

STATE OF
COLORADO

Rules - CDOT, DOT_ <dot_rules@state.co.us>

RE: Senate Bill 21-260

1 message

Alma Sekulich <ASekulich@powerpro.com>
To: CDOT Rules <cdot_rules@state.co.us>

Tue, Mar 22, 2022 at 9:43 AM

Yes. Please include my comment. Thank you so much.

Alma

970-250-3002

From: CDOT Rules [mailto:cdot_rules@state.co.us]
Sent: Tuesday, March 22, 2022 9:13 AM
To: Alma Sekulich <ASekulich@powerpro.com>
Subject: Re: Senate Bill 21-260

Dear Ms. Sekulich,

Thank you for providing this important feedback on Senate Bill 21-260. I will forward it along to the rest of the team. Do you wish for this comment to be included in the rulemaking record for the Clean Transit Enterprise and/or the Nonattainment Area Air Pollution Mitigation Enterprise?

My best,

Sari

Sari Weichbrodt

CDOT Rules, Policies, and Procedures Advisor

On Tue, Mar 22, 2022 at 8:00 AM Alma Sekulich <ASekulich@powerpro.com> wrote:

Hello,

This upcharge will hurt the sick and aged most of all. Home delivery was proven during Covid to enable people to remain in their homes and still survive. I suggest those who are disabled, or over 65 are exempt from this additional tax.

Those who are able will probably just start driving to the store if home delivery becomes too expensive.

Thank you for your attention.

Alma Sekulich, PHR SHRM-CP

HR/Acctg Manager

Innovative Textiles, Inc.

970-683-6701

970-250-3002

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STATE OF
COLORADO

Rules - CDOT, DOT_ <dot_rules@state.co.us>

Clean Transit Enterprise Comments from Grand Valley RTPO

1 message

Dana Brosig <dana.brosig@mesacounty.us>
To: dot_rules@state.co.us

Tue, Apr 5, 2022 at 8:35 AM

Dear Clean Transit Enterprise Board-

Thank you for the opportunity to comment on the CTE Rulemaking . Attached you will find the comments from the Mesa County Regional Transportation Planning Office submitted on behalf of the Grand Valley Metropolitan Planning Organization, Grand Valley Transportation Planning Region and Grand Valley Transit.

Sincerely,

Dana Brosig P.E.
GVMPO Director
Regional Transportation Planning Office
525 S. 6th Street
Grand Junction, CO 81501
(970) 255-7187
dana.brosig@mesacounty.us

 **Clean Transit Enterprise Comments-FINAL SIGNED.pdf**
153K



Mesa County Regional Transportation Planning Office

March 31, 2022

Dear Clean Transit Enterprise Governing Board:

Thank you for the opportunity to provide public comment on 2 CCR 607-1- Rules Governing Clean Transit Enterprise (CTE) Processes & Fees. The Regional Transportation Planning Office (RTPO) includes the Grand Valley Metropolitan Planning Organization (GVMPO), the Grand Valley Transportation Planning Region (TPR) and is the contract administrator for Grand Valley Transit (GVT). These comments are sent on behalf of the Grand Valley Regional Transportation Committee (GVRTC), the transportation policy board that oversees the GVMPO, GVT and GVT. The GVRTC includes elected officials from Mesa County, City of Grand Junction, City of Fruita and Town of Palisade, all of whom also help to fund GVT and the RTPO.

The RTPO supports the progression of clean transit in Colorado and the creation of the CTE. However, we do have a number of concerns with the rule with respect to equity as it does not currently apply to all Colorado transit agencies, including GVT, nor does it account for the expansions of transit services in Colorado.

Grand Valley Transit was an early adopter in transitioning its fleet to clean energy with the first CNG buses arriving in 2011. In 2015, the Persigo WWTP commissioned a first-of-its-kind project that beneficially recaptures waste methane gas (biogas) produced as a byproduct of the treatment process and converts it into compressed natural gas (CNG) which is used as a vehicle fuel. The CNG produced at the Persigo WWTP is a carbon-neutral advanced biofuel (considered a Renewable and recoverable Natural Gas-RNG) and is used locally to fuel approximately 74 fleet vehicles owned by the City of Grand Junction and GVT buses. This RNG accounts for approximately 50% of the fuel used to power GVT buses, gas that would otherwise be burned off with no beneficial use. Additional storage has recently been added to the system so that all methane captured at the WWTP is being used to power vehicles. Since 2011, GVT has converted all 29 buses to CNG and considers the system to be Clean Transit. With this conversion to CNG buses, GVT is no longer eligible for FTA low-no funding for bus replacements as there are no longer diesel or gasoline buses eligible for replacement and, as the CTE rule is written, would not be eligible for CTE funds.

With this, GVT does not agree with the CTE focus on electric vehicles with an allowance for CNG vehicles only if electric vehicles are not, "practically available". RNG has proven to be a reliable and affordable fuel source for GVT and the CTE focus on electric vehicles may prevent other communities from capturing this methane to fuel vehicles whereby this methane is burned off without a beneficial use. With this we request that the Rule be modified so that RNG vehicles are eligible for funding from the Clean Transit Enterprise in the same way electric vehicles are eligible.

Additionally, we feel that the requirement that "at least ninety percent of the fuel for the Compressed Natural Gas Motor Vehicles will be Recovered Methane" would be difficult to achieve and prohibitive of communities capturing and using methane. Instead, we request that the Rule change so that the




Mesa County Regional Transportation Planning Office

percent of RNG is to be greater than the percent of renewable energy in the local grid which would be charging the electric vehicles.

While we support the replacement of gas and diesel buses with cleaner alternatives, we believe that this funding should also be available for fleet expansion with electric or CNG buses. While we desire a future where transit is a viable, reliable and clean mode of transportation, viability depends upon service expansion. Currently GVT has one-hour headways on all regular routes. While the system does serve the travelling public, ridership is largely made up of community members that have no other transportation options leading to low ridership. In order to increase ridership so that it is attractive to the travelling public, resulting in a greater reduction in Vehicle Miles Traveled (VMT) and greenhouse gas emissions (GHG), increased frequency is needed to decrease headways to 30-min or less. Of course, additional fleet is needed to do so. With this, we request that the Rule be expanded such that fleet expansion in addition to fleet replacement is eligible for Clean Transit Enterprise funding.

We understand that the Retail Delivery Fees will be collected across the state and believe the requested revisions to the rule will lead to equity in the distribution of these funds to transit agencies across the state. This fee would be collected from residents in Mesa County but Grand Valley Transit, which serves Mesa County residents, would not be eligible to access these funds as the Rule is currently written. With this, we respectfully request that RNG be included as an option for CTE funding, that the percentage of RNG be reduced and that fleet expansions of RNG and electric buses are eligible for CTE funding. If these changes are not possible, we request a way for equity to be achieved by CDOT or the CTE board through other transit funding mechanisms.

Respectfully signed,

DocuSigned by:


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Scott McInnis
GVRTC Chair
Mesa County Commissioner

DocuSigned by:


E01E52CA7AA54A2...
Greg Mikolai
GVRTC Vice Chair
Town of Palisade- Mayor

DocuSigned by:


40FE89E8B1534E4...
Dennis Simpson
GVRTC Representative
City of Grand Junction Councilman

DocuSigned by:


99EC1FDAAA3C4A6...
Lori Buck
GVRTC Representative
City of Fruita- Mayor Pro Tem



Dana Brosig, P.E.
Grand Valley MPO Director