@dot.state.co.us

The 2035 Statewide Transportation Plan Amendment (Plan Amendment) serves as an excellent opportunity for CDOT to reaffirm Colorado’s long range vision for a comprehensive multimodal transportation system while ensuring that all stakeholders have a voice in the process. Public involvement is a key component to developing an effective statewide transportation plan for Colorado. The public involvement approach developed for the Plan Amendment meets state and federal requirements and takes advantage of previously scheduled public involvement activities with our planning partners.

Other Outreach Mechanisms

CDOT Website – CDOT recently deployed a new website in order to make the maximum effort practicable to supply public information in electronic formats accessible via the internet, communicate complex information, and improve comment solicitation. CDOT website users can access the Plan Amendment, provide comments electronically, and link to 2035 MPO plan updates.

E-Mail and Print Postcard Notification (see Figure 1) – Using CDOT’s mailing database of over 4,700 citizens, elected officials, and organizational contacts, e-mail and print postcards were sent to stakeholders notifying them of the availability of the Plan Amendment. This low cost distribution method allowed for a wide range of citizens to play an active role in the planning process. The postcards notified the public of the availability of the document, provided the web address and staff contact information.

2035 Statewide Transportation Plan Amendment *Enmienda estatal del plan de transporte 2025*

The Colorado Department of Transportation is seeking comments on an amendment to the currently adopted 2035 Statewide Transportation Plan. The currently adopted 2035 Statewide Transportation Plan, 2035 Plan Amendment and an online comment form are accessible on the CDOT website at:

<http://www.coloradodot.info/programs/statewide-planning/long-range-transportation-plans.html>

Comments will be received in writing from February 18, 2011 to March 21, 2011.

You may comment or ask questions by contacting:

El departamento de transporte de Colorado (CDOT) está buscando comentarios sobre una enmienda del plan 2035 estatal de transporte adoptado. El plan 2035 estatal de transporte adoptado, la enmienda del plan de 2035, y un forma de comentarios están disponibles en el Internet. Vea:

Se recibirán comentarios por escrito desde el 18 de febrero hasta el 21 de marzo de 2011. Puede hacer

comentarios o preguntas para ponerse en contacto con:

mail/mail: **Aaron Willis**

**Colorado Department of Transportation
4201 E. Arkansas Avenue, Shumate Bldg.
Denver, CO 80222**

phone/phone: **303-512-4019** fax: **(303) 757-9727**

email/email: **aaron.willis@dot.state.co.us**

En Español contacto: **Darin Stavish, 303-365-7047**



**Colorado Department of Transportation
4201 E. Arkansas Avenue, Shumate Bldg.
Denver, CO 80222**



*We Look Forward to Hearing From You!
Tenemos ganas de recibir sus comentarios!*



Figure 1: Postcard notification of availability of the 2035 Plan Amendment

Document Viewing Locations - As identified by the Colorado Department of Education, Colorado Depository Libraries are affiliated with the Colorado State Publications Library and maintain collections of state documents for public use. Copies of the 2035 Statewide Transportation Plan and Plan Amendment were sent to Colorado State Depository Libraries to help make the document more accessible to the public.

In addition, copies of the Plan Amendment were available at CDOT Region offices and headquarters, as well as other neighborhood libraries as discussed below. The following is a list of Colorado’s Depository Libraries and CDOT Offices (see Table 1) where English and Spanish versions of the Plan Amendment and 2035 Statewide Transportation Plan are available to the public:

Colorado Depository Libraries and CDOT Offices – Table 1

<p>Boulder: University of Colorado at Boulder Norlin Library 184 UCB 1720 Pleasant Street Boulder, CO 80309-0184 (303)492-8834</p>	<p>Colorado Springs: Pikes Peak Library District Penrose Public Library Government Publications & Local History 20 N. Cascade Avenue Colorado Springs, CO 80903 (719)531-6333, ext. 2253</p>	<p>University of Colorado at Colorado Springs Kraemer Family Library 1420 Austin Bluffs Parkway, P.O. Box 1750 719-262-3295</p>
<p>Denver: Denver Public Library Government Publications Division 10 West 14th Avenue Parkway Denver, CO 80204 (720)865-1711</p>	<p>Auraria Library Government Publications Department 1100 Lawrence Street Denver, CO 80204 (303)556-8372</p>	<p>Durango: Fort Lewis College John F. Reed Library 1000 Rim Drive Durango, CO 81301 (970)247-7551</p>
<p>Fort Collins: Colorado State University Government Publications Department Morgan Library 501 University Avenue Fort Collins, CO 80523 (970)491-1841</p>	<p>Glenwood Springs: Colorado Mountain College Spring Valley Library 3000 County Road 114 Glenwood Springs, CO 81601 (970)945-7481</p>	<p>Golden: Colorado School of Mines Arthur Lakes Library Government Documents Department 1400 Illinois Street Golden, CO 80401-0029 (303)273-3695</p>

Colorado Depository Libraries and CDOT Offices – Table 1

<p>Grand Junction: Mesa County Public Library District Government Publications Division 530 Grand Avenue Grand Junction, CO 81502-5019 (970)241-5251</p>	<p>Greeley: University of Northern Colorado Michener Library Government Publications Department 501 20 Street Greeley, CO 80639 (970)351-2987</p>	<p>Gunnison: Western State College Leslie J. Savage Library Government Publications Department 600 North Adams Street Gunnison, CO 81231 (970)943-2103</p>
<p>Lakewood: Jefferson County Public Library Lakewood Library Government Publications Division 10200 West 20th Avenue Lakewood, CO 80215 (303)232-9507</p>	<p>Pueblo: Pueblo City-County Library District Main Library 100 E. Abriendo Avenue Pueblo, CO 81004-4290 (719)562-5601</p>	<p>Steamboat Springs: Colorado Mountain College Alpine Campus Library 1330-50 Bob Adams Drive Steamboat Springs, CO 80477 (970)870-4451</p>
<p>Sterling: Sterling Public Library 421 North 5th Street Sterling, CO 80751 (970)522-2023</p>	<p>CDOT Region 1 18500 E. Colfax Ave. Aurora, CO 80011</p>	<p>CDOT Region 2 905 Erie Ave. Pueblo, CO 81002</p>
<p>CDOT Region 3 222 South 6th St., #317 Grand Jct., CO 81501-2769</p>	<p>CDOT Region 4 1420 2nd Street Greeley, CO 80632</p>	<p>CDOT Region 5 3803 N. Main Ave., #306 Durango, CO 81301</p>
<p>CDOT Region 6 2000 South Holly St. Denver, CO 80222</p>	<p>CDOT Headquarters Office Division of Transportation Development 4201 E. Arkansas Ave Shumate Building Denver, CO 80222</p>	

Outreach to Underserved Populations

CDOT takes seriously the responsibility of seeking input from all communities in Colorado. To that end, the department strives to provide information that is accessible and understandable, and provides the Plan Amendment documents in Spanish at libraries, public meetings, public offices, and on CDOT’s statewide planning website.

The department utilized a new outreach technique making English and Spanish versions of the current 2035 Statewide Transportation Plan and the Plan Amendment available at local libraries located in low

income areas, rural areas and minority neighborhoods to provide further access and equal opportunity for public participation to underserved populations. Through a process of analyzing 2000 Census tract data on low income and minority areas, staff identified 40 additional libraries (see Table 2) to provide increased public access to the Plan Amendment in low income, rural and minority communities. By utilizing both depository and local neighborhood libraries for the distribution of plan documents, staff was able to cover gap areas that require additional attention for public outreach and help make these public documents more accessible. Additionally, staff looked at areas of the state that lack high speed internet, acknowledging the fact that by placing increased emphasis on visualization and producing easier to understand long range plan documents, often results in the need for high speed internet access. Therefore, the methodology for neighborhood library selection considered the availability of public internet access, the proximity to depository libraries and CDOT offices, and the percentages of underserved populations based on 2000 Census data.

Neighborhood Libraries – Table 2

Library	City	Public Internet Access?	Hours of Operation
Two Buttes Branch Library	Two Buttes	Y	Fri 10-2
Aguilar Public Library	Aguilar	Y	Mon 9-2, Tues 10-2, Thu 10-2, Fri 9-2
San Miguel Library District # 2/Norwood Public Library	Norwood	Y	Mon -Sat 11/5
Ordway Public Library	Ordway	Y	Mon/Wed/Thu 3-7, Fri/Sun 12-4
Costilla County Public Library	San Luis	Y	Mon-Fri 10:30-4:30
Flagler Community Library	Flagler	Y	Mon-Fri 10-4
Baca County Public Library	Springfield	Y	Mon-Fri 10-5
Boulder Public Library	Boulder	Y	Mon-Fri 10-5, Sat 10-3
Huerfano County Public Library	Walsenburg	Y	Mon-Fri 10-6, Sat 12-4
Rifle Branch Library	Rifle	Y	Mon-Sat 10-5, Sat/Sun 1-5
Delta Public Library	Delta	Y	Mon-Thu 10-7, Fri 10-6, Sat 10-4
Lafayette Public Library	Lafayette	Y	Mon-Thu 10-9, Fri/Sat 10-5, Sun 1-5
Silverton Public Library	Silverton	Y	Tue/Thu 11-8, Fri/Sat 10-5
Valdez-Perry	Denver	Y	Tues-Fri 10-6
Cedaredge Public Library	Cedaredge	Y	Tues 10-6, Wed 10-8, Thu/Fri 10-6, Sat 10-2
Maybell Branch Library	Maybell	Y	Wed-Sat 10-6
Akron Public Library	Akron	Y	Mon-Fri 9-5:30, SAT 9-1
Eloise May	Denver	Y	Mon-Thu 9-6, Fri & Sat 9-4, Sun 1-5
Martin Luther King Jr. Branch Library	Aurora	Y	Tues 11-7, Wed/Fri/Sat 10-6
Bent County Library District	Las Animas	Y	Mon 1-5, Wed-Thu 10-6, Fri 9-5, Sat 9-1
Canon City Public Library	Canon City	Y	Mon-Thu 9-7, Fri & Sat 10-5

Library	City	Public Internet Access?	Hours of Operation
Conejos Public Library District	La Jara	Y	Mon-Thu/Fri/Sat 8:30-4:30, Tues & Wed 8:30-7
Cortez Public Library	Cortez	Y	Mon-Thu 9-7, Fri 9-4, Sat 10-4
Blair-Caldwell Library	Denver	Y	Mon 12-8, Wed & Fri 10-6, Sat 9-5
Montbello Branch	Denver	Y	Mon & Tues 12-8, Thu & Fri 10-6, Sat 9-5
Park Hill Branch	Denver	Y	Tues 12-8, Thu & Fri 10-6, SAT 9-5
Pauline Robinson Branch	Denver	Y	Mon 12-8, Tues-Thu 10-6
Ross-Broadway Branch	Denver	Y	Mon-Tues 12-8, Wed 10-6, Sat 9-5
Dolores Public Library	Dolores	Y	Mon-Wed 9-6, Thu 9-7, Fri 9-4, Sat 9-3
McClanahan Memorial Library	Ignacio	Y	Mon-Thu 9-7, Fri 9-5, Sat 9-4
La Junta/Woodruff Memorial Library	La Junta	Y	Mon-Thu 10-8, Fri 10-6, Sat & Sun 1-5
La Veta Public Library District	La Veta	Y	Mon & Wed 10-8:30, Tues/Fri/Sat 10-5:30
Lamar Public Library	Lamar	Y	Mon-Thu 9-7, Fri 9-5, Sat 9-4
Manzanola School/Public Library	Manzanola	Y	Mon-Fri 8-4
Fruita Branch Library	Fruita	Y	Mon-Fri 9-6, Sat 9-4
Northern Chaffee County Library District	Buena Vista	Y	Mon-Fri 9-7, Sat 9-4
Southern Peaks Public Library	Alamosa	Y	Mon-Thu 9-8, Fri & Sat 9-5, Sun 9-1
Northern Plains Public Library	Ault	Y	Mon-Fri 9-7, Sat 9-12
Saguache County Public Library	Saguache	Y	Wed-Sat 10-6
Victor Public Library	Victor	Y	Tues/Thu/Fri 10-4

Update to the Statewide Mailing Database

As a part of increasing our outreach to general and underserved populations, CDOT utilized a database specialist to check each of the existing database addresses and contacts for completeness and accuracy. The database was updated to include:

- Updated local government addresses and contacts
- Special purpose districts
- Chambers of Commerce and Economic Development Organizations
- Media outlets (Spanish language and other ethnic groups)
- New transportation and environmental non-profit organizations

In effort to further increase access to underserved communities, specific emphasis was placed on identifying ‘community leaders’ who specialize in outreach to traditionally underserved communities for inclusion in the mailing database. The update resulted in increased accuracy for the postcard mailing and better inclusion of more diverse populations and organizations.

