

# Permanent Rulemaking Hearing

2 CCR 601-22

“Rules Governing Statewide Transportation  
Planning Process and Transportation Planning  
Regions”



Exhibits

## Rulemaking Hearing on the Rules Governing Statewide Transportation Planning Process

### 2 CCR 601-22 Index of Exhibits

Exhibit	Description
1	A. Resolution dated January 18, 2024 from Transportation Commission, opening the rulemaking process and delegating authority to an administrative hearing officer.
2	A. SOS Notice of Rulemaking Confirmation dated January 29, 2024. B. SOS Notice of Rulemaking Confirmation update dated January 31, 2024. C. Proposed Permanent Rules filed with the SOS to open rule making, as updated March 11, 2024. D. Notice of Rulemaking Hearing published in Colorado Register on February 10, 2024.
3	A. DORA Email Notice of Proposed Rule Submitted dated January 29, 2024 B. DORA Rulemaking Confirmation dated January 29, 2024. C. DORA Notice that no Cost-Benefit Analysis is necessary dated February 19, 2024.
4	A. Screenshot of CDOT rules website indicating rule language posted.
5	A. Proposed Statement of Basis and Purpose and Statutory Authority filed January 29, 2024.
6	A. List of meetings held prior to commencing rulemaking
7	A. Email to Representative Stakeholders Group dated January 29, 2024, regarding notice of hearing and proposed permanent rules. (attach NoH, Statement of Basis & Purpose, red-lined rule) B. Updated Email to Representative Stakeholders Group dated January 31, 2024 C. Email reminder to Stakeholders Group, March 13, 2024
8	A. Email to Interested Parties dated January 29, 2024, regarding notice of hearing and proposed permanent rules. (attach NOH, Statement of Basis & Purpose, red-lined rule) B. Updated Email to Interested Parties dated January 31, 2024 C. Email Reminder to Interested Parties, March 13, 2024
9	Written comments received before the rule opened (TPR study)
10	Written comments since rule was opened and as 5:00 p.m. March 15, 2024
11	Memo to maintain permanent rule making record
12	Proposed Rules for Adoption - Clean Version
13	Registration list for hearings on March 6 & March 11

# Exhibit 1

## **Resolution #TC-2024-01-08**

Commence Permanent Rulemaking and Delegate Authority to an Administrative Hearing Officer to Conduct a Public Rulemaking Hearing for the Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions (“the Planning Rules”), 2 CCR 601-22.

**Approved by the Transportation Commission on January 18, 2024.**

**Whereas**, House Bill 23-1101 directed the Colorado Department of Transportation (CDOT) to complete a study and study report of the boundaries of the Transportation Planning Regions (TPRs), as defined in Section 43-1-1102(8); the membership of the Transportation Advisory Committee created in section 43-1-1104(1)(a); the Transit and Rail Advisory Committee appointed pursuant to Section 43-1-1104(1)(b); and the consistency and transparency of the transportation planning process across the TPRs; and

**Whereas**, House Bill 23-1101 further requires that following the completion of the study and before June 1, 2024, the Commission shall initiate updates to its Planning Rules; and

**Whereas**, § 43-1-106(8)(k), C.R.S. authorizes the Commission to make all necessary and reasonable orders, rules, and regulation to carry out its authority and duties; and

**Whereas**, § 43-1-1103(5), C.R.S. authorizes the Commission to promulgate rules regarding the formation of the statewide transportation plan through a statewide and regional planning process, and the boundaries of the TPRs pursuant to §43-1-1102(8)(a); and

**Whereas**, CDOT completed “HB 23-1101: Transportation Planning Region Study” (the Report) and presented the Report and the Report’s recommendations to the Commission on November 15, 2023; and

**Whereas**, the Planning Rules makes use of the statutory definition of Disproportionately Impacted Communities (DIC) and that definition has changed in state statute; and

**Whereas**, the Commission has the authority to conduct a rulemaking hearing or to delegate the authority to an Administrative Hearing Officer for the purposes of conducting the rulemaking hearing, making a complete procedural record of the hearing, and submitting that record and any recommendations to the Commission for its review and action concerning amendments to the Planning Rules; and

**Whereas**, the Commission has established the Planning Rules Coordination Committee (PRCC) to act as liaison for the Commission throughout the rulemaking process, consider the proposed amendments to the Planning Rules and ensure affected and interested parties are provided with notice and opportunity to comment under the requirements of the State Administrative Procedure Act.

**Now therefore be it resolved**, the Commission authorizes staff and the PRCC to take all necessary actions in accordance with the State Administrative Procedure Act to initiate rulemaking for the purpose of considering amendments to Section 1.11, Section 2 and Section 3 of the Planning Rules, 2 CCR 601-22.

**Now therefore be it resolved,** the Commission delegates its authority to conduct the permanent rulemaking hearing to a CDOT Administrative Hearing Officer to prepare a complete record of the hearing in collaboration with the PRCC and forward said record and proposed rules to the Commission for consideration and adoption.

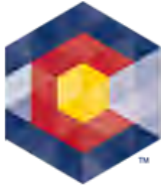
**Now therefore be it resolved,** the Commission requests that CDOT and the PRCC include in the official rulemaking record the Report as well as all formal, written public comments from stakeholders prior to the Commission taking action to open the Rules and treat those as public comment related to the rulemaking.

**Herman Stockinger** Digitally signed by Herman  
Stockinger  
Date: 2024.01.24 15:33:43 -07'00'

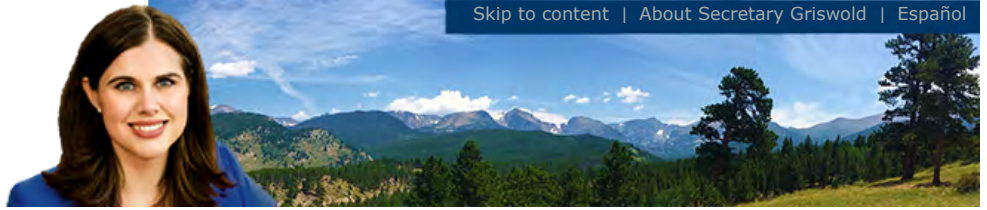
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Herman Stockinger, Secretary  
Transportation Commission of Colorado

# Exhibit 2



Colorado  
Secretary of State  
Jenna Griswold



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## Notice of Rulemaking Confirmation

Official Publication of the State Administrative Rules (24-4-103(11) C.R.S.)

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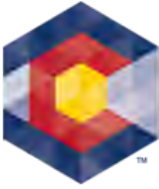
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REMEMBER: You must submit your proposed rules to DORA's Office of Policy, Research and Regulatory Reform at the time of filing this notice with the Secretary of State, as required by section 24-4-103(2.5) C.R.S.  
Link: [https://www.dora.state.co.us/pls/real/SB121\\_Logon](https://www.dora.state.co.us/pls/real/SB121_Logon)

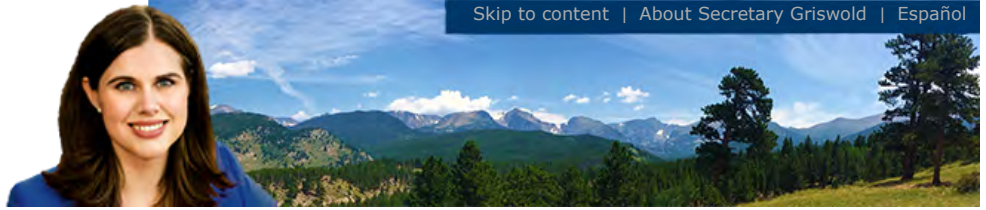
**Your notice of rulemaking has been submitted to the Secretary of State.**  
**Your tracking number is 2024-00042.**

<b>Department</b>	600 - Department of Transportation
<b>Type of Filing</b>	Permanent
<b>Agency</b>	601 - Transportation Commission and Office of Transportation Safety
<b>CCR Number</b>	2 CCR 601-22
<b>CCR Title</b>	RULES GOVERNING STATEWIDE TRANSPORTATION PLANNING PROCESS AND TRANSPORTATION PLANNING REGIONS
<b>Hearing Date</b>	03/06/2024
<b>Hearing Time</b>	02:00 PM
<b>Hearing Location</b>	Virtual Only
<b>Description</b>	The specific purpose of this rulemaking is to consider changes to Section 2 (Transportation Planning Regions) and Section 3 (Statewide Transportation Advisory Committee) of the Rules as recommended by CDOT staff and published in the "HB 23-1101: Transportation Planning Region Study (TPR Study)." The proposed changes include the addition of minimum requirements in a TPR's governing documents, changes to the boundaries of several TPRs, and requirements related to the process for how the Statewide Transportation Advisory Committee (STAC) selects its officers. Additionally, the Transportation Commission is also considering changes to Rule 1.11, the definition of Disproportionately Impacted Communities, to conform the Rule's definition to recent changes in state statute.
<b>Statutory Authority</b>	The specific authority under which the Commission shall establish these proposed rule revisions is set forth in §§ 43-1-106(8)(k), 43-1-1101, 43-1-1103(5), and 43-1-131 (3) C.R.S.
<b>Proposed Rule</b>	<a href="#">ProposedRuleAttach2024-00042.pdf</a>
<b>Additional Information</b>	<a href="#">AddInfoAttach2024-00042.pdf</a>
<b>Contacts for Public</b>	
<b>Name</b>	Herman Stockinger
<b>Title</b>	CDOT Acting Rules Administrator
<b>Phone</b>	7208106934
<b>Email</b>	herman.stockinger@state.co.us

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Colorado  
Secretary of State  
Jenna Griswold



## Notice of Rulemaking Confirmation

Official Publication of the State Administrative Rules (24-4-103(11) C.R.S.)

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Date Filed: January 31, 2024 11:33:28

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REMEMBER: You must submit your proposed rules to DORA's Office of Policy, Research and Regulatory Reform at the time of filing this notice with the Secretary of State, as required by section 24-4-103(2.5) C.R.S.  
Link: [https://www.dora.state.co.us/pls/real/SB121\\_Logon](https://www.dora.state.co.us/pls/real/SB121_Logon)

**Your notice of rulemaking with tracking number 2024-00042 has been updated successfully.**

<b>Department</b>	600 - Department of Transportation
<b>Type of Filing</b>	Permanent
<b>Agency</b>	601 - Transportation Commission and Office of Transportation Safety
<b>CCR Number</b>	2 CCR 601-22
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<b>Proposed Rule</b>	<a href="#">ProposedRuleAttach2024-00042.pdf</a>
<b>Additional Information</b>	<a href="#">AddInfoAttach2024-00042.pdf</a>
<b>Comments</b>	On January 31, 2024, the Proposed Rule was updated to correct an error in the draft related to which parts of Eagle County would belong in each TPR.
<b>Contacts for Public</b>	
<b>Name</b>	Herman Stockinger
<b>Title</b>	CDOT Acting Rules Administrator
<b>Phone</b>	7208106934
<b>Email</b>	herman.stockinger@state.co.us

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DEPARTMENT OF TRANSPORTATION

Transportation Commission

RULES GOVERNING STATEWIDE TRANSPORTATION PLANNING PROCESS AND  
TRANSPORTATION PLANNING REGIONS

2 CCR 601-22

\*\*\*\*\*

- 1.11 Disproportionately Impacted Communities - defined in ~~§ 24-38.5-302(3)~~ §24-4-109, C.R.S. as a community that is described in § 24-4-109(2)(b)(II)(G) or (2)(b)(II)(H), C.R.S. or that is in a census block group, as determined in accordance with the most recent five-year United States bureau of the census American community survey and meets one or more of the following criteria. ~~Decennial Census where the proportion of households that are low income is greater than forty percent (40%), the proportion of households that identify as minority is greater than forty percent (40%), or the proportion of households that are housing cost burdened is greater than forty percent (40%).~~
- 1.11.1 The proportion of the population living in households that are below two hundred percent of the federal poverty level is greater than forty percent;
  - 1.11.2 The proportion of households that spend more than thirty percent of household income on housing is greater than fifty percent;
  - 1.11.3 The proportion of the population that identifies as people of color is greater than forty percent;
  - 1.11.4 The proportion of the population that is linguistically isolated is greater than twenty percent;
  - 1.11.5 A statewide agency determines, after a community presents evidence of being and requests to be classified as a disproportionately impacted community, that the population is disproportionately impacted based on evidence, presented in a relevant statewide agency decision-making process, that a census block group is disproportionately impacted because it has a history of environmental racism perpetuated through redlining or through anti-indigenous, anti-immigrant, anti-Latino, or anti-Black laws, policies, or practices and that present-day demographic factors and data demonstrate that the community currently faces environmental health disparities;
  - 1.11.6 The community is identified by a statewide agency as being one where multiple factors, including socioeconomic stressors, vulnerable populations, disproportionate environmental burdens, vulnerability to environmental degradation or climate change, and lack of public participation may act cumulatively to affect health and the environment and may contribute to persistent disparities;
  - 1.11.7 The community is a mobile home park, as defined in section 38-12-201.5 (6), regardless of whether the mobile home park is a census block group; or
  - 1.11.8 The community is located on the Southern Ute or Ute Mountain Ute Indian reservation, regardless of whether the community is a census block group.

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**2.00 Transportation Planning Regions (TPR).**

2.01 Transportation Planning Region Boundaries. TPRs are geographically designated areas of the state with similar transportation needs that are determined by considering transportation commonalities. Boundaries are hereby established as follows:

2.01.1 The Pikes Peak Area TPR comprises the Pikes Peak Area Council of Governments' metropolitan area within El Paso and Teller counties.

2.01.2 The Greater Denver TPR, which includes the Denver Regional Council of Governments' planning area, comprises the counties of Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Gilpin, Jefferson, and parts of Weld.

2.01.3 The North Front Range TPR comprises the North Front Range Transportation and Air Quality Planning Council's metropolitan area within Larimer and Weld counties.

2.01.4 The Pueblo Area TPR comprises Pueblo County, including the Pueblo Area Council of Governments' metropolitan area.

2.01.5 The Grand Valley TPR comprises Mesa County, including the Grand Valley Metropolitan Planning Organization's metropolitan area.

2.01.6 The Eastern TPR comprises Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Phillips, Sedgwick, Washington, and Yuma counties.

2.01.7 The Southeast TPR comprises Baca, Bent, Crowley, Huerfano, Kiowa, Las Animas, Otero, and Prowers counties.

2.01.8 The San Luis Valley TPR comprises Alamosa, Chaffee, Conejos, Costilla, Mineral, Rio Grande, and Saguache counties.

2.01.9 The Gunnison Valley TPR comprises Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel counties.

2.01.10 The Southwest TPR comprises Archuleta, Dolores, La Plata, Montezuma, and San Juan counties, including the Ute Mountain Ute and Southern Ute Indian Reservations.

2.01.11 The West Intermountain TPR comprises Eagle, Garfield and, Lake, Pitkin counties, and the portion of Eagle County that is within the boundaries of the Roaring Fork RTA, Summit counties.

2.01.12 The East Intermountain TPR comprises Lake and Summit counties, and the portion of Eagle County that is within the boundaries of the Eagle Valley Transportation Authority.

~~2.01.13~~ The Northwest TPR comprises Grand, Jackson, Moffat, Rio Blanco, and Routt counties.

~~2.01.14~~ The Upper Front Range TPR comprises Morgan County, and the parts of Larimer and Weld counties, that are outside both the North Front Range and the Greater Denver (metropolitan) TPRs.

2.01.1~~54~~ The Central Front Range TPR comprises Custer, El Paso, Fremont, Park, and Teller counties, excluding the Pikes Peak Area Council of Governments' metropolitan area.

~~2.01.15 The South Central TPR comprises Huerfano, and Las Animas Counties.~~

2.02 Boundary Revision Process.

2.02.1 TPR boundaries, excluding any MPO-related boundaries, will be reviewed by the Commission at the beginning of each regional and statewide transportation planning process. The Department will notify counties, municipalities, MPOs, Indian tribal governments, and RPCs for the TPRs of the boundary review revision requests. MPO boundary review shall be conducted pursuant to 23 U.S.C. § 134 and 23 C.F.R. Part 450 Subpart B and any changes shall be provided to the Department to update the Rules. All boundary revision requests shall be sent to the Division Director, and shall include:

2.02.1.1 A geographical description of the proposed boundary change.

2.02.1.2 A statement of justification for the change considering transportation commonalities.

2.02.1.3 A copy of the resolution stating the concurrence of the affected RPC.

2.02.1.4 The name, title, mailing address, telephone number, fax number and electronic mail address (if available) of the contact person for the requesting party or parties.

2.02.2 The Department will assess and STAC shall review and comment (as set forth in these Rules) on all Non-Metropolitan Area TPR boundary revision requests based on transportation commonalities and make a recommendation to the Commission concerning such requests. The Department will notify the Commission of MPO boundary changes. The Commission may initiate a rule-making proceeding under the Colorado Administrative Procedure Act, § 24-4-103, C.R.S. to consider a boundary revision request. Requests received for a MPO or non-metropolitan TPR boundary revision outside of the regularly scheduled boundary review cycle must include the requirements identified above.

2.02.3 In the event that the Commission approves a change to the boundary of a TPR that has a RPC, the RPC in each affected TPR shall notify the Department of any changes to the Intergovernmental Agreement governing the RPC as specified in these Rules.

2.03 Transportation Planning Coordination with MPOs.

2.03.1 The Department and the MPOs shall coordinate activities related to the development of RTPs, the Statewide Transportation Plan, TIPs, and the STIP in conformance with 23 U.S.C. § 134 and 135 and § 43-1-1101 and § 43-1-1103, C.R.S. The Department shall work with the MPOs to resolve issues arising during the planning process.

2.04 Transportation Planning Coordination with Non-MPO RPCs.

2.04.1 The Department and RPCs shall work together in developing RTPs and in planning future transportation activities. The Department shall consult with all RPCs on development of the Statewide Transportation Plan; incorporation of RTPs into the Statewide Transportation Plan; and the inclusion of projects into the STIP that are consistent with the RTPs. In addition, the Department shall work with the RPCs to resolve issues arising during the planning process.

- 2.05 Transportation Planning Coordination among RPCs.
- 2.05.1 If transportation improvements cross TPR boundaries or significantly impact another TPR, the RPC shall consult with all the affected RPCs involved when developing the RTP. In general, RPC planning officials shall work with all Planning Partners affected by transportation activities when planning future transportation activities.
- 2.06 Transportation Planning Coordination with the Southern Ute and the Ute Mountain Ute Tribal Governments.
- 2.06.1 Regional transportation planning within the Southwest TPR shall be coordinated with the transportation planning activities of the Southern Ute and the Ute Mountain Ute tribal governments. The long-range transportation plans for the tribal areas shall be integrated in the Statewide Transportation Plan and the RTP for this TPR. The TTIP is incorporated into the STIP without modification.

~~2.07 Transportation Commission Expectations for consistency and transparency of RPC and TPR governing documents. To ensure consistency and transparency among RPC and TPRs that conduct transportation planning and develop RTPs under Rule 4.00, the governing documents of RPCs these entities must include the following information.~~

~~2.07.1 The name of the organization, and the membership, including transit membership consistent with and required under 43-1-1103.~~

~~2.07.2 The duties of the organization, and the ability to spend and receive funds, sue and be sued, and enter into contracts.~~

~~2.07.3 The ability to terminate and amend its governing documents.~~

~~2.07.4 An overview of general meeting cadence and locations.~~

~~2.07.5 A list of officers, process for the elections of officers, and the length of term of officers.~~

~~2.07.6 What shall constitute a quorum and what the voting structure shall be.~~

~~2.07.7 An assurance that meetings are open to the public and must be publicly noticed.~~

~~2.07.8 An assurance that agendas and meeting minutes are available and accessible to the public.~~

~~2.07.9 An assurance that regularly scheduled meetings shall allow time for public comment on the agenda.~~

~~2.07.10 The process for identifying how the TPR's STAC representative is chosen.~~

~~2.07.11 A statement on how the TPR arranges for administrative support for its activities and responsibilities. is to be administered.~~

~~2.07.12 The inclusion of a Conflict of Interest Statement.~~

~~2.07.13 An assurance that TPR information can be found on the internet.~~

~~2.08 TPRs that have governmental jurisdictions that are represented within multiple TPRs are encouraged to work together to ensure no political jurisdiction represents more than one TPR on STAC.~~

### 3.00 Statewide Transportation Advisory Committee (STAC).

- 3.01 Duties of the STAC. Pursuant to § 43-1-1104 C.R.S. the duties of the STAC shall be to meet as necessary and provide advice to both the Department and the Commission on the needs of the transportation system in Colorado including, but not limited to: budgets, TIPs of the MPOs, the STIP, transportation plans, and state transportation policies.

The STAC shall review and provide to both the Department and the Commission comments on:

- 3.01.1 All RTPs, amendments, and updates as described in these Rules.
- 3.01.2 Transportation related communication and/or conflicts which arise between RPCs or between the Department and a RPC.
- 3.01.3 The integration and consolidation of RTPs into the Statewide Transportation Plan.
- 3.01.4 Colorado's Mobility requirements to move people, goods, services, and information by furnishing regional perspectives on transportation problems requiring interregional and/or statewide solutions.
- 3.01.5 Improvements to modal choice, linkages between and among modes, and transportation system balance and System Continuity.
- 3.01.6 Proposed TPR boundary revisions.
- 3.02 Notification of Membership
- 3.02.1 Each RPC and tribal government shall select its representative to the STAC pursuant to § 43-1-1104(1), C.R.S. The Ute Mountain Ute Tribal Council and the Southern Ute Indian Tribal Council each appoint one representative to the STAC. Each TPR and tribal government is also entitled to name an alternative representative who would serve as a proxy in the event their designated representative is unable to attend a STAC meeting and would be included by the Department in distributions of all STAC correspondence and notifications. The Division Director shall be notified in writing of the name, title, mailing address, telephone number, ~~fax number~~ and electronic mail address (if available) of the STAC representative and alternative representative from each TPR and tribal government within thirty (30) days of selection.

3.02.2 The chairperson of the Transit and Rail Advisory Committee (TRAC) shall be a non-voting member of STAC and is entitled to name an alternative representative in the event the chairperson is unable to attend a STAC meeting and both individuals shall be included by the Department in distributions of all STAC correspondence and notifications. The Division Director shall be notified in writing of the name, title, mailing address, telephone number, and electronic mail address of the STAC representative and alternative representative within thirty (30) days of selection.

### 3.03 Administration of STAC

- 3.03.1 STAC recommendations on Regional and Statewide Transportation Plans, amendments, and updates shall be documented in the STAC meeting minutes, and will be considered by the Department and Commission throughout the statewide transportation planning process.

3.03.2 The STAC shall establish procedures to govern its affairs in the performance of its advisory capacity, including, but not limited to, the appointment of a chairperson and the length of the chairperson's term, meeting times, and locations.

3.03.2.1 In establishing procedures for the appointment of a chairperson and vice chairperson, STAC shall include a provision for term limits for each office so that no individual may serve in either position for more than two consecutive two-year terms.

3.03.2.2 To ensure the STAC's leadership represent ~~come from~~ both rural and urban Colorado, STAC procedures shall require that when the chairperson is chosen from a rural TPR or tribe, the vice chairperson shall be chosen from an urban MPO area, and each position shall rotate so that no consecutive chairpersons or vice chairpersons come from either a rural TPR or tribe, or urban MPO area consecutively.

3.03.3 The Division Director will provide support to the STAC, including, but not limited to:

3.03.3.1 Notification of STAC members and alternates of meeting dates.

3.03.3.2 Preparation and distribution of STAC meeting agendas, supporting materials, and minutes.

3.03.3.3 Allocation of Department staff support for STAC-related activities.

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# Colorado Register

Official Publication of the State Administrative Rules (24-4-103(11) C.R.S.)

