



COLORADO MOTOR CARRIERS ASSOCIATION

An Affiliate of the American Trucking Associations, Inc.

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I-70 East Project Team
Colorado Department of Transportation

I-70 East Project CMCA comments on the Supplemental Draft EIS

Preferred Alternative:

CMCA supports the **Partial Cover Lowered Alternative, Basic Option with General Purpose Lanes**. CMCA supports this alternative because it: (1) is broadly supported by the public, the business community and local officials; (2) improves safety and mobility for all users of I-70; (3) meets the purpose, need, goals, and objectives identified for this project; (4) restores and enhances the community and the social environment; (5) provides essential access to I-70 at Vasquez Blvd. without the need for a roundabout.

Related comments:

Regardless of the alternative and options selected, it is essential mobility of commercial vehicles be maintained during the construction phase of this project. There is significant commercial and industrial activity in the area on both sides of I-70. North-south connectivity must be maintained for freight movements between and within these areas. CMCA is especially concerned with the shift of vehicles north to I-270 and its impact on local streets and intersections; specifically, the I-270/Colorado Blvd. interchange is grossly deficient at current traffic volumes. As a minimum, we request the following intersection improvements be made before construction begins on I-70 East: (1) Access from NB Colorado Blvd. to EB I-270. (2) Improve traffic flow from EB I-270 to EB 46th Avenue and access to the industrial area east of Colorado Blvd.

Background and basis for comments:

Reroute Alternative. CMCA is aware of continued efforts to reroute current elevated I-70 traffic to I-270/I-76. This alternative was eliminated in the I-70 PACT (in which CMCA was a member) because of the impact to local communities; additional miles traveled and related costs; the necessary widening of both I-76 and I-270 would likely not meet the needed capacity requirement. However, in CMCA's view, the fatal flaw in this proposal is the removal of east-west route redundancy for the metro area. A full closure of the common segment would halt all east-west traffic movement in the corridor. Commercial vehicles with no alternate route would be especially impacted. CMCA will continue to oppose this alternative.

Capacity improvements (purpose and need). Recently, public officials that weren't part of the PACT process have questioned the need for additional capacity and have advocated a narrow footprint with reduced capacity for the project. The purpose and need statement of the EIS clearly addressed the need for additional capacity. Efficient movement of freight is vital to our economy. Freight costs are a factor in all stages of production (farm to market, extraction of raw materials, manufacturing, warehousing and distribution, retail). Increased cost of transportation has a "multiplier" impact on the cost of finished goods. Nationally, in 2013 the operational cost of congestion to the trucking industry was \$9.2 billion (see attached report from the American Transportation

Research Institute –ATRI). While Denver is not one of the top ten metro areas with highest cost, the elevated portion of I-70 is a major source of congestion delays for commercial vehicles in the Denver area.

Freight transportation is a “derived” demand and a function of population and the level of economic activity. The American Trucking Associations (ATA) conducted a study of all domestic freight tonnage by all modes of freight transportation for the period 1990 through 2013 with forecasts to the years 2019 and 2025. For the period 2012-2019 truck tonnage was forecast to increase by 23% while non-truck freight tonnage was forecast to increase by only 9%. For the period 2012-2025 truck tonnage was forecast to increase by 31% while non-truck freight tonnage was forecast to increase by only 13%. This underscores the economic importance of motor freight transportation to the national economy. To the extent Denver and Colorado exceed the national average for population growth and level of economic activity, these forecasts will understate regional demand for motor freight transportation. It is essential the I-70 East Project be constructed with the maximum capacity of the preferred alternative.

Air Quality. Again, this issue was vetted in the I-70 East PACT in which the Colorado Department of Health and Environment participated. Mobile source air pollution has declined in recent decades despite significant increases in vehicle miles traveled (VMT). This trend is expected to continue. The current generation of commercial vehicles are powered by clean diesel and natural gas. They are practically zero emission vehicles, especially considering particulates and nitrous oxides (NOx). Consequently, air quality in the I-70 corridor is expected to improve over current levels even at increased capacity and VMT.

Vasquez/Steele Interchange. CMCA supports the split diamond interchange for Vasquez Blvd. and Steele Street. The proposed elimination of this interchange raised concerns with a number of our member companies who utilize and are dependent on the Vasquez interchange for access to their businesses as well as reasonable and safe access to I-70. A number of trucking related businesses as well as companies dependent on trucks for freight movement are located in the area based on proximity and easy access to the interstate. The elimination of this interchange and its convenient access to the interstate will adversely affect those businesses which could force those businesses to relocate. This potential loss of business could translate into lost jobs as well as lost sales taxes and property taxes to both the City of Denver and Commerce City.

Another important consideration is the fact that a number of commercial operations presently using the Vasquez interchange are over-size and/or over-weight (OSOW) loads for which there is not a viable alternative. If that traffic were forced to utilize either the Colorado Boulevard Interchange or Brighton Interchange, it would significantly affect overall traffic operations at those sites.

Finally, CMCA strongly opposes the use of a roundabout at this intersection. Roundabouts typically are undersized for commercial vehicles with insufficient lane width for trailer off-tracking. Entering a roundabout with high traffic volumes is difficult for a commercial vehicle. When traffic volumes require yielding vehicles to come to a complete stop, it is difficult for a 70 foot, 80,000 lb. vehicle to sequence into traffic flow; it is even more difficult for OSOW loads.

CMCA respectfully requests continued involvement in of the decision-making process surrounding the Vasquez alternatives given the freight concerns identified above as well as being consulted on construction/phasing impacts to improve commercial vehicle mobility and reduce impacts.



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