Non-Metropolitan Local Officials Consultation Process

CDOT recently approved its Non-Metropolitan Local Officials Consultation Process which specifically targets rural area elected and appointed officials. Within Colorado there are many non-metropolitan local officials due to the predominately rural nature of the state. Local elected and appointed officials are those that represent units of local government or have responsibility for transportation, including counties, incorporated cities, and special-purpose local government entities.

In compliance with the most recent federal transportation authorization known as SAFETEA – LU (Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users), and to ensure the state’s rural voices are heard, CDOT established a process to ensure that non-metropolitan local elected and appointed officials are able to fully participate in statewide transportation planning and programming. CDOT values the participation of local officials and works diligently to continuously improve collaboration with local governments in all aspects of statewide transportation planning and programming. A copy of the Non-Metropolitan Local Officials Consultation Process can be accessed on the CDOT website: www.coloradodot.info

Results of the Information Gathered

After obtaining comments on the Plan Amendment through the various mechanisms, CDOT staff provided responses to each comment, by way of either letter or e-mail. In some cases, staff responses include the contact information for CDOT subject matter experts to ensure that all issues are addressed. The following lists all of the public comments received during the 30-day public comment period and the corresponding responses.

Comment #1

Once again the people of rural Colorado are being asked to subsidize the larger urban centers of Colorado. Case in point - the increased motor vehicle registration hits rural Colorado harder per person. Agriculture needs more vehicles (two to three times) than their urban counterparts, most of which rarely, if ever, are used on the major highways, and those highways are generally the last to receive any funding. The bulk of the funding is spent in the metro areas of Denver and Colorado Springs. We have to travel larger distances to acquire the same services as our urban neighbors, yet less of our money is spent on our roads. The state needs to learn to live within its revenue like the rest of us and not ask for more funding.

Lee Hollingsworth

Response to Comment #1

Dear Mr. Hollingsworth,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment submitted online. CDOT recognizes all areas of the state as important for the safe and efficient movement of people, goods and information, and for the economic vitality of Colorado. In these difficult economic times both citizens of Colorado and state and local governments must stretch limited resources and make difficult decisions.

The Department uses a process to fairly and equitably distribute resources to all areas of the state to meet the needs of all Coloradans. With the continued decline in revenues, CDOT faces tough choices in funding transportation improvements. CDOT's \$53 billion funding gap identified in the 2035 Statewide Transportation Plan has continued to grow in size since the adoption of that plan in 2008. This is the result of many factors including rising costs for materials and construction, funding shortages, population growth, and aging infrastructure. There are fewer dollars to maintain the transportation system in all areas of the state.

With passage of the FASTER (Funding Advancements for Surface Transportation and Economic Recovery) Act, CDOT and local governments (cities, towns and counties) now have a new and much needed dedicated funding source that is predictable and stable for transportation improvements throughout the state. Through modest increases in vehicle registration fees (approximately \$2.60 a month for the first year and \$3.50 by 2012 for the average driver) and other funding mechanisms, CDOT and local governments will receive dedicated funds to repair structurally deficient bridges and make important road safety improvements across the state. The registration fee is based on vehicle weight since vehicle weight disproportionately affects road and bridge deterioration (the heavier the vehicle the greater the impact to the roadway surface). Funds can be used for improvements on the interstate system as well as state highways and local roads throughout Colorado, including many of the roadways that run through rural parts of the state.

It is the role of the Colorado Transportation Commission to guide the department in making tough choices on priorities and it is their responsibility to ensure that the difficulties are equitably shared statewide.

Once again, thank you for your comments.



Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Division of Transportation Development
Colorado Department of Transportation

Comment #2

Mr. Aaron Willis,

I am a member of the Montrose City Council and a member of the CML Executive Board; however my comments reflect my own personal opinion.

Governor Hickenlooper has stated that he wants to bring the State together economically. Doing what is in the best interests of the State as a whole, not a particular region or area. I think CDOT and the Transportation Plan can and should be a part of the Governor's plans.

I have read through the 2035 Statewide Transportation Plan and submit the following observations:

There is a disconnect between the Front Range and the Western Slope.

Of the top ten strategies, only 3 or 4 are applicable to the Western Slope and rural areas, whereas all of the 10 apply to the Front Range and metro area.

A considered 'fix' for CDOT's problems would be an increase of an average of \$601 per car owner, per year. Rural Colorado (specifically the Western Slope) is vast and with non-existent rail and little transit system. We have no alternative but to drive cars, therefore the cost of the proposed 'fix' would unfairly burden those in rural areas.

I have lived in Montrose for over 58 years. If I remember correctly the need to four lane Highway 50 between Grand Junction and Montrose was a low priority compared to other projects on the Front Range. However once it was finally completed, the economic impact on the Western Slope is undeniable.

If the transportation system on the Western Slope were brought in line with the Front Range, the population of the State would have a better chance of expanding across the State.

In a similar thought, the State is trying to divert water from the Western Slope to the thirsty Front Range. I think the State should consider diverting people to the Western Slope and a better transportation system would encourage that growth.

Gov. Ritter took funds from FASTER to balance the budget. Considering what happened to FASTER, I would not support any funding proposals that allowed the Governor or legislators to divert funding to other projects. If the voters approve funding for transportation, those funds should not be used for anything other than transportation.

Thanks for the opportunity to comment.

Respectfully,

Gail Marvel
735 South Park Ave.
Montrose, CO 81401
970-249-4443

Response to Comment #2

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Gail Marvel
735 South Park Ave.
Montrose, CO 81401

Dear Ms. Marvel,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment. The Executive Director of CDOT is part of the Governor's cabinet and CDOT is actively working with other state agencies to be more effective and efficient, and support the economic vitality of the entire state.

The top 10 strategies you reference in your comment are the result of input received from all areas of the state. They capture the values and needs identified in the 350 statewide corridors as provided by all 15 transportation planning regions within Colorado (10 are rural and 5 are urban) and are therefore reflective of all areas of the state equally.

With passage of the FASTER (Funding Advancements for Surface Transportation and Economic Recovery) Act, CDOT and local governments now have a new and much needed dedicated funding source that is predictable and stable for transportation improvements throughout the state, including transit. Through modest increases in vehicle registration fees (\$2.60 a month for the first year and \$3.50 by 2012 for the average driver) and other funding mechanisms, CDOT and local governments will receive dedicated funds to repair structurally deficient bridges and make important road safety improvements across the state. The fee is based on vehicle weight since vehicle weight disproportionately affects road and bridge deterioration (the heavier the vehicle the greater the impact to the roadway surface). Funds can be used for improvements on the interstate system as well as state highways and local roads throughout Colorado, including many of the roadways that run through rural parts of the state.

FASTER funds may not be used for any other purpose than for transportation. Funds were not taken from FASTER to balance the budget as they are not part of the State's General Fund. The sources of funds for CDOT are primarily federal transportation funds and the Highway Users Tax Fund (HUTF), which includes FASTER funds) accounting for approximately 85 percent to 95 percent of CDOT's revenues. Very little, if any, funds come from the state's general fund. This is why FASTER is so important to maintaining the state's transportation system.

As shown in the Plan Amendment, 69 percent of revenue is allocated to and managed by local governments, primarily for local roadway projects, while 31 percent goes to CDOT for the state transportation system. In addition, CDOT provides funds to each of its six engineering regions for projects within that region. Projects are identified and prioritized through a public process in cooperation with the transportation planning region.

Once again, thank you for your comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #3

I was reviewing the 2035 Statewide Transportation Plan Amendment, and specifically the cost of snow & ice removal per mile of highway. The plan discussed possible reduced service in the future, and even road closures due to budget short falls. Is this necessary, or are there still savings to be realized? I have questioned the current operation for several years. I notice CDOT trucks and plows running the highways in the winter 24/7 weather or not snow removal was needed. I was told the drivers have to log so many miles a day, because in the past they were spending too much time in the break room, or not responding quick enough when plowing was needed (please correct me if I am wrong). REALLY, is this effective or efficient? I think CDOT could find significant savings utilizing the operators in off peak time conducting preventative maintenance on those machines, or other projects.

How much savings could be realized from fuel, or reduced wear and tear on the machines. Just a thought...

V/R

Rodney E. Due
Director of Public Works
Town of Crested Butte
(970) 349-5338 Ext. 114

Response to Comment #3

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Rodney E. Due
Director of Public Works
Town of Crested Butte
P.O. Box 39
Crested Butte, CO 81224

Dear Mr. Due,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment. As part of our mission, the Colorado Department of Transportation takes seriously the role of keeping roadways safe for the traveling public at all times of the year and especially during winter months. CDOT employees take pride in keeping our roads safe for the public and only use snow and ice removal vehicles as needed and do not drive these vehicles unnecessarily. There is no requirement that a certain number of miles must be logged per day to keep employees busy. Maintenance staff performs several duties as part of the job to keep the system maintained and safe, including those you suggest. When severe weather is predicted CDOT prepares in advance of the storm so as to ensure that the roads are prepared and staff ready to respond. As you know, weather in Colorado is unpredictable and storms may not come to pass. However, it is CDOT's responsibility to be prepared.

To achieve greater efficiencies, CDOT has invested in dual-purpose heavy vehicles that not only serve in winter months to remove snow and ice from roadways but can also carry large amounts of salt, sand and liquid deicer, as well as earth, rock and hot mix asphalt in the summer months. CDOT also purchases alternate fuel vehicles and more fuel efficient vehicles as they require replacement, reducing the Department's fuel costs.

As the needs of the state's transportation system continue to grow, available revenue has not been sufficient to meet those needs in recent years. Therefore, CDOT has recently installed 'smart technology' in our snowplow vehicles. This technology, titled Maintenance Decision Support System, measures air and roadway temperatures as well as receives up to the minute location specific weather forecasts. The system provides drivers with treatment recommendations based on best practices and utilizes the location specific forecasts to ensure the optimum application of deicing liquid and to minimize wear on snowplow blades. CDOT also invested in a Roadway Weather Information System just outside of Crested Butte. This weather station provides CDOT's maintenance operations branch with real time weather and roadway surface condition information. These improvements result in a more efficient and longer lasting snowplow fleet. For more information on the Department's snow removal policies and efficiency strategies please contact David Wieder in CDOT's Maintenance and Operations Office. David can be reached via phone at 303-512-5502 or via email at david.wieder@dot.state.co.us.

Thank you again for your comments and participation in the 2035 Statewide Transportation Plan Amendment process.