February 10, 2024 - Volume 47 , No. 3

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**Notices of proposed rulemaking**

Department	Agency	Proposed rules	Hearing
Department of Revenue	Hearings Division	<a href="#">RULES FOR HEARINGS BEFORE THE HEARINGS DIVISION OF THE DEPARTMENT OF REVENUE NOT RELATED TO DRIVER'S LICENSE MATTERS</a>	<a href="#">03/14/2024 11:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (405 Series, Parks)	<a href="#">CHAPTER P-7 - PASSES, PERMITS AND REGISTRATIONS</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-0 - GENERAL PROVISIONS</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-2 - BIG GAME</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-3 - FURBEARERS AND SMALL GAME, EXCEPT MIGRATORY BIRDS</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-5 - SMALL GAME - MIGRATORY BIRDS</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-9 - WILDLIFE PROPERTIES</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-15 - DIVISION AGENTS</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Natural Resources	Colorado Parks and Wildlife (406 Series, Wildlife)	<a href="#">CHAPTER W-16 - PARKS AND WILDLIFE PROCEDURAL RULES</a>	<a href="#">03/13/2024 08:00 AM</a>
Department of Transportation	Transportation Commission and Office of Transportation Safety	<a href="#">RULES GOVERNING STATEWIDE TRANSPORTATION PLANNING PROCESS AND TRANSPORTATION PLANNING REGIONS</a>	<a href="#">03/06/2024 02:00 PM</a>

# Exhibit 3



STATE OF  
COLORADO

Stockinger - CDOT, Herman &lt;herman.stockinger@state.co.us&gt;

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**Proposed Rule Submitted - Transportation Planning Rules -**1 message

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DORA\_OPR\_Website@state.co.us &lt;DORA\_OPR\_Website@state.co.us&gt;

Mon, Jan 29, 2024 at 1:04  
PM

To: herman.stockinger@state.co.us

The following Proposed Rule has been submitted to the Colorado Office of Policy, Research and Regulatory Reform:


**Department:** Department of Transportation**Rulemaking Agency:** Transportation Commission of Colorado**Rule ID:** 10122**Title or Subject:** Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions**Submitted by:** Herman Stockinger**Date Submitted:** 01/29/2024




After your submission has been checked for completeness, it will be made available to the general public on DORA's website and email notifications will be sent to interested stakeholders.

In accordance with SB13-158, the public will have until Thursday, February 15th, 2024 at midnight to request that the Department of Regulatory Agencies require your agency to prepare a cost-benefit analysis of these rules or amendments. You will be copied on all stakeholder requests for a cost-benefit analysis and DORA staff will contact you to discuss the requests. A second email notification will be sent if you are required to submit a cost-benefit analysis as a result of a public request.

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Please contact us at [DORA\\_OPR\\_Website@state.co.us](mailto:DORA_OPR_Website@state.co.us) if you have further questions regarding this e-mail message.

-  **Home**
- My Proposed Rules
- Submit New Rule

-  **Reports**
-  **My Account**
-  **Help**

### Submission Accepted

### Rule Submitted

Your proposed rules or amendments to rules have been successfully submitted to the Department of Regulatory Agencies.

After your submission has been checked for completeness, it will be made available to the general public on DORA's website and email notifications will be sent to interested stakeholders. You will be copied on all stakeholder requests for a cost-benefit analysis and DORA staff will contact you to discuss any public requests.

You may log back in to this system at any time to check on the current status of this rule. An email notification containing further instructions will be sent if a cost-benefit analysis is required as a result of your submission.

**Colorado Department of Regulatory Agencies**

January 29, 2024 01:04 pm  
Calling Procedure:  
SB121\_Submit\_Rule.  
Rule\_Submitted  
Version: 1.0



STATE OF  
COLORADO

Stockinger - CDOT, Herman <herman.stockinger@state.co.us>

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## No Public Cost-Benefit Analysis Request for Rule - Transportation Planning Rules -

1 message

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**DORA\_OPR\_Website@state.co.us** <DORA\_OPR\_Website@state.co.us>  
To: herman.stockinger@state.co.us

Mon, Feb 19, 2024 at 7:46 PM

The deadline for public Cost-Benefit Analysis requests has passed for the following Proposed Rule:

**Department:** Department of Transportation  
**Rulemaking Agency:** Transportation Commission of Colorado  
**Rule ID:** 10122  
**Title or Subject:** Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions  
**Submitted by:** Herman Stockinger  
**Date Submitted:** 01/29/2024  
**Deadline for Public Cost-Benefit Analysis Request:** February 15, 2024 11:59 pm

No public requests were received by the deadline. A Cost-Benefit Analysis is not required for this submission.

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Please contact us at [DORA\\_OPR\\_Website@state.co.us](mailto:DORA_OPR_Website@state.co.us) if you have further questions regarding this e-mail message.

# Exhibit 4

# Proposed Rules & Public Hearing Dates

The following rules are in the process of being revised by CDOT staff and set for a public rulemaking hearing. Proposed revisions are required by statute to be available five days prior to the hearing date. Please check this page five days prior to the hearing for the final proposed rule that will be discussed at the hearing.

Please submit all comments or questions regarding the proposed rules to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us).

CDOT maintains a list of individuals and entities who are interested in being notified of CDOT rulemaking activities. If you would like to be added to this list, please email [DOT\\_Rules@state.co.us](mailto:DOT_Rules@state.co.us).

## Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions

Number	2 CCR 601-22
Contact	<a href="#">Herman Stockinger</a>
Hearing Notice	<a href="#">Notice of 2 CCR 601-22 Permanent Rulemaking Hearing</a>
Statement of Basis and Purpose	<a href="#">2 CCR 601-22 Statement of Basis and Purpose</a>
Proposed Rule	<a href="#">Proposed Rule 2 CCR 601-22 - Corrected 1/31/24</a>
Virtual Hearing Date & Time	March 6, 2024, 2:00pm-3:30pm (MST) & March 11, 2024, 6:00pm-7:30pm (MST)
Virtual Hearing Registration	See below
Hearing Exhibits	Hearing Exhibits for 2 CCR 601-22 - coming soon
Recording of Rulemaking Hearing	Recording of Rulemaking Hearing for 2 CCR 601-22 - Posted After Hearing
Please submit written questions or comments to:	<a href="mailto:dot_rules@state.co.us">dot_rules@state.co.us</a>
Written Comments	Deadline for Submission: March 15th, 5:00pm (MST)

Virtual Public Hearing

# Exhibit 5



# **COLORADO**

## **Department of Transportation**

2829 W. Howard Place  
Denver, CO 80204-2305

1/29/2024

### **Transportation Commission of Colorado Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions 2 CCR 601-22**

#### **Updated Proposed Statement of Basis and Purpose, Statutory Authority**

#### **Statement of Basis and Purpose**

##### **Overview**

The purpose of the Rules Governing the Statewide Transportation Planning Process and Transportation Planning Regions (Rules) is to prescribe the statewide transportation planning process through which a long-range multimodal, comprehensive Statewide Transportation Plan will be developed, integrated, updated, and amended by the Colorado Department of Transportation (Department or CDOT), in cooperation with local governments, Metropolitan Planning Organizations (MPOs), Regional Planning Commissions, Indian tribal governments, relevant state and federal agencies, the private sector, transit and freight operators, and the general public. This cooperative process is designed to coordinate regional transportation planning, guided by the statewide transportation policy set by the Department and the Transportation Commission of Colorado ("Commission"), as a basis for developing the Statewide Transportation Plan. The result of the statewide transportation planning process shall be a long-range, financially feasible, environmentally sound, multimodal transportation system plan for Colorado that will reduce traffic and smog.

Further, the purpose of the Rules is to define the state's Transportation Planning Regions for which long-range Regional Transportation Plans are developed, prescribe the process for conducting and initiating transportation planning in the non-MPO Transportation Planning Regions and coordinating with the MPOs for planning in the metropolitan areas. Memoranda of Agreement (MOA) that serve as the Metropolitan Planning Agreements (MPAs) pursuant to 23 C.F.R. § 450 between the Department, each MPO, and applicable transit provider(s) further prescribe the transportation planning process in the MPO Transportation Planning Regions. In addition, the purpose of the Rules is to describe the organization and function of the Statewide Transportation Advisory Committee (STAC) as established by § 43-1-1104, Colorado Revised Statutes (C.R.S.).

The Rules are promulgated to meet the intent of both the U.S. Congress and the Colorado General Assembly for conducting a continuing, cooperative, and comprehensive statewide performance-based multimodal transportation planning process for producing a Statewide Transportation Plan and Regional Transportation Plans that address the transportation needs of the State. This planning process, through comprehensive input, results in systematic project prioritization and resource allocation.

The Rules, governing the statewide planning process, emphasize Colorado's continually greater integration of multimodal, cost-effective, and environmentally sound means of transportation which leads to cleaner air and reduced traffic. The Rules reflect the Commission's and the Department's focus on multimodal



transportation projects including highways, transit, rail, bicycles and pedestrians. Section 8 of these Rules establishes an ongoing administrative process for identifying, measuring, confirming, and verifying those best practices and their impacts, so that CDOT and MPOs can easily apply them to their plans in order to achieve the pollution reduction levels required by these Rules.

The specific purpose of this rulemaking is to consider changes to Section 2 (Transportation Planning Regions) and Section 3 (Statewide Transportation Advisory Committee) of the Rules as recommended by CDOT staff and published in the [“HB 23-1101: Transportation Planning Region Study \(TPR Study\).”](#) The proposed changes include the addition of minimum requirements in a TPR’s governing documents, changes to the boundaries of several TPRs, and requirements related to the process for how the Statewide Transportation Advisory Committee (STAC) selects its officers. Additionally, The Commission is also considering changes to Rule 1.11, the definition of Disproportionately Impacted Communities, to conform the Rule’s definition to recent changes in state statute.

### Why the Commission is Taking This Action

HB 23-1101, signed into law by the Governor on April 28, 2023, includes a requirement that, following the completion of the TPR Study and with considerations of the findings of the study, the Commission shall initiate updates to the Rules before June 1, 2024. Because CDOT and the TPRs will begin updates to the statewide and regional transportation plans during Summer, 2024, the Commission is authorizing the opening of the Rules in January so that any changes to the TPRs will be completed at the start of the state and regional planning processes.

### Statutory Authority

The statutory authority is as follows:

- § 43-1-131(3), C.R.S., which requires the Commission to initiate updates to the Rules before June 1, 2024.
- § 43-1-1101, C.R.S., which authorizes CDOT to develop and maintain the state transportation planning process and the State Transportation Plan in cooperation with Regional Planning Commissions and local government.
- § 43-1-1103(5), C.R.S., which authorizes the Commission to promulgate rules to establish the formation of the Statewide Transportation Plan and the statewide planning process.
- § 43-1-106(8)(k), C.R.S., which authorizes the Commission to make all necessary and reasonable order, rules and regulations.





# Exhibit 6

## Stakeholder Involvement During TPR Study - 2023

Date of meeting	Stakeholder	Location	CDOT reps in the meeting
4/6/2023	STAC	Virtual	CDOT Staff
4/13/2023	Southwest TPR	Virtual	Herman, Jamie, R5
4/17/2023	Central Front Range TPR	Fairplay	Herman, Jamie, Kathleen Collins, R2
2/21/2023	Intermountain TPR	Eagle	Herman, Jamie, R3
4/26/2023	Southeast TPR		Herman, Jamie, Kathleen Collins
4/27/2023	SCTPR	Trinidad	Herman, Jamie, Kathleen Collins
5/9/2023	PACOG TAC	Virtual	Jamie
5/11/2023	NW TPR	Steamboat Springs	Herman
5/11/2023	Gunnison Valley TPR	Montrose	Jamie
5/25/2023	SLVTPR	Alamosa	Herman, R5
5/25/2023	PACOG Board Meeting	Pueblo/Virtual	Jamie, Melissa
6/1/2023	STAC	Virtual	Herman
6/1/2023	Upper Front Range TPR	Fort Lupton	Herman
6/1/2023	North Front Range MPO	Greeley	Herman
6/5/2023	Eastern TPR	Limon	Herman
6/8/2023	SWTPR	Virtual	Jamie
6/26/2023	Presentation to GVMPO	Vitual	Jamie
7/6/2023	July STAC	Virtual	Herman, Jamie
7/11/2023	Central Front Range TPR	Florence	Jamie and Melissa (plus Crystal and Kathleen Collins)
7/19/2023	DRCOG July Meeting	DRCOG	Jamie
21-Jul	IMTPR	Eagle	Jamie, Darius, Melissa
24-Jul	GVMPO (GVRTC)	Grand Junction	Herman
25-Jul	Region 5 Public Meeting	Virtual	Herman, Jamie, Melissa, Julie, Tim Funk, Tony Cady
7/26/2023	Southeast TPR July Meeting	Lamar	Jamie, Melissa, Darius, Kathleen
7/27/2023	South Central TPR July Meeting	Walsenburg	Jamie, Melissa, Darius, Kathleen
7/31/2023	Region 4 Public Meeting	Virtual	Sari, Jamie, Herman, Darius, Heather Paddock, Josie Thomas, Suzette Mallette, Jim Eussen

8/1/2023	Region 2 Public Meeting	Virtual	Melissa, Sari, Jamie, Herman, Darius, Shane Ferguson, Geoff Gutherie, Rob Frei, Lisa Hickey
8/2/2023	Region 1 Public Meeting	Virtual	Myklebust, Darius, Danny Herrmman, Karen Stuart, Ron Papsdorf
8/3/2023	Region 3 Public Meeting	Virtual	Darius, Herman, Jamie, Mark Rogers, Jason Smith, Anna Dunn
8/3/2023	August STAC	DRCOG	Herman, Jamie, Melissa, Darius
8/7/2023	NWTPR Special Meeting	Virtual	Herman, Aubrey, Melissa, Marissa
8/10/2023	Southwest TPR	Durango	Herman, Melissa, Kathleen Collins
8/10/2023	Gunnison Valley TPR	Montrose/Virtual	Herman, Melissa
8/24/2023	San Luis Valley TPR	Alamosa/Virtual	Herman, Jamie
9/7/2023	September STAC	DRCOG	
9/7/2023	Upper Front Range TPR	Fort Morgan/Virtual	Herman
9/11/2023	Eastern TPR	Akron	Jamie and Melissa
9/12/2023	PACOG TAC	Virtual	Jamie
9/14/2023	Northwest TPR	Steamboat Springs	Herman, Melissa, Crystal, Phil
9/27/2023	SECED Meeting	Lamar	Herman, Shane
9/28/2023	PACOG Board Meeting	Virtual	Jamie
10/4/2023	Special IMTPR Meeting	Eagle	Herman, Jamie, Jason
10/5/2023	October STAC	Denver	Herman, Jamie
10/5/2023	NFRMPO Board Meeting	Virtual	Herman
10/9/2023	CFR TPR Meeting	Divide	Herman, Jamie, Melissa, Kathleen Collins
10/12/2023	Southwest TPR	Virtual	Jamie
10/16/2023	Special PPACG Board Meeting	Colorado Springs	Herman, Shane
10/25/2023	SETPR Meeting	Lamar	Herman
10/26/2023	SCTPR Meeting	Trinidad	Herman
10/27/2023	IMTPR Meeting	Eagle	Herman, Jamie, Melissa, Jason

**Exhibit 7**



STATE OF  
COLORADO

Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportation Planning Process

1 message

**CDOT Rules** <cdot\_rules@state.co.us>

Mon, Jan 29, 2024 at 1:17 PM

Cc: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Sarah Wellington - CDOT <sarah.wellington@state.co.us>  
 Bcc: Jean.sykes@bentcounty.net, kbaker@chaffeeconomy.org, kratt\_andy@wagnerequipment.com, mirwin@co.lake.co.us, jrobinson@cripple-creek.co.us, gtripp@cortezco.gov, Bill Bruner <bill@heartandsoulexcursions.com>, smacys@co.routt.co.us, darren.horstmeier@spaceforce.mil, sweaver@co.yuma.co.us, Cmoon@centennialco.gov, rtokar@mancoscolorado.co, clyde.church@co.laplata.co.us, b.baskette@comcast.net, mgarcia@townofignacio.com, Dianna Van Auken <dvanauken@tellerseniorcoalition.org>, Steve Garchar <steve.garchar@yahoo.com>, Kcase@city-woodlandpark.org, rkondo@northglenn.org, gglover@riograndecounty.org, jcandelaria@co.montezuma.co.us, Patz20@rocketmail.com, Wyutcowgirl@yahoo.com, Ted Schweitzer <Tschweitzer@cripple-creek.co.us>, eddills@elpasotel.net, kbrackeTCDistrict5@gmail.com, astolzmann@bouldercounty.gov, tylerjbain@gmail.com, dustinbooks@yahoo.com, fossett.blueriver@gmail.com, jverner@ppacg.org, sarah.hill@durangogov.org, lmulvihill@silverton.co.us, shak@region9edd.org, Lscocchia@gmail.com, richard.p.crane@gmail.com, mikeb@sanmiguelcountyco.gov, Hugomainst@gmail.com, mwesthoff@prowerscounty.net, Aaron Fodge <aaron.fodge@colostate.edu>, Brian Berger <manager@ponchasprings.us>, Ben Gerdes <ben.gerdes@eaglecounty.us>, Bwilson@windsorgov.com, dawn.block@lajuntacolorado.org, denverchiarwalk@gmail.com, gbbarn1@gmail.com, Lorie.Acosta15@comcast.net, jeff Travis <Fortoy32@gmail.com>, Mbennett21@hotmail.com, Jdcjupiter@msn.com, Beth Luther <bluther@clearcreekcounty.us>, Stephen@haydel.com, jamie@kjblawoffice.com, erikarows@gmail.com, allison.burns@coloradosprings.gov, Amy Ostrander <aostranderconsulting@msn.com>, halvarez@mancoscolorado.com, jeff@kullmanengineering.com, shannons@townofbreckenridge.com, Jonathan Flint <jflint@steamboatsprings.net>, Keith Riesberg <Kriesberg@wpgov.com>, courtney@region10.net, rgeorge@co.grand.co.us, terry.hofmeister@phillipscounty.co, jma@fcgov.com, laura@region9edd.org, tomf@townoffrisco.com, tcanonico@gmail.com, 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Hello Transportation Planning Stakeholder:

This email serves to notify you as a stakeholder regarding rulemaking for statewide transportation planning in Colorado.

The Transportation Commission of Colorado adopted [Resolution #TC-2024-01-08](#) on January 18, 2024 to initiate rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The proposed changes reflect the recommendations from CDOT's TPR Study as required by House Bill 23-1101. You can access the completed study "[HB 23-1101: Transportation Planning Region Study \(TPR Study\)](#)."

Additionally, the Commission will consider changes to the Rule's definition of Disproportionately Impacted Communities. That definition was recently updated in state statute, and the Commission proposes a corresponding change in the Rule.

CDOT invites you to submit written comments on the attached proposed permanent rules by **March 15, 2024 at 5 p.m.** Sections 1.11, 2 and 3 of the proposed permanent rules are attached, with proposed changes shown in red. These are the only sections of the rule that will be open for public comment or modification in this rulemaking.

I have also attached the notice of hearing and statement of basis and purpose for permanent rulemaking. **We plan to hold two virtual permanent rulemaking hearings on Zoom. The first meeting is March 6, at 2:00pm ([Register for March 6 Hearing Here](#)). The second meeting is March 11, at 6:00pm ([Register for March 11 Hearing Here](#)).** You may through the provided links, which are also found in the attached Notice of Hearing, on our website, and on the Secretary of State's website. If you have any problems registering for the hearing, please email Jamie Grim at [Jamie.Grim@state.co.us](mailto:Jamie.Grim@state.co.us). If you require language translation services, please let us know by February 26 at 9:00 a.m. MT.




Please submit all written comments to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us). All comments received from stakeholders will be posted on CDOT's [Rulemaking Web Page](#) and will be available for review during the public comment period. Additionally, all written public comments received during the department's TPR Study effort will be included as exhibits and will be considered as part of the Transportation Commission's rulemaking process.

Please feel free to contact Herman Stockinger at [Herman.Stockinger@state.co.us](mailto:Herman.Stockinger@state.co.us) or [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us) if you have any questions or would like to be removed from our stakeholder list.

Thank you for your participation in the rulemaking process and for providing feedback on the proposed rules.

---

### 3 attachments

-  **2 CCR 601-22 2024 redline proposed changes.pdf**  
157K
-  **NOH Proposed Permanent Rulemaking\_2 CCR 601-22.pdf**  
202K
-  **Updated Statement of Basis, Purpose & Authority 2 CCR 601-22.pdf**  
173K



STATE OF  
COLORADO

Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Re: Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportation Planning Process

1 message

**CDOT Rules** <cdot\_rules@state.co.us>

Wed, Jan 31, 2024 at 11:48 AM

To: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, "Uebelher - CDOT, Jennifer"

<jennifer.uebelher@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, Sarah Wellington - CDOT <sarah.wellington@state.co.us>

Bcc: Jean.sykes@bentcounty.net, kbaker@chaffeeconomy.org, kratt\_andy@wagnerequipment.com, Michael Irwin <mirwin@co.lake.co.us>, jrobinson@cripple-creek.co.us, gtripp@cortezco.gov, Bill Bruner <bill@heartandsoulexcursions.com>, smacys@co.routt.co.us, darren.horstmeier@spaceforce.mil, sweaver@co.yuma.co.us, Cmoon@centennialco.gov, rtokar@mancoscolorado.co, clyde.church@co.laplata.co.us, b.baskette@comcast.net, mgarcia@townofignacio.com, Dianna Van Auken <dvanauken@tellerseniorcoalition.org>, Steve Garchar <steve.garchar@yahoo.com>, Kcase@city-woodlandpark.org, rkondo@northglenn.org, gglover@riograndecounty.org, jcandelaria@co.montezuma.co.us, Patz20@rocketmail.com, Wyutcowgirl@yahoo.com, Ted Schweitzer <Tschweitzer@cripple-creek.co.us>, eddills@elpasotell.net, kbrackeTCDistrict5@gmail.com, astolzmann@bouldercounty.gov, tylerjbain@gmail.com, dustinbooks@yahoo.com, fossett.blueriver@gmail.com, jverner@ppacg.org, sarah.hill@durangogov.org, lmulvihill@silverton.co.us, shak@region9edd.org, Lscocchia@gmail.com, richard.p.crane@gmail.com, mikeb@sanmiguelcountyco.gov, Hugomainst@gmail.com, mwesthoff@prowerscounty.net, Aaron Fodge <aaron.fodge@colostate.edu>, Brian Berger <manager@ponchasprings.us>, Ben Gerdes <ben.gerdes@eaglecounty.us>, Bwilson@windsorgov.com, "dawn.block" <dawn.block@lajuntacolorado.org>, denverchiarwalk@gmail.com, gbbarn1@gmail.com, Lorie.Acosta15@comcast.net, jeff Travis <Fortoy32@gmail.com>, Mbennett21@hotmail.com, Jdcjupiter@msn.com, Beth Luther <bluther@clearcreekcounty.us>, Stephen@haydel.com, jamie@kjblawoffice.com, erikarows@gmail.com, allison.burns@coloradosprings.gov, Amy Ostrander <aostranderconsulting@msn.com>, halvarez@mancoscolorado.com, jeff@kullmanengineering.com, shannons@townofbreckenridge.com, Jonathan Flint <jflint@steamboatsprings.net>, Keith Riesberg <Kriesberg@wpgov.com>, courtney@region10.net, rgeorge@co.grand.co.us, terry.hofmeister@phillipscounty.co, jma@fcgov.com, laura@region9edd.org, tomf@townoffrisco.com, tcanonico@gmail.com, 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Transportation Planning Stakeholders,

We appreciate the quick comments back that CDOT inadvertently inserted the Roaring Fork RTA area of Eagle County into the proposed new East IMPTR, and the Eagle Valley RTA portion of Eagle County into the proposed new West IMPTR, when in fact that should be reversed. Please see the corrected version that we will proceed with the rulemaking process on.

