



October 31, 2014

Mr. Anthony DeVito
Colorado Department of Transportation
2000 S. Holly Street
Denver, CO 80222

RE: City of Commerce City's Comments on the I-70 East Supplemental Draft Environmental Impact Statement

Dear Mr. DeVito,

Thank you for the opportunity to comment on the I-70 East Supplemental Draft Environmental Impact Statement. For more than a decade, the City of Commerce City has been involved in the I-70 East Project, collaborating with a wide variety of stakeholders to find compromise solutions that balance critical regional mobility needs while minimizing impacts of the interstate to adjacent neighborhoods.

The City supports the Partially Covered Lowered Alternative: Basic Option as the best and most preferred alternative to deliver a project that fully integrates with the needs of a regional transportation system while providing access to and addressing the complex challenges within our communities. We also support the expansion of managed lanes to reduce congestion within the region and hope the proposed I-70 tolled express lanes will connect someday in the future with a similar solution on Interstate 270.

The City analyzed the I-70 East Supplemental Draft Environmental Impact Statement (SDEIS) to ensure the document was:

- Responsive to the City's official comments on the 2008 Draft EIS
- Aligned with the outcomes of the Preferred Alternative Collaborative Team (PACT)
- Consistent with agency statements and commitments to elected officials and community leaders

While the SDEIS generally addresses the City's overall concerns, several, significant changes are needed prior to the issuance of the Final Environmental Impact Statement and Record of Decision. The City of Commerce City offers the following comments to further inform the Colorado Department of Transportation and Federal Highway Administration's decision-making process on the I-70 East Project:

The City supports the Partial Covered Lowered Alternative (PCL) Basic Option.

Commerce City concurs with the SDEIS analysis that the PCL Basic Option provides the best regional economic benefit, provides a significant number of jobs and offers best construction value.

The City supports this alternative because it best meets the purpose and need of the project; it improves safety and mobility for all interstate users; retains directional access to and from Vasquez Boulevard, a gateway into Commerce City; and restores or enhances the community and social environment.

The City supports the Basic Option, maintaining directional access to the interstate at Vasquez Boulevard.

Access to interstate highways is a critical element of commerce and industry throughout the country. Vasquez Boulevard provides a vital link between I-70 and Commerce City, especially as it serves significant industrial areas in the southern portion of the city. Ensuring regional connectivity, enhancing our economic development opportunities, reducing out-of-directional travel, maintaining traffic and safety and preserving Commerce City's gateway from I-70 are core values for our community.

The City does not support closing the Vasquez Boulevard interchange.

Closing the Vasquez Boulevard interchange limits Commerce City's economic development opportunities to the benefit of Denver and will have too many negative transportation effects on local businesses, freight and trucking movements, residents, and reduces local connectivity in an already challenged area. Further, there is not adequate traffic analysis on Colorado Boulevard for modifications that eliminate Vasquez.

The City supports the inclusion of tolled express lanes on I-70.

Express Lanes provide more choices for travelers, improve mobility, shorten travel time, and can relieve congestion in the entire corridor. CDOT's traffic analysis indicates that reconstructing the corridor with general purpose (free) lanes and Express Lanes (tolled) can reduce the average trip times on I-70 East from 60 minutes to 17 minutes by the year 2035. The City hopes to replicate similar congestion management strategies on I-270 in the near future, where drivers spend an average three hours in congestion – nearly three times that of any interstate in the region.

The City supports the elimination of realignment alternatives from the SDEIS.

After seven years of discussions, the City is pleased the realignment of I-70 along I-270 was discarded as an alternative. When the DEIS came out, Commerce City opposed the realignment alternatives and wrote a strongly-worded letter advocating for a supplemental document and a better approach to find a solution to address traffic and community impacts. Commerce City actively participated with businesses and residents in a collaborative process to eliminate the realignment alternatives and reaffirm that a reroute of the interstate made absolutely no sense from a emergency management, traffic and cost perspective. We still believe this is the case and thank the agencies that this supplemental draft acknowledges this truth.



Likewise, eliminating any alternatives that reroute I-70 is supported by Commerce City. Removing I-70 from its current alignment to I-270 and I-76 is not practical for a variety of reasons, which is why it was eliminated during the PACT process. First and foremost is the new, disproportionate impacts placed on local communities with similar socio-economic challenges. Second is the additional miles traveled by commuters and inter/intrastate travelers, resulting in increased costs and reduced air quality benefits. Third, these existing routes are already at max capacity and the necessary widening of I-76 and I-270 will not meet the needed capacity for all three interstates at a reasonable cost. Finally, rerouting I-70 eliminates east-west route redundancy, a critical element in a robust transportation system. For emergency responders to hazmat shipments and commercial vehicles, having alternative routes is necessary to ensure safety of the traveling public.

The City supports the proposed new Holly interchange.

We support the inclusion of the proposed Holly interchange because it supports the City's long-term connectivity plans for the City's southern industrial area.

The City supports a 10-lane footprint that meets current and future capacity needs.

The proposed preferred alternative footprint was a result of collaborative process among cities, community leaders and businesses. It strikes a balance between meeting future traffic needs and the desired mitigation strategies of local communities to reconnect residents, expanding recreational and economic opportunities. The footprint allows the free flow of goods, services and freight movements critical to the regional and state economy.

The City supports Denver's efforts to revitalize the Elyria, Swansea and Globeville neighborhoods.

Commerce City supports redevelopment efforts throughout surrounding communities; the proposed Swansea lid and recreational uses will help mitigate impacts to local residents and youth. Commerce City may also see a long-term benefit from the momentum created from some of the proposed redevelopment efforts by Denver.

Commerce City is ready to assist CDOT with right of way relocations.

Given the magnitude of the project, numerous businesses and residents likely will need to find alternative locations. The City is ready to assist the State in finding suitable relocation sites for affected businesses and residents.

The City is supportive of the Sand Creek trail realignment.

While there will be minimal impacts to the trail realignment, the City requests coordination during construction to help reduce pedestrian and bicycle conflicts.

Greater traffic analysis is needed for the interaction between I-70, I-225 and I-270

The SDEIS traffic analysis does not provide enough information on how the improvements will affect the I-225 and I-270 interchanges. In fact, data demonstrates traffic on I-70 and these two regional interchanges further degrades, with no noticeable improvement.



Given the importance of these two interstates to the regional transportation network, it is critical that additional traffic analysis is completed to further explain the relationship and how improvements could benefit this area, as well as the impact on doing these improvements sooner or later could have on the entire transportation system.

Additional traffic analysis is needed on Colorado Boulevard and the interaction between I-70 and local streets.

Given limited existing local and intercity roadway connectivity, additional traffic analysis is needed along Colorado Boulevard, 46th Avenue, 47th Avenue and 48th Avenue and the remaining frontage road system to better understand the improvements necessary to manage additional capacity predicted by the SDEIS.

The City requests to be an active participant in construction phasing

The city requests to be actively involved in construction phasing plan and approvals for detours or changes to interstates and state highways within city limits that may see traffic increases. The City is especially concerned about construction traffic migrating to I-270, Colorado Boulevard/SH 2 and other local streets that are already at capacity. I-270, for example, already experiences a three-hour daily congestion window, a problem that is only expected to grow without improvements.

The SDEIS does not recognize or acknowledge Commerce City impacts within the defined project area.

The document fails to discuss social, economic, environmental justice, air quality and noise impacts/associated mitigation within the city's Sand Creek, 56th Avenue Industrial Park, South Rose Hill and Stapleton Industrial Park Neighborhoods – all Commerce City neighborhoods within the project's defined area. Consistent with our previous comment letter, the city remains concerned with the lack of analysis or recognition of Commerce City impacts within the defined project area.

The document still contains inaccurate references to Commerce City that need to be fixed.

The document contains several inaccurate references to City planning documents, mapped areas within the community or relies on third party sources for Commerce City documents. Please refer to the subsequent spreadsheet for a more detailed list to fix.

Thank you to CDOT and FHWA for a 13 year process to work with affected communities to find the right solution for Interstate 70. Additional technical comments are included for specific feedback.

The SDEIS is a critical step in a decade-long process that soon must reach a thoughtful conclusion in order to provide clarity for the thousands of residents and businesses in Denver, Commerce City, Adams County and Aurora.



Commerce City is committed to partnering with its sister communities and the state to ensure this regional transportation project finds an appropriate balance that benefits system users and property owners.

Thank you for your consideration.

Sincerely,



Brian K. McBroom
City Manager

cc: City Council of Commerce City
Mayor Michael Hancock, City & County of Denver
Board of County Commissioners, Adams County
Colorado Transportation Commissioner Heather Barry
Congressman Ed Perlmutter
State Representative Dominick Moreno
State Representative Jenise May
State Senator Jessie Ulibarri