Sincerely,



Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #4

While sitting in traffic last weekend - Friday night both east and west directions were fully loaded with stop-and-go traffic in parts of both directions - so lots of time for thoughts. What about issuing (selling?) traffic passes for peak periods of travel? We are sure that the traffic engineers know the capacity of the highways per hour during peak periods traveling reasonable speeds.....you could issue online passes for vehicles to travel during specific peak hours. For example, if I had a 3 pm pass, I could enter the highway at any time during the 3 pm period. There would have to be check points at Vail, Copper, Frisco and Silverthorne but only for those days when there are major delays expected. Perhaps car pools and certainly commercial vehicles would be excepted. Before and after peak hours there would be no restrictions.....this would be similar to the metering that now occurs on interstate on-ramps during peak hours, which makes us think it might even be legal! And we're guessing that the ski areas would be in favor of this as it would keep people around to eat or shop a little longer if they had a later pass time. Maybe they would even facilitate this by issuing passes for their customers. Regular travelers would be able to use an electronic chip - which could be activated for a specific time period - much like is now used in the HOV lanes. Someone could even write an app for that! And if we, as drivers, could wait an hour or so and be assured of a trip to Denver without the stop and go, we would be ecstatic! As you can see, we had a lot of time sitting in traffic to develop our idea. We would appreciate a response - so at least we know we've been heard!!!! Charlie and Ginny Crowley

Response to Comment #4

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Charles Crowley
1863 Wazee St. 4C
Denver, CO 80202

Dear Mr. and Ms. Crowley,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment.

CDOT evaluates many options when looking at ways to address congestion and improve the efficiency of the transportation system. CDOT has considered strategies aimed at changing travel behaviors by encouraging travel at off-peak times, promoting increased carpooling, vanpooling and use of transit, and implementing HOV and high occupancy toll lanes. Other traffic management techniques, like ramp metering or variable speed limits, can be implemented to improve traffic flow during high volume periods. However, restricting drivers to specific times of travel is not considered and is not consistent with operation of a federal interstate

The I-70 Mountain Corridor has considered many of these traffic management strategies in addition to an advanced guideway system and highway improvements to improve the flow of traffic through the I-70 Mountain Corridor. These strategies can begin in advance of major infrastructure improvements to address immediate issues in the corridor, and are detailed in the I-70 Mountain Corridor Final Programmatic Environmental Impact Statement (PEIS) (<http://www.coloradodot.info/projects/i-70mountaincorridor>).

For more information on the I-70 Mountain Corridor, please contact Wendy Wallach at 303-757-9008 or Wendy.Wallach@dot.state.co.us

Again, thank you for your comments.

Sincerely,

A handwritten signature in blue ink that reads "Tracey Wolff".

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #5

I do think that this is a very good plan and address allot. I do think capital improvement projects do need to be cut and try to sustain what we have. When CDOT can't keep the streetlights on how can they keep improving things with less money and less personal? The public web site to report things is the wave of the future, although this should be anonymous. When state employees get upset when something is reported for doing their JOB, we need new management. Any state taxpayer should be able to make comment without criticism or retaliation. One thing that does need to be looked at in the future is new management. We need them to look at things outside the box, not do things because we've always done them that way. I've talked to a lot of Colorado Tax Payers and they don't feel their input has any weight in what gets done, that's why the meetings about your 2035 State Transportation Plan have low attendance. I hope there is better communication in the future with CDOT and Colorado taxpayers.

Kasey Smolha

Response to Comment #5

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Kasey Smolha
204 E Lexington Way
Fruita, CO 81521

Dear Mr. Smolha,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment.

Recent legislation called FASTER (Funding Advancements for Surface Transportation and Economic Recovery) emphasizes the need to address preservation of the existing transportation system (known as fix it first) to support the economic vitality of the state. With limited dollars, this is the most prudent use of resources and will play prominently in how funds are allocated.

CDOT makes full use of the CDOT website to inform and educate the public on various transportation issues and to announce meeting days, times and locations, as well as provide real time traffic information. CDOT continues to improve upon a multi-pronged approach to public involvement and outreach. Our public involvement efforts go well beyond public meetings and engage the public through a variety of methods, including, but not limited to web based information, print and TV media, local news stories and various social media techniques. CDOT also works closely with our statewide planning partners to provide information at their meetings and to attend as needed. CDOT's website is located at: <http://www.coloradodot.info>

CDOT values the input of all citizens and considers all comments (positive and negative) received, including those submitted anonymously. CDOT also takes seriously the issue of public accountability and providing clear and understandable information. The Department continues to make difficult financial trade off decisions with increasing declines in revenue. Colorado's long-range transportation plan serves as the primary vehicle to communicate to the public that while significant accomplishments have been made, CDOT's funding gap continues to grow in size since the 2035 Plan was adopted, due to many factors including rising costs, funding shortages, population growth, and aging infrastructure.

Once again, thank you for your comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #6

Dear Michelle,

I apologize if you are not the correct person to direct my comment. I have read through the 2035 plan and I can't seem to find the section I am interested in discussing or reviewing. I applaud the efforts to clean up the log jam on I -70 at the twin tunnels. Any improvements to I -70 would be welcome improvements including counter flow lanes, etc.

We will never address the traffic jams if we just focus on I- 70. We need an alternative route. If I- 70 is messed up we need to go somewhere besides a hotel room or a parking lot. Highway 285 is the logical choice but would require significant upgrades. The highway could be restricted as a turn pike or limited access/farm access. The main cost would be a better connector corridor from 285 over to Summit County. This could be done and the 285 corridor at Buena Vista could continue west over the pass to connect Crested Butte and ski areas in that part of the state.

We need an alternative and a corridor that can handle all the work without shutting down I-70. Please let me know how to get my comments routed to the correct person. Thanks you for reading my comments.

Ray Hornsby, CFO
1515 Wazee St.
Suite 350
Denver, Colorado 80202
(303) 318-0717 Ofc
(303) 318-0720 Fax
ray@3ForksRes.com

Response to Comment #6

Dear Mr. Hornsby,

Thank so much for your interest in the 2035 Plan Amendment and the transportation needs of Colorado. The statewide long-range plan (2035 Plan Amendment) is not a project specific document. Project specific information and project selection is handled via the metropolitan planning organizations, rural transportation regions, and the CDOT regions. The portion of I-70 that you refer to is within CDOT Region 1 and has been addressed via the I-70 Programmatic Environmental Impact Statement. The individual you should speak to about your specific concerns and alternative recommendations is Chuck Attardo. He is the Region Planning and Environmental Manager for Region 1. His contact information is: (303) 365-7042 and his e-mail address is chuck.attardo@dot.state.co.us . I am copying him on this e-mail.

Once again thank you for interest, and expressing your concern and recommendations.

Regards, Michelle

Comment #7

The Town of Carbondale supports the 2035 Statewide Transportation Plan Amendment

The 2035 Statewide Transportation Plan Amendment is a fully supportable document. It is the story of our Statewide Transportation Planning Region and CDOT's stewardship of our state roads.

Imagine tasking an agency with maintaining an ever expanding network of roads and trails through a region of plains, mountains and deserts. Then, have it craft a plan at the zenith of funding in 2008, to expand roads and maintain the increasingly deteriorating road surfaces and bridges for 20 years out. Now cut that budget by 1/3 and add in buses and trains while the original mission expands relentlessly. It is a story of dedication and how in spite of the increase in mission and reduction of resources, CDOT is on the proverbial track to accomplish everything with near nothing at all. CDOT will have only a \$126 billion shortfall by 2035.

It addresses CDOT's thorough public process and their diligent use of ARRA funding, the timely instigation of the Faster Funding, and the brand new Division of Transit and Rail along with their directive to accommodate bikes and pedestrians.

To show that we are tuned into science, CDOT address's emissions reduction. air quality, and sustainability. They are also planning and promoting mass transit (bus service) and serving Underserved populations. And then we look ahead to future needs.

I would like to congratulate and thank CDOT for an exemplary job of grasping the needs of the state and dealing with the real obstacles before us.

I want to point out that a 1 cent state tax on gas would raise \$25 million yearly and a 10 cent a gallon tax would raise the \$250 million per annum shortfall CDOT is experiencing. That could put us back on track for replacing the Federal Transportation Trust Fund money lost with its insolvency in 08'. The people of Colorado and its economy deserve to give ourselves this boost to fiscal independence for CDOT. We should support and encourage legislation to this effect.

Thank you for your time,

John Hoffmann, Carbondale Trustee

Response to Comment #7

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

John Hoffmann
Carbondale Trustee
Town of Carbondale
511 Colorado Ave.
Carbondale, CO 81623

Dear Mr. Hoffmann,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment on behalf of the Town of Carbondale.

We are most appreciative of your insightful comments and support of the Plan Amendment, and CDOT's efforts in serving the citizens of Colorado in a time of declining revenues. We also are pleased to know you recognize and understand the funding difficulties CDOT faces and are supportive of CDOT receiving more dedicated funds for transportation. We look forward to your continued involvement in the statewide transportation planning process.

Again, thank you for your time and comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #8

Dear Mr. Willis,

Your name is listed as the contact person on this subject, and I have a multi-part question.

Please review the following newspaper article: <http://www.greeleytribune.com/article/2011703139985>

What specific highway safety issues do you see that might relate to your plan? For example: what data collection efforts currently compile facts associated with drug-impaired traffic accidents; do FARS data elements specifically include drug impairments other than those related to alcohol; is Colorado's statutory basis for traffic law enforcement sufficient for hold accountable those who kill others while driving impaired due to drugs other than alcohol; are Colorado's traffic records systems timely and accurate with regard to citations or arrests by all jurisdictions; etc.

To the extent my questions can be answered by referring to segments of your plan, please do so to make your responsiveness as complete and efficient as practicable.

Since comments are due by March 21, 2011, your timely response will help gauge my reply. Thanks.

Sincerely,

Mike Clemens
Juneau, Alaska

Response to Comment #8

Dear Mr. Clemens,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment. The purpose of the 2035 Plan Amendment is to maintain consistency with regional planning processes and to serve as a bridge between the 2035 Plan and the next plan update set for adoption by 2015. The adopted 2035 Statewide Plan serves as a 20+ year transportation vision for Colorado.

In the long-range plan, traffic data serves as a performance metric to help the Transportation Commission make appropriate funding level decisions. Colorado traffic accident data is maintained and is in addition to the Fatality Analysis Reporting System (FARS). CDOT's website has additional accident data available to download.

In addition, Colorado's strategic highway safety plan was published in 2006. Although the plan contains an impaired driving emphasis area, the issue of drugged driving had not risen to its current level. The plan will be updated in the near future and will likely include drugged driving as an area of focus. In addition, CDOT has a drunk driving education program called "the Heat is On" and is discussed briefly in the Plan Amendment.

For more information please contact Glenn Davis, our Impaired Driving Manager. Glenn can be reached via e-mail at Glenn.Davis@dot.state.co.us.

Once again, thank you for your comments.



Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Division of Transportation Development
Colorado Department of Transportation

Comment #9

The Transit Service Areas per the 2008 2035 Statewide Transportation Plan need to be amended to show current transit services offered that are not reflected in that plan. Currently, Black Hills Stage Lines provides round trip service everyday from Alamosa and Gunnison to Denver via Salida, Buena Vista, Fairplay. Also, The Chaffee Shuttle (a division of Neighbor to Neighbor Volunteers) provides roundtrip service Monday-Friday from Salida to Pueblo via Canon City. If there are any questions, please contact John Valerio.

Connie @Neighbor to Neighbor Volunteers

Response to Comment #9

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Connie Cole
Neighbor to Neighbor Volunteers
54 Jones Avenue
Salida, CO 81201

Dear Ms. Cole,

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment. The purpose of the 2035 Plan Amendment is to maintain consistency with regional planning processes and to serve as a bridge between the 2035 Plan and the next plan update set for adoption by 2015.

As identified in the adopted 2035 San Luis Valley Regional Transportation Plan (SLVRTP) the transit services referenced in your comments are appropriately reflected in the SLVRTP corridor visions. The transit needs satisfied by these routes are also identified in the existing SLVRTP transit section and therefore no amendment to the already adopted SLVRTP is necessary at this time.