Thanks so much for the watchful eyes!

CDOT Rule Team

On Mon, Jan 29, 2024 at 1:17 PM CDOT Rules <[cdot\\_rules@state.co.us](mailto:cdot_rules@state.co.us)> wrote:

Hello Transportation Planning Stakeholder:

This email serves to notify you as a stakeholder regarding rulemaking for statewide transportation planning in Colorado.

The Transportation Commission of Colorado adopted [Resolution #TC-2024-01-08](#) on January 18, 2024 to initiate rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The proposed changes reflect the recommendations from CDOT's TPR Study as required by House Bill 23-1101. You can access the completed study "[HB 23-1101: Transportation Planning Region Study \(TPR Study\)](#)."

Additionally, the Commission will consider changes to the Rule's definition of Disproportionately Impacted Communities. That definition was recently updated in state statute, and the Commission proposes a corresponding change in the Rule.

CDOT invites you to submit written comments on the attached proposed permanent rules by **March 15, 2024 at 5 p.m.** Sections 1.11, 2 and 3 of the proposed permanent rules are attached, with proposed changes shown in red. These are the only sections of the rule that will be open for public comment or modification in this rulemaking.

I have also attached the notice of hearing and statement of basis and purpose for permanent rulemaking. **We plan to hold two virtual permanent rulemaking hearings on Zoom. The first meeting is March 6, at 2:00pm ([Register for March 6 Hearing Here](#)). The second meeting is March 11, at 6:00pm ([Register for March 11 Hearing Here](#)).** You may through the provided links, which are also found in the attached Notice of Hearing, on our website, and on the Secretary of State's website. If you have any problems registering for the hearing, please email Jamie Grim at [Jamie.Grim@state.co.us](mailto:Jamie.Grim@state.co.us). If you require language translation services, please let us know by February 26 at 9:00 a.m. MT.

Please submit all written comments to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us). All comments received from stakeholders will be posted on CDOT's [Rulemaking Web Page](#) and will be available for review during the public comment period. Additionally, all written public comments received during the department's TPR Study effort will be included as exhibits and will be considered as part of the Transportation Commission's rulemaking process.

Please feel free to contact Herman Stockinger at [Herman.Stockinger@state.co.us](mailto:Herman.Stockinger@state.co.us) or [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us) if you have any questions or would like to be removed from our stakeholder list.

Thank you for your participation in the rulemaking process and for providing feedback on the proposed rules.



**2 CCR 601-22 2024 redline proposed changes IMTPR corrected.pdf**

150K





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Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Public comment on the Planning Rule closes Friday

1 message

CDOT Rules <cdot\_rules@state.co.us>

Wed, Mar 13, 2024 at 8:09 AM

To: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Amber Paoloemilio - CDOT <amber.paoloemilio@state.co.us>, Andrew Hogle - CDOT He Him <andrew.hogle@state.co.us>

Bcc: Jean.sykes@bentcounty.net, kbaker@chaffeeconomy.org, kratt\_andy@wagnerequipment.com, Michael Irwin <mirwin@co.lake.co.us>, jrobinson@cripple-creek.co.us, gtripp@cortezco.gov, Bill Bruner <bill@heartandsoulexcursions.com>, smacys@co.routt.co.us, darren.horstmeier@spaceforce.mil, Scott Weaver <sweaver@co.yuma.co.us>, Cmoon@centennialco.gov, rtokar@mancoscolorado.co, clyde.church@co.laplata.co.us, b.baskette@comcast.net, mgarcia@townofignacio.com, Dianna Van Auken <dvanauken@tellerseniorcoalition.org>, Steve Garchar <steve.garchar@yahoo.com>, Kcase@city-woodlandpark.org, rkondo@northglenn.org, gglover@riograndecounty.org, jcandelaria@co.montezuma.co.us, Patz20@rocketmail.com, Wyutcowgirl@yahoo.com, Ted Schweitzer <Tschweitzer@cripple-creek.co.us>, eddills@elpasotel.net, kbrackeTCDistrict5@gmail.com, astolzmann@bouldercounty.gov, tylerjbain@gmail.com, dustinbooks@yahoo.com, fossett.blueriver@gmail.com, jverner@ppacg.org, sarah.hill@durangogov.org, lmulvihill@silverton.co.us, 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Planning Rule Stakeholders,

This email is to remind you that we will close public comments on the Planning Rule on March 15, at 5:00 pm. If you have been wanting to comment on the rule, you still have time! As a reminder, we are including as part of the Exhibits for this rule all written comments we received during the rulemaking process and also that we received during the TPR Study process last year.

Additionally, I am attaching an slightly updated version of the Proposed Rule. The edits are non-substantive and increase the clarity and readability of the Rule. You'll find the new changes in green font.

If you missed the public hearings, you can find the recording of those as well as the entire Planning Rules Exhibit Packet here: <https://www.codot.gov/business/rules/proposed-rules>. The second public hearing recording will be posted today or tomorrow, and the entire hearing packet will be finalized and updated on Monday.

Please let us know if you have any questions.

Herman

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 **2 CCR 601-22 2024 redline proposed changes March 11 nonsubstantive changes.pdf**  
152K

# Exhibit 8



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Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportation Planning Process

1 message

**CDOT Rules** <cdot\_rules@state.co.us>

Mon, Jan 29, 2024 at 1:11 PM

Cc: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Sarah Wellington - CDOT <sarah.wellington@state.co.us>  
Bcc: jason\_hensley@kindermorgan.com, mike\_johnson2@kindermorgan.com, "Bergstrom, Shelly" <Shelly.bergstrom@centurylink.com>, jdossey@akaenergy.com, Patricia McKinney - CDPS <patricia.mckinney@state.co.us>, tcoleman@coloradorea.org, mschmidt@pagosasprings.co.gov, Scott Hite <scott.hite@verizon.com>, rnelson@adcogov.org, Stephni Balzly <stephnib@rpowerc.com>, Robert Williams <robertd.williams@zayo.com>, bkaufman@irea.coop, bstephens@gcea.coop, bryan.balderston@xcelenergy.com, mike.valentine@trinidad.co.gov, Patti Gillette <Patti@cmca.com>, Greg Fulton <greg@cmca.com>, Grier Bailey <gbailey@cwpmca.org>, Eric Bergman <ebergman@ccionline.org>, phil@pdemos.com, RJ@lobbyco.com, Tony Milo <tmilo@ccainfo.org>, Jim Moody <jmoody@ccainfo.org>, aaron.bustow@dot.gov, Kirstie Nixon - CDPS <kirstie.nixon@state.co.us>, John Hahn - CDPS <john.hahn@state.co.us>, tgablehouse@gcgllc.com, James Justice <jamesjustice377@gmail.com>, summerloveyeah@gmail.com, matthew.groves@colorado.auto, totsyr@aol.com, steve.s.topalian@ehi.com, Meegan.C.WoodTrombley@ehi.com, sfair@csu.org, sirkus0504@gmail.com, mcullen@cml.org, Randy Drennen <RDrennen@ccainfo.org>, "Cooley, Crystal" <CRYSTAL.COOLEY@blackhillscorp.com>, Edavenport@irea.coop, mk@goodbeeassoc.com, Jeremy Hanak <jhanak@greenwoodvillage.com>, Jacquelyn Jobe - CDOT <jacquelyn.jobe@state.co.us>, Zach Margolis <zachm@silverthorne.org>, dwiseheart@arapahoegov.com, laurah@goodbeeassoc.com, paul.peloquin@denverwater.org, craig@zonecrew.com, sgrieger@wcca-gj.com, ghigashi@yeh-eng.com, Lori@noraaconcrete.com, Jessica Acosta <jacosta@ecscompliance.com>, jk@kingconstructionmanagementservices.com, skobayashi@kdgengineering.com, omoreno@ironwomancon.com, dkhribeche@peloton-construction.com, rsisson@rmsmobility.com, adam@mbrelectric.net, "Whelan, Sloane L." <swwhelan@bhfs.com>, Matthew Conroy <mconroy@weld.gov>

Hello Transportation Planning Stakeholder:

This email serves to notify you as a stakeholder regarding rulemaking for statewide transportation planning in Colorado.

The Transportation Commission of Colorado adopted [Resolution #TC-2024-01-08](#) on January 18, 2024 to initiate rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The proposed changes reflect the recommendations from CDOT's TPR Study as required by House Bill 23-1101. You can access the completed study "[HB 23-1101: Transportation Planning Region Study \(TPR Study\)](#)."

Additionally, the Commission will consider changes to the Rule's definition of Disproportionately Impacted Communities. That definition was recently updated in state statute, and the Commission proposes a corresponding change in the Rule.

CDOT invites you to submit written comments on the attached proposed permanent rules by **March 15, 2024 at 5 p.m.** Sections 1.11, 2 and 3 of the proposed permanent rules are attached, with proposed changes shown in red. These are the only sections of the rule that will be open for public comment or modification in this rulemaking.

I have also attached the notice of hearing and statement of basis and purpose for permanent rulemaking. **We plan to hold two virtual permanent rulemaking hearings on Zoom. The first meeting is March 6, at 2:00pm ([Register for March 6 Hearing Here](#)). The second meeting is March 11, at 6:00pm ([Register for March 11 Hearing Here](#)).** You may through the provided links, which are also found in the attached Notice of Hearing, on our website, and on the Secretary of State's website. If you have any problems registering for the hearing, please email Jamie Grim at [Jamie.Grim@state.co.us](mailto:Jamie.Grim@state.co.us). If you require language translation services, please let us know by February 26 at 9:00 a.m. MT.

Please submit all written comments to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us). All comments received from stakeholders will be posted on CDOT's [Rulemaking Web Page](#) and will be available for review during the public comment period. Additionally, all written public comments received during the department's TPR Study

effort will be included as exhibits and will be considered as part of the Transportation Commission's rulemaking process.


Please feel free to contact Herman Stockinger at [Herman.Stockinger@state.co.us](mailto:Herman.Stockinger@state.co.us) or [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us) if you have any questions or would like to be removed from our stakeholder list.

Thank you for your participation in the rulemaking process and for providing feedback on the proposed rules.

---

### 3 attachments

 **2 CCR 601-22 2024 redline proposed changes.pdf**  
157K

 **NOH Proposed Permanent Rulemaking\_2 CCR 601-22.pdf**  
202K

 **Updated Statement of Basis, Purpose & Authority 2 CCR 601-22.pdf**  
173K



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Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Re: Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportation Planning Process

1 message

CDOT Rules <cdot\_rules@state.co.us>

Wed, Jan 31, 2024 at 11:44 AM

Cc: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Sarah Wellington - CDOT <sarah.wellington@state.co.us>  
Bcc: jason\_hensley@kindermorgan.com, mike\_johnson2@kindermorgan.com, "Bergstrom, Shelly" <Shelly.bergstrom@centurylink.com>, jdossey@akaenergy.com, Patricia McKinney - CDPS <patricia.mckinney@state.co.us>, tcoleman@coloradorea.org, mschmidt@pagosasprings.co.gov, Scott Hite <scott.hite@verizon.com>, rnelson@adcogov.org, Stephni Balzly <stephnib@rpowerc.com>, Robert Williams <robertd.williams@zayo.com>, bkaufman@irea.coop, bstephens@gcea.coop, bryan.balderston@xcelenergy.com, mike.valentine@trinidad.co.gov, Patti Gillette <Patti@cmca.com>, Greg Fulton <greg@cmca.com>, Grier Bailey <gbailey@cwpm.org>, Eric Bergman <ebergman@ccionline.org>, phil@pdemos.com, RJ@lobbyco.com, Tony Milo <tmilo@ccainfo.org>, Jim Moody <jmoody@ccainfo.org>, aaron.bustow@dot.gov, Kirstie Nixon - CDPS <kirstie.nixon@state.co.us>, John Hahn - CDPS <john.hahn@state.co.us>, tgablehouse@gcgllc.com, James Justice <jamesjustice377@gmail.com>, summerloveyeah@gmail.com, matthew.groves@colorado.auto, totsyr@aol.com, steve.s.topalian@ehi.com, Meegan.C.WoodTrombley@ehi.com, sfair@csu.org, sirkus0504@gmail.com, Morgan Cullen <mcullen@cml.org>, Randy Drennen <RDrennen@ccainfo.org>, "Cooley, Crystal" <CRYSTAL.COOLEY@blackhillscorp.com>, Edavenport@irea.coop, mk@goodbeeassoc.com, Jeremy Hanak <jhanak@greenwoodvillage.com>, Jacquelyn Jobe - CDOT <jacquelyn.jobe@state.co.us>, Zach Margolis <zachm@silverthorne.org>, dwiseheart@arapahoegov.com, laurah@goodbeeassoc.com, paul.peloquin@denverwater.org, craig@zonecrew.com, sgrieger@wcca-gj.com, ghigashi@yeh-eng.com, Lori@noraaconcrete.com, Jessica Acosta <jacosta@ecscompliance.com>, jk@kingconstructionmanagementservices.com, skobayashi@kdgengineering.com, omoreno@ironwomancon.com, dkhribeche@peloton-construction.com, rsisson@rmsmobility.com, adam@mbrelectric.net, "Whelan, Sloane L." <swwhelan@bhfs.com>, Matthew Conroy <mconroy@weld.gov>

Transportation Planning Stakeholders,

We appreciate the quick comments back that CDOT inadvertently inserted the Roaring Fork RTA area of Eagle County into the proposed new proposed East IMPTR, and the Eagle Valley RTA portion of Eagle County into the proposed new West IMPTR, when in fact that should be reversed. Please see the corrected version that we will proceed with the rulemaking process on.

Thanks so much for the watchful eyes!

CDOT Rule Team

On Mon, Jan 29, 2024 at 1:11 PM CDOT Rules <cdot\_rules@state.co.us> wrote:

Hello Transportation Planning Stakeholder:

This email serves to notify you as a stakeholder regarding rulemaking for statewide transportation planning in Colorado.

The Transportation Commission of Colorado adopted [Resolution #TC-2024-01-08](#) on January 18, 2024 to initiate rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The proposed changes reflect the recommendations from CDOT's TPR Study as required by House Bill 23-1101. You can access the completed study "[HB 23-1101: Transportation Planning Region Study \(TPR Study\)](#)."

Additionally, the Commission will consider changes to the Rule's definition of Disproportionately Impacted Communities. That definition was recently updated in state statute, and the Commission proposes a corresponding change in the Rule.

CDOT invites you to submit written comments on the attached proposed permanent rules by **March 15, 2024 at 5 p.m.** Sections 1.11, 2 and 3 of the proposed permanent rules are attached, with proposed changes shown in red. These are the only sections of the rule that will be open for public comment or modification in this rulemaking.

I have also attached the notice of hearing and statement of basis and purpose for permanent rulemaking. **We plan to hold two virtual permanent rulemaking hearings on Zoom. The first meeting is March 6, at 2:00pm ([Register for March 6 Hearing Here](#)). The second meeting is March 11, at 6:00pm ([Register for March 11 Hearing Here](#)).** You may through the provided links, which are also found in the attached Notice of Hearing, on our website, and on the Secretary of State's website. If you have any problems registering for the hearing, please email Jamie Grim at [Jamie.Grim@state.co.us](mailto:Jamie.Grim@state.co.us). If you require language translation services, please let us know by February 26 at 9:00 a.m. MT.

Please submit all written comments to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us). All comments received from stakeholders will be posted on CDOT's [Rulemaking Web Page](#) and will be available for review during the public comment period. Additionally, all written public comments received during the department's TPR Study effort will be included as exhibits and will be considered as part of the Transportation Commission's rulemaking process.

Please feel free to contact Herman Stockinger at [Herman.Stockinger@state.co.us](mailto:Herman.Stockinger@state.co.us) or [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us) if you have any questions or would like to be removed from our stakeholder list.

Thank you for your participation in the rulemaking process and for providing feedback on the proposed rules.



**2 CCR 601-22 2024 redline proposed changes IMTPR corrected.pdf**

150K



STATE OF  
COLORADO

Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Public comment on the Planning Rule closes Friday

1 message

**CDOT Rules** <cdot\_rules@state.co.us>

Wed, Mar 13, 2024 at 8:14 AM

To: Herman Stockinger - CDOT <herman.stockinger@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, Andrew Hogle - CDOT He Him <andrew.hogle@state.co.us>, Amber Paoloemilio - CDOT <amber.paoloemilio@state.co.us>  
 Bcc: jason\_hensley@kindermorgan.com, mike\_johnson2@kindermorgan.com, "Bergstrom, Shelly" <Shelly.bergstrom@centurylink.com>, jdossey@akaenergy.com, Patricia McKinney - CDPS <patricia.mckinney@state.co.us>, tcoleman@coloradorea.org, mschmidt@pagosasprings.co.gov, Scott Hite <scott.hite@verizon.com>, rnelson@adcogov.org, Stephni Balzly <stephnib@rpowerc.com>, Robert Williams <robertd.williams@zayo.com>, bkaufman@irea.coop, bstephens@gcea.coop, bryan.balderston@xcelenergy.com, mike.valentine@trinidad.co.gov, Patti Gillette <Patti@cmca.com>, Greg Fulton <greg@cmca.com>, Grier Bailey <gbailey@cwpmo.org>, Eric Bergman <ebergman@ccionline.org>, phil@pdemos.com, RJ@lobbyco.com, Tony Milo <tmilo@ccainfo.org>, Jim Moody <jmoody@ccainfo.org>, aaron.bustow@dot.gov, Kirstie Nixon - CDPS <kirstie.nixon@state.co.us>, John Hahn - CDPS <john.hahn@state.co.us>, tgablehouse@gcgllc.com, James Justice <jamesjustice377@gmail.com>, summerloveyeah@gmail.com, matthew.groves@colorado.auto, totsyr@aol.com, steve.s.topalian@ehi.com, Meegan.C.WoodTrombley@ehi.com, sfair@csu.org, sirkus0504@gmail.com, Morgan Cullen <mcullen@cml.org>, Randy Drennen <RDrennen@ccainfo.org>, "Cooley, Crystal" <CRYSTAL.COOLEY@blackhillscorp.com>, Edavenport@irea.coop, mk@goodbeeassoc.com, Jeremy Hanak <jhanak@greenwoodvillage.com>, Jacquelyn Jobe - CDOT <jacquelyn.jobe@state.co.us>, Zach Margolis <zachm@silverthorne.org>, dwiseheart@arapahoegov.com, laurah@goodbeeassoc.com, paul.peloquin@denverwater.org, craig@zonecrew.com, sgrieger@wcca-gj.com, ghigashi@yeh-eng.com, Lori@noraaconcrete.com, Jessica Acosta <jacosta@ecscpliance.com>, jk@kingconstructionmanagementservices.com, skobayashi@kdgengineering.com, omoreno@ironwomancon.com, dkhribeche@peloton-construction.com, rsiisson@rmsmobility.com, adam@mbrelectric.net, "Whelan, Sloane L." <swhelan@bhfs.com>, Matthew Conroy <mconroy@weld.gov>

CDOT Interested Parties,

This email is to remind you that we will close public comments on the Planning Rule on March 15, at 5:00 pm. If you have been wanting to comment on the rule, you still have time! As a reminder, we are including as part of the Exhibits for this rule all written comments we received during the rulemaking process and also that we received during the TPR Study process last year.

Additionally, I am attaching an slightly updated version of the Proposed Rule. The edits are non-substantive and increase the clarity and readability of the Rule. You'll find the new changes in green font.

If you missed the public hearings, you can find the recording of those as well as the entire Planning Rules Exhibit Packet here: <https://www.codot.gov/business/rules/proposed-rules>. The second public hearing recording will be posted today or tomorrow, and the entire hearing packet will be finalized and updated on Monday.

Please let us know if you have any questions.

Herman



**2 CCR 601-22 2024 redline proposed changes March 11 nonsubstantive changes.pdf**  
152K



# Exhibit 9



November 8, 2023

Transportation Commission  
Colorado Department of Transportation  
2829 W Howard Place  
Denver, CO 80204

Dear Transportation Commissioners,

The I-70 Coalition is represented by 28 local governments and businesses working together to address transportation issues along the I-70 mountain corridor. Although the majority of the membership falls within the Intermountain TRP (IMTPR), others are part of the Northwest TRP and DRCOG.

The I-70 mountain corridor provides access to and from Colorado's Rocky Mountains and is critical to the economic health of both our mountain communities and the state of Colorado. It is estimated that the Mountain Resort Region accounts for 25% of the state's tourism revenue. In addition, I-70 is the lifeline for corridor communities, is critical to intra- and inter-state commerce, and is vital to providing Western Slope residents access to jobs, medical services and educational opportunities.

For all of these reasons, it is imperative that the I-70 mountain corridor has adequate and equal representation in all of CDOT's funding conversations, particularly on the Statewide Transportation Advisory Committee (STAC). The I-70 Coalition encourages the Transportation Commission to consider and give weight to the data that was collected as part of the TRP Boundary Study Advisory Committee process. This data demonstrates that the IMTPR is actually bigger than all but three of the states MPO's. Additionally, a number of IMTPR metrics would still exceed those of a combined South Central and Southeast TRP including VMT, population, vehicle crashes, tourism direct spending, movement of goods, commuter origin/destination and truck miles traveled.

The emergency funding this corridor required in the last year is indicative that this critical corridor is not getting the funding it needs to maintain safety and operations. We strongly encourage the Transportation Commission to let the data guide any decision-making as it considers boundary changes as part of the TPR Study.

Sincerely,



Ryan Hyland, Chair  
I-70 Coalition

CC: Shoshana Lew, Executive Director, CDOT  
Herman Stockinger, Commission Secretary, CDOT

# TOWN OF AULT

GARY D. WHITE, MAYOR  
201 FIRST STREET  
P.O. BOX 1098  
AULT CO 80610

Office (970) 834-2844

e-mail: [mayor@aultcolorado.gov](mailto:mayor@aultcolorado.gov)

Fax (970) 834-2199

August 1, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Ault is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that the Town of Ault can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,



Gary D. White  
Mayor  
Town of Ault



Baca County Commissioners  
741 Main Street, Suite 1  
Springfield, CO 81073  
Telephone: (719) 523-6532 ~ Fax: (719) 523-6584

Glen R. Ausmus, Two Buttes, District I  
[sausmus@bacacountyco.gov](mailto:sausmus@bacacountyco.gov)

Shiloh Freed, Campo, District II  
[sfreed@bacacountyco.gov](mailto:sfreed@bacacountyco.gov)

Rick Butler, Pritchett, District III  
[rbutler@bacacountyco.gov](mailto:rbutler@bacacountyco.gov)

October 9, 2023

Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

**Subject: Adamant Opposition to Modifications of TPR/MPO Boundaries in the SE TPR**

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

The Board of County Commissioners of Baca County, Colorado, member of the Southeast TPR, submit this letter in response to the TPR study mandated by HB23 - 1101. As you are aware, the Southeast TPR is comprised of six counties (Baca, Bent, Crowley, Kiowa, Otero, and Prowers) as well as the 10 municipalities within those counties. In regard to the potential changes in TPR boundaries, we request that the Southeast Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the SE TPR boundary.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Sincerely,



Glen R. Ausmus, Two Buttes, District I  
[sausmus@bacacountyco.gov](mailto:sausmus@bacacountyco.gov)



Shiloh Freed, Campo, District II  
[sfreed@bacacountyco.gov](mailto:sfreed@bacacountyco.gov)



Rick Butler, Pritchett, District III  
[rbutler@bacacountyco.gov](mailto:rbutler@bacacountyco.gov)



WHEREAS, there appears to be no benefit to the South Central and Southeast TPRs in support of combining; while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both South Central and Southeast TPRs have been voiced to CDOT representatives regarding the proposed boundary changes.

