



**March 21, 2022**

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Executive Director, CDOT  
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Doug Rex  
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Michael Hancock  
Mayor, City and County of Denver  
City and County of Denver  
1437 Bannock Street, #350  
Denver, CO 80202

Dear Executive Director Lew, Executive Director Rex, and Mayor Hancock,

We, the undersigned organizations, are calling on CDOT, DRCOG, and the City and County of Denver to not add any new highway capacity or disrupt surrounding communities in the I-25 Central corridor, and to modify existing plans, including CDOT's 10-year plan and DRCOG's Regional Transportation Plan, to ensure that highway capacity expansion in the I-25 Central corridor is not eligible for funding.

CDOT's recent adoption of the Greenhouse Gas Standard for Transportation Planning demonstrates Colorado's leadership in taking a first step towards addressing the catastrophic impacts of climate change. CDOT, DRCOG, and the City and County of Denver must follow through by comprehensively realigning the state's investments in transportation projects that support both the state's goals and its values by

- Stopping highway expansion projects.
- Using those dollars to build out a regional Bus Rapid Transit (BRT) network and complete streets on major arterials in the Denver metro area.

Doubling down on highway projects will only make life worse for residents of the Denver metro region, especially for poor communities and communities of color, which are most heavily

impacted by air pollution, burdensome household transportation costs, and increased greenhouse gas emissions. It's long past time that Colorado invests in projects that align with its commitments to address climate change, air quality, and equity.

Colorado leaders can no longer pretend it's possible to have it both ways—you can not continue to fund highway widenings that [induce demand for driving](#) while spending a marginal amount on multimodal projects. Colorado must stop highway expansion projects **and** instead must significantly increase investment in projects and programs that increase transportation options. To meet our state's climate goals and realize the immense economic benefits estimated in CDOT's [Cost-Benefit Analysis for Rules Governing Statewide Transportation Planning](#), “between a quarter and a third of resources would need to be shifted toward transportation project types that have air quality mitigation benefits.” CDOT's own modeling shows that leaders need to update state and regional transportation plans to increase funding for bicycle and pedestrian infrastructure by \$500 million and for transit by \$1.1 billion, while simultaneously decreasing funding for roadway capacity projects by \$1.4 billion to meet the 2030 GHG reduction targets. The updates to CDOT's 10-Year Plan and DRCOG's TIP are the perfect place to start—you can do just that, shift resources from a highway expansion project that would negatively impact air quality to projects that help alleviate air pollution and greenhouse gas emissions.

**Figure 1.** Shift in funding for multimodal transportation, GHG mitigation measures, and roadway capacity projects.

Source: CDOT [Cost-Benefit Analysis for Rules Governing Statewide Transportation Planning](#)

| Transportation Measures                        |  | 2022-2025<br>(in millions) | 2026-2030<br>(in millions) | Total<br>(in millions) |
|--|--|----------------------------|----------------------------|------------------------|
| <b>Tele-Travel Programs</b>                    |  | \$0.7                      | \$0.8                      | \$1.5                  |
| <b>Bicycle, Pedestrian, and Micro-Mobility</b> | Sidewalk Infrastructure                  | \$100                      | \$112                      | \$212                  |
|  | Bicycle Infrastructure                   | \$46                       | \$50                       | \$96                   |
|  | Maintenance                              | \$46                       | \$145                      | \$191                  |
|  | Electric micromobility equipment subsidy | \$0.4                      | \$1.5                      | \$1.9                  |
| <b>Transit Service Expansion</b>               | Vehicle Costs                            | \$38                       | \$136                      | \$174                  |
|  | Operating Costs                          | \$200                      | \$718                      | \$918                  |
| <b>Land Use Measures</b>                       |  | \$7                        | \$8                        | \$15                   |
| <b>Roadway Capacity Expansion</b>              |  | -\$418                     | -\$985                     | \$1403                 |

According to [a Denver Post report in 2019](#), the two neighborhoods bordering I-25 Central on the west, Valverde and Sun Valley, have the highest rates of asthma in Denver, 254% and 253% higher than the state average respectively. In Valverde, 17% of the population lives below the poverty line and 89% are non-white. In Sun Valley, 81% of the population lives below the poverty

line and 88% are non-white. Low income residents and residents of color have already paid the price for our transportation system by way of their health as evidenced by this data. Shifting funding from highway expansion to multimodal transportation projects in these neighborhoods will increase residents' access to and from their communities while alleviating some of the air pollution impacts and giving people more transportation options. This is an opportunity to use our transportation system to improve people's lives.

Future investments should be focused on building a transportation system that hits our state's goals to equitably reduce air pollution and greenhouse gas emissions, save lives, increase affordability, and expand access. A transformative investment for you to make in place of an I-25 Central highway expansion is in a regional BRT network and complete streets on urban arterials. Not only could BRT address the need for north-south travel through Central Denver by accommodating those trips on buses rather than in personal cars, a comprehensive, gridded network of BRT routes would support this mode shift throughout the Denver metro region.