For the next long-range regional and statewide transportation plan process, CDOT will provide updated information on current transit services and integrate the upcoming statewide transit plan and state freight and passenger rail plan into the next statewide transportation plan.

Again, thank you for your comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #10

Please continue the long range planned improvements to the US 385 corridor, especially within Phillips County. Overall, I am in agreement with the document and the updated information provided.

Jose Leon

Response to Comment #10

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Jose Leon
425 S. Sherman Street
Holyoke, CO 80734

Dear Mr. Leon,

Thank you for your comment on the 2035 Statewide Transportation Plan Amendment. The purpose of the 2035 Plan Amendment is to maintain consistency with regional planning processes and to serve as a bridge between the 2035 Plan and the next plan update set for adoption by 2015.

For the Eastern Transportation Planning Region, US 385 continues to be a high priority corridor for the region and among all the communities along the corridor.

Thank you again for your comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #11

I believe that public involvement is a very important aspect of the 2035 Statewide Plan Amendment and the process associated with it. I also believe that the incorporation of the most recent Census data is essential to predicting trends with greater accuracy. Utilizing the most recent economic data that is available an important component. Senate Bill 09-108 will play a critical role in ensuring an adequate and more predictable funding stream.

Eric Swan

Response to Comment #11

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9525



May 12, 2011

Eric Swan
2030 Albion St.
Denver , CO 80207

Dear Mr. Swan,

Thank you for your comment on the 2035 Statewide Transportation Plan Amendment. The purpose of the 2035 Plan Amendment is to maintain consistency with regional planning processes and to serve as a bridge between the 2035 Plan and the next plan update set for adoption by 2015.

In developing the long-range statewide transportation plan, CDOT utilizes the most current demographic and economic information available from the US Census and state sources. However, at the time the Plan Amendment was developed, the most current Census data was not yet available. For the next long-range plan update process CDOT will use the most up-to-date data available including data available from the 2010 Census.

Senate Bill 09-108 aka FASTER should assist the department in providing an improved transportation system for the traveling public by providing a much needed dedicated funding source. While FASTER funds represent an important first step in addressing the state's transportation funding gap and provides funds to local agencies, it is still not enough to address the \$53 billion funding gap.

Thank you again for your comments.

Sincerely,

Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Colorado Department of Transportation

Comment #12

Aaron,

I have reviewed the 2035 Statewide Transportation Plan Amendment and have no comments at this time.

Thank you for the opportunity to review the plan. Please contact me for any future public review opportunities.

David Campbell

dc13x@yahoo.com

Response to Comment #12

Dear Mr. Campbell,

Thank you for your email message. We will include your e-mail address in future long-range planning public outreach efforts.

Please let me know if you have any questions or need any additional information.

Sincerely,



Tracey (MacDonald) Wolff
Statewide Planning Unit Manager
Division of Transportation Development
Colorado Department of Transportation

Comment #13

Aaron, attached please find the comments of the Southwest Energy Efficiency Project. Included also are the comments submitted by SWEEP to DRCOG with respect to the addition of the Jefferson Parkway into the Denver Regional Transportation Plan, and the comments submitted by SWEEP to CDOT with respect to the NEPA analysis for the I-70 Draft PEIS. These additional comments are incorporated by reference into the comments we submit today on the Statewide Transportation Plan Amendment.

If you have any questions, please contact me at your convenience.

Bob Yuhnke, Director

Transportation Program

Southwest Energy Efficiency Project

303-999-0788

COMMENTS BY THE SOUTHWEST ENERGY EFFICIENCY PROJECT
ON THE 2035 STATEWIDE TRANSPORTATION PLAN AMENDMENT

By

Robert E. Yuhnke

Director, Transportation Program

Michael Salisbury

Transportation Policy Analyst

SUMMARY.

Amendments to Colorado's transportation planning law in 2009, and amendments to federal transportation planning law together establish directives for the development of a statewide transportation plan that are not met by the proposed 2035 Statewide Transportation Plan Amendment. These include numerous planning factors added by FASTER to C.R.S. §43-1-1103(5), and requirements added by SAFETEA-LU to 23 U.S.C. §135.

SWEEP submits these comments to propose an analytical methodology for application as part of the statewide planning process that integrates the new legislative authority added by FASTER for the use of user fees as a source of funding for major corridor investments with implementation of the planning objectives required by both State and federal transportation planning laws.

II. IMPLEMENTATION OF FASTER FUNDING AUTHORITY AND PLANNING REQUIREMENTS.

The proposed 2035 Statewide Transportation Plan Amendment makes painfully clear that current funding sources from federal, State and local sources are not sufficient for Colorado to adequately maintain, much less improve, its transportation system. Over the time horizon of the 2035 Plan there is a projected shortfall of \$53 billion to simply maintain the current transportation system. To achieve the more expansive system contained in the Vision Plan for 2035 and maximize economic development and quality of life in Colorado would require an additional \$126 billion above current funding levels.

The Legislature in 2009 authorized a new source of funding for the transportation system, i.e., user fees authorized by FASTER. In FASTER, the Legislature enacted authority for "user fees" to be assessed in a corridor to fund new transportation infrastructure in that corridor. C.R.S. § 43-4-808(3)(b). FASTER also authorizes the investment of those user fees on "multimodal transportation projects that promote mobility, reductions in emissions of greenhouse gases, and energy efficiency." C.R.S. § 43-4-808(3)(c).

User fees can provide a funding source that can be used to improve transportation choices in corridors by improving and expanding transit and rail service, bicycle and pedestrian travel as well as roadway networks. User fees are an important funding tool that provides the resources needed to maintain mobility and economic vitality, as well as a strategy for implementing the other planning objectives identified by the legislature. The application of user fees should be integrated into the statewide planning process to identify the transportation needs and other planning objectives that can be met with this source of funding. SWEEP proposes a methodology for the evaluation of the benefits of user fees in each major transportation corridor of the State.

A. Evaluating User Fees As A Tool For Achieving The Multiple Planning Objectives Added By Faster.

Transit and rail services in a corridor are essential if the transportation planning objectives in State and federal law are to be met. A transit alternative that is comparable in travel time and convenience, but allows travelers to avoid the expected future increases in fuel costs could help maintain access to the corridor and economic activity associated with discretionary travel to corridor destinations. The Statewide Transit and Rail Plan required by S.B. 94 is not reflected in the 2035 Statewide Transportation Plan Amendment. When it is developed there will be an opportunity to incorporate detailed transit options into corridors across the state.

In anticipation of the development of the Statewide Transit and Rail Plan, the 2035 Statewide Transportation Plan Amendment should identify the opportunities for the use of FASTER user fees to develop integrated highway and transit/rail facilities in the major transportation corridors of the State. The Statewide Plan should recognize that FASTER user fees provide a revenue source to fill the funding gap between current revenues and the many needs described in the Plan Amendment, both to maintain the current system, and to achieve the objectives described in the Vision Plan.

In the future, each corridor level analysis performed for the statewide plan should provide information on how options considered for the plan achieve the State and federal planning objectives. The objectives defined by C.R.S. § 43-1-1103(5) include –

- (e) SAFETY ENHANCEMENT;
- (f) STRATEGIC MOBILITY AND MULTIMODAL CHOICE;
- (g) THE SUPPORT OF URBAN OR RURAL MASS TRANSIT;
- (h) ENVIRONMENTAL STEWARDSHIP;
- (i) EFFECTIVE, EFFICIENT, AND SAFE FREIGHT TRANSPORT; AND
- (j) REDUCTION OF GREENHOUSE GAS EMISSIONS.

Federal planning objectives require a plan that 1) improves mobility, 2) fosters economic growth and development, 3) minimizes fuel consumption, and 4) minimizes air pollution. Federal law also requires that the Plan consider measures to mitigate the adverse impacts of the Plan.

An analytical methodology for the development of user fees must also include consideration of how user fees can be applied to achieve these objectives of the statewide planning process.

These objectives can best be achieved by reducing VMT while improving mobility. Investment in transit and rail are critical elements of a plan that reduces VMT while improving mobility. The statewide planning process needs to incorporate an analytical methodology to identify the mix of highway, transit, rail and other modes that optimally achieves these goals. In its comments on the PEIS for the I-70 mountain corridor, SWEEP suggested a methodology for evaluating options, and identifying the optimal investment mix between highway and transit in a corridor. SWEEP provided an example of how user fees can be optimized to provide transit services in a corridor along with highway investments that provide strategic mobility for the 30% of the traveling population who do not drive personal vehicles, enhance multi-modal choice for all travelers, support urban and rural mass transit, ensure environmental stewardship by reducing vehicle emissions of air pollutants and contaminants that contribute to surface water pollution, help promote effective, efficient and safe freight transport by freeing up congested highway capacity for freight vehicles, and reducing GHG emissions by reducing VMT.

CDOT responded to these comments by applying a methodology for estimating the level of user fee per mile that would be necessary to fund different levels of corridor maintenance and improvement. The methodology below was proposed by CDOT to determine appropriate user fee levels:

1. Consider different levels of user fees
2. For each level of user fee, calculate what percentage increase from the base auto operating cost of \$0.365 per mile it represents
3. Multiply the percent increase in auto cost per mile from Step 2 by the national VMT elasticity of -0.45 or a locally-derived value to get the percentage change in VMT
4. Calculate the VMT under that user fee by multiplying the VMT with no user fee with the percentage change from Step 3
5. Calculate the total user fee receipts by multiplying the VMT from Step 4 by the user fee
6. Examine the user fee receipts from each fee level to find the user fee that returns enough funds to pay for construction and operation costs, or to find the revenue-maximizing user fee.

SWEEP does not fully support this CDOT approach because it places primary emphasis on resolving funding shortfalls in a corridor without addressing the other specific objectives of the statewide planning process defined by the legislature. To incorporate all the statutory planning objectives into the methodology, other variables need to be included.

B. Analysis of Proposed Projects for the Statewide Transportation Plan Must Implement All the FASTER Planning Objectives.

Critical factors omitted from the CDOT methodology are 1) the impact that future fuel price increases will have on the cost of driving, and the resulting suppression of travel demand in a corridor, 2) minimizing air and water pollution, 3) minimizing fuel consumption and GHG emissions. These factors must be integrated into the methodology to address all the applicable planning objectives in State and federal law.

At the same time that user fees provide a funding source for corridor improvements, including transit, they will also have other positive and negative impacts. User fees send a price signal to users that will encourage use of alternative modes of transportation and reduce VMT, air pollution and GHG emissions. In a corridor where transit alternatives are not provided, user fees (along with increased fuel prices) are expected to reduce travel demand in the corridor along with likely suppression of economic activity in the corridor. The negative economic impacts of user fees can usually be off-set if transit services are provided that offer the potential to stabilize travel costs as fuel prices rise during the next decade. Fuel prices have risen more than 25% within the last three months. Under EIA's estimated upper range of fuel prices by 2020 (\$5.61/gal) fuel costs will rise another 70% above current levels. When these increases in the costs of driving are accounted for, the value of transit investments to the state's economy is brought sharply into focus.

A corridor analysis that properly accounts for all the statutory criteria that must be addressed through the statewide plan would show the VMT and related pollutant reductions (GHG, air pollutants, water pollutants) that the user fee would achieve from increasing the overall cost of driving, the VMT and pollutant benefits of adding or improving transit service along the same corridor, and how the provision of transit service at a comparatively stable price would help the corridor maintain levels of mobility and economic activity that would otherwise be adversely effected by rising fuel prices. This will allow corridors to determine what the optimal pricing alternative would be for reducing VMT and pollutants while maintaining access and promoting economic development along the corridor.

SWEEP conducted a detailed analysis for the I-70 Mountain and East Corridors showing the level of user fee that would need to be collected per mile to pay for the Preferred Alternatives for the two corridors. The impacts of that level of user fee (and the impact of increased fuel prices) were then examined with respect to VMT and GHG reduction (reductions in other pollutants were not considered, but should be included in any protocol adopted for the statewide planning process to address the environmental stewardship objectives in §1103(5), and the "minimize air pollution" objective in federal §§ 134(a) and 135(a)).