NOW THEREFORE BE IT RESOLVED by the Board of County Commissioners of Bent County Colorado that the proposed change in boundaries of the South Central and Southeast TPRs is hereby opposed.

BE IT FURTHER RESOLVED by the Board of County Commissioners that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 26th DAY OF OCTOBER, 2023.

ATTEST:

BOARD OF COUNTY COMMISSIONERS OF  
BENT COUNTY, STATE OF COLORADO:



*Lynda G. Moss*

Lynda G. Moss,  
Bent County Clerk

*Jean Sykes*

Jean Sykes, Chairwoman

*Kim MacDonnell*

Kim MacDonnell, Commissioner

*Alan Stump*

Alan Stump, Commissioner



# Town of Blue River

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October 25, 2023

TO: Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners, Statewide Transportation Advisory Committee Members  
CC: Shoshana Lew, CDOT Executive Director

RE: Support of IMTPR split in CDOT Region 3

Dear Transportation Planning Region Boundary Study Advisory Committee Members, Transportation Commissioners and Statewide Transportation Advisory Committee Members, The Town of Breckenridge is submitting this letter to express support for the split of the Intermountain Transportation Planning Region (IMTPR) as presented by CDOT on October 6, 2023. At the special meeting, the Town of Blue River, alongside a majority of IMTPR members, selected a split of the IMTPR to create two TPR's: (1) Summit County, Lake County, Eagle County (partial) and (2) Garfield County, Pitkin County, Eagle County (partial) as the best option for cohesion of transportation and transit planning, projects, and priorities as well as an equitable representation for our communities at STAC.

As mandated in HB 23-1101, CDOT has gathered and analyzed data for many parameters that influence travel and transit throughout the state. At our special meeting of the IMTPR, CDOT staff presented compelling data on vehicle miles traveled, truck vehicle miles traveled, tourism, population, and crash rates that indicate a strong need to split the IMTPR.

The Town of Blue River supports CDOT's analysis and agrees that a split of the IMTPR will bring a better balance of representation for the counties of the current IMTPR.

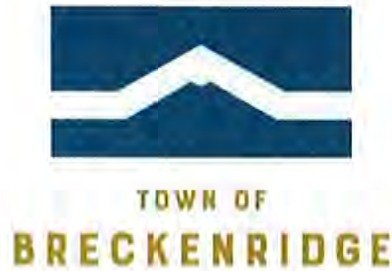
Sincerely,

*Toby Babich*

Toby Babich  
Mayor Town of Blue River

**P.O. Box 1784, Breckenridge, CO 80424**  
**970-547-0545, <https://townofblueriver.colorado.gov>**





October 24, 2023

TO: Transportation Planning Region Boundary Study Advisory Committee Members, Transportation Commissioners, Statewide Transportation Advisory Committee Members

CC: Shoshana Lew, CDOT Executive Director

RE: Support of IMTPR split in CDOT Region 3

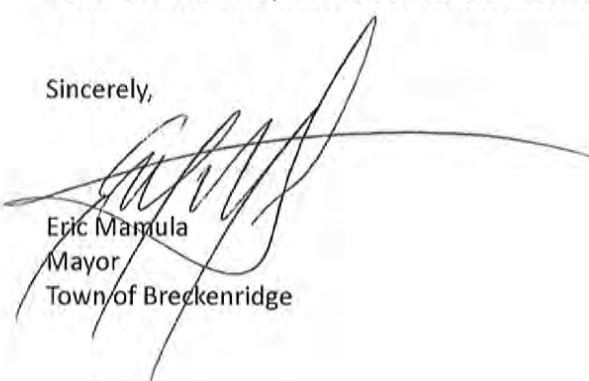
Dear Transportation Planning Region Boundary Study Advisory Committee Members, Transportation Commissioners and Statewide Transportation Advisory Committee Members,

The Town of Breckenridge is submitting this letter to express support for the split of the Intermountain Transportation Planning Region (IMTPR) as presented by CDOT on October 6, 2023. At the special meeting, the Town of Breckenridge, alongside a majority of IMTPR members, selected a split of the IMTPR to create two TPR's: (1) Summit County, Lake County, Eagle County (partial) and (2) Garfield County, Pitkin County, Eagle County (partial) as the best option for cohesion of transportation and transit planning, projects, and priorities as well as an equitable representation for our communities at STAC.

As mandated in HB 23-1101, CDOT has gathered and analyzed data for many parameters that influence travel and transit throughout the state. At our special meeting of the IMTPR, CDOT staff presented compelling data on vehicle miles traveled, truck vehicle miles traveled, tourism, population, and crash rates that indicate a strong need to split the IMTPR.

The Town of Breckenridge supports CDOT's analysis and agrees that a split of the IMTPR will bring a better balance of representation for the counties of the current IMTPR.

Sincerely,



Eric Manula  
Mayor  
Town of Breckenridge

---

## Fwd: Official Chaffee County interagency position

1 message

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**Willis - CDOT, Aaron** <aaron.willis@state.co.us>  
To: Aaron Willis - CDOT <aaron.willis@state.co.us>

Sun, Sep 17, 2023 at 7:15 PM

----- Forwarded message -----

From: **Keith Baker** <kbaker@chaffeecounty.org>

Date: Thu, Sep 14, 2023 at 2:52 PM

Subject: Official Chaffee County interagency position

To: Stockinger - CDOT, Herman <herman.stockinger@state.co.us>

Cc: Hew Hallock <hhallock@slvdr.org>, Vern Heersink <vheersink@alamosacounty.org>, Constan - CDOT, Julie <julie.constan@state.co.us>

Hello Herman and all,

Chaffee County and our three municipalities discussed the possible shift of Chaffee County from the SLV TPR to another TPR.

The County and all three municipalities wish to remain in the SLV TPR and not move to any other TPR. Please keep this in mind in future discussions about TPR realignment.

Thank you!



**Keith Baker, M.A.**

Commander, United States Navy (Retired)

County Commissioner and Board Chair

Chaffee County, Colorado

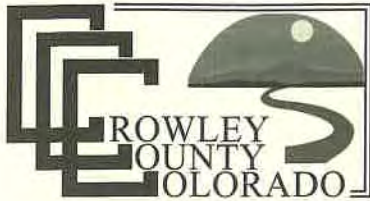
Phone: 719.963.4164

[kbaker@chaffeecounty.org](mailto:kbaker@chaffeecounty.org)

**Business Hours:** Please note that the standard business hours for Chaffee County Government are Monday - Thursday: 7:30am - 5:30pm.

I honor and respect boundaries around well-being, recharge, personal time, and rest. Unless otherwise stated, I neither require nor desire an immediate response during your off time. Prioritize joy and renewal whenever and however you can.

**Confidentiality Note:** This email is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure.



BOARD OF  
**County Commissioners**

CROWLEY COUNTY  
603 MAIN ST. • SUITE 2  
ORDWAY, COLORADO 81063  
Phone (719) 267-5555 Ext. 3 • Fax (719) 267-3114

ROY ELLIOTT, DIST. 1  
BLAINE ARBUTHNOT, DIST. 2  
TERRY McMILLIAN, DIST. 3

September 20, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to have this letter serve as our official response in opposition to the recommendation by the Colorado Department of Transportation's (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

SE TPR represents the counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties and the municipalities within those six counties. It covers 9,570 square miles and collectively 26 municipalities within those boundaries.

SC TPR represents the counties of Huerfano and Las Animas Counties and the municipalities with those two counties. It covers 6,368 square miles and collectively 8 municipalities within those boundaries.

Needless to say, both cover enormous areas and have monumental tasks of representing their respective areas without adding additional counties.

Per statute, there can only be 10 TPRs and unbeknownst to us, CDOT conducted a reassessment of those 10 boundaries. In the process of the reassessment, we were not invited to the table to give input on what those boundaries should be and whether they should remain the same.

On August 23, 2023, CDOT requested an audience with SE TPR and SC TPR representatives via a Zoom call to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. Both TPRs made it extremely clear that we were not in favor of the suggested merger.

On September 19, 2023, again CDOT requested another call with both TPRs to have, what we thought, was another discussion to review the "study" or assessment that CDOT conducted. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to split the Intermountain TPR into

two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

Although we were presented with data stating that we are the two smallest TPRs population-wise and in CDOT's opinion, it makes sense for them to combine us, we would like to give you our reasons for our staunch opposition.

1) Enormous Coverage area:

SE TPR covers 9,570 sq. miles and 6 counties

SC TPR covers 6,368 square miles and 2 counties

Combining them would result in 15,938 sq. miles and 8 counties, which is an unreasonably large area to manage.

Intermountain TPR covers 6,422 sq. miles and 5 counties, why would splitting them into two make more sense?

2) Loss of STAC representation:

Current:

SE TPR – 1 seat at the table

SC TPR – 1 seat at the table

Intermountain TPR – 1 seat at the table

Proposed:

Combined TPR (SE & SC) – 1 seat at the table

Intermountain TPR – 2 seats at the table

We are vehemently opposed to losing a voice at the table. We believe that this goes fully against the initiatives to include rural areas and encourage participation in state and federally funded programs.

3) Freight Corridor-Priority concerns:

The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.

The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25.

These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado.

Both SE TPR and SC TPR have extreme concern that priority will be shifted to I-25 and SH 50/287 respectively. They already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding Concern:

Both TPRs are extremely concerned about the funding being further diluted and rotated as suggested. We were presented with the assurance that our Regional Priority Plan funding would remain at the same percentage, however, again we already have internal challenges to prioritizing funding within our boundaries and adding additional counties either direction will cause bigger challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

The planning process is difficult with 6 counties and even 2 counties. Due to our large coverage area, we feel this will further inhibit our members from participating.



Roy Elliott  
Crowley County Commissioner

RESOLUTION NO.: 2023-8711

A RESOLUTION OPPOSING A CHANGE TO THE SOUTH CENTRAL AND SOUTHEASTERN TRANSPORTATION PLANNING REGION BOUNDARIES.

WHEREAS, the Crowley County Commissioners responsibilities include the health, safety, and welfare of the residents of Crowley County; and

WHEREAS, Crowley County is a member of the Southeastern Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states "A statement of justification for the change considering transportation commonalities.;" and

WHEREAS, Section 2.02.1.4 states "A copy of the resolution stating the concurrence of the affected Regional Planning Commission.;" and

WHEREAS, The Crowley County Commissioners feel that any change to the TPR boundary for the Southeastern and South Central TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the Southeastern and South Central TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both South Central and Southeastern TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

NOW THEREFORE BE IT RESOLVED by the Board of County Commissioners of Crowley County Colorado that the proposed change in boundaries of the Southeastern TPR is hereby opposed.


BE IT FURTHER RESOLVED by the Board of County Commissioners that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 10<sup>TH</sup> DAY OF OCTOBER 2023.

Attest:

  
Melinda Carter, Clerk and Recorder

Board of Crowley County Commissioners

  
Blaine Arbuthnot, Chairman

  
Roy Elliott, Commissioner

  
Terry McMillian, Commissioner





November 2, 2023

TO: Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners, Statewide Transportation Advisory Committee  
Members

CC: Shoshana Lew, CDOT Executive Director

RE: Support of IMTPR split in CDOT Region 3

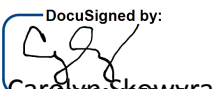
Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners, Statewide Transportation Advisory Committee  
Members,

The Town of Dillon would like to express our support for the split of the Intermountain Transportation Planning Region (IMTPR) into two TPR's: (1) Summit County, Lake County, and Eagle County (partial) and (2) Garfield County, Pitkin County, Eagle County (partial). After careful consideration, we feel that this split would be the best option for more equitable representation concerning transportation/transit planning projects and provide better cohesion and coordination for projects within our larger community.

As mandated in HB 23-1101, CDOT gathered and analyzed data concerning travel and transit throughout the state. This data was presented and reviewed at a special IMTPR meeting and clearly demonstrated the need to split the IMTPR and possibly combine TPR's in southern Colorado.

The Town of Dillon supports CDOT's analysis and agrees that the split of the IMTPR will provide a better balance of representation.

Sincerely,

DocuSigned by:  
  
Carolyn Lewis  
Mayor  
Dillon Colorado



Mayor Zo Hubbard  
130 S. McKinley Avenue Phone: 303.857.6694  
Fort Lupton, CO 80621 Fax: 303.857.0351  
[www.fortluptonco.gov](http://www.fortluptonco.gov)

July 28, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The City of Fort Lupton is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that the City of Fort Lupton can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Zo Hubbard", is written over a blue circular scribble.

Zo Hubbard  
Mayor



the Intermountain TPR, which isn't interested in the proposed changes to their TPR either. Leaders within the Intermountain TPR have expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

Prowers County does not feel that the comparison of the SE and SC TPRs to TPRs located along the I-70 corridor yields a fair assessment. We are rural frontier regions and as such our travel patterns and data are very different from urban or rural resort regions, but certainly not any less important. At the end of the day, the roads traveled in our region lead to the interior of this great State, and they are, and will remain a reflection of the time, money, and effort of those in authority. If the SE and SC TPRs are merged, the vital roads in our region will deteriorate.

The Board of County Commissioners for Prowers County, Colorado respectfully asks that you reconsider the combining of the SE TPR and SC TPR and truly hope that our voices will be heard and considered in the HB23-1101 boundary decision.

Thank you,

Board of County Commissioners for Prowers County, Colorado



Ron Cook, Chair



Wendy Buxton-Andrade, Vice-Chair



Thomas Grasmick, Commissioner

cc: Vince Rogalski, STAC Chair

Terry Hart, TC Representative for SE Colorado

Honorable US Senator John Hickenlooper

Honorable US Senator Michael Bennet

Honorable US Representative Ken Buck, CO-04 Congressional District

Honorable CO Senator Rod Pelton, Senate District 35

Honorable CO Representative Ty Winter, House District 47

John Galusha, South Central TPR



July 27, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The City of Fort Morgan is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that The City of Fort Morgan can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

City Manager,  
City of Fort Morgan



October 4, 2023

To: Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

CC: Shoshana Lew, CDOT Executive Director

**Subject: Opposition to modifying TPR Boundaries in CDOT Region 3**

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

I am writing this letter on behalf of the Town of Fraser concerning the Transportation Planning Region (TPR) study mandated by HB23-1101. The Northwest TPR is located in CDOT's Region 3 and is comprised of five counties (Grand, Jackson, Moffat, Rio Blanco and Routt) as well as the 10 municipalities within those counties. In regard to the potential changes in TPR boundaries, the Fraser Board of Trustees strongly request that our Northwest Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the Northwest TPR boundary.

One of Fraser's Trustees, Brian Cerkvenik, is heavily involved in this collaboration as the Vice-Chair of the Northwest TPR and works to develop and maintain a long-range Regional Transportation Plan. Our TPR has worked together for many years with the goal to support the needs of all of the participating agencies in our rural NWTPR, even though there are differing priorities and there is never enough funding for all the needed projects.

We appreciate that CDOT is looking to ensure consistency and transparency of the TPR process throughout the state, and we are happy to assist with that endeavor. However, we believe our current boundaries and participating counties of the NWTPR are appropriate and should remain unchanged. It is extremely important that the Highway 40 corridor remain in the same TPR, so that the same group of people can look at the road as a whole, and not have it broken up into different regions with different priorities.

Sincerely,

Mayor Philip Vandernail  
Town of Fraser

Town of Fraser  
PO Box 370, Fraser, CO 80442 office 970-726-5491 fax 970-726-5518  
[www.frasercolorado.com](http://www.frasercolorado.com)



# TOWN of FRISCO

P.O. Box 4100 • Frisco, Colorado 80443

---

October 25, 2023

TO: Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

CC: Shoshana Lew, CDOT Executive Director

RE: Support of IMTPR Division in CDOT Region 3

Dear TPR Boundary Study Advisory Committee Members, Transportation Commissioners, and STAC Members:

The Town of Frisco is submitting this letter to express support for the division of the Intermountain Transportation Planning Region (IMTPR) into two new TPRs, as presented by CDOT on October 6, 2023. At the special meeting, the Town of Frisco, alongside a majority of IMTPR members, selected a split of the IMTPR to create the following two TPRs:

TPR 1 - Summit County, Lake County, Eagle County (partial)


TPR 2 - Garfield County, Pitkin County, Eagle County (partial)

The Town of Frisco believes the division proposed above provides the best option for cohesion of transportation and transit planning, projects, and priorities, as well as an equitable representation for our communities at STAC.

As mandated in HB 23-1101, CDOT has gathered and analyzed data for many parameters that influence travel and transit throughout the state. At our special meeting of the IMTPR, CDOT staff presented compelling data on vehicle miles traveled, truck vehicle miles traveled, tourism impacts, population, commuting, and crash rates that indicate a strong need to divide the IMTPR.

The Town of Frisco supports CDOT's analysis and agrees that a division of the IMTPR will bring a better balance of representation for the municipalities of the current IMTPR.

Respectfully,

DocuSigned by:  
  
CBE0CC1AC14442E...

---

Hunter Mortensen, Mayor  
Town of Frisco

cc. Thad Renaud, Esq. (Counsel to the Town)

*Tom Jankovsky, Chair Pro Tem*  
District 1

*John Martin, Chair*  
District 2

*Mike Samson*  
District 3



October 30, 2023

To: The Colorado Department of Transportation; Transportation Commission  
Statewide Transportation Advisory Committee (STAC)  
Shoshana Lew, Executive Director, Colorado Department of Transportation  
Transportation Planning Region Boundary Study Committee

**Re: *Opposition to TPR Boundary changes***

The Garfield County Board of County Commissioners respectfully submits this letter expressing our strong opposition to changes to Transportation Planning Region Boundaries. Garfield County has been an active participant in Western Colorado regional transportation planning since the inception of the Intermountain Transportation Planning Region (IMTPR) almost 30 years ago. There is no arguing that since its inception, the general composition of the entire IMTPR has changed significantly. The one true constant, however, has been the relationships built and the collaboration of the members of the IMTPR, whether it was the 4-laning of Hwy 9 in Summit County or improvements to Highway 82 in Pitkin County. The entire region has been the beneficiary of regional planning efforts. Across the region, projects have been identified, programmed, and executed as the result of those collaborations. The 2018 process that resulted in the IMTPR 10 Year Plan is a perfect example, resulting in the identification and prioritization of projects representing each of the 5 Counties in the IMTPR.

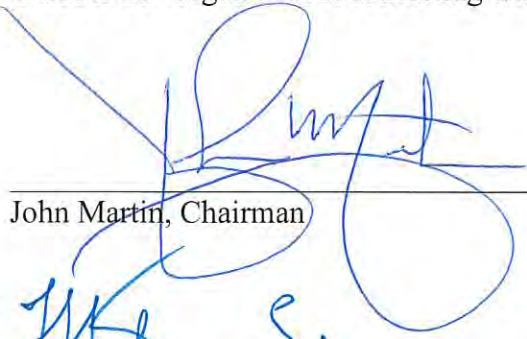
The 11<sup>th</sup> hour amendment to HB23-1101, requiring the boundary study clearly didn't take into account the history of cooperation Statewide that has been the hallmark of the participants involved in Regional Transportation Planning processes, and the unique characteristics of each of the Rural TPR's. As of the writing of this letter, there have been 26 letters submitted for the record with 21 of them in opposition to any change.

The criteria that were established for boundary change were nebulous and lacked any real evaluation metrics. This lack of clarity made the undertaking/evaluation significantly more difficult as there was nothing available for CDOT staff to truly attach any measurable significance to. Arguably, there is not a single proposed change to any TPR that confers any discernable monetary, representation, or relationship benefit to the affected TPR's. Not only are there no real benefits associated with the proposed changes, there is very real harm done regarding representation in South East and South Central portions of the State.

While there have been territorial squabbles between the rural TPR's and the Metropolitan Planning Organizations (MPO's), they were always civil and typically resulted in the development of effective consensus driven decisions. Rarely (never) has there been an issue of

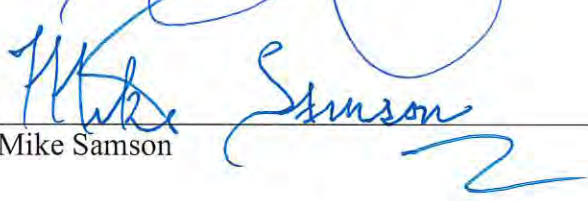
such contention that the discussion resulted in demands for changes to boundaries or representation. To further the point, there has never been a question raised regarding equity of representation, either by a TPR representative or the broader public. Given the civility of the participants and the respect for the work that is done monthly at the STAC, this re-evaluation effort has all of the markings of some kind of dubious hidden agenda, considering that until it was proposed in legislation a TPR boundary change was never discussed at any recent STAC meeting. In short, we believe this has been an exercise of a solution looking for a problem.

Garfield County is in agreement with and fully supports the position of the IMTPR opposing any changes. This decision was reached through a thoughtful, transparent and open discussion at the October 28<sup>th</sup> regular IMTPR meeting with a deciding vote of 12 to 7.




---

John Martin, Chairman



---

Mike Samson



---

Tom Jankovsky

Cc: Brian Pettet – Chair, Intermountain Transportation Planning Region



PO Box 128  
304 8<sup>th</sup> Street  
Gilcrest, CO  
80623  
(970) 737-2426  
(970) 737-2427 fax

[www.townofgilcrest.org](http://www.townofgilcrest.org)

August 7, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Gilcrest is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that the Gilcrest Board of Trustees can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Nothem", is written over a horizontal line.

Steve Nothem, Mayor



**City of Glenwood Springs**

101 West 8th Street, Glenwood Springs, CO 81601

---

Ingrid Wussow, Mayor  
970-404-5105 (c)  
[ingrid.wussow@cogs.us](mailto:ingrid.wussow@cogs.us)

11/2/2023

Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

Dear TPR Boundary Study Advisory Committee Members, Transportation Commissioners, and STAC Members:

The City of Glenwood Springs is submitting this letter to express support for the division of the Intermountain Transportation Planning Region (IMTPR) into two new TPRs, as presented by CDOT on October 6, 2023, and as recommended by CDOT on October 27<sup>th</sup>. The City of Glenwood Springs, alongside a majority of IMTPR members, selected a split of the IMTPR to create the following two TPRs:

TPR 1 - Summit County, Lake County, Eagle County (partial)

TPR 2 - Garfield County, Pitkin County, Eagle County (partial along the Highway 82 Corridor)

The City of Glenwood Springs believes the division proposed above provides the best option for cohesion of transportation and transit planning, projects, and priorities, as well as an equitable representation for our communities at STAC. Glenwood Springs encourages this split for the following reason.

Summit County, Lake, and Eagle County (along with nearly every municipality in those counties) have expressed support for breaking the IMTPR into two separate TPR's. When three of the five counties express a desire to leave the existing IMTPR, we feel that those voices should be acknowledged and honored. Whether they feel the current IMTPR does not work well for them, or if they feel a new make-up would have additional benefit, Glenwood Springs doesn't feel comfortable standing in the way of those counties to self-determine.



The City of Glenwood Springs supports CDOT's analysis and the requests of our neighbors in Summit, Lake, and Eagle Counties that a division of the IMTPR will bring a better balance of representation for the municipalities of the current IMTPR.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ingrid Wussow'.