According to CDOT's [I-25 Central Study](#), it would cost roughly \$1.5 billion to widen 4.5 miles of highway through central Denver. Adding new highway lanes will attract more vehicle traffic and we can expect the project to [increase VMT by 70 million miles per year](#), about the same as adding 5,600 passenger cars and light trucks to the road. If this \$1.5 billion were spent on transit instead of highway widening for personal vehicles, it could fund [10 new BRT projects](#) in the Denver-Boulder metro area and cover the operating costs for those lines for over a year. The 10 BRT routes would add over 125 miles of high-frequency transit service to our regional transportation system and would increase daily transit ridership by 80,000, about a 125% increase along the 10 transit corridors. In total, the new BRT system would reduce VMT by over 140 million miles per year.

**Figure 2.** Bus Rapid Transit corridor analysis.

Sources: [RTD BRT Feasibility Study](#), [CDOT I-25 PEL Study](#), [Colfax Corridor Connections Alternatives Analysis Report – 2018](#), [RTD State Highway 119 BRT Study](#), [RMI Induced Travel Calculator](#)

|   | Proposed BRT Lines      | Daily riders | % Change in Daily Ridership | Capital Cost (in millions) | Annual Operating Cost (in millions) | Annual VMT Reduction | Miles | State Highway? |
|---|-------------------------|--------------|-----------------------------|----------------------------|-------------------------------------|----------------------|-------|----------------|
| 1 | Colfax Ave              | 50,000       | 127.27%                     | \$250                      | \$114                               | 34,705,295           | 9.0   | Yes, US-40     |
| 2 | Colorado Blvd           | 7,000        | 44.15%                      | \$35                       | \$16                                | 21,900,000           | 6.5   | Yes, SH-2      |
| 3 | SH-119                  | 2,780        | 67.47%                      | \$253                      | \$6                                 |                      | 18.5  | Yes, SH-119    |
| 4 | Alameda Ave             | 13,000       | 235.22%                     | \$61                       | \$30                                | 18,250,000           | 14.7  | Yes, partial   |
| 5 | Speer/Leetsdale/Paraker | 15,000       | 262.93%                     | \$95                       | \$34                                | 12,775,000           | 10.4  | No             |
| 6 | Federal Blvd            | 13,000       | 29.68%                      | \$94                       | \$30                                | 10,950,000           | 19.4  | Yes, SH-88     |

|    | Proposed BRT Lines | Daily riders   | % Change in Daily Ridership | Capital Cost (in millions) | Annual Operating Cost (in millions) | Annual VMT Reduction | Miles        | State Highway? |
|----|--------------------|----------------|-----------------------------|----------------------------|-------------------------------------|----------------------|--------------|----------------|
| 7  | Broadway/Lincoln   | 13,000         | 38.00%                      | \$61                       | \$30                                | 16,425,000           | 12.3         | No             |
| 8  | 38th/Park          | 7,000          | 258.61%                     | \$40                       | \$16                                | 7,300,000            | 6.8          | No             |
| 9  | North I-25         | 11,000         | 131.58%                     | \$97                       | \$25                                | 18,250,000           | 17.8         | Yes            |
| 10 | Havana/Hampden     | 9,000          | 64.93%                      | \$61                       | \$20                                |                      | 11.1         | Yes, partial   |
|    | <b>Total</b>       | <b>140,780</b> | <b>124.62%</b>              | <b>\$1,047</b>             | <b>\$320</b>                        | <b>140,555,295</b>   | <b>126.4</b> |                |

State and regional transportation agencies must stop assuming that driving will and should continue to be the primary mode of transportation in the Denver region. Continuing to build on the assumption that the number of cars on the road will always increase with population growth is a self-fulfilling prophecy. You have the ability to plan for and create a different future, where we break away from our unhealthy dependency on cars, and make multimodal transportation a truly viable option for the majority of the daily trips in the Denver region.

[Seattle is a great example of a city that made investments to expand travel options that really paid off.](#) “The number of people driving solo to work in Seattle fell from 53 percent in 2010 to only 44 percent in 2018—the steepest decline in the nation among large metro areas over that period according to a Seattle Times analysis of Census records. Meanwhile, transit use in the Seattle area skyrocketed from 5 percent to 23 percent over the same period.” This shift didn’t happen by accident. It was the result of deliberate decision making to support the kind of future Seattle wanted, rather than maintaining the status quo. Seattle prioritized spending money on public transit, increased service frequency, lowered barriers for accessing the transit system, and worked with the private sector to incentivize transit ridership. Those same strategies should be applied here in the Denver metro region if we are going to meet our air quality, climate, access, and safety goals.

How you spend the state's funding is a direct reflection of the state's values. It is clear to us that investing in regional BRT projects is a more accurate reflection of your stated values and commitments to equity and the environment than a highway expansion project that would displace low income residents and people of color. We urge you to not add any new highway capacity or disrupt surrounding communities in the I-25 Central corridor, and to modify existing plans, including CDOT's 10-year plan and DRCOG's Regional Transportation Plan, to ensure that highway capacity expansion in the I-25 Central corridor is not eligible for funding. We are looking forward to continuing to engage with you as you evaluate transportation projects to fund with the influx of funding from the Bipartisan Infrastructure Investment and Jobs Law and SB 21-260. Please let us know if you have any questions or if you would like to continue this dialogue.

Sincerely,

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Executive Director  
Denver Streets Partnership

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Chair, Denver Streets Partnership Steering Committee  
Executive Director, CoPIRG

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