As CDOT updates the current Statewide Transportation Plan and as a new one is developed, it will be critical that major corridors consider how they can continue to improve access while minimizing VMT, environmental pollutants and GHG emissions. As CDOT moves forward with incorporating user fees into the analysis of funding sources available to meet the State's transportation needs, user fees must be fully assessed as a tool for making the investments that achieve the legislative directives to reduce GHG emissions from the transportation sector, ensure environmental stewardship, enhance mobility and multimodal choice and strengthen the State's economy.

III. FEDERAL PLANNING REQUIREMENTS.

Analysis to identify strategies to minimize air pollution and fuel consumption while promoting mobility and economic development is also necessary to satisfy federal planning requirements.

Until information is provided to show that the regional plan minimizes fuel consumption and air pollution as required by 23 USC § 134(a), and that the numerous adverse impacts associated with the project are fully evaluated, alternatives considered, and necessary mitigation required, the Statewide Plan does not satisfy federal requirements that must be met to support a Secretarial planning finding under 23 U.S.C. §135(g)(7).

A. ACCOMPLISHING THE NATIONAL PLANNING OBJECTIVES

Sections 134(c) and 135(a) require the development of transportation plans for metropolitan areas adopted by Metropolitan Planning Organizations (MPOs), and statewide transportation plans adopted by the States that will “accomplish the objectives” defined in section 134(a)(1). Despite these statutory provisions making the accomplishment of the statutory objectives a requirement of the planning process, the proposed Amendment to the Statewide Plan does not satisfy these requirements because the revised MPO RTPs fail to mention these objectives, and fail to explain how each MPO RTP, as revised, demonstrates compliance with the federal statutory directives. Indeed, this is the most glaring omission in the proposed Statewide plan revision.

The statutory language directing Metropolitan Planning Organizations (MPOs) to adopt regional plans that “accomplish the objectives” of the planning process requires analysis and a determination that these objectives will be accomplished by the revised RTP. Section 134 of the Federal Aid Highway Act includes language establishing general objectives for the planning process, and requiring consideration of projects and strategies that will achieve more detailed planning factors:

(a) Policy.--It is in the national interest to--

(1) encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and between States and urbanized areas, while minimizing transportation-related fuel consumption and air pollution through metropolitan and statewide transportation planning processes identified in this chapter; and

(2) encourage the continued improvement and evolution of the metropolitan and statewide transportation planning processes by metropolitan planning organizations, State departments of transportation, and public transit operators as guided by the planning factors identified in subsection (h) and section 135(d).

In the Title 23, section 134(c), as amended in 2005, the Act requires that MPOs adopt transportation plans that “accomplish” these national “objectives.”

1) Development of long-range plans and TIPs.-- To accomplish the objectives in subsection (a), metropolitan planning organizations designated under subsection (d), in cooperation with the State and public transportation operators, shall develop long-range transportation plans and transportation improvement programs for metropolitan planning areas of the State.

Similar language in amended section 135(a)(1) requires that the Statewide Transportation plan also “accomplish the objectives stated in section 134(a).”

This language on its face establishes a duty for the MPO to craft an RTP that will accomplish each of the national objectives in subsection 134(a)(1). These planning objectives establish four broad criteria to be achieved by the MPO transportation plan:

- 1) improve mobility,
- 2) foster economic growth and development,
- 3) minimize fuel consumption, and
- 4) minimize air pollution.

These objectives allow discretion for determining how they are to be achieved, but do not allow the planning agencies discretion to adopt plans that fail to achieve progress with respect to one or more of the four objectives.

The national planning objectives in § 134(a)(1) establish the statutory criteria for evaluating the sufficiency of an MPO plan. Section 134(c) also refers to the planning factors in §§ 134(h)(1) and 135(d) which were first enacted in ISTEA, but have been modified by both TEA-21 and SAFETEA-LU. But paragraph § 134(a)(2) only requires “consideration of projects and strategies” that will achieve these objectives. Unlike the national planning objectives in (a)(1), (a)(2) only requires transportation planning agencies to consider various projects and strategy options that could achieve the policy objectives listed in § 134(h)(1). But the discretion to consider various project and strategy options must be viewed in the context of the overall obligation to actually accomplish the statutory objectives in (a)(1). The consideration of project and strategy options must be geared toward identifying and selecting the options that will achieve the more specific planning factors in (a)(2), and that when combined into a regional or statewide plan can best accomplish the statutory objectives in (a)(1).

Compliance with these statutory planning procedures should be reflected in the underlying evaluation of proposed projects that are presented to the public and each MPO board for consideration before action is taken to revise the RTP, but are not. As an example, there is no independent analysis by the MPO of the impact that the proposed addition of the Jefferson Parkway to the Denver RTP will have on accomplishing any of the national planning objectives in § 134(a)(1), or the planning factors listed in § 134(h).

The Act requires that an MPO RTP demonstrate improvements in all four objectives, and not improvements in one or two at the expense of one or another. For example, a plan that fosters economic development, but does not improve mobility or minimize both fuel consumption and air emissions, cannot be determined to meet the statutory objectives. The analysis of the proposed RTP revision should show improvements in each of the four objectives with respect to the current baseline condition, and not only an improvement with respect to a projected worst case condition in a future horizon year. Otherwise the RTP will simply accommodate predicted deterioration in system performance, fuel consumption and air pollution, while demonstrating minor improvements compared to a future deteriorated condition. SAFETEA-LU does not call for plans that continue current practices that merely accommodate the deteriorating performance of transportation systems. Where projects and strategies are available that can achieve improvements in system performance with regard to each objective compared to current conditions, the benefits of those projects and strategies must be presented to decision-making boards and the public with a description of improvements that can be accomplished compared to current conditions and future conditions that would result from adoption of the proposed projects, such as the Jefferson Parkway project or the I-70 improvements without the guideway transit system.

Requiring that the transportation plan minimize fuel consumption and air pollution requires more than merely demonstrating reductions slightly below the current baseline based upon taking credit for federally mandated pollution control rules or corporate average fuel efficiency standards that on their own may ensure some emissions reductions or improved fuel efficiency due solely to motor vehicle fleet turnover. To satisfy the requirement to minimize these impacts, an assessment must be made of the potential reductions in both parameters that may be achieved by a plan that optimizes projects, facilities, services and strategies known to contribute to reductions in fuel use and emissions while improving mobility and fostering economic growth.

The SWEEP comments to DRCOG on the proposed Jefferson Parkway provide another example of the kind of analysis that should be performed before an MPO plan is added to the Statewide Plan. Based on the traffic volume data submitted by the Jefferson Parkway project proponents, it appears that the project will increase VMT in the Northwest quadrant of the metropolitan region by 16%, which in turn will increase fuel consumption and air pollution by nearly comparable amounts. Such a large increase in VMT, fuel consumption and air pollution cannot satisfy the national planning objectives, especially when no alternatives analysis has been performed that considers the reasonableness of accommodating the same residential and job growth in planned FasTracks service nodes where much of the travel demand could be served by more fuel efficient and less polluting transit services.

B. MITIGATION OF ADVERSE EFFECTS OF THE RTP, AS REVISED

The SAFETEA-LU amendments added statutory criteria for evaluating plans and TIPs (in addition to the four planning objectives) that require explicit discussion of adverse impacts of the plan and mitigation of these impacts. These include --:

§ 134(i)(2)(B)(i) which requires –

“discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan;” and (B)(ii) requires that this discussion “shall be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies.”

§ 134(i)(4)(A) which requires that --

“the metropolitan planning organization shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of a long-range transportation plan.”

§ 134(i)(4)(B) which requires that the consultation include comparison of the transportation plan with conservation plans or maps.

Counterparts to each of these requirements also appear in the amendments to the requirements for “Statewide transportation plans.” See –

- §135(f)(2)(D) [identical duty to consult]; and
- § 135(f)(4)(A) and (B) [identical duty to discuss mitigation measures].

1. Discussion of Mitigation Activities.

This provision raises the same questions that NEPA did at the outset:

1. what kinds of impacts need to be included in the discussion?
2. what kind and magnitude of mitigation needs to be considered?
3. what obligation is there to implement the mitigation measures?

The FHWA/FTA planning rules issued in 2007 do not provide guidance for how to answer these questions under the relevant provisions of FAHA. In the absence of a definitive agency interpretation, NEPA and 23 USC § 109(h) add requirements that demonstrate how these questions are to be answered.

- a. Considering Mitigation for the Purpose of Satisfying 23 USC § 109(h).

Section 109(h) of the Federal Aid Highway Act requires that highway projects be reviewed for their adverse environmental, social and economic impacts, and that mitigation strategies be identified to “eliminate or minimize” such “adverse” impacts. 23 USC § 109(h). The FHWA regulation implementing this section requires that an EIS prepared under NEPA also address the social and economic impacts required to be considered under § 109(h). 23 CFR §771.105. In addition, the metropolitan planning rule issued to implement ISTEA requires that MPOs address the criteria required by § 109(h) in the

transportation plan. 23 CFR §450.316(a)(13)(1993). The revised federal planning rule does not retain this requirement, but this requirement must be addressed at some stage of the process. To the extent that mitigation must be considered as part of the planning process, section 109(h) provides guidance to define the parameters of that consideration in the MPO planning process.

b. Scope of Impacts to be Included in Discussion of Mitigation to Satisfy FAHA Requirements.

The consideration of mitigation measures required by §§ 134(i)(2)(B)(i) and 135(f)(4)(A) and (B) must be at least as broad as NEPA because NEPA limits the obligation to consider mitigation for only those impacts that “significantly affect the human environment,” whereas 23 U.S.C. §§ 134(i)(2)(B), 135(f)(4)(A) and (B), and 109(h) do not limit consideration only to “significant” impacts on the human environment. Since Congress decided not to limit mitigation under FAHA to “significant” impacts, then at least those impacts found to be significant for NEPA purposes must be included. Other impacts may also be relevant, but in the case of the Jefferson Parkway the impacts of concern would be considered “significant” for NEPA purposes. See 40 C.F.R. § 1508.27.

In addition to NEPA, the provisions of § 109(h) provide further guidance regarding the scope of mitigation under the closely parallel provisions in sections 134 and 135 of FAHA. Section 109(h) of the Federal-Aid Highway Act, enacted on December 30, 1970 by the same Congress that enacted NEPA (January 1, 1970), supplemented the requirements of NEPA for highway projects by defining a more specific analytical process. Section 109(h) requires a three-step evaluation of impacts and mitigation measures to ensure that “final decisions on the project are made in the best overall public interest.” 23 U.S.C. § 109(h) (2004). The first step is to determine the “possible adverse economic, social and environmental effects relating to any proposed project.” *Id.* The second step is to determine “the costs of eliminating or minimizing such adverse effects” *Id.* The third step is to consider “the costs of eliminating or minimizing such adverse effects” together with “the need for fast, safe and efficient transportation” to make a final decision on the project “in the best overall public interest.” *Id.*

In the national planning objectives in § 134(a)(1), Congress defined the minimum criteria for determining whether a proposed project is “in the best overall public interest.” Since the MPO must at least determine that the RTP will “accomplish” these objectives if the proposed project is added to the plan, the analytical steps prescribed by § 109(h) should be performed to evaluate the mitigation appropriate for any new project proposed for addition to an RTP that would interfere with or defeat progress toward accomplishing the objectives of minimizing fuel consumption and air pollution.

FHWA’s implementing regulation further requires that any measures necessary to mitigate adverse effects be incorporated into the project. 23 C.F.R. § 771.105(d). Therefore, the mitigation identified in the planning process needs to be incorporated into the project, which means that the costs of mitigation must be accounted for in the fiscally constrained plan as part of the overall project cost.

None of these steps have been performed for the update of the DRCOG RTP as evidenced by the lack of analysis for the Jefferson Parkway. Similarly, the RTP updates being considered by other Colorado MPOs do not included these steps.

c. The kind and magnitude of mitigation needs to be considered to Satisfy §§ 134(i)(2)(B) and 135(f)(4)(A) and (B).

Both NEPA and § 109(h) provide helpful interpretative guidance to understand the extent of mitigation required to be considered under §§ 134(i)(2)(B) and 135(f)(4)(A) and (B). The NEPA rules require that mitigation be identified as part of the environmental review. 40 CFR § 1502.16(h). Mitigation is defined to include measures that–

- (a) avoid the impact altogether;
- (b) minimize impacts by limiting the degree or magnitude of the action;
- (c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- (e) compensating for the impact by replacing or providing substitute resources or environments.

40 CFR § 1508.20.

Section 109(h) of the Federal-Aid Highway Act also requires a determination of the “possible adverse economic, social and environmental effects relating to any proposed project,” and “the costs of eliminating or minimizing such adverse effects” to be used in weighing “the costs of eliminating or minimizing such adverse effects” together with “the need for fast, safe and efficient transportation” to make a final decision on the project that is “in the best overall public interest.” *Id.*

Using both NEPA and § 109(h) as the reference point for defining the scope of the duty to discuss mitigation under §§ 134(i)(2)(B) and 135(f)(4) calls for the identification of measures that include “eliminating” or “avoiding” the impact, as well as measures that may be less protective of the environment. Furthermore, § 109(h) also requires that the cost of mitigation be weighed against the benefits of improved mobility likely to result from the project. Thus the scope of the duty must include identifying all “possible adverse” impacts, the identification of effective mitigation capable of eliminating or avoiding the adverse impact as well as options that minimize the impact, and also the quantification of the costs of the various mitigation options to be weighed against the benefits of the mobility improvements so that the planning agency has the kinds of information to make an informed determination regarding the option that is in “the best overall public interest.”

Thus defined, the adverse impacts of individual projects as well as the aggregate impacts of all the projects in a regional plan would need to be discussed in the long-range plan. A major advantage of

addressing these considerations at the regional planning stage is to include consideration of mitigation measures that may only be implemented at the regional level, such as transit-oriented development, more comprehensive transit services, pricing, fuel quality, zone SOV travel limitations, and other measures that would not be available or relevant at the corridor scale in a project-level EIS.

Emerging case law interpreting the obligation under NEPA to consider the cumulative impacts of federally funded highway projects, make clear that if the analyses of cumulative impacts are not performed by the MPO as part of the development of the long-range plan, they will nonetheless have to be considered by the implementing agencies as part of project EISs. See 40 CFR §§ 1502.14, 1502.16, 1508.7; *Carmel-by-the-Sea v. U.S. DOT*, 123 F3d. 1142 (9th Cir.1997); *W. N.C. Alliance v. N.C. Dep't of Transp.*, 312 F. Supp. 2d 765, 778 (E.D. N.C. 2003). Developing information regarding the mitigation of regional impacts that will result from the program of projects planned for the region will be much less useful if prepared by the implementing agencies outside the regional planning process. The Sierra Club therefore believes that MPOs must identify and consider mitigation for all impacts, at the regional, corridor and local scales, and develop cost estimates as part of the planning process.

2. Mitigation Analyses to Be Performed for Impacts of Regionally Significant Projects.

Based on the evidence of the impacts of emissions from the transportation sector on public health and climate change, SWEEP believes that these are significant impacts for which mitigation must be considered in the planning process under §§ 134(i)(2)(B) and 135(f)(4)(A) and (B) and § 109(h).

(a). Public Health Impacts.

Reviews of recent health effects research conducted by the Health Effects Institute and others demonstrate that emissions from highways have a significant impact on human health. These studies include studies of the undifferentiated effects of all highway emissions without distinguishing the effects of particular pollutants, and other studies that attempt to identify the effects of individual pollutants, or limited combinations of pollutants. Some of these are criteria pollutants (i.e., pollutants for which a NAAQS has been adopted under § 109 of the Clean Air Act), and some are pollutants listed as a hazardous air pollutant under § 112 and/or listed as a mobile source air toxic ("MSAT") pollutant under § 202(l) of the CAA. EPA revised the NAAQS for nitrogen oxides to protect against the adverse health effects associated with NO_x emissions from motor vehicles, 75 Fed. Reg. 6473 (Feb. 9, 2010), and has also updated its initial assessment of the health risks associated with exposure to motor vehicle emissions as part of its recent MSAT rulemaking. 71 Fed. Reg. 15804 (March 29, 2006). See also 66 Fed. Reg. 17229 (March 29, 2001); and 64 Fed. Reg. 38705 (July 19, 1999)(National Integrated Air Toxic's Strategy). This evidence demonstrates that the adverse health impacts of highway emissions will be significant in every metropolitan planning area, and that mitigation of these impacts must be considered.

Together the health risk assessments performed by EPA, and the methodologies used by FHWA in preparing the study of the health costs of air pollution provide examples of the tools available to MPOs and state DOTs to estimate the magnitude of adverse health outcomes associated with exposure to air

pollution in a metropolitan area. These tools can provide estimates that, even if they suffer from a range of uncertainty with respect to exact numbers of adverse health outcomes in the exposed population, are useful in comparing the expected health consequences of different emission scenarios associated with differing project, mode, land use and economic incentive strategies.

(b) Impacts of Greenhouse Gas Emissions.

The adverse impacts of CO₂ and other air pollutants emitted from the transportation sector have been recognized by the United States and the United Nations. The ultimate goal of the United Nations Framework Convention on Climate Change (UNFCCC) is to stabilize atmospheric concentrations of greenhouse gases at levels that would prevent dangerous human interference with the climate system. The United States ratified the UNFCCC in 1992, and the Bush Administration officially endorsed the scientific consensus on the threat posed by climate change with its submission to the United Nations (U.N.) of Climate Action Report 2002. The U.S. Environmental Protection Agency has now issued its finding under the Clean Air Act that greenhouse gas emissions endanger the health and welfare of the American people. The U.S. Department of Energy also acknowledged that drastic reductions in total greenhouse gas emissions are needed to stabilize atmospheric concentrations, and has funded technological developments toward this end. Measurement of increasing CO₂ concentrations in the atmosphere provides compelling evidence that comprehensive programs to reduce CO₂ emissions are needed to meet climate change goals. EPA's inventories of carbon emissions from major sectors of the US economy demonstrate that emissions from the transport sector account for the fastest growth of GHG emissions from the United States. Significant reductions in GHG emissions from the U.S. cannot be achieved without at least stopping the growth in GHG emissions from the transportation sector. *Id.*

Although the United States declined to ratify the Kyoto Protocol, a first step in market-based, global CO₂ regulation, Congress has nonetheless required that the transportation planning process produce transportation plans that "minimize fuel consumption" and "air pollution." 23 USC §§ 134(a) and (c), 135(a). Implementation of this national policy can accomplish significant reductions in CO₂ emissions from the transportation sector. Given that the United States has already acknowledged the potential harm to the human environment from GHG emissions and expected climate change, and the congressional directive to develop metropolitan and statewide transportation plans that "minimize" fuel consumption and air pollution, it is clear that these impacts are significant in every state and metropolitan planning area for the purpose of triggering an obligation to consider mitigation in the transportation planning process designed to minimize these impacts.

In addition, other significant adverse environmental impacts are identified in the letter to the Secretary of Interior asking that a comprehensive EIS be prepared to analyze impacts, consider alternatives and require mitigation.

C . Project May Not Be Added to Plan Until Compliance with National Planning Objectives
and Mitigation is Considered under Appropriate Procedures.

In light of the extensive impacts projects like the Jefferson Parkway, I-70 corridor and other major projects in the Plan would have on VMT, fuel consumption and GHG emissions, the performance of the transportation system in the corridors affected by such projects, endangered species and their habitat, land use and regional development, and other significant impacts on socioeconomic values and natural resources, the MPOs must prepare an MIS for such projects before deciding whether to add such projects to the RTP.

1. Federal Law Requires MPOs to Prepare an MIS or Equivalent Assessment.

Since 1993, federal regulations have required that, before a metropolitan planning organization (MPO) may add a project to an RTP or TIP, it must analyze the project and potential alternatives to determine the cost-effectiveness of the project and its effects on system performance and the national transportation planning objectives prescribed in 23 U.S.C. § 134(a)(1). 23 C.F.R. § 450.318 (1994). As explained below, this requirement – known as the MIS rule – remains in effect by statutory mandate despite recent conflicting regulatory amendments by US DOT.

US DOT amended the federal transportation planning rules, 23 C.F.R. pt. 450, in February 2007. 72 Fed. Reg. 7224 (Feb. 14, 2007). Upon adopting the amendments, US DOT stated that

[s]ection 1308 of the TEA-21 required the Secretary to eliminate the [MIS] set forth in [23 C.F.R. § 450.318], as a separate requirement, and promulgate regulations to integrate such requirement, as appropriate, as part of the analysis required to be undertaken pursuant to the planning provisions of title 23 U.S.C. and title 49 U.S.C. Chapter 53 and the National Environmental Policy Act of 1969 (NEPA) for Federal-aid highway and transit projects. [As amended, the] purpose of [23 C.F.R. § 450.318 (Transportation planning studies and project development)] is to implement this requirement of Section 1308 of the TEA-21 and eliminate the MIS as a stand-alone requirement.

72 Fed Reg. at 7241. US DOT thus adopted a regulation that purports to integrate the MIS requirement with NEPA and the planning process required by 23 U.S.C. § 134 (metropolitan planning) and 23 U.S.C. § 135 (state transportation planning). *Id.* The revised rule makes the MIS a voluntary undertaking by MPOs, however, whereas the 1993 MIS rule provided that MPOs “shall” prepare a MIS before adding a project to an RTP or TIP. Unlike the 1993 MIS rule, the amended regulation falls short of section 1308 of TEA-21, Pub. L. No. 105-178 (1998).

The 1993 MIS rule required MPOs to satisfy 23 C.F.R. § 450.322(b)(7) before adding a major project to a RTP or TIP. 23 C.F.R. § 450.322(b)(7) requires a RTP or TIP to “[r]eflect a multimodal evaluation of the transportation, socioeconomic, environmental, and financial impact of the overall plan, including all major transportation investments in accordance with § 450.318.” At the time it adopted the 1993 MIS rule, US DOT explained that “[s]uch investment studies should occur before a particular investment is ultimately defined in an area’s approved plan After a corridor/subarea study is completed, the plan would be revised to reflect the specific decision resulting from the study.” 58 Fed. Reg. 58040, 58056 (Oct. 28, 1993). Together, 23 C.F.R. §§ 450.322 and 450.318 define the MIS requirement that was preserved by the 1998 amendment to 23 U.S.C. § 134 by requiring the MPO to demonstrate in an MIS

the factual basis supporting its determination to add a project to a RTP or TIP. Section 450.322 (1993) required the MPO to evaluate the “impact of the overall plan,” and section 450.318 requires individual investments and strategies to be evaluated for their impacts on “local, State and national goals and objectives” before the MPO adds one of the alternatives to the RTP or TIP.

Although TEA-21 instructed the Secretary of Transportation to eliminate the “separate” MIS requirement, it also directed the Secretary to “integrate such requirement, as appropriate,” into the planning provisions of Title 23, Title 49, and NEPA. Pub. L. No. 105-178, at § 1308. US DOT explained its understanding that “[t]he technical structure of the law is such that this action requires a two step process: (1) Eliminating and (2) proposing an approach for integrating what remains.” 67 Fed. Reg. 59219, 59223 (Sept. 20, 2002). US DOT thus understood that Congress intended for it to integrate into the planning process “what remains” of the required “approach” that is not otherwise required by NEPA or titles 23 or and 49 of the U.S. Code. In short, the MIS regulation remains in effect under 23 U.S.C. § 134 until US DOT replaces the original 23 C.F.R. § 450.318 with a regulation that fulfills the mandate to “integrate such [MIS] requirement” into the planning process.

Prior to amending its planning regulations in 2007, US DOT acknowledged that the existing regulation remained a “placeholder” to meet Congress’s integration requirement. *Id.* at 59223. The MIS rule remains in effect because (1) Congress did not repeal the MIS requirement reflected in 23 C.F.R. § 450.318, (2) the MIS rule remained consistent with 23 U.S.C. § 134 after the TEA-21 revisions and enforceable, and (3) the US DOT has not lawfully revoked the 1993 regulation because it has not promulgated a rule that satisfies the mandate to “integrate such [MIS] requirement” into the planning process.

a. TEA-21 Retained the MIS Requirement

The 1998 TEA-21 amendments did not repeal or eliminate the MIS requirement, but rather clarified a latent ambiguity as to whether an MIS must be prepared separately or as part of the NEPA process. The MIS regulation left this issue to be determined on a case-by-case basis. 23 C.F.R. § 450.318(f). Because MPOs had no obligation to satisfy NEPA as part of their planning processes, MPOs often did not include within the MIS a treatment of alternatives that met the comprehensive requirement of NEPA. Accordingly, after a project was added to a RTP or TIP, US DOT would prepare a separate, but largely duplicative, environmental impact statement (EIS) to satisfy NEPA. Participants often viewed this as a make-weight, paper-shuffling task to meet the letter of the law that had little to do with the final selection of a project. See, e.g., 144 Cong. Rec. S6399, S6402 (June 16, 1998) (S.J.R. 15). Indeed, as a practical matter, US DOT usually would not select a different alternative identified in the NEPA process because such an alternative was not in the RTP or TIP, and thus could not be funded without a revision to the RTP.

TEA-21 sought to avoid this duplication by ensuring that the MIS would satisfy NEPA. Congress did not intend to eliminate the MIS requirement. S. Rep. 106-47, at 5 (1999) (“TEA-21 deletes the Major Investment Study as a stand-alone requirement and integrates it into the planning process.”); H.R. Rep. 105-831, at 29 (1998) (“The project review process is reformed by deleting the Major Investment Study

as a stand-alone requirement and integrating it into the planning process.”); 144 Cong. Rec. H10479, H10502 (daily ed. Oct. 10, 1998) (same). It is no wonder, then, that the mandate to integrate the MIS requirement is found within the section titled “Program Streamlining and Flexibility.” Pub. L. No. 105-178, § 1308, 112 Stat. 107 (June 9, 1998). An MPO satisfies the MIS requirement when it demonstrates how the MIS affected its decision to add a project to the RTP or TIP. See *Clairton Sportsmen’s Club v. Pa. Turnpike Comm’n*, 882 F. Supp. 455, 481 (W.D. Pa. (1995) (concluding, before the 1998 TEA-21 amendments, that the Federal Highway Administration [FHWA] did not abuse its discretion by permitting the agencies to comply with the MIS regulation by incorporating a section regarding MIS compliance into the environmental impact statement). See also FHWA, Notice of Intent, 67 Fed. Reg. 50504, 50504 (Aug. 2, 2002) (“As directed by the Transportation Efficiency [sic] Act for the 21st Century (TEA-21), the Major Investment Study (MIS) will be integrated with the [environmental impact statement (EIS)].”).

b. US DOT Has Not Lawfully Replaced the MIS Rule

Because TEA-21 did not eliminate the MIS requirement, the MIS rule remains in effect until US DOT replaces it with a rule that complies with the statutory directive. The February 2007 rule amendment fails to retain the MIS as a requirement. Accordingly, US DOT has not integrated the 1993 requirement as required by law. Accordingly, the 1993 MIS rule has not been lawfully superseded and therefore remains in effect.

US DOT’s explanation for the 1993 MIS rule describes the requirement that TEA-21 intended to retain and integrate into the planning process: “[T]he intent of the requirement is to integrate planning and environmental requirements at the planning stage so that alternative courses of action, their costs and environmental effects as well as transportation demand are considered at this point.” 58 Fed. Reg. at 58056. The 2007 amendments to the MPO and statewide planning rules do not preserve these requirements because they purport to allow MPOs the discretion not to integrate these factors into the planning decision. Revisions to an MPO plan that are not based on these factors do not fulfill the statutory mandate.

In contrast to the 1993 MIS requirement, the amended MIS regulation makes the preparation of an MIS discretionary. 23 C.F.R. §§ 450.212(a) (“a State, MPO, or public transportation operator may undertake a multimodal, systems-level corridor or subarea planning study as part of the statewide transportation planning process.”), 450.318(a) (“MPO(s), State(s), or public transportation operator(s) may undertake a multimodal, systems-level corridor or subarea planning study as part of the metropolitan transportation planning process.”). The regulations are thus inconsistent with statutory mandate in TEA-21, which directs US DOT to “integrate such requirement” into existing planning processes.

In sum, because US DOT has not replaced the 1993 MIS rule with a rule that satisfies the statutory MIS mandate, the MIS rule remains in effect. Thus, regionally significant projects added to MPO plans and major projects such as I-70 corridor that are proposed to be added to the Statewide Plan are a “major metropolitan transportation investment” within the meaning of 23 C.F.R. § 450.318 (1994), see 23 C.F.R. § 450.104 (defining “major metropolitan transportation investment”). Such projects may not be lawfully

added to the Statewide Plan until the kinds of alternatives analysis required by the MIS rule have been completed in accordance with the 1993 regulatory requirements for an MIS. 23 CFR § 450.318 (2006). Projects not analyzed in an MIS, or a functionally equivalent assessment of impacts, alternatives, mitigation of adverse impacts, and compliance with the national planning objectives, will not comply with federal statutory requirements, and may not be lawfully added to the Statewide Transportation Plan.

CONCLUSION.

New or revised projects may not be added to the 2035 Statewide Transportation Plan without determining how the project will affect compliance of the Statewide Plan with the national planning objectives, and the obligation to consider mitigation measures to avoid or minimize adverse impacts.

With respect to the DRCOG RTP, no mitigation of the public health or climate impacts associated with increased VMT and increased GHG emissions resulting from the Jefferson Parkway project has been performed or presented for public comment. Nor has any evidence been provided to show that DRCOG staff have consulted with the relevant resource management agencies regarding these impacts. The adoption of the Jefferson Parkway into the RTP without complying with these requirements of FAHA is unlawful, and makes incorporation of the DRCOG plan into the 2035 Statewide Transportation Plan unlawful under federal law as well.

In addition, the failure of DRCOG in the case of the Jefferson Parkway, and any failure by DRCOG and other MPOs in the case of other regionally significant projects, to specifically consider the State planning objectives added by the Legislature to §43-1-1103(5) means that these projects may not be added to the 2035 Statewide Transportation Plan Amendment without performing the kind of analysis discussed above to consider whether such projects meet the planning objectives of State law.

Other projects added to RTPs for other MPO planning regions suffer from the same faults.

The procedures for evaluating impacts and considering mitigation are provided in the 1993 MIS rule, or may have been satisfied if an EIS has been prepared for a project under NEPA, or a comprehensive analysis has been performed for a project under the Commission's Environmental Stewardship Guideline. But if a project has not been fully analyzed with respect to identifying and considering the application of user fees and other measures for implementing the applicable State and federal planning objectives, then each such project must be analyzed in accordance with such procedures to ensure there is an opportunity for public involvement and adequate consideration of alternatives before each project is added to the Statewide Plan.

Respectfully submitted,

Robert E. Yuhnke
Director, Transportation Program
Southwest Energy Efficiency Project

Response to Comment #13

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Division of Transportation Development
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9011



May 13, 2011

Robert E. Yuhnke,
Director Transportation Program
Southwest Energy Efficiency Project
2334 North Broadway, Suite A
Boulder, CO 80304

RE: SWEEP Comments on the 2035 Statewide Transportation Plan Amendment

Dear Mr. Yuhnke:

Thank you for your comments on the 2035 Statewide Transportation Plan Amendment; we have reviewed them in consultation with the FHWA. As stated in the Plan Amendment, the decision to develop a plan amendment instead of a plan update was the result of careful deliberation and discussion with FHWA, FTA, the MPOs, TPRs, STAC, TC and other planning partners as the most efficient and effective approach. It was developed to maintain consistency with the regional planning process and to serve as a bridge between the 2035 Plan and the next plan set for adoption by 2015. The primary reason for this is that the state is not required to update the long-range transportation plan on a specific interval (unlike the MPOs), but CDOT is required to incorporate the MPO RTP updates and amendments. As stewards of tax-payer dollars and given current economic conditions and tight budgets, lack of federal authorization, new census data, and no legal requirement, this was determined the most prudent and fiscally responsible course of action.

The purpose of the Plan Amendment is to amend the MPO RTPs into the statewide plan and to provide information to stakeholders on the financial outlook, recent accomplishments, such as ARRA and FASTER, and acknowledge emerging issues in transportation that will feature prominently in the next plan. CDOT is well aware of the new planning factors now included in CRS 43-1-1103, including that we address the concept of "fixing it first" to support economic vitality of state in addition to safety, mobility and multimodal choice, support of transit, environmental stewardship, freight, and reduction of GHG emissions. CDOT is currently looking at these factors and developing methodologies to effectively integrate them in the next plan.

As stated in the Plan Amendment, CDOT fully intends to address all of these factors as well as any federal factors that may be included in the next authorization bill. CDOT works with federal agencies, transportation planning regions and stakeholders to develop a comprehensive multimodal transportation plan that considers all factors and

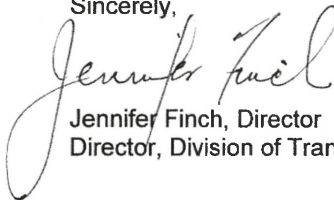
makes every attempt to integrate these concepts into the planning process. As such, the planning process will integrate the other modal plans being developed into the next statewide transportation plan. These included the State Freight and Passenger Rail Plan, the Statewide Bicycle and Pedestrian Plan, Transit Plan, and Aviation Plan. All of these plans are yet to be completed, but several are underway or soon will be. In concert with the development of these multimodal plans, CDOT, with its partners, is developing strategies for their integration.

As you mention in your letter, FASTER provides a dedicated funding source for transit, bridge and road safety projects and identifies user fees as another potential funding source for CDOT. The High-Performance Transportation Enterprise (HPTE) was created by FASTER to seek innovative and efficient financing opportunities to fund important surface transportation infrastructure projects. This includes user fee-based project financing. While FASTER added the ability to toll existing highway/road capacity, approval must be obtained from every local government in which all or any portion of the highway segment or highway lanes are contained or that will be substantially impacted. Per the legislation, revenues based on user fees shall be expended only for the surface transportation infrastructure project for which they were collected or for a project that is integrated with that project as part of a surface transportation system. The HPTE developed a Strategic Planning and 2010 Action Plan that further defines the goals and mission of the HPTE, as well as potential projects inventory. This document can be viewed online at <http://www.coloradodot.info/about/high-performance-transportation-enterprise-hpte/workshop>

In developing their regional transportation plans, the MPOs follow federal and state planning requirements. The MPOs develop plans in coordination with CDOT, FHWA and FTA, conduct a rigorous public involvement process, and follow federal and state requirements for consideration of planning factors and air quality conformity if applicable. Their plans are vetted through their planning process as prescribed in state and federal regulations and are adopted by their respective boards. After adoption, the plans are then submitted to the state for integration into the statewide plan. In addition, FHWA and FTA certify the MPO planning process and make air quality conformity determinations. Based on the above process, CDOT, through the statewide plan amendment, has incorporated the MPO plans. The DRCOG 2035 Metro Vision Regional Transportation Plan adopted in February 2011 was completed consistent with their planning process and is considered in compliance with federal and state requirements.

CDOT appreciates your concern and interest regarding transportation in the State. We look forward to your input on the next plan and any future endeavors. Thank you for your time and effort to comment on the Plan Amendment.

Sincerely,



Jennifer Finch, Director
Director, Division of Transportation Development

Project Priority Programming Process (4P)

As a part of developing the 2012-2017 Statewide Transportation Improvement Program (STIP) CDOT regions hosted Project Priority Programming Process (4P) meetings to discuss project selection and prioritization with each of their TPRs and/or MPOs. The 4P meetings consisted of individual and joint TPR meetings where discussions on regional priorities and coordination took place. The purpose of the 4P meetings was to review the current STIP and solicit requests for new projects. The 4P meetings also provided CDOT staff an opportunity to discuss the Plan Amendment and obtain feedback. Additionally, CDOT staff attended individual county meetings where the Plan Amendment among other transportation topics was discussed. A list of all the 2010 4P related outreach is contained in the following table (Table 3).

4P County Meeting Statewide – Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
2	Central Front Range	26-Aug	10:00 - 12:00	Florence City Hall, 600 W. 3rd St., Florence	16
1	Central Front Range	25-Oct	12:30 - 2:30 pm	Pikes Peak Area COG, 15 So. 7th St., Colorado Springs	5
1	DRCOG	28-Oct	2:00 - 4:00 pm	DRCOG, 1290 Broadway, Denver	13
4, 6	DRCOG	25-Oct TAC	1:30 - 5:00 pm	DRCOG, 1290 Broadway, Denver	46
1	Eastern (Region 1)	2-Nov	10:00 am -12:00	Limon Community Center, 477 "D" Ave., Limon	17
4	Eastern (Region 4)	13-Sep	10 am - 12:00	Limon Community Center, 477 "D" Ave., Limon	37
3	Grand Valley	13-Oct TAC 25-Oct GVRTC	3-5 pm TAC 3-5 pm GVRTC	Grand Valley Regional Transportation Planning offices, 525 So. 6th St., 2nd floor, Grand Junction	10 14
3, 5	Gunnison Valley	27-Oct	10:00 am	Sneffles Conf Rm, Region 10 Enterprise Center, 300 N. Cascade Ave., Montrose	25
1, 3	Intermountain	21-Oct	3:00 pm	Eagle County Bldg, 500 Broadway, Eagle	40
1, 3	Intermountain	2-Dec	1:00 - 5:00 pm	Eagle County Bldg, 500 Broadway, Eagle	33
4	North Front Range	7-Oct Public Meeting	6:00 - 8:00 pm	Severance Town Hall, 231 W. Fourth Ave., Severance	40

4P County Meeting Statewide – Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
4	North Front Range	20-Oct TAC	1:00 - 4:00 pm	Windsor Rec Center, 250 N. 11th Street, Windsor	21
4	North Front Range	4-Nov Council	6:00 - 8:00 pm	Greeley Police Station	38
3	Northwest	28-Oct	10:00 am	Crawford Room, Centennial Hall, 124 10 th St., Steamboat Springs	21
2	Pikes Peak	8-Sep 18-Nov TAC 8-Dec Board	9:00 am - 12:00	Pikes Peak Area COG, 15 So. 7th St., Colorado Springs	N/A
2	Pueblo	2-Sep	8:30 am - 11:00	Pueblo City Hall, 1 City Hall Pl., 3rd Floor, Pueblo	23
5	San Luis Valley	1-Nov	1:00 - 3:00	Alamosa County Building, 8900 Independence Way, Alamosa	12
2	South Central	23-Sep	1:00 - 3:00 pm	Early Learning Center, 300 Bonaventure, Trinidad	18
2	Southeast	28-Oct	1:30 - 3:00 pm	SE Colorado Enterprise Development, 112 W. Elm St., Lamar	20
5	Southwest	1-Oct	8:30 am - 11:00	La Plata County Fairgrounds, Pine Room, Durango	17
4	Upper Front Range	9-Sep	1:00 - 4 p.m.	Morgan County Administrative Building, 231 Ensign St., Fort Morgan	25

4P County Meeting Statewide – Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
2	Pueblo	28-Apr	4:00pm - 7:00pm	Pueblo Transit Center 2nd and Court Street in Pueblo	N/A
1, 6	Douglas	17-May	10:00am	Park Meadows Conference Room, 9350 Heritage Hills Circle, Lone Tree 80124 (West of 1-25 off Lincoln Avenue)	32
5	San Miguel	25-May	11am	Telluride	15
2	Crowley	26-May	8:30 -10:30 am	603 Main St., Suite 2, Ordway	N/A
2	Otero	26-May	1:00 -3:00 pm	13 W. 3rd St, Rm 107, La Junta	N/A
2	Custer	27-May	9:00 – 11:00am	205 S. 6th St, Westcliffe	N/A
2	Fremont	27-May	2:30-4:30pm	615 Macon , #208, Canon City	N/A
1	Lincoln	27-May	10:00am	Hugo Lincoln County Court House, 103 3rd Avenue, Hugo 80821	15
5	Archuleta	8-Jun	9:00-10:30am	449 San Juan Street Pagosa Springs	5
6, 4	Broomfield	8-Jun	10:00am	1 DesCombes Drive, Broomfield	27
2	Huerfano	8-Jun	10:30 – 12:30pm	401 Main St., Ste 202, Walsenburg	N/A

4P County Meeting Statewide – Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
2	Las Animas	8-Jun	2:00 – 4:00 pm	Courthouse, 200 E. 1st St, #201, Trinidad	N/A
5	Saguache	8-Jun	1:30-3:00pm	501 4th Street Saguache	8
4	Boulder	10-Jun	9:00am-10:30am	Courthouse Main Building 1325 Pearl Street Boulder, CO 80302	32
2	Kiowa	10-Jun	1:30-3:30pm	1305 Goff, Courthouse, 2nd fl, Eads	N/A
2	Prowers	10-Jun	9:00 – 11:00 am	Lamar Resource & Senior Center, 407 E. Olive Street, Lamar, CO 81052	N/A
5	Alamosa	14-Jun	10:30-12:00pm	8900 Independence Way Alamosa	6
2	Baca	14-Jun	9:30-11:30am	748 Main Street, Springfield	N/A
2	Bent	14-Jun	2:30 – 4:30 pm	725 Bent Ave, Las Animas	N/A
4	Logan	15-Jun	1-2:30pm	Logan County Courthouse Annex - 315 Main St, Sterling, CO	18
4	Washington	15-Jun	4-5:30pm	County Building, 150 Ash, Akron, CO	13
5	Dolores	21-Jun	1:00-2:30pm	409 N. Main Dove Creek	6
2	El Paso	21-Jun	9-11am	27 E. Vermijo, 3rd floor, Colorado Spgs	N/A
2	Teller	21-Jun	2-4pm	112 N. A St., Cripple Creek	N/A

4P County Meeting Statewide - Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
6	Denver	23-Jun	3pm	Denver	11
5	La Plata	23-Jun	12:30-2:30pm	1060 E. 2nd Avenue Courthouse Durango	12
1	Park	23-Jun	1:30pm	County Commission Board Room, 501 Main Street (SH 9), Fairplay 80440	13
5	San Juan	28-Jun	9-10:30am	1557 Green Street Silverton	5
1, 6	Jefferson	29-Jun	1:00pm	Jefferson County Administration & Courts Facility, Lookout Mountain Conference Room, 100 Jefferson County Parkway, Golden 80419	28
4	Larimer	22-Jul	6:00pm-8:00pm	Fort Collins Police Building, Fort Collins	20
4	Larimer	29-Jun	6:30pm-8:30pm	200 West Oak Street, Fort Collins	25
1, 6	Adams	7-Jul	7pm	Adams County Economic Development Boardroom, 12050 Pecos, Westminster, 80234	N/A
1	Clear Creek	7-Jul	1:00pm	Commission Meeting Room, 405 Argentine Street, Georgetown 80444	20
4	Weld	13-Jul	6:30pm-8:00pm	Weld County Training Center - 1104 H Street, Greeley	21

4P County Meeting Statewide – Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
3	Mesa	19-Jul	2-3:30pm	544 Rood Ave, Multipurpose Room, 1st Floor, Grand Junction	12
4	Phillips	19-Jul	10-11:30am	Phillips County Fairground 22505 US385, Holyoke CO	18
4	Morgan	20-Jul	1:30-3:30pm	Morgan County Administration Bldg., Basement Assembly Room 231, Ensign St, Fort Morgan	18
1	Summit	20-Jul	1:30pm	Summit County Courthouse, 208 E. Lincoln Avenue, 3rd floor, Breckenridge 80424	17
4	Weld	22-Jul	6:30pm-8:00pm	Southwest Weld County Services Complex - 4209 Weld County Rd 24 1/2	30
5	Chaffee	26-Jul	1-2:30pm	Salida	6
1, 6	Arapahoe	29-Jul	10am-12pm	Arapahoe County Administration Bldg. 4334 S Prince Street Pikes Peak Conference Room Littleton, CO 80120	26
4	Sedgwick	29-Jul	10-11:30am	315 Cedar St., 2nd Floor, Julesburg CO	24
4	Yuma	30-Jul	10:30am-12pm	Yuma County Courthouse - 310 Ash, Wray, CO	17
3	Lake	2-Aug	1-2:30pm	800 Harrison Leadville	25

4P County Meeting Statewide - Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
1	Kit Carson	4-Aug	10:00am	Commissioners Board Room, Kit Carson County Courthouse, 251 16th Street, Burlington 80807	12
3	Moffat	10-Aug	1-2:30pm	221 W. Victory Way, Craig	8
3	Routt	10-Aug	10-11:00am	136 6th Street, Steamboat	17
5	Conejos	13-Aug	1-2:30pm	Conejos	Meeting Cancelled
5	Mineral	16-Aug	1:30-3pm	Creede	5
5	Rio Grande	16-Aug	10-11:30am	Del Norte	20
3	Eagle	17-Aug	10:30-12pm	500 Broadway, 2nd Floor, Eagle	30
5	Ouray	23-Aug	2:30-4pm	Ridgway	9
3	Rio Blanco	23-Aug	11:30-1pm	317 E. Market Street, Meeker	
3	Grand	24-Aug	1:30-3:00pm	308 Byers Ave, Hot Sulphur Springs	17
5	Ute Mountain Ute Tribe	24-Aug	9am - 10:30am	Towaoc	5
5	Southern Ute Tribe	25-Aug	9-10:30am	Ignacio	8
3	Jackson	31-Aug	1:30-3:00pm	396 Le Fever Street, Walden	17
3	Delta	13-Sep	10-11:30am	501 Palmer, Delta	30
3	Montrose	13-Sep	1:30-3pm	161 S. Townsend, Montrose	17

4P County Meeting Statewide - Table 3

CDOT Region	TPR	Meeting Date	Time	Location	Number of Persons in Attendance
1	Elbert	14-Sep	10am	Elbert County Government, Board of County Commissioners Meeting Room, 215 Comanche Street, Kiowa 80117	7
3	Gunnison	14-Sep	1:30-3pm	200 E Virginia, Gunnison	12
3	Garfield	20-Sep	10:15-12pm	108 8th Street, Glenwood	40
5	Montezuma	20-Sep	10:30-12pm	Cortez	10
1	Gilpin	21-Sep	10:00-12:00pm	Old Courthouse, 203 Eureka Street, Central City 80427	17
3	Pitkin	21-Sep	1-3:00pm	530 East Main, Aspen	20
3	Hinsdale	23-Sep	1-2:30pm	311 Henson Street, Lake City	12
1	Cheyenne	30-Sep	10:30am	Courthouse Basement, 51 South 1st Street, Cheyenne Wells 80810	14
5	Costilla	30-Sep	1-2:30pm	San Luis	3