Ingrid Wussow, Mayor  
City of Glenwood Springs  
970-404-5105 (c)  
[ingrid.wussow@cogs.us](mailto:ingrid.wussow@cogs.us)

CC: Shoshana Lew, CDOT Executive Director

Resolution 2023-006

A RESOLUTION OPPOSING A CHANGE TO THE SOUTHEAST AND SOUTH CENTRAL TRANSPORTATION PLANNING REGION BOUNDARIES.

WHEREAS, the Town of Granada Trustees responsibilities include the health, safety and welfare of the residents of Town of Granada; and

WHEREAS, Town of Granada is a member of the Southeast Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states “A statement of justification for the change considering transportation commonalities.”; and

WHEREAS, Section 2.02.1.4 states “A copy of the resolution stating the concurrence of the affected Regional Planning Commission.”; and

WHEREAS, The Town of Granada Trustees feel that any change to the TPR boundary for the Southeast and South Central TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the Southeast and South Central TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

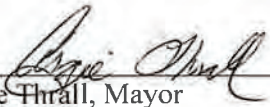
WHEREAS, repeated objections from representatives from both Southeast and South Central TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.


NOW THEREFORE BE IT RESOLVED by the Board of the Town of Granada Trustees of Granada Colorado that the proposed change in boundaries of the Southeast TPR is hereby opposed.

BE IT FURTHER RESOLVED by the Board of the Town of Granada Trustees that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 11th DAY OF OCTOBER, 2023.

TOWN OF GRANADA, STATE OF COLORADO

  
Argie Thrall, Mayor

ATTEST:   
Jackie Malone, Town Clerk



# Grand County BOARD OF COMMISSIONERS

Colorado

308 Byers Ave., P.O. Box 264 | Hot Sulphur Springs, CO 80451 | 970-725-3347

**Richard D. Cimino**

District 1, Fraser 80442

**Merrit S. Linke**

District 2, Granby 80446

**Randal F. George**

District 3, Kremmling 80459

**Email:** [grndcty1@co.grand.co.us](mailto:grndcty1@co.grand.co.us)

**Phone:** 970-725-3100

**Fax:** 970-725-0565

**Edward Moyer**, County Manager

**Maxine LaBarre-Krostue**, County Attorney

August 31, 2023

**TO:** Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

**RE: Opposition to modifying TPR/MPO boundaries in CDOT Region 3**

Dear Transportation Planning Region Boundary Study Advisory Committee Members, Transportation Commissioners and Statewide Transportation Advisory Committee Members:

We are writing in response to the Transportation Planning Region (TPR) study mandated by **HB23-1101, Ozone Season Transit Grant Program Flexibility**. We humbly request that there be no additions to or deletions from the members currently within the Northwest TPR (NWTPR).

The NWTPR includes Grand, Moffat, Routt, Rio Blanco and Jackson counties – all of which are characterized by mountainous terrain, agricultural lands, and river valleys. Our counties are home to numerous national forests, wilderness areas, state parks, and world-renowned ski resorts. As the gateways to Rocky Mountain National Park and the West, our populations explode with visitors during both winter and summer seasons – which adverse winter weather conditions on our many high-altitude mountain passes can make challenging.

With limited redundant routes to provide detours and road closures, the NWTPR has worked together for many years to support the needs of our rural mountain communities. NWTPR agencies confirm participation in an Intergovernmental Agreement each year, which includes acknowledging our cooperation in developing and maintaining a long-range Regional Transportation Plan, committing to participation in the Northwest Transportation Planning Region, and voting on chair and vice chair and representatives for STAC.

Changing of TPR boundaries would be to the detriment of the NWTPR, and at the expense of our communities and visitors. It is for these reasons that we believe the TPR boundaries within Region 3 should remain unchanged.

Sincerely,

Richard Cimino  
Commissioner Chair

Randal George  
Commissioner

Merrit Linke  
Commissioner

# TOWN OF HILLROSE

315B Emerson Street P O Box 1  
Hillrose, CO 80733-0001  
(970) 847-3761

August 7, 2023

RE: HB 23-1101 CDOT Study – UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Hillrose Board of Trustees is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that the Town of Hillrose can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,



Mayor Dale Colerick

A Small Town with Friendly People!

## RESOLUTION NO. 2023-6

### A RESOLUTION OPPOSING A CHANGE TO THE SOUTH CENTRAL AND SOUTHEAST TRANSPORTATION PLANNING REGION BOUNDARIES

WHEREAS, the Town of Holly's responsibilities include the health, safety and welfare of the residents of the Town of Holly; and

WHEREAS, The Town of Holly is a member of the Southeast Transportation Planning Region (TPR); and

WHEREAS, the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states "A statement of justification for the change considering transportation commonalities."; and

WHEREAS, Section 2.02.1.4 states "A copy of the resolution stating the concurrence of the affected Regional Planning Commission."; and

WHEREAS, The Town of Holly feels that any change to the TPR boundary for the South Central and Southeast TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the South Central and Southeast TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both South Central and Southeast TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

NOW THEREFORE BE IT RESOLVED by the Town of Holly Board of Trustees that the proposed change in boundaries of the Southeast TPR is hereby opposed.

BE IT FURTHER RESOLVED by the Town of Holly Board of Trustees that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 18<sup>TH</sup> DAY OF OCTOBER, 2023.

  
Larry Sitts, Mayor

ATTEST:

  
Cynthia S. Humrich, Clerk/Treasurer



## Intermountain Transportation Planning Region

October 31, 2023

Colorado Transportation Commission (TC)  
Statewide Transportation Advisory Committee (STAC)  
Transportation Planning Region Boundary Study Advisory Committee  
Shoshana Lew, CDOT Executive Director

RE: IMTPR position on TPR boundary change options

Dear Commissioners, Committee members and Executive Director Lew,

The Intermountain Transportation Planning Region (IMTPR) has completed its analysis of the proposed planning region boundary change alternatives. This process was conducted over the last few IMTPR meetings, which culminated in a straw poll of members at a special meeting on October 4<sup>th</sup> and a formal vote at the regular TPR meeting on October 27<sup>th</sup>.

On October 4<sup>th</sup>, in order to better understand the opinions of IMTPR members, an informal straw poll was conducted to provide a snapshot in time about how folks felt about four boundary change options:

- 1a: Split TPR: Summit and Lake. Garfield Eagle and Pitkin.
- 1c: Split TPR: Summit, Lake, (part of) Eagle. Garfield, Pitkin, (part of) Eagle.
- 1d: Split TPR: Summit, Lake, Eagle. Garfield, Pitkin.
- 3: No change

Members were asked for their first and second choices of these options so CDOT staff could further refine the alternatives. The following is the result of that poll:

- 1a: 0 first choice. 12 second choice.
- 1c: 9 first choice. 3 second choice.
- 1d: 2 first choice. 2 second choice.
- 3: 7 first choice. 1 second choice.

Given this feedback, CDOT staff further refined the alternatives; which involved better defining the location of a dividing line for Eagle County between an East IMTPR and a West IMTPR. These refined options would then be considered in a formal vote at the next regular IMTPR meeting.

On October 27<sup>th</sup>, four alternatives were presented to the IMTPR membership. These included:

- 1: Split TPR: Summit and Lake. Garfield, Eagle and Pitkin.
- 2: Split TPR: Summit, Lake, west side of Eagle (mm 165). Garfield, Pitkin, east side of Eagle (mm 165)
- 3: Split TPR: Summit, Lake, northeast side of Eagle (I-70 valley section)  
Garfield, Pitkin, southwest corner of Eagle (RF Valley section)
- 4: No change

Through IMTPR member dialogue and proposals, Option 1 and Option 2 were eliminated from consideration with no opposition. A formal motion was then made and a second was received for the following statement:

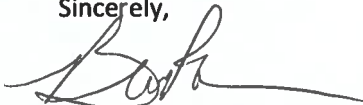
*The IMTPR would prefer no change be made to the TPR boundary (option 4), however if CDOT decides a change must be made, the preference would be that the TPR be divided similarly to Option 3 and in such a way that the division occurs along the Transportation Authority Boundary.*

A formal vote was conducted. 12 members voted to support the motion. 7 members voted not to support the motion. The motion passed.

Given this result, the IMTPR requests that no change be made to the TPR boundary. However, if a change is deemed to be required, the IMTPR requests the dividing line be located along the Transportation Authority Boundary.

Thank you for the opportunity to weigh in on the proposed TPR boundary change alternatives. The IMTPR looks forward to its continued advisory role to CDOT and the Transportation Commission through STAC.

Sincerely,



Brian Pettet, Chair IMTPR



Bentley Henderson, Vice-Chair IMTPR



TOWN OF KEENESBURG  
FOUNDED JULY 1906  
A MUNICIPAL CORPORATION SINCE JULY 1919

August 7, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Keenesburg is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that Keenesburg can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

Aron Lam, Mayor





Date: July 27, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Kersey is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence the Town of Kersey can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

*C. Morgan*

Christian Morgan

Kersey Town Manager

# KIOWA COUNTY COLORADO



Mike Lening \* Howard "Butch" Robertson \* Donald Oswald  
District 1 District 2 District 3

1305 Goff St. \* PO Box 100 \* Eads \* CO \* 81036  
Phone: 719.438.5810 \* Fax: 719.438.5615  
kiowaco100@gmail.com

October 26, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to have this letter serve as our response in opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

As members of the SE TPR, which represents the counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties and the municipalities within those six counties, we feel adamant that we remain as a separate TPR. The current boundary for the SE TPR currently encompasses 9,570 square miles and collectively 26 municipalities within those boundaries.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. However, we are very concerned that CDOT conducted a reassessment of the 10 TPR boundaries, at the request from the legislative body, and did not include any input from any of the TPRs, more specifically SE, SC and Intermountain. In the process of the assessment, we were not invited to the table to give input on what those boundaries should be and whether they should change or remain the same.

We were not made aware of the proposed changes until August 23, 2023, when CDOT requested an audience with our SE TPR as well as with the SC TPR representatives via a Zoom call. We were made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the "study" data/results. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

We were presented with data stating that we are the two smallest TPRs by population, however, no compelling data was given to either TPR to concretely confirm that there is a need to combine the TPRs.

The reasons for our opposition are;

- Enormous Coverage area
- Loss of STAC representation
- Freight Corridor-Priority
- Changes in Funding
- Difficulty with Planning Process
- Effects on our Transit System

Our roads are regional priorities as they are an economic driver. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to be able to offer safety to domestic travelers, as our crash data usually involves freight vehicles. We feel our ability to continue to address infrastructure to accommodate safe travel is threatened by this merger.

The lack of input during the time that this study was conducted is alarming. Would it not have been wise to include the counties, municipalities and stakeholders, that this change will affect? The region feels this is another example of how decisions are being made for us, without consideration of our opinions, or considering the logistics for rural areas. In addition, the Southeast feels that in order to accommodate the Intermountain TPR, we are being told what will be done.

In conversations between South Central and Intermountain TPR, the Intermountain TPR has expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

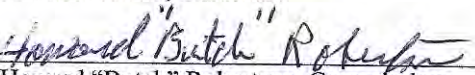
We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Respectfully,

**Kiowa County Board of Commissioners**

  
\_\_\_\_\_  
Donald Oswald, Chairman

  
\_\_\_\_\_  
Howard "Butch" Robertson, Commissioner

  
\_\_\_\_\_  
Michael Lening, Commissioner

- cc: Stephanie Gonzales, SE TPR Chair
- Vince Rogalski, STAC Chair
- Terry Hart, TC Representative for SE Colorado
- Honorable Senator John Hickenlooper
- Honorable Senator Michael Bennet
- Honorable Senator Ken Buck
- Honorable Senator Rod Pelton, Senate District 35
- Honorable Representative Ty Winter, House District 47
- John Galusha, South Central TPR



# Town of Kremmling

200 Eagle Ave. | P.O. Box 538  
Kremmling, CO 80549-0538  
Office 970.724.3249  
<https://townofkremmling.colorado.gov/>

September 7, 2023

To: Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

CC: Shoshana Lew, CDOT Executive Director

**RE: Opposition to modifying TPR/MPO boundaries in CDOT Region 3**

Dear Transportation Planning Region Boundary Study Advisory Committee Members, Transportation Commissioners and Statewide Transportation Advisory Committee Members,

On behalf of the Town of Kremmling, I am writing to submit this letter in response to the TPR study mandated by HB23-1101. The Northwest TPR is located in CDOT's Region 3 and is comprised of five counties (Grand, Jackson, Moffat, Rio Blanco and Routt) as well as the 10 municipalities within those counties. **In regard to the potential changes in TPR boundaries, the Kremmling Board of Trustees strongly request that our Northwest Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the NWTPR boundary.**

Our agencies confirm participation in an Intergovernmental Agreement each year, which includes acknowledging our cooperation in developing and maintaining a long-range Regional Transportation Plan, committing to participation in the Northwest Transportation Planning Region, and voting on chair and vice chair and representatives for STAC. Our TPR has worked together for many years with the goal to support the needs of all of the participating agencies in our rural NWTPR, even though there are differing priorities and there is never enough funding for all the needed projects.

**We appreciate that CDOT is looking to ensure consistency and transparency of the TPR process throughout the state, and we are happy to assist with that endeavor. However, we believe our current boundaries and participating counties of the NWTPR are appropriate and should remain unchanged. Furthermore we feel that all of the TPR boundaries within Region 3 work well for participating agencies and should stay as is.**

Sincerely,

Ashley Macdonald

Town Manager of Kremmling



## City of La Junta

October 4, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to have this letter serve as our response in opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

As members of the SE TPR, which represents the counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties and the municipalities within those six counties, we feel adamant that we remain as a separate TPR. The current boundary for the SE TPR currently encompasses 9,570 square miles and collectively 26 municipalities within those boundaries.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. However, we are very concerned that CDOT conducted a reassessment of the 10 TPR boundaries, at the request from the legislative body, and did not include any input from any of the TPRs, more specifically SE, SC and Intermountain. In the process of the assessment, we were not invited to the table to give input on what those boundaries should be and whether they should change or remain the same.

We were not made aware of the proposed changes until August 23, 2023, when CDOT requested an audience with our SE TPR as well as with the SC TPR representatives via a Zoom call. We were made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the "study" data/results. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

We were presented with data stating that we are the two smallest TPRs by population, however, no compelling data was given to either TPR to concretely confirm that there is a need to combine the TPRs.

We would like to give our reasons for our staunch opposition.

1) Enormous Coverage area:

The area is unreasonably large to manage.

2) Loss of STAC representation:

We are vehemently opposed to losing a voice at the table because we will lose one seat. We believe this goes against the initiative.

3) Freight Corridor-Priority:

The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.

The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25. These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado. You must travel our roads to get goods into the populated areas!

Both SE TPR and SC TPR have extreme unease about being combined, as we will be competing for the dollars for future infrastructure projects that address the need of our current priorities. The fear is that funds allocated will be shifted to either I-25 or SH 50/287 respectively. These areas already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding:

Both TPRs are extremely troubled about the funding being further diluted and/or rotated as suggested. We were presented with the assurance that our Regional Priority Plan funding would remain at the same percentage, however, again we already have internal challenges for prioritizing funding within our boundaries and adding additional counties in either direction will cause considerable challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

The planning process is difficult with 6 counties, and even 2 counties. Due to the proposed large coverage area, we feel this will further inhibit our members from participating. Priorities are also a concern from both TPRs. When we begin identifying priorities, we are worried it will be difficult to come to a consensus on the identification of priorities, not because of an unwillingness to work together, but because of the sheer size of the region that is being proposed and the number of projects that are within both TPR boundaries.

6) Transit:

SECED in our SE TPR program is currently working on a regional transit route program. We feel very uneasy on how this merger will affect our efforts of reopening routes in the six county region and what affect it might have on our ability to continue to secure funding to work towards that effort. Again, the question is, funds have the potential to be diluted.

Our roads are regional priorities as they are an economic driver. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to be able to offer safety to domestic travelers, as our crash data usually involves freight vehicles. We feel our ability to continue to address infrastructure to accommodate safe travel is threatened by this merger.

The lack of input during the time that this study was conducted is alarming. Would it not have been wise to include the counties, municipalities and stakeholders, that this change will affect? The region feels this is another example of how decisions are being made for us, without consideration of our opinions, or considering the logistics for rural areas. In addition, the Southeast feels that in order to accommodate the Intermountain TPR, we are being told what will be done.

In conversations between South Central and Intermountain TPR, the Intermountain TPR has expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Respectfully,

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Klein".

Rick Klein  
La Junta City Manager

# Las Animas County



## Board of County Commissioners

Felix M. Lopez  
Commissioner

Tony C. Hass  
Commissioner

Luis A. Lopez II  
Commissioner

### Resolution 23-022

#### **A RESOLUTION OPPOSING A CHANGE TO THE SOUTH CENTRAL AND SOUTHEASTERN TRANSPORTATION PLANNING REGION BOUNDARIES.**

WHEREAS, the Las Animas County Commissioners' responsibilities include the health, safety, and welfare of the residents of Las Animas County; and

WHEREAS, Las Animas County is a member of the South Central Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.2 states "A statement of justification for the change considering transportation commonalities."; and

WHEREAS, Section 2.02.1.3 states "A copy of the resolution stating the concurrence of the affected Regional Planning Commission."; and

WHEREAS, The Las Animas County Commissioners feel that any change to the TPR boundary for the South Central and South East TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the South Central and South East TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both South Central and South East TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

NOW THEREFORE BE IT RESOLVED by the Board of County Commissioners of Las Animas County Colorado that the proposed change in boundaries of the South Central TPR is hereby opposed;

BE IT FURTHER RESOLVED by the Board of County Commissioners that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

This Resolution, upon motion made and seconded, and an affirmative vote was adopted on this 17<sup>th</sup> day of October 2023.

**By Order of the Board of County Commissioners of Las Animas County, Colorado**



  
Felix M. Lopez, Commissioner

  
Tony C. Hass, Commissioner

  
Luis A. Lopez II, Commissioner

ATTEST:

  
Karrie L. Apple, Las Animas County Clerk and Recorder



## Mesa County Regional Transportation Planning Office

June 21, 2023

To: Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members

CC: Shoshana Lew- CDOT Executive Director  
Herman Stockinger- CDOT Deputy Director and Director of Policy

**Re: Opposition to Modifying the Grand Valley Transportation Planning Region Boundary**

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and STAC Representatives,

This letter is signed on behalf of the Grand Valley Regional Transportation Committee (GVRTC); the governing board that oversees the Grand Valley Transportation Planning Region, the Grand Valley Metropolitan Planning Organization (MPO) and Grand Valley Transit in response to the TPR Study done under HB23-1101.

Since the 1990s, the GVRTC has served the Grand Valley in synergy as an equitable representative of the people in both the urban and rural areas of Mesa County. Altering the current Grand Valley TPR boundary would greatly impact currently efficient governing structures and disrupt the unified transportation vision of both the Grand Valley TPR and the Grand Valley Metropolitan Planning Organization (MPO). The GVRTC stands in opposition to any modification to the current Grand Valley Transportation Planning Region (TPR) boundary.

### **Disruption to Efficient Governing Structures**

Currently, the Grand Valley TPR boundary follows the Mesa County boundary and is housed with the Grand Valley MPO in the Mesa County Regional Transportation Planning Office (RTPO). Staff in the office also oversee the funding and contract administration of Grand Valley Transit. This structure allows great collaboration and mentorship between the urban areas including Unincorporated Mesa County, Cities of Grand Junction and Fruita, and Town of Palisade, all of which are inside the Grand Valley MPO; the rural communities of Collbran and Debeque, as well as the transit system.

This synergy is seen monthly during Transportation Advisory Committee meetings where rural and urban staff come together to discuss transportation issues in Mesa County. This relationship is also important as we implement the Greenhouse Gas Rule for Transportation Planning into our travel-demand model and long-range plan. Changing the TPR boundaries would require an entirely new governing structure, such as a council of governments, and result in a segregation between the TPR and MPO meetings as different staff and elected officials would need to be present at each. With this, the relationships and collaboration we have built over the years would likely decrease, negatively impacting the transportation system in our communities. The increased complexity in governance would require more administrative staff hours that could otherwise be used toward the pursuit of regional transportation goals.

**Muddy a Clear Transportation Vision for the Urban and Rural Areas of Mesa County**

Historically, the RTPO has produced one long-range plan and the travel demand model for both the Grand Valley TPR and Grand Valley MPO. With this, we have one vision that guides our community and we work together to prioritize projects in the urban and rural areas of the county. This makes sense given the interconnectedness of the rural and urban areas of Mesa County with nearly 80 percent of workers in Mesa County also living in Mesa County. Changing the TPR boundaries would again segregate the current process such that the RTPO would produce the long-range plan for the MPO and CDOT would produce the plan for the TPR. With this, it would be more difficult to have a clear transportation vision in Mesa County and TPR funding would be competitive with counties outside of Mesa County. The current process has worked well for many planning cycles and we would like to continue to use this model into the future.

We understand the desire to look at TPR boundaries with fresh eyes to determine if transportation planning can be done more collaboratively or efficiently. However, we can confidently say that the Grand Valley TPR is well governed and brings together urban and rural areas to effectively plan for all of Mesa County. With this, we respectfully request that the Grand Valley TPR boundary remains as it stands today.

Sincerely,

DocuSigned by:  
*Cody Davis*  
00CD87E0101045F...  
Cody Davis  
Mesa County

DocuSigned by:  
*Jason Nguyen*  
A0C98DCA36C6482...  
Jason Nguyen  
City of Grand Junction

DocuSigned by:  
*Ken Krie*  
6A89A632E2064E2...  
Ken Krie  
City of Fruita

DocuSigned by:  
*Greg Mikolai*  
E01B52CA7AA54A2...  
Greg Mikolai  
Town of Palisade



July 27, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

Morgan County is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that Morgan County can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "John H. Westberg", is written over a light blue circular stamp.

Commissioner/Board Chair



**RESOLUTION NO. 2023-19**  
**OF THE NORTH FRONT RANGE TRANSPORTATION & AIR QUALITY PLANNING COUNCIL**  
**SUPPORTING THE RECOMMENDATIONS ON HB23-1101**

**WHEREAS**, the North Front Range Transportation & Air Quality Planning Council as the Metropolitan Planning Organization (MPO) has engaged with the Colorado Department of Transportation (CDOT) in a legislatively mandated review of procedures and potential boundary modifications across Colorado; and

**WHEREAS**, the study shall report on:

- The Consistency and Transparency of the Transportation Planning Process Across the Transportation Planning Regions (TPRs);
- The boundaries of the TPRs;
- Membership of the State Transportation Advisory Committee (STAC); and
- Membership of the Special Interim Transit and Rail Advisory Committee (TRAC); and

**WHEREAS**, CDOT provided opportunities for public comment and considered input from stakeholders throughout the process from across the State; and

**WHEREAS**, legislation protects rural Colorado's transportation interests by mandating that the number of rural TPRs cannot be reduced and CDOT was mandated to look at specific factors in determining boundary changes; and

**WHEREAS**, changes affecting the NFRMPO are:


- State a preference in the Transportation Commission rule that relevant TPR governing documents do not allow a single political jurisdiction to represent two TPRs on STAC. The NFRMPO will amend its Article of Association so that NFRMPO and Upper Front Range (UFR) TPR do not have representation from the same political jurisdiction on STAC.
- No boundary modifications are recommended.

**NOW, THEREFORE, BE IT RESOLVED**, the North Front Range Transportation & Air Quality Planning Council hereby supports the recommendations for CDOT improvements; recommendations for STAC and TRAC, with term limits of two consecutive terms; recommendations for TPR Governance; and the proposed new TPR Boundaries, with no change as supported by the STAC at their November 2, 2023 meeting. For the NFRMPO specifically, the North Front Range Transportation & Air Quality Planning Council supports the modification of the NFRMPO's Articles of Association and no modifications to the NFRMPO's boundary.

Passed and approved at the regular meeting of the North Front Range Transportation & Air Quality Planning Council held this 2<sup>nd</sup> day of November 2023.

  
Scott K. James (Nov 3, 2023 13:25 MDT)  
\_\_\_\_\_  
Scott James, Chair

ATTEST:

  
Suzette Mallette (Nov 5, 2023 13:28 MDT)  
\_\_\_\_\_  
Suzette Mallette, Executive Director

# NORTHWEST TRANSPORTATION PLANNING REGION

August 31, 2023

To: Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members  
CC: Shoshana Lew, CDOT Executive Director

**RE: Request to retain current TPR/MPO boundaries in CDOT Region 3**

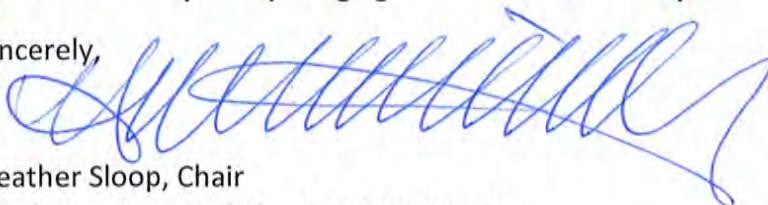
Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

On behalf of the Northwest Regional Planning Commission of the Northwest TPR, I am writing to submit this letter in response to the TPR study mandated by HB23-1101. The Northwest TPR is located in CDOT's Region 3 and is comprised of five counties (Grand, Jackson, Moffat, Rio Blanco and Routt) as well as the 10 municipalities within those counties. **In regard to the potential changes in TPR boundaries, we request that our Northwest Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the NWTPR boundary.**

Our agencies confirm participation in an Intergovernmental Agreement each year, which includes acknowledging our cooperation in developing and maintaining a long-range Regional Transportation Plan, committing to participation in the Northwest Transportation Planning Region, and voting on chair and vice chair and representatives for STAC. Our TPR has worked together for many years with the goal to support the needs of all of the participating agencies in our rural NWTPR, even though there are differing priorities and there is never enough funding for all the needed projects.

**We appreciate that CDOT is looking to ensure consistency and transparency of the TPR process throughout the state, and we are happy to assist with that endeavor. However, we believe our current boundaries and participating counties of the NWTPR are appropriate and should remain unchanged. Furthermore we feel that all of the TPR boundaries within Region 3 work well for participating agencies and should stay as is.**

Sincerely,



Heather Sloop, Chair  
Northwest Regional Planning Commission



**TOWN OF NUNN**  
185 LINCOLN AVENUE  
PO BOX 171  
NUNN, CO 80648  
PHONE: (970) 897-2385 FAX: (970) 897-2540

Date: August 03, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

Town of Nunn is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that Town of Nunn can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

Jordan Cable, Mayor  
Town of Nunn Board of Trustees



## Town of Ordway

Phone 719-267-3134

232 Main St Ordway, CO 81063

Fax 719-267-3192

October 4, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to have this letter serve as our response in opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South-Central Transportation Planning Region (SC TPR).

As members of the SE TPR, which represents the counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties and the municipalities within those six counties, we feel adamant that we remain as a separate TPR. The current boundary for the SE TPR currently encompasses 9,570 square miles and collectively 26 municipalities within those boundaries.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. However, we are very concerned that CDOT conducted a reassessment of the 10 TPR boundaries, at the request from the legislative body, and did not include any input from any of the TPRs, more specifically SE, SC and Intermountain. In the process of the assessment, we were not invited to the table to give input on what those boundaries should be and whether they should change or remain the same.

We were not made aware of the proposed changes until August 23, 2023, when CDOT requested an audience with our SE TPR as well as with the SC TPR representatives via a Zoom call. We were made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the "study" data/results. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.



SECED in our SE TPR program is currently working on a regional transit route program. We feel very uneasy on how this merger will affect our efforts of reopening routes in the six county region and what affect it might have on our ability to continue to secure funding to work towards that effort. Again, the question is, funds have the potential to be diluted.

Our roads are regional priorities as they are an economic driver. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to be able to offer safety to domestic travelers, as our crash data usually involves freight vehicles. We feel our ability to continue to address infrastructure to accommodate safe travel is threatened by this merger.

The lack of input during the time that this study was conducted is alarming. Would it not have been wise to include the counties, municipalities and stakeholders, that this change will affect? The region feels this is another example of how decisions are being made for us, without consideration of our opinions, or considering the logistics for rural areas. In addition, the Southeast feels that in order to accommodate the Intermountain TPR, we are being told what will be done.

In conversations between South Central and Intermountain TPR, the Intermountain TPR has expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Respectfully,



Gerald Barber, Mayor  
Town of Ordway



**Rob Oquist** - Commissioner Dist. 1  
**Tim Knabenshue** - Commissioner Dist. 2  
**Jim Baldwin** - Commissioner Dist. 3  
**Nathan Shultz** - County Attorney  
**Amy White-Tanabe** - County Administrator

## Office of the Commissioners

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September 25, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

Otero County would like to have this letter serve as our official response in opposition to the recommendation by the Colorado Department of Transportation's (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

The Southeast TPR encompasses Baca, Bent, Crowley, Kiowa, Otero, and Prowers Counties, along with the municipalities within those six counties, spanning an expansive 9,570 square miles. Similarly, the South Central TPR represents Huerfano and Las Animas Counties, along with the municipalities within those two counties, covering a substantial 6,368 square miles. Clearly, both TPRs operate across vast territories and face substantial responsibilities in representing their respective regions, without the inclusion of additional counties.

According to the statute, a maximum of 10 TPRs is allowed, and without our knowledge, CDOT reevaluated these 10 boundaries. During this reevaluation, we were not included in discussions to provide our input on whether these boundaries should be altered or remain unchanged.

On August 23, 2023, CDOT requested an audience with SE TPR and SC TPR representatives via a Zoom call to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. Both TPRs made it extremely clear that we were not in favor of the suggested merger.

On September 19, 2023, again CDOT requested another call with both TPRs to have, what we thought, was another discussion to review the "study" or assessment that CDOT conducted. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

Although we were presented with data stating that we are the two smallest TPRs population-wise and in CDOT's opinion, it makes sense for them to combine us, we would like to give you our reasons for our staunch opposition.

1) Enormous Coverage area:

- o SE TPR covers 9,570 sq. miles and 6 counties
- o SC TPR covers 6,368 square miles and 2 counties

Combining them would result in 15,938 sq. miles and 8 counties, which is an unreasonably large area to manage.

Intermountain TPR covers 6,422 sq. miles and 5 counties, why would splitting them into two make more sense?

2) Loss of STAC representation:

Current:

- o SE TPR – 1 seat at the table
- o SC TPR – 1 seat at the table
- o Intermountain TPR – 1 seat at the table

Proposed:

- o Combined TPR (SE & SC) – 1 seat at the table
- o Intermountain TPR – 2 seats at the table

We are vehemently opposed to losing a voice at the table. We believe that this goes fully against the initiatives to include rural areas and encourage participation in state and federally funded programs.

3) Freight Corridor-Priority concerns:

- o The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.
- o The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25.

These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado.

Both SE TPR and SC TPR have extreme concern that priority will be shifted to I-25 and SH 50/287 respectively. They already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding Concern:

Both TPRs are extremely concerned about the funding being further diluted and rotated as suggested. We were presented with the assurance that our Regional Priority Plan funding would remain at the same percentage, however, again we already have internal challenges to prioritizing funding within our boundaries and adding additional counties either direction will cause bigger challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

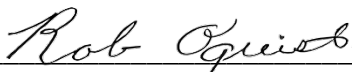
The planning process is difficult with 6 counties and even 2 counties. Due to our large coverage area, we feel this will further inhibit our members from participating.

Our understanding of TPRs is that they primarily concern transportation and the management of traffic flow throughout the state. It's important to note that TPRs should not be solely determined by population figures. Relying solely on population statistics would have detrimental effects on the more remote areas of the state while disproportionately benefiting the metropolitan area. Although we acknowledge that the metro area serves as the state's economic hub, it's crucial to remember that if the transportation routes leading to this hub are not properly maintained, commerce cannot reach it safely and efficiently.

In terms of funding allocation, it should reflect the actual mileage traveled within each TPR, rather than being solely based on the entire population of the TPR. This approach would ensure that resources are distributed in a way that aligns with the transportation needs and challenges faced by each region, rather than being skewed by population numbers alone.

Otero County respectfully requests that the existing TPRs remain unchanged. The current model appears to be the most effective, fair, and secure method for distributing funds across the state. Any alterations to this established model could further strain an already stretched and stressed infrastructure in the southeastern region.

Sincerely,



---

Rob Oquist, Chairman



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Tim Knabenshue



November 21, 2023

Colorado Transportation Commission (TC)  
Statewide Transportation Advisory Committee (STAC)  
Transportation Planning Region Boundary Study Advisory Committee  
Shoshana Lew, CDOT Executive Director

RE: Pitkin County position on TPR boundary change proposal

Dear Commissioners, Committee members and Executive Director Lew,

The Pitkin County Board of County Commissioners respectfully submits this letter expressing opposition to the currently proposed changes to existing Transportation Planning Region Boundaries. Pitkin County has been an active participant in regional transportation planning since the inception of the Intermountain Transportation Planning Region (IMTPR) almost 30 years ago. All member counties have benefited from these regional planning efforts. Across the planning region, projects have been identified, programmed and executed as the result of those collaborations. The 2018 process that resulted in the IMTPR 10 Year Plan is an example, which resulted in the identification and prioritization of projects representing each of the five Counties in the IMTPR.

An amendment to HB23-1101 (Ozone Season Transit Grant Program Flexibility) required CDOT to study current TPR boundaries and recommend changes to the Transportation Commission. The recommendation has been made based on TPR population and vehicle miles traveled, but it fails to adequately account for the cooperation between TPR representatives to solve transportation issues from a regional and statewide perspective. There is not a single proposed change to any TPR that confers any discernible monetary, representational or relationship benefit to the affected TPRs.

While there have been spirited debates and territorial squabbles between the rural TPR's and the Metropolitan Planning Organizations (MPO' s), they were always civil and typically resulted in the development of effective consensus driven decisions. There has never been an issue of such contention that the discussion resulted in demands for changes to boundaries or representation. To further the point, there has never been a question raised regarding equity of representation, either by a TPR representative or the broader public. Finally, the State Transportation Advisory Commission (STAC) recently voted unanimously to not support any TPR boundary change recommendations from CDOT.

Due to the lack of discernible benefit and harm to current collaborative regional relationships, Pitkin County fully supports the position of the IMTPR and STAC opposing any changes to existing TPR boundaries.

Sincerely,  
Pitkin County Board of Commissioners

A handwritten signature in blue ink, appearing to read "Francie Jacober", with a long horizontal flourish extending to the right.

Francie Jacober  
Chair



## TOWN OF PLATTEVILLE

Adrienne Sandoval, Mayor  
400 Grand Avenue, Platteville, Colorado 80651  
970.785.2245 - 970.785.2476 (f)  
([asandoval@plattevillegov.org](mailto:asandoval@plattevillegov.org))

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July 27, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

The Town of Platteville is writing in support of keeping our community membership and representation in the Upper Front Range Transportation Planning Region (UFR TPR) as it is currently adopted. Our community participates in the regional transportation planning partnership and does not believe CDOT needs to modify its current boundaries or representation.

As part of the study, CDOT staff is tasked with studying the consistency and transparency of the regional planning process to ensure transportation priorities are accurately and equitably represented in our rural TPR. It is with great confidence that the Town of Platteville can say the UFR TPR is well organized and managed and does an excellent job of rotating the quarterly meetings in three different counties to ensure all parties have equitable input in partnership opportunities with CDOT on regional projects. Due to the size of the TPR, hybrid meetings are an option providing each agency the ability to attend and contribute, including CDOT staff, due to the rescheduling of STAC meetings being on the same day as our quarterly meetings.

Also, be assured our TPR Chair and Vice Chair supports our communities and fairly represents our interests at STAC and any other appointed committees.

We request full and fair consideration of our input into this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

Adrienne Sandoval  
Mayor of Platteville

***TOWN OF PRITCHETT***  
***P.O. BOX 56***  
***PRITCHETT, CO 81064***

Troy Plagge, Mayor  
Marcus Hund  
Steve Wheeler  
Greg Huffman

Doug Davis, Manager  
Michelle Butler, Clerk  
Phone: (719) 523-3622

e-mail: [mbutler.townofpritchett@hotmail.com](mailto:mbutler.townofpritchett@hotmail.com)

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October 4, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to express our opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and including two counties and 15 municipalities within their boundaries. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. We are concerned that CDOT did not include any input from any of the TPRs, more specifically SE, SC and Intermountain. We were not asked to give input on what those boundaries should be and whether they should change or remain the same.

We did not become aware of the proposed changes until August 23, 2023, when CDOT requested an audience with our SE TPR as well as with the SC TPR representatives via a Zoom call. We were made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the "study" data/results. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not



approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

We were presented with data stating that we are the two smallest TPRs by population, however, no compelling data was given to either TPR to concretely confirm that there is a need to combine the TPRs.

We would like to give our reasons for our staunch opposition.

1) Enormous Coverage area:

SE TPR covers 9,570 sq. miles and 6 counties

SC TPR covers 6,368 square miles and 2 counties

Combining them would result in 15,938 sq. miles and 8 counties, which is an unreasonably large area to manage.

Intermountain TPR covers 6,422 sq. miles and 5 counties, why would splitting them into two make more sense?

2) Loss of STAC representation:

Current:

SE TPR – 1 seat at the table

SC TPR – 1 seat at the table

Intermountain TPR – 1 seat at the table

Proposed:

Combined TPR (SE & SC) – 1 seat at the table

Intermountain TPR – 2 seats at the table

We are vehemently opposed to losing a voice at the table. We believe that this goes fully against the initiatives to include rural areas and encourage participation in state and federally funded programs.

3) Freight Corridor-Priority:

The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.

The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25.

These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado. You must travel our roads to get goods into the populated areas!

Both SE TPR and SC TPR have extreme unease about being combined, as we will be competing for the dollars for future infrastructure projects that address the need of our current priorities. The fear is that funds allocated will be shifted to either I-25 or SH 50/287 respectively. These areas already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding:

Both TPRs are extremely troubled about the funding being further diluted and/or rotated as suggested. We were presented with the assurance that our Regional

Priority Plan funding would remain at the same percentage, however, again we already have internal challenges for prioritizing funding within our boundaries and adding additional counties in either direction will cause considerable challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

The planning process is difficult with 6 counties, and even 2 counties. Due to the proposed large coverage area, we feel this will further inhibit our members from participating. Priorities are also a concern from both TPRs. When we begin identifying priorities, we are worried it will be difficult to come to a consensus on the identification of priorities, not because of an unwillingness to work together, but because of the sheer size of the region that is being proposed and the number of projects that are within both TPR boundaries.

6) Transit:

SECED in our SE TPR program is currently working on a regional transit route program. We feel very uneasy on how this merger will affect our efforts of reopening routes in the six county region and what affect it might have on our ability to continue to secure funding to work towards that effort. Again, the question is, funds have the potential to be diluted.

Our roads are regional priorities as they are an economic driver. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to be able to offer safety to domestic travelers, as our crash data usually involves freight vehicles. We feel our ability to continue to address infrastructure to accommodate safe travel is threatened by this merger.

We would have appreciated an opportunity to have our concerns actually listened to prior to a decision being made. The region feels this is another example of how decisions are being made for us, without considering the logistics for rural areas. In addition, the Southeast feels that our needs are being sacrificed in order to accommodate the Intermountain TPR.

In conversations between South Central and Intermountain TPR, the Intermountain TPR has expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Respectfully,

  
\_\_\_\_\_  
Troy Plagge, Mayor

  
\_\_\_\_\_  
Reva Phillips, Deputy Clerk

cc: Stephanie Gonzales- Southeast TPR Chair

Resolution  
23-1

A RESOLUTION OPPOSING A CHANGE TO THE SOUTH CENTRAL AND SOUTHEASTERN  
TRANSPORTATION PLANNING REGION BOUNDARIES.

WHEREAS, the Pritchett Board of Trustees responsibilities include the health, safety and welfare of the residents of Pritchett; and

WHEREAS, Pritchett is a member of the South Central Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states “A statement of justification for the change considering transportation commonalities.”; and

WHEREAS, Section 2.02.1.4 states “A copy of the resolution stating the concurrence of the affected Regional Planning Commission.”; and

WHEREAS, The Pritchett Board of Trustees feel that any change to the TPR boundary for the South Central and South East TPRs will be detrimental to the planning process that has been in place for over 25 years; and

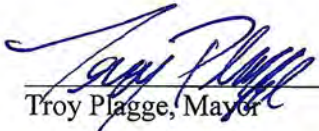
WHEREAS, there appears to be no benefit to the South Central and South East TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both South Central and South East TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

NOW THEREFORE BE IT RESOLVED by the Board of Trustees of Pritchett Colorado that the proposed change in boundaries of the South Central TPR is hereby opposed.

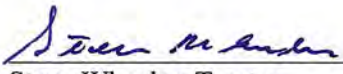
BE IT FURTHER RESOLVED by the Board of Trustees that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 10th DAY OF OCTOBER, 2023.

  
\_\_\_\_\_  
Troy Plagge, Mayor

  
\_\_\_\_\_  
Greg Huffman, Trustee

  
\_\_\_\_\_  
Marcus Hund, Trustee

  
\_\_\_\_\_  
Steve Wheeler, Trustee

  
\_\_\_\_\_  
Attest: Reva Phillips, Deputy Clerk





# Board of County Commissioners

## Prowers County

301 South Main, Suite 215

Lamar, Colorado 81052-2857

(719) 336-8025

FAX: (719) 336-2255

THOMAS GRASMICK  
FIRST DISTRICT

RON COOK  
SECOND DISTRICT

WENDY BUXTON-ANDRADE  
THIRD DISTRICT

October 10, 2023

Colorado Department of Transportation  
Transportation Commission of Colorado  
2829 W. Howard Place  
Denver, CO 80204  
*Emailed to: Jennifer.uebelher@state.co.us*

Dear Transportation Commission:

The Board of County Commissioners for Prowers County writes this letter expressing our strong opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

As a member County of the SE TPR, which also represents the counties of Baca, Bent, Crowley, Kiowa, and Otero Counties and the municipalities within those six counties, Prowers County feels adamant that we must remain as a separate TPR. The SE TPR currently encompasses 9,570 square miles, including 6 counties and 26 municipalities, within its boundaries.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. However, we are very concerned that CDOT conducted a reassessment of the 10 TPR boundaries, at the request of the legislative body, and did not include any input from any of the TPR members, specifically SE, SC and Intermountain. In the process of the reassessment, the SE TPR was not invited to the table to give input on what future boundaries should be and whether they should change or remain the same.

The SE TPR was not made aware of the proposed changes until August 23, 2023, when CDOT requested an audience with the SE TPR as well as with the SC TPR representatives via a Zoom call. The SE TPR was made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the “study” data/results. At this meeting, we were informed that CDOT would recommend to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were the SE TPR and SC TPR vocal in our disapproval of that move, but we were also informed that the Intermountain TPR disapproved as well.

Both TPRs were presented with data showing that we are the two smallest TPRs by population, however, no compelling data was given to either TPR to concretely confirm that there is a need to combine the TPRs. Population alone is not an equitable measure for determining size and scope of a TPR.

Prowers County staunchly opposes the combining the SE TPR and SC TPR for the following reasons:

1) Enormous Coverage area:

SE TPR covers 9,570 sq. miles and 6 counties

SC TPR covers 6,368 square miles and 2 counties

Combining these TPRS would result in 15,938 sq. miles and 8 counties, which is an unreasonably large area to manage.

Intermountain TPR covers 6,422 sq. miles and 5 counties, why would splitting them into two make more sense?

2) Loss of STAC representation:

Current:

SE TPR – 1 seat at the table

SC TPR – 1 seat at the table

Intermountain TPR – 1 seat at the table

Proposed:

Combined TPR (SE & SC) – 1 seat at the table

Intermountain TPR – 2 seats at the table

Prowers County is vehemently opposed to either TPR losing a voice at the table. This goes fully against the initiatives to include rural areas and encourage participation in state and federally funded programs. Additionally, based on CDOT’s own assessment data, the SE and SC TPRs contain some of the largest areas of Disproportionately Impacted Communities compared to all other TPRs. Taking away a representative for these Disproportionately Impacted Communities flies in the face of CDOT’s equity initiatives.

3) Freight Corridor-Priority:

The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.

The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25.

These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado. Freight must travel over SE TPR and SC TPR roads to get goods into the populated areas!

Both SE TPR and SC TPR have extreme unease about being combined, as our region will then be competing for dollars for future infrastructure projects that address the need of our current priorities. Those allocated funds will then be shifted to either I-25 or SH 50/287 rather than being available for both corridors. These areas already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding:

Both TPRs are extremely troubled about the funding being further diluted and/or rotated as suggested. We were presented with the assurance that our Regional Priority Plan funding would remain at the same percentage, however, we already experience challenges for prioritizing funding within our boundaries and adding additional counties in either direction will undoubtedly cause additional challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

The planning process is difficult with 6 counties, and even 2 counties. Due to the proposed large coverage area, we feel this will further inhibit our members from participating. Priorities are also a concern. The proposed combined TPR will struggle to come to a consensus on the identification of priorities, not because of an unwillingness to work together, but because of the sheer size of the region that is being proposed and the number of projects that fall within existing TPR boundaries.

6) Transit:

SECED in the SE TPR program is currently working on a regional transit route program. Prowers County has invested considerable time and money into this effort, and we are concerned how the merger will affect our efforts of reopening routes in the six county region. What effect will the proposed merger have on our ability to continue to secure funding to work towards that effort? Again, the available funds will likely be diluted.

Our roads are regional priorities as they are an economic driver for Prowers County and the entire region. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to offer safety to domestic travelers through continued roadway improvements, as most crashes on our corridors involve large freight vehicles. Prowers County feels the ability of our TPR to continue to address infrastructure to accommodate safe travel is threatened by this merger.

The lack of input during the time that this study was conducted is alarming. Why were the counties, municipalities and other regional stakeholders that this change will affect not brought to the table? Prowers County feels this is another example of how decisions are being made for us, without consideration of our opinions, concerns, or the logistics of rural areas. In addition, Prowers County feels that the SE TPR and SC TPR are being ordered to merge to accommodate





BOARD OF COUNTY COMMISSIONERS  
OF RIO BLANCO COUNTY, COLORADO  
RIO BLANCO COUNTY HISTORIC COURTHOUSE  
555 MAIN STREET, P.O. BOX 599  
MEEKER, COLORADO 81641  
970-878-9430

September 12, 2023

Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members  
CC: Shoshana Lew, CDOT Executive Director

**Subject: Adamant Opposition to Modifications of TPR/MPO Boundaries in CDOT Region 3**

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

The Board of County Commissioners of Rio Blanco County, Colorado, member of the Northwest TPR, submit this letter in response to the TPR study mandated by HB23-1101. As you are aware, the Northwest TPR is located in CDOT's Region 3 and is comprised of five counties (Grand, Jackson, Moffat, Rio Blanco and Routt) as well as the 10 municipalities within those counties. In regard to the potential changes in TPR boundaries, we request that the Northwest Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the NWTPR boundary.

We participate in an Intergovernmental Agreement each year, which includes acknowledging our cooperation in developing and maintaining a long-range Regional Transportation Plan, committing to participation in the Northwest Transportation Planning Region, and voting on chair and vice chair and representatives for STAC. Our TPR has worked together for many years with the goal to support the needs of all of the participating agencies in our rural NWTPR, even though there are differing priorities and there is never enough funding for all the needed projects.

We appreciate that CDOT is looking to ensure consistency and transparency of the TPR process throughout the state, and we are happy to assist with that endeavor. However, we believe our current boundaries and participating counties of the NWTPR are appropriate and adamantly oppose any changes. Furthermore, we feel that all of the TPR boundaries within Region 3 work well for participating agencies and should stay as is.

Sincerely,

Handwritten signature of Jennifer O'Hearon in blue ink.

The Board of County Commissioners of  
Rio Blanco County, Colorado

Handwritten signature of Ty Gates in blue ink.

TY GATES  
Commissioner  
[bocc@rbc.us](mailto:bocc@rbc.us)

Handwritten signature of Doug Overton in blue ink.

DOUG OVERTON  
Commissioner

JENNIFER O'HEARON  
Chairman



October 24, 2023

TO: Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners, Statewide Transportation Advisory Committee Members

CC: Shoshana Lew, CDOT Executive Director

RE: Support of IMTPR split in CDOT Region 3

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

The Town of Silverthorne is submitting this letter to express support for the split of the Intermountain Transportation Planning Region (IMTPR) as presented by CDOT on October 6, 2023. At the special meeting, the Town of Silverthorne, alongside a majority of IMTPR members, selected a split of the IMTPR to create two TPR's: (1) Summit County, Lake County, Eagle County (partial) and (2) Garfield County, Pitkin County, Eagle County (partial) as the best option for cohesion of transportation and transit planning, projects, and priorities as well as an equitable representation for our communities at STAC.

As mandated in HB 23-1101, CDOT has gathered and analyzed data for many parameters that influence travel and transit throughout the state. At our special meeting of the IMTPR, CDOT staff presented compelling data on vehicle miles traveled, truck vehicle miles traveled, tourism, population, and crash rates that indicate a strong need to split the IMTPR.

The Town of Silverthorne supports CDOT's analysis and agrees that a split of the IMTPR will bring a better balance of representation for the counties of the current IMTPR.

Sincerely,

Ann-Marie Sandquist, Mayor

October 20, 2023

State of Colorado  
Department of Transportation  
Transportation Commission

Dear Transportation Commission:

We would like to have this letter serve as our response in opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TPR) with the South Central Transportation Planning Region (SC TPR).

As members of the SE TPR, which represents the counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties and the municipalities within those six counties, we feel adamant that we remain as a separate TPR. The current boundary for the SE TPR currently encompasses 9,570 square miles and collectively 26 municipalities within those boundaries.

The proposal aims to combine SE TPR with SC TPR. SC TPR is 6,368 square miles and encompasses two counties and 15 municipalities within their boundaries. This would create an enormous area and we already have monumental tasks of representing our respective area without adding additional counties. This creates yet again another capacity issue to an already stressed area that strives to build capacity in the regions they serve.

We understand that per statute, there can only be 10 TPRs. However, we are very concerned that CDOT conducted a reassessment of the 10 TPR boundaries, at the request from the legislative body, and did not include any input from any of the TPRs, more specifically SE, SC and Intermountain. In the process of the assessment, we were not invited to the table to give input on what those boundaries should be and whether they should change or remain the same.

We were not made aware of the proposed changes until August 23, 2023, when CDOT requested an audience with our SE TPR as well as with the SC TPR representatives via a Zoom call. We were made aware of the boundary review, to garner the opinion of both TPRs on whether or not we would be open to the idea of combining the two TPR regions. At that meeting, both TPRs made it extremely clear that we were not in favor of the suggested merger.

Again, on September 19, 2023, CDOT requested a call with both TPRs to have, what we thought, was another discussion to review the "study" data/results. At this meeting, we were informed that it was going to be the recommendation from CDOT to the Transportation Commission to merge the two TPRs, which would then allow them to have an additional TPR open so that they could split the Intermountain TPR into two and by statute stay at 10 TPRs. Not only were we very vocal in saying that we do not approve of that move, but we were informed that the Intermountain TPR was also not in favor of that move.

We were presented with data stating that we are the two smallest TPRs by population, however, no compelling data was given to either TPR to concretely confirm that there is a need to combine the TPRs.

We would like to give our reasons for our staunch opposition.

1) Enormous Coverage area:

SE TPR covers 9,570 sq. miles and 6 counties

SC TPR covers 6,368 square miles and 2 counties

Combining them would result in 15,938 sq. miles and 8 counties, which is an unreasonably large area to manage.

Intermountain TPR covers 6,422 sq. miles and 5 counties, why would splitting them into two make more sense?

2) Loss of STAC representation:

Current:

SE TPR – 1 seat at the table

SC TPR – 1 seat at the table

Intermountain TPR – 1 seat at the table

Proposed:

Combined TPR (SE & SC) – 1 seat at the table

Intermountain TPR – 2 seats at the table

We are vehemently opposed to losing a voice at the table. We believe that this goes fully against the initiatives to include rural areas and encourage participation in state and federally funded programs.

3) Freight Corridor-Priority:

The SE TPR has four integral Colorado freight corridors within its boundaries on SH 10, US 50, US 160 and US 287.

The SC TPR has three integral Colorado freight corridors within its boundaries on SH 10, US 160 and I-25.

These routes are part of the corridors that have been identified as part of the most critical routes to facilitate the movement of goods into, out of, and within Colorado. You must travel our roads to get goods into the populated areas!

Both SE TPR and SC TPR have extreme unease about being combined, as we will be competing for the dollars for future infrastructure projects that address the need of our current priorities. The fear is that funds allocated will be shifted to either I-25 or SH 50/287 respectively. These areas already get the least amount of attention in the State and to have it diluted even further is of grave concern.

4) Funding:

Both TPRs are extremely troubled about the funding being further diluted and/or rotated as suggested. We were presented with the assurance that our Regional Priority Plan funding would remain at the same percentage, however, again we already have internal challenges for prioritizing funding within our boundaries and adding additional counties in either direction will cause considerable challenges to getting projects funded and completed in a timely manner.

5) Planning Process:

The planning process is difficult with 6 counties, and even 2 counties. Due to the proposed large coverage area, we feel this will further inhibit our members from participating. Priorities are also a concern from both TPRs. When we begin identifying priorities, we are worried it will be difficult to come to a consensus on the identification of priorities, not because of an unwillingness to work together, but because of the sheer size of the region that is being proposed and the number of projects that are within both TPR boundaries.

6) Transit:

SECED in our SE TPR program is currently working on a regional transit route program. We feel very uneasy on how this merger will affect our efforts of reopening routes in the six county region and what affect it might have on our ability to continue to secure funding to work towards that effort. Again, the question is, funds have the potential to be diluted.

Our roads are regional priorities as they are an economic driver. We must continue to have safe roads that accommodate freight and domestic travelers. Highway 287 in particular is the Ports to Plains Corridor, and has extremely high truck traffic each day. While the data may show that domestic travel is not as prevalent in our area as compared to I-70 or I-25, it is imperative to be able to offer safety to domestic travelers, as our crash data usually involves freight vehicles. We feel our ability to continue to address infrastructure to accommodate safe travel is threatened by this merger.

The lack of input during the time that this study was conducted is alarming. Would it not have been wise to include the counties, municipalities and stakeholders, that this change will affect? The region feels this is another example of how decisions are being made for us, without consideration of our opinions, or considering the logistics for rural areas. In addition, the Southeast feels that in order to accommodate the Intermountain TPR, we are being told what will be done.

In conversations between South Central and Intermountain TPR, the Intermountain TPR has expressed that while they face internal challenges with the counties they represent, they did not ask for the boundary changes, and certainly they do not want a change at the expense of other TPRs.

We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. At the end of the day, the roads traveled in our region, lead to the interior of our great State, and they are certainly a reflection of the time, money and effort of those in authority.

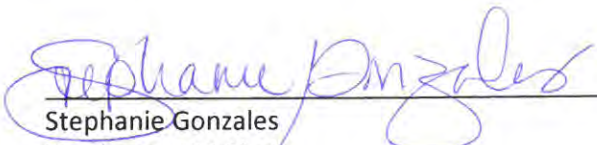
We respectfully ask that you reconsider the combining of our TPRS and truly hope that our voices will be heard and considered in the HB1101 boundary decision.

Respectfully,



---

Ron Cook  
Southeast TPR STAC Representative



---

Stephanie Gonzales  
Southeast TPR Chair

cc: Vince Rogalski, STAC Chair  
Terry Hart, TC Representative for SE Colorado  
Honorable Senator John Hickenlooper  
Honorable Senator Michael Bennet  
Honorable Senator Ken Buck  
Honorable Senator Rod Pelton, Senate District 35  
Honorable Representative Ty Winter, House District 47  
John Galusha, South Central TPR

Resolution  
No: 23-01

A RESOLUTION OPPOSING A CHANGE TO THE SOUTHEAST AND SOUTH CENTRAL TRANSPORTATION PLANNING REGION BOUNDARIES.

WHEREAS, the Southeast Transportation Planning Region responsibilities include the planning efforts for the health, safety and welfare of the residents of Southeast Colorado within the Region 6 planning area; and

WHEREAS, membership is comprised of representatives from the twenty-six municipalities and six counties of Southeast Colorado counties of Baca, Bent, Crowley, Kiowa, Otero and Prowers and officially make up the Southeast Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states "A statement of justification for the change considering transportation commonalities."; and

WHEREAS, Section 2.02.1.4 states "A copy of the resolution stating the concurrence of the affected Regional Planning Commission."; and

WHEREAS, The Southeast Transportation Planning Region members feel that any change to the TPR boundary for the Southeast and South Central TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the Southeast and South Central TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

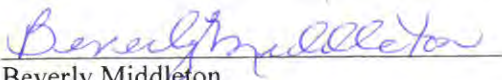
WHEREAS, repeated objections from representatives from both Southeast and South Central TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

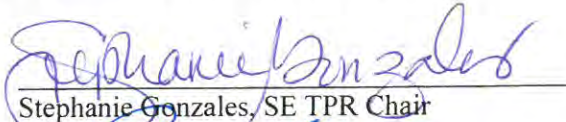
NOW THEREFORE BE IT RESOLVED by the Board of the Southeast Transportation Planning Region of Region 6 planning area that the proposed change in boundaries of the Southeast TPR is hereby opposed.

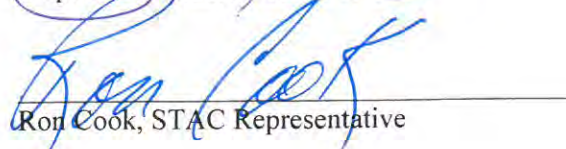
BE IT FURTHER RESOLVED by the Board of the Southeast Transportation Planning Region that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 25<sup>th</sup> DAY OF OCTOBER, 2023.

ATTEST:

  
Beverly Middleton

  
Stephanie Gonzales, SE TPR Chair

  
Ron Cook, STAC Representative

Resolution  
No: 23-01

A RESOLUTION OPPOSING A CHANGE TO THE SOUTHEAST AND SOUTH CENTRAL TRANSPORTATION PLANNING REGION BOUNDARIES.

WHEREAS, the Southeast Council of Governments responsibilities include the planning efforts for the health, safety and welfare of the residents of Southeast Colorado within the Region 6 planning area; and

WHEREAS, members of the Southeast Council of Governments are also members of the Southeast Transportation Planning Region (TPR); and

WHEREAS the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries; and

WHEREAS, the legislation passed creating a process for reviewing the TPR boundaries; and,

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

WHEREAS, Section 2.02.1.3 states "A statement of justification for the change considering transportation commonalities."; and

WHEREAS, Section 2.02.1.4 states "A copy of the resolution stating the concurrence of the affected Regional Planning Commission."; and

WHEREAS, The Southeast Council of Governments members feel that any change to the TPR boundary for the Southeast and South Central TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the Southeast and South Central TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

WHEREAS, repeated objections from representatives from both Southeast and South Central TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

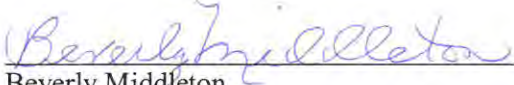
NOW THEREFORE BE IT RESOLVED by the Board of the Southeast Council of Governments of Region 6 planning area that the proposed change in boundaries of the Southeast TPR is hereby opposed.

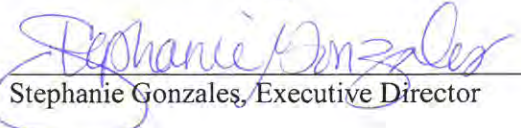
BE IT FURTHER RESOLVED by the Board of the Southeast Council of Governments that copies of this resolution be sent to the Transportation Commission, CDOT Headquarters, and the Governor of the State of Colorado.

INTRODUCED, APPROVED, AND ADOPTED ON THE 25<sup>th</sup> DAY OF OCTOBER, 2023.

ATTEST:

  
Danelle Berg, Chair

  
Beverly Middleton

  
Stephanie Gonzales, Executive Director



August 29, 2023

To: Transportation Planning Region Boundary Study Advisory Committee Members  
Transportation Commissioners  
Statewide Transportation Advisory Committee Members  
CC: Shoshana Lew, CDOT Executive Director

**RE: Opposition to modifying TPR/MPO boundaries in CDOT Region 3**

Dear Transportation Planning Region Boundary Study Advisory Committee Members,  
Transportation Commissioners and Statewide Transportation Advisory Committee Members,

On behalf of the City of Steamboat Springs City Council, I am writing this letter to support the Northwest Transportation Planning Region's opposition to modifying the TPR/MPO boundaries in CDOT Region 3. The Northwest TPR is located in CDOT's Region 3 and is comprised of five counties (Grand, Jackson, Moffat, Rio Blanco and Routt) as well as the 10 municipalities within those counties. **In regard to the potential changes in TPR boundaries, we request that our Northwest Transportation Planning Region stay the same and that there are no additions or deletions of the members currently within the NWTPR boundary.**

Our agencies confirm participation in an Intergovernmental Agreement each year, which includes acknowledging our cooperation in developing and maintaining a long-range Regional Transportation Plan, committing to participation in the Northwest Transportation Planning Region, and voting on chair and vice chair and representatives for STAC. Our TPR has worked together for many years with the goal to support the needs of all of the participating agencies in our rural NWTPR, even though there are differing priorities and there is never enough funding for all the needed projects.

**We appreciate that CDOT is looking to ensure consistency and transparency of the TPR process throughout the state, and we are happy to assist with that endeavor. However, we believe our current boundaries and participating counties of the NWTPR are appropriate and should remain unchanged. Furthermore, we feel that all of the TPR boundaries within Region 3 work well for participating agencies and should stay as is.**

Sincerely,

A handwritten signature in blue ink that reads "Robin Crossan".

Robin Crossan  
City Council President  
City of Steamboat Springs





## BOARD OF COUNTY COMMISSIONERS

970 453 3414 ph | 970 453 3535 f  
summitcountyco.gov

208 East Lincoln Ave. | PO Box 68  
Breckenridge, Colorado 80424

October 26, 2023

To: Transportation Planning Region Boundary Study Advisory Committee  
Transportation Commission of Colorado  
Statewide Transportation Advisory Committee

Cc: Shoshana Lew, Director, Colorado Department of Transportation (CDOT)

Subj: Support to split current Intermountain Transportation Planning Region (IMTPR)

Dear Commissioners and Committee Members,

We offer this letter of strong support to split the current IMTPR as voted on during the IMTPR meeting in the Town of Eagle on October 6, 2023. Specifically, the majority of the IMTPR members voted to split and create two Transportation Planning Regions (TPR): 1) Summit County, Lake County, and partial Eagle County, and 2) Garfield County, Pitkin County, and partial Eagle County. Although, the dividing line in Eagle County has not yet been determined.

After listening to the presentation provided by CDOT staff, and analyzing the data presented, we agree that realignment of existing boundaries makes sense and is better representative of our rural mountain communities. One point made by the CDOT staff that stood out to us is that the current size of the IMTPR – particularly the population, projected population, and vehicle miles traveled – suggests that the IMTPR is outgrowing rural status. Splitting the IMTPR, while perhaps adjusting other rural TPR boundaries, will ensure the requisite number of rural and metropolitan transportation planning organizations are maintained as stipulated by HB23-1101.

Again, Summit County Government enthusiastically supports CDOT's recommendation to split the IMTPR as the IMTPR members voted on October 6, 2023.

Sincerely,

A handwritten signature in blue ink that reads "Elisabeth Lawrence".

Elisabeth Lawrence  
Summit County Commissioner

A handwritten signature in blue ink that reads "Tamara Pogue".

Tamara Pogue  
Summit County Commissioner

A handwritten signature in blue ink that reads "Christina Waters".

Christina Waters  
Summit County Commissioner



## OFFICE OF THE BOARD OF COMMISSIONERS

PHONE: 970-400-4200  
FAX: 970-336-7233  
1150 O STREET  
P.O. BOX 758  
GREELEY, CO 80632

August 15, 2023

RE: HB 23-1101 CDOT Study - UFR TPR Letter of Support

Dear Transportation Commission:

Weld County is writing in support of keeping the Upper Front Range Transportation Planning Region (UFR TPR) membership and representation in accordance with our existing intergovernmental agreements (IGA's) and CDOT Memorandum of Agreement (MOA) as currently adopted.

Weld County is grateful to have been part of the creation of the rural TPR's since 1993. In 2017, CDOT asked Weld County to re-formalize the staffing and management of the UFR regional planning commission (RPC) through an adopted MOA. The UFR RPC has been operating in accordance with those agreements since 1993. As part of the final report being prepared by staff, Weld County requests CDOT speak to how the recommendations of the study will remain consistent with state statute, more specifically, Title 30-28-105 CRS, and the RPC's authority and responsibilities.

To an outsider, the membership of the UFR TPR may appear characteristically different for these rural areas, however, transportation corridors are not biased. They don't see anything but safety, mobility, and capacity. The equity of the UFR TPR, should be the example that other TPR's are using to conduct business.

While historically, the Chair of the TPR has been Weld County, the communities have never voted otherwise. Like other organizations or committees, the TPR Chair represents the voice of the overall organization and not solely their county, which has been true for all the thirty-years of representation on STAC.

Thank you for the opportunity to provide input into the study and we hope CDOT also sees the value Weld County has provided and continues to provide to the statewide transportation planning effort.

Sincerely,

A handwritten signature in blue ink that reads 'Mike Freeman'.

Mike Freeman  
Chair, Weld County Board of Commissioners

# Exhibit 10



January 29, 2024

Colorado Department of Transportation  
Transportation Commission of Colorado  
2829 W. Howard Place  
Denver, CO 80204

Emailed to: [Jennifer.Uebelher@state.co.us](mailto:Jennifer.Uebelher@state.co.us)

Dear Transportation Commission,

Please accept this letter as a request to retain the Southeast Transportation Planning Region and the South-Central Transportation Planning Region as separate entities. It is critical the counties in these two regions retain their voice. Outside of population, these regions contain major travel corridors and integral freight corridors where their voice is critical and funding is essential.

Additionally, the decision to merge the South and South-Central +TPR's was made without the regions input or stakeholder involvement is wrong. Diluting the voice of rural Colorado Counties which suffer transportation challenges unique to the region defies the CDOT equity initiative.

To further the point, no TPR should be changed or the statute limiting the regions to 10 should be amended before a thorough stakeholder review. If the 10 TPR requirement of CDOT no longer serves the State of Colorado infrastructure well, then CDOT must conduct an all-inclusive review and discussion of the regions with all stakeholders at the table to formulate a new plan. Then run a CDOT bill to request the legislature amend the statute as decided by all current 10 TPR's.

As a Park County, County Commissioner, I ask CDOT to respect counties, the current structure and recognize the unique transportation and funding challenges of each region.

Thank you for your consideration.

*Amy Mitchell*

Amy Mitchell  
Park County, County Commissioner  
BOCC Chair  
P.O. Box 1373  
Fairplay, CO 80440  
719-838-0840  
amitchell@parkco.us



STATE OF COLORADO

Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## 2 CCR 601-22 Comment - IMTPR and RTA reversed

1 message

**Jacob Rivera** <jacob@townofgypsum.com>  
To: "dot\_rules@state.co.us" <dot\_rules@state.co.us>  
Cc: Dana Wood <mobilitymanager@nwccog.org>

Tue, Jan 30, 2024 at 4:06 PM

Hello,

This is a comment for the 2 CCR 601-22 rule making. On 2.01.11 and 2.01.12, I believe the Eagle Valley RTA and Roaring Fork RTA are mixed up in the current document. Roaring Fork RTA should go with West IMTPR and Eagle County RTA should go with East IMTPR.

Here is a snip of the current language.

...comprises, including the ... mountain ... and ... ..

**2.01.11** The West Intermountain TPR comprises Eagle, Garfield and Lake, Pitkin counties, and the portion of Eagle County that is within the boundaries of the Eagle County RTA. Summit counties.

**2.01.12** The East Intermountain TPR comprises Lake and Summit counties, and the portion of Eagle County that is within the boundaries of the Roaring Fork RTA.

Thanks,



**Jacob Rivera, PE, PMP**

**Town Engineer**

**P:** 970.524.1727

**C:** 970.763.4618

**E:** [Jacob@townofgypsum.com](mailto:Jacob@townofgypsum.com)



50 Lundgren Blvd. | P.O. Box 130

Gypsum, CO 81637

[www.townofgypsum.com](http://www.townofgypsum.com)

STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

## Re: Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportation Planning Process

1 message

James Dustin <jdust1948@yahoo.com>  
To: CDOT Rules <cdot\_rules@state.co.us>

Wed, Jan 31, 2024 at 12:48 PM

I'd love to comment, but it's been my experience that governmental agencies only request comments because the laws require them to request comments. But they don't have to consider those comments, or even read them.  
Jim Dustin

On Wednesday, January 31, 2024 at 11:48:45 AM MST, CDOT Rules <cdot\_rules@state.co.us> wrote:

Transportation Planning Stakeholders,

We appreciate the quick comments back that CDOT inadvertently inserted the Roaring Fork RTA area of Eagle County into the proposed new East IMPTR, and the Eagle Valley RTA portion of Eagle County into the proposed new West IMPTR, when in fact that should be reversed. Please see the corrected version that we will proceed with the rulemaking process on.

Thanks so much for the watchful eyes!

CDOT Rule Team

On Mon, Jan 29, 2024 at 1:17 PM CDOT Rules <cdot\_rules@state.co.us> wrote:

Hello Transportation Planning Stakeholder:

This email serves to notify you as a stakeholder regarding rulemaking for statewide transportation planning in Colorado.

The Transportation Commission of Colorado adopted [Resolution #TC-2024-01-08](#) on January 18, 2024 to initiate rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The proposed changes reflect the recommendations from CDOT's TPR Study as required by House Bill 23-1101. You can access the completed study "[HB 23-1101: Transportation Planning Region Study \(TPR Study\)](#)."

Additionally, the Commission will consider changes to the Rule's definition of Disproportionately Impacted Communities. That definition was recently updated in state statute, and the Commission proposes a corresponding change in the Rule.

CDOT invites you to submit written comments on the attached proposed permanent rules by **March 15, 2024 at 5 p.m.** Sections 1.11, 2 and 3 of the proposed permanent rules are attached, with proposed changes shown in red. These are the only sections of the rule that will be open for public comment or modification in this rulemaking.

I have also attached the notice of hearing and statement of basis and purpose for permanent rulemaking. **We plan to hold two virtual permanent rulemaking hearings on Zoom. The first meeting is March 6, at 2:00pm ([Register for March 6 Hearing Here](#)). The second meeting is March 11, at 6:00pm ([Register for March 11 Hearing Here](#)).** You may through the provided links, which are also found in the attached Notice of Hearing, on our website, and on the Secretary of State's website. If you have any problems registering for the hearing, please email Jamie Grim at [Jamie.Grim@state.co.us](mailto:Jamie.Grim@state.co.us). If you require language translation services, please let us know by February 26 at 9:00 a.m. MT.

Please submit all written comments to [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us). All comments received from stakeholders will be posted on CDOT's [Rulemaking Web Page](#) and will be available for review during the public comment period. Additionally, all written public comments received during the department's TPR Study effort will be included as exhibits and will be considered as part of the Transportation Commission's rulemaking process.

2/15/24, 5:52 PM

State.co.us Executive Branch Mail - Re: Opportunity to Comment on Proposed Permanent Rules Governing Statewide Transportat...

Please feel free to contact Herman Stockinger at [Herman.Stockinger@state.co.us](mailto:Herman.Stockinger@state.co.us) or [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us) if you have any questions or would like to be removed from our stakeholder list.

Thank you for your participation in the rulemaking process and for providing feedback on the proposed rules.

STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

---

**RE: 2 CCR 601-22 Comment - IMTPR and RTA reversed**

1 message

---

**Dana Wood** <mobilitymanager@nwccog.org>  
To: "dot\_rules@state.co.us" <dot\_rules@state.co.us>  
Cc: Jacob Rivera <jacob@townofgypsum.com>

Wed, Jan 31, 2024 at 8:29 AM

Also, we are only one IMTPR, there is no East and West IMTPR. I believe Ben Gerdes from Eagle County sent this to CDOT the other day as well.

Thanks,

**Dana Wood, MBA (she/her/hers)**

Mobility Manager

Northwest Colorado Council of Governments

249 Warren Ave

PO Box 2308

Silverthorne, CO 80498

Cell: 970-389-9510

*\*I work remotely from my home office in Silt*

[Schedule time to talk!](#)



---

**From:** Jacob Rivera <jacob@townofgypsum.com>  
**Sent:** Tuesday, January 30, 2024 4:07 PM  
**To:** [dot\\_rules@state.co.us](mailto:dot_rules@state.co.us)  
**Cc:** Dana Wood <mobilitymanager@nwccog.org>  
**Subject:** 2 CCR 601-22 Comment - IMTPR and RTA reversed

---

Hello,



This is a comment for the 2 CCR 601-22 rule making. On 2.01.11 and 2.01.12, I believe the Eagle Valley RTA and Roaring Fork RTA are mixed up in the current document. Roaring Fork RTA should go with West IMTPR and Eagle County RTA should go with East IMTPR.

Here is a snip of the current language.

~~2.01.11 The West Intermountain TPR comprises Eagle, Garfield and Lake, Pitkin counties, and the portion of Eagle County that is within the boundaries of the Eagle County RTA. Summit counties.~~

~~2.01.12 The East Intermountain TPR comprises Lake and Summit counties, and the portion of Eagle County that is within the boundaries of the Roaring Fork RTA.~~

Thanks,



**Jacob Rivera, PE, PMP**

**Town Engineer**

**P:** 970.524.1727

**C:** 970.763.4618

**E:** [Jacob@townofgypsum.com](mailto:Jacob@townofgypsum.com)



50 Lundgren Blvd. | P.O. Box 130

Gypsum, CO 81637

[www.townofgypsum.com](http://www.townofgypsum.com)

**RESOLUTION #7-24**

**A RESOLUTION OPPOSING A CHANGE TO THE SOUTH CENTRAL AND SOUTHEASTERN  
TRANSPORTATION PLANNING REGION BOUNDARIES.**

**WHEREAS**, the responsibilities of the Town Board of Trustees include the health, safety and welfare of the residents of the Town of La Veta; and

**WHEREAS**, The Town of La Veta is a member of the South Central Transportation Planning Region (TPR); and

**WHEREAS**, the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review TPS boundaries; and

**WHEREAS**, the legislation passed creating a process for reviewing the TPS boundaries; and

**WHEREAS**, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries; and

**WHEREAS**, Section 2.02.1.3 states that such requests must include "a statement of justification for the change considering transportation commonalities."; and

**WHEREAS**, Section 2.02.1.4 states that such requests must include "a copy of the resolution stating the concurrence of the affected Regional Planning Commission."; and

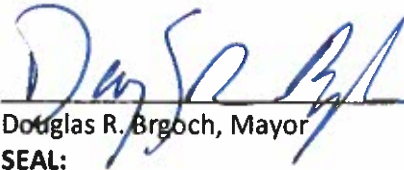
**WHEREAS**, the Town Board of Trustees finds that any change to the TPR boundary for the South Central and South East TPRs will be detrimental to the planning process that has been in place for over 25 years; and

**WHEREAS**, the Town Board of Trustees finds no benefit to the South Central and South East TPRs in combining these regions and limiting their voices on the Statewide Transportation Advisory Committee to the benefit of another region of the State; and


**WHEREAS**, repeated objections from representatives from both South Central and South East TPRs have been voiced to the CDOT representatives regarding the proposed boundary changes.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF TRUSTEES OF THE TOWN OF LA VETA, COLORADO, that:** The Town Board of Trustees of La Veta, Colorado do hereby oppose the proposed change in boundaries of the South Central Transportation Planning Region

**INTRODUCED, READ AND ADOPTED, this 6<sup>th</sup> day of February, 2024.**

  
Douglas R. Brooch, Mayor  
SEAL:



  
Heather Hillis, Town Clerk



## **RESOLUTION NO. 1654**

### **A RESOLUTION IN OPPOSITION TO A CHANGE TO THE SOUTH-EAST AND SOUTH CENTRAL TRANSPORTATION PLANNING REGION BOUNDARIES**

WHEREAS, the Colorado Department of Transportation works closely with ten rural Transportation Planning Regions and five Metropolitan Planning Areas to prioritize transportation within those regions and areas of Colorado; and

WHEREAS, the South Central Transportation Planning Region is responsible for planning efforts for the health, safety and welfare of the residents and travelers of South Central Colorado, the Region 14 planning area, which includes Colorado Interstate 25 from the New Mexico border to the edge of Pueblo County; Highway 12 in its entirety; Highway 160 to Alamosa County; and Highway 350/160 to Otero and Baca County, respectively to the east; and, Highways 389, 10 and 69; and

WHEREAS, membership of Region 14 is comprised of representatives from Huerfano County, Las Animas County, the Town of Aguilar, the Town of Cokedale, the Town of Branson, the Town of Kim, the Town of La Veta, the City of Trinidad and the City of Walsenburg; and

WHEREAS, the Colorado Department of Transportation initiated legislation for the 2023 General Assembly to review the TPR boundaries during which legislation was passed to create a process for reviewing the TPR boundaries; and

WHEREAS, 2 CCR 601-22 Section 2.02.1 specifically identifies the conditions which must be met for requesting changes to TPR boundaries to include (Section 2.02.1.3) "A statement of justification for the change considering transportation commonalities", and (Section 2.02.1.4) "A copy of the resolution stating the concurrence of the affected Regional Planning Commission"; and

WHEREAS, the South Central Transportation Planning Region members feel that any change to the TPR boundary for the Southeast and South Central TPRs will be detrimental to the planning process that has been in place for over 25 years; and

WHEREAS, there appears to be no benefit to the Southeast and South Central TPRs in support of combining while another area of the State gains a vote on the Statewide Transportation Advisory Committee; and

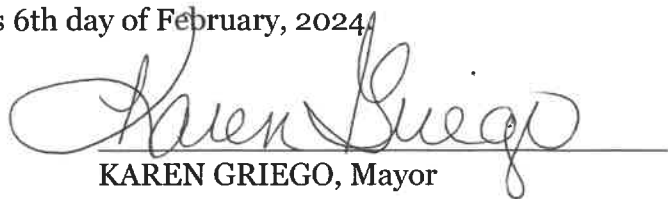
WHEREAS, opposition has been consistent among the counties, municipalities and town that comprise both Region 6 and Region 14.

**NOW THEREFORE, BE IT RESOLVED**, by the City Council of the City of Trinidad, Colorado, that:

1. The proposed change in boundaries of the Southeast and South Central TPRs to combine the two regions is hereby opposed and the City offers the following in support of the opposition:
  - a. Combining Regions 6 and 14 will result in a rural TPR with the second most Lane Miles as well as the second largest geographic size;
  - b. There will be a loss of STAC representation;
  - c. The two regions have freight corridors;
  - d. This will represent a change in funding;
  - e. There will be added difficulties in the planning process;
  - f. Both regions have differing needs and concerns;
  - g. The impact on disproportionately affected communities needs to be more closely examined;
  - h. Combining the Southeast and South Central TPRs would result in the 5<sup>th</sup> highest of the 15 total TPRs in Truck Vehicle Miles Traveled;
  - i. The Southeast TPR already has the 4<sup>th</sup> highest of the 10 rural Truck Vehicle Miles Traveled and the South Central TPR has the 5<sup>th</sup> highest of the 10 rural TPRs in Truck Vehicle Miles Traveled;
  - j. Combining the Southeast and South Central TPRs would result in the 4<sup>th</sup> highest of the 10 rural TPRs in Truck Vehicle Miles Traveled;
  - k. Las Animas County incurs energy and mineral impact to its roadways;
  - l. Data for the 2023 Study was collected in 2021 when the COVID-19 Pandemic was prevalent and people were not traveling out of state (for instance, New Mexico's Governor prohibited out-of-state travel);
  - m. STAC voted unanimously to oppose the boundary changes proposed in the TPR Boundary Changes recommendation.
  
2. A copy of this resolution shall be provided to the Transportation Commission, CDOT Headquarter, and the Governor of the State of Colorado, as formal opposition to the proposed boundary change.

Approved by the Trinidad City Council this 6th day of February, 2024



  
KAREN GRIEGO, Mayor

ATTEST:

  
AUDRA GARRETT, City Clerk

STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

## Written Comment - Rules Governing Statewide Transportation Planning Process

1 message

**Fodge, Aaron** <Aaron.Fodge@colostate.edu>  
To: "dot\_rules@state.co.us" <dot\_rules@state.co.us>

Thu, Feb 8, 2024 at 10:03 AM

Dear CDOT:

Please accept the following comment regarding the Transportation Planning Region Study:

1. Wellington - Wellington is currently situated in the Upper Front Range TPR. I am suggesting they should be incorporated into the North Front Range (TPR). Wellington is a bedroom community supporting employers in the North Front Range. Their regional transportation planning attempts to improve access and mobility in the North Front Range, not the Upper Front Range. This includes a recent pilot project to operate a transit route between Wellington and Fort Collins. CSU is also investigating a trail from the Wellington underpass of I-25 (Colorado's Front Range Trail) into Timnath and Fort Collins through our agricultural research campus. As the description on page 46 explains, "The Upper Front Range TPR includes predominantly rural areas..." Wellington is not a rural area anymore and should be aligned with the NFRMPO to optimize circulation, mobility, and access throughout the metro area. Wellington would also provide a representation balance between Weld and Larimer county as currently Weld has more communities, thereby more votes in the metro area.
2. Estes Park - Estes Park is currently situated in the Upper Front Range TPR. As the description on page 46 explains, "The Upper Front Range TPR includes predominantly rural areas..." Estes Park is not a rural area anymore and should be aligned with the NFRMPO to optimize circulation, mobility, and access throughout the metro area. Estes Park operates its own shuttle system and would benefit from regional transit investment aligned with the NFRMPO. US 34 is Strategic Corridor in the NFRMPO Regional Transportation Plan and terminates in Estes Park. Estes Park would also provide a representation balance between Weld and Larimer County as currently Weld has more communities, thereby more votes in the metro area. Estes Park commuting patterns center around tourism and bedroom community—both are not rural transportation considerations, rather metro area driven.

Regards,

Aaron Fodge | Director Active Transportation and Fleet Services

Colorado State University | Parking and Transportation Services | [1508 Center Avenue](#) | Fort Collins, Colorado 80523-6012P: 970.491.2823 | F: 970.491.2017 | [aaron.fodge@colostate.edu](mailto:aaron.fodge@colostate.edu) |<http://www.linkedin.com/in/fodge>Board Member – [Association for Commuter Transportation \(ACT\)](#)



STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

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**TPRs and STAC Permanent Rules 2 CCR 601-22**

1 message

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**Colleen Hannon** <wsrd.colleen@gmail.com>  
To: dot\_rules@state.co.us

Thu, Feb 8, 2024 at 3:26 PM

Hi, I have one comment which leads to a question for clarification:

Under Section 3.03.2.1, it states that "no individual may serve in either position for more than two consecutive two-year terms."

As I understand the language, an individual may not serve a third term after serving two consecutive terms. It does not say an individual cannot sit out a single term following the two consecutive two year terms and then be appointed for another two consecutive two year terms. What is the intent here? Is it that an individual must sit out a term and then may apply again or may never be appointed ever again?

I do not support the intent if it is to preclude someone from every serving again.

Thank you.

Colleen Hannon

--

**Colleen Hannon**  
*West Slope Resource Development*  
223 Regent Circle  
Gunnison, CO 81230  
970.275.3651  
[wsrd.colleen@gmail.com](mailto:wsrd.colleen@gmail.com)



February 14, 2024

Attention: Commissioners  
Colorado Department of Transportation  
2829 West Howard Place  
Denver, CO 80204

Dear Transportation Commissioners:

Thank you for your service to the people of Colorado to ensure that one of the most important resources in our great state – its transportation system – runs efficiently to improve commerce, connection, and community for the citizens of our great state.

As former Colorado elected officials, we understand the prioritization and budgetary pressures you confront. As consultants and advisors to the Board of Directors of the Southeast Colorado Enterprise Development (SECED), we also understand the unique economic and transportation challenges of rural Colorado, especially in southeast Colorado.

As you know, the SECED represents six southeast Counties in Colorado to ensure that southeast Colorado builds thriving communities. The SECED is a collective group of local governments that provide incentives and develops promotional activities that market and advertise the advantages of locating a business in Southeast Colorado.

The SECED Board of Directors has grave concerns about the Colorado Department of Transportation (CDOT) staff's recommendation to eliminate one of the two CDOT Statewide Advisory Committee seats (STAC) from southeast Colorado and move it to the intermountain region. Based on previous experience, this decision has the real potential to reduce future transportation dollars to the citizens of southern Colorado.

We recognize that regionalism plays an important role in all governing bodies' decisions. We also recognize that there are unique challenges to rural Colorado. Reducing access and influence does not assist rural Colorado confront its challenges.

Please consider maintaining the current STAC makeup.



Thank you for listening to our concerns on behalf of the SECED Board of Directors and the good people of southeast Colorado.

We are,

Sincerely Yours

Mark Waller  
Colorado Representative (2009-2015)  
El Paso County Commissioner (2016-2021)  
CEO, Waller Consulting  
Consultant to the SECED

Joe Miklosi  
Colorado Representative (2009-2013)  
CEO, Bridge Consulting, PBC  
Consultant to the SECED



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March 1, 2024

TO: Transportation Commission of Colorado

RE: HB 23-1101 Transportation Planning Region Study

Dear Commissioners,

This letter provides our comments in support of the proposed change to divide the IMTPR into two TPRs. As mandated in HB 23-1101, CDOT gathered and analyzed data concerning travel and transit throughout the state. The study provides compelling data that supports dividing the IMTPR. The study points out that the TPR boundaries have not changed since 1992 and significant changes have occurred in the past 32 years.

- The study shows that the IMTPR has had the largest population increase as a percentage than all other TPRs since 1990, and it currently has the fourth largest population of all TPRs – larger than two of the five Metropolitan Planning Organizations (MPO) and larger than all nine other rural TPRs.
- The IMTPR currently has the third highest daily Vehicle Miles Traveled (VMT), which is more than three of the five MPOs and more than all nine other rural TPRs.
- The IMTPR has had the second highest VMT increase since 2000, which is only topped by one of the MPOs.
- Truck VMT is currently the fourth highest of all 15 TPRs – currently more Truck VMT than four MPOs and seven rural TPRs.
- Vehicle Crashes in the IMTPR are the fourth highest of all 15 TPRs – currently higher than two MPOs and all nine other rural TPRs.
- Tourism spending in the IMTPR is second only behind the Denver MPO – currently higher than four MPOs and all nine other rural TPRs.

The IMTPR has experienced some of the highest increases and changes in the statutory factors that CDOT was mandated to consider for TPR boundaries. The study clearly demonstrates that the IMTPR has outgrown its rural status and could easily be designated an MPO. The most appropriate decision per mandated boundary considerations would be to divide the IMTPR in order to maintain rural status.



The Town of Dillon would like to express our support for the split of the Intermountain Transportation Planning Region (IMTPR) into two TPR's. After careful consideration, we feel that this split would be the best option for more equitable representation concerning transportation/transit planning projects and provide better cohesion and coordination for projects within our larger community.

Sincerely,

DocuSigned by:

*Carolyn Skowyr*

Carolyn Skowyr  
Mayor  
Dillon Colorado

2/15/2024 | 11:29 AM PST



Pikes Peak Area  
Council of Governments  
Communities Working Together

February 23, 2024

Colorado Department of Transportation  
2829 W. Howard Place  
Denver, CO 80204-2305

RE: Letter of Support for the Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions

Dear Transportation Commissioners:

On behalf of the Pikes Peak Area Council of Governments (PPACG) and our 16 member governments, I am writing regarding the Transportation Planning Region boundaries as recommended in the Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. We believe the Central Front Range TPR boundary should remain as is. This allows the long-standing cooperation and coordination of the jurisdictions that comprise the Central Front Range TPR to continue.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Gunning', is written over a large, stylized, light-colored graphic element that resembles a signature or a large letter 'G'.

Andrew Gunning  
Executive Director

Pikes Peak Area Council of Governments (PPACG)



**REGIONAL TRANSPORTATION PLANNING OFFICE**

Grand Valley MPO • Grand Valley TPR • Grand Valley Transit

**Memorandum**

To: Herman Stockinger, CDOT Deputy Director and Director of Policy, CDOT, The Colorado Transportation Commission

From: Grand Valley Regional Transportation Planning Committee

Date: February 26, 2024

Subject: GVRTC Comments on Proposed Permanent Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions

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Dear Mr. Stockinger and Transportation Commission Members,

This letter is signed on behalf of the Grand Valley Regional Transportation Committee (GVRTC); the governing board that oversees the Grand Valley Transportation Planning Region, the Grand Valley Metropolitan Planning Organization (MPO) and Grand Valley Transit in response to the open rulemaking to modify 2 CCR 601-22-Transportation Commission of Colorado Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions.

The GVRTC appreciates the effort by CDOT staff to analyze TPR governance and boundaries and the ensuing recommendations. However, the GVRTC has the following comments:

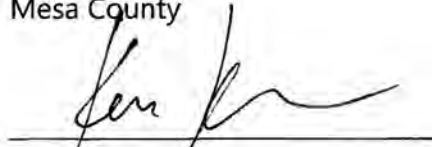
- Section 2.0- The GVRTC opposes the changes in this section which combines the Central Front Range TPR and South Central TPR and splits the Intermountain TPR into two TPRs. This opposition is consistent with the opposition of the involved TPRs as well as the Statewide Transportation Advisory Committee (STAC)
- All other recommended changes to 2 CCR 601-22 are supported

Thank you for the ability to comment on these proposed changes to the statewide transportation planning process.

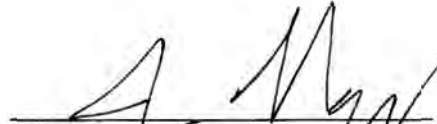
Sincerely,



Cody Davis  
Mesa County



Ken Krie  
City of Fruita



Jason Nguyen  
City of Grand Junction



Greg Mikolai  
Town of Palisade



Lake County Government  
Board of County Commissioners

505 Harrison Avenue • PO Box 964 • Leadville, Colorado 80461 • (719) 486-4101

March 1, 2024

Lake County Board of County Commissioners: Comments on Rulemaking 2 CCR 601-22  
(Statewide Transportation Planning Process and Transportation Planning Regions)

Lake County BOCC strongly supports the proposed changes to the Transportation Planning Regions in the posted proposed rule, as amended on 1/31/24. Specifically, Lake County supports remaining in a TPR with Summit County and the portion of Eagle County that includes the Eagle Valley Transportation Authority (EVTA).

The transportation corridors and transit routes between Eagle/EVTA, Summit, and Lake Counties are incredibly important to Lake County. Roughly 70 percent of the Lake County workforce commutes out of county, with the majority going to Eagle and Summit either in private vehicles or on the existing bus transit links operated in partnership with EVTA and Summit Stage. More generally, these two routes (Highway 91 to Summit; Highway 24 to Eagle) are vital transportation links for residents, businesses, and visitors. Being separated from the EVTA portion of Eagle County or Summit County in TPR realignment would greatly complicate our engagement in planning meetings. (As a small county, we have no stand-alone transportation department or staff, so being split from EVTA and portions of Eagle County would add another monthly meeting to Commissioners' calendars and double the workload of staying engaged in TPR processes.)

In contrast, the Roaring Fork areas of Eagle and Pitkin Counties are much less important for Lake County, as there is no direct, year-round transportation link shared between Lake and that portion of Eagle County. (Independence Pass is only open seasonally; commuting routes beyond Eagle valley begin to exceed an hour and are much less common.)

Thank you for your and CDOT staff's work on this issue.

A handwritten signature in black ink, appearing to read 'Jeff Fiedler', with a horizontal line underneath.

Jeff Fiedler  
Chair, Lake County BOCC



# TOWN of FRISCO

P.O. Box 4100 • Frisco, Colorado 80443

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February 27, 2024

State of Colorado  
Department of Transportation  
Transportation Commission

RE: Support of HB 23-1101 Final Study and IMTPR Division

Dear Transportation Commissioners,

This letter provides the Town of Frisco's support for the HB23-1101 final study, specifically, the proposed change to divide the Intermountain Transportation Planning Region (IMTPR) into a West IMTPR and East IMTPR.

The comprehensive study conducted by CDOT presents undeniable data, grounded in required statutory factors, supporting the division of the IMTPR into two TPRs. Notably, the study underscores that the TPR boundaries, established in 1992, have remained unchanged despite significant transformations over the past 32 years, particularly within the IMTPR compared to other TPRs. Visual representations of CDOT study data highlight substantial changes, such as the IMTPR experiencing the largest population increase since 1990, currently ranking fourth in population among all TPRs, surpassing two Metropolitan Planning Organizations (MPOs) and all nine other rural TPRs.

Furthermore, the IMTPR ranks third highest in daily Vehicle Miles Traveled (VMT), exceeding three MPOs and all nine other rural TPRs, and has seen the second highest VMT increase since 2000, trailing only one MPO. Additional significant statutory factors supporting the division include the IMTPR's fourth-highest Truck VMT among all 15 TPRs, higher Vehicle Crashes (Safety factor) compared to two MPOs and all nine other rural TPRs, and second-ranking tourism spending behind the Denver MPO, surpassing four MPOs and all nine other rural TPRs.


While some advocate for maintaining current TPR boundaries due to their historical efficacy, the data reveals otherwise. Significant changes have occurred within the IMTPR, urging a reassessment of its boundaries. This sentiment is echoed by officials from Summit County's towns, including Breckenridge, Frisco, Silverthorne, Dillon, Blue River, Montezuma, and Keystone, all of whom endorse the division of the IMTPR into two TPRs.

The Town of Frisco firmly supports CDOT's recommendation to divide the IMTPR, aligning with the proposal presented on October 6, 2023. This proposal outlines the creation of two new TPRs: TPR 1 - comprising Summit County, Lake County, and partial Eagle County, and TPR 2 - including Garfield County, Pitkin County, and partial Eagle County. