Comments

Source: Submittal | Document Number: 729 | Name: Conservation Colorado and Southwest Energy Efficiency Project

SWEEP

SOUTHWEST ENERGY EFFICIENCY PROJECT

Saving Money and Protecting the Environment Through More Efficient Energy Use

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4) Fourth, we believe that additional explanation and analysis is needed of particulate concentrations in the analysis of air quality impacts, in order to accurately assess the impact of the project on the people who live and go to school in the immediate vicinity of I-70. We do not have a depth of expertise in this area, but believe that other organizations will be submitting comments with greater technical depth, and would encourage that these be taken seriously.

E

5) Fifth, we are concerned with the analysis of greenhouse gas emissions in the Air Quality Technical Report. The report compares project level emissions to total global emissions, and concludes that they are insignificant by comparison. This is a specious comparison – by this logic, no actions below a global climate agreement would be significant. This flies in the face of the multiple steps the federal government is taking to reduce emissions. Within the DRCOG region, the adopted 2035 Metro Vision regional plan calls for a 60% reduction in transportation sector GHG emissions by 2035; we would suggest that the emissions from this project be analyzed to see whether they meet the regional targets.

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1) **We are concerned that the proposed highway expansion is larger than is needed**

The SDEIS forecasts that between 2012 and 2035, Vehicle Miles Travelled (VMT) for the study area will grow from 15,243,000 to 25,026,000, an increase of 64%.[1] It also projects that, for the Preferred Alternative (PA), VMT on the I-70 East corridor will grow from 1,586,000 to 2,935,000, an increase of 85%. Over the same period of time, the study area's population is expected to grow 41% and employment is expected to grow 59%.[2]

These projections of VMT growing at a faster rate than population are inconsistent with regional trends since 2006. The figure below (from DRCOG's 2012 Annual Report on Traffic Congestion in the Denver Region[3]) shows that VMT per capita has actually been falling in the region since 2006. At the state level, annual VMT per capita has fallen from a high of 10,123 in 2005 to 9,016 in 2012, an eleven percent decline. This decline in VMT per capita means that even as the region and state have added hundreds of thousands of new residents, total regional and state VMT has remained relatively flat. The DRCOG report notes that "2012 marks the sixth straight year of a relatively flat level of VMT, the longest period of non-growth in VMT since the invention of the automobile." The aggressive growth in VMT projected in the SDEIS cannot be attributed to more aggressive population and employment growth in the study area. DRCOG's 2035 Metro Vision Regional Transportation Plan forecasts growth rates of 48% for population and 63% for employment for the region between 2010 and 2035[4], so study area growth rates are slightly lower than the regional average. The SDEIS assumes that neither the current VMT nor VMT per capita trends continues and that VMT growth follows its pre-2006 pattern.

[1] This is based on the Partial Covered Lower Alternative with Managed Lanes, Modified Option. VMT details come from the Traffic Technical Report, Attachment E, Sections 3.4.1 and 6.4.1.
[2] SDEIS Executive Summary
[3] DRCOG. 2013. Annual Report on Traffic Congestion in the Denver Region. https://drcog.org//node/178
[4] DRCOG 2035 Metro Vision Regional Transportation Plan. https://drcog.org/programs/transportation-planning/regional-transportation-plan

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Responses to Comments

D The Supplemental Draft EIS and Final EIS are fully compliant with the requirements of NEPA, the Clean Air Act, 23 U.S.C. Sec. 109(h) and other provisions, and have adequately addressed environmental health issues and air quality impacts, which are considered in Section 5.20, Human Health Conditions, of the Final EIS and the Air Quality Technical Report. For information on air quality and health, please see AQ2 through AQ6 of the Frequently Received Comments and Responses on the Supplemental Draft EIS, located in Part 1 of Attachment Q.

E Greenhouse gas emissions have been adequately addressed in the Final EIS. Section 8.1 of Attachment J, Air Quality Technical Report, describes mitigation measures CDOT will undertake to help reduce emissions. The I-70 East project must be included in the DRCOG 2035 Metro Vision Plan in order to meet federal air quality conformity rules. It is not expected to delay the region from meeting its greenhouse gas reduction goals. Discussions on greenhouse gases are included in the Section 5.10, Air Quality in the Final EIS.

F The I-70 East EIS has used a process for projecting future traffic volumes that is based upon industry standards for completing transportation planning and engineering projects. The process used for this project has remained the same through the development of the Draft EIS the subsequent Supplemental Draft EIS, and the Final EIS. The process used to develop future traffic projections, both volumes and the associated measures of effectiveness such as vehicle miles traveled, are based on Federal requirements for completing NEPA studies. For a complete description of the methodology used for I-70 East, see Attachment E, Traffic Technical Report, to both the Supplemental Draft EIS and Final EIS.

It should be noted that subsequent to the submission of the Supplemental Draft EIS, the project team began work on the Final EIS. As part of the analysis for the Final EIS, the project team obtained the 2035 COMPASS 5.0 TDM, which included the 2013 Cycle 2 updates, which was the absolute latest adopted TDM at the time the Final EIS analysis began. Models and the projects included in them are updated roughly twice a year, and waiting for the next version would cause unneeded delays. DRCOG adopted the 2040 FOCUS TDM in the months after the Final EIS modeling began.

DRCOG began the development of a new 2040 FOCUS TDM between 2010 and 2012, but the model was only in the development phase and was not yet approved or adopted for use on regional projects at the time the Final EIS traffic analysis began. The 2040 FOCUS model was not approved and adopted until early 2015, which was well after the completion of the Supplemental Draft EIS analysis and submittal of the Supplemental Draft EIS documentation. It is worth noting that both the 2035 COMPASS and 2040 FOCUS models were developed based on the same pre-2000 household survey data, meaning the variations in driver behavior will be very small between the two models. In addition, the 2040 FOCUS model includes more up to date socio-economic growth predictions. The newest models are still predicting growth, just not as high as previous models have shown. The project team, in coordination with FHWA, completed a sensitivity analysis using the 2040 traffic projections and found that the demand levels coming out of the 2040 TDM are lower than, but similar to the 2035 TDM volumes and would not result in the need for fewer lanes on I-70. This sensitivity analysis is available in Attachment E of the Final EIS, Traffic Technical Report.

Responses continue on the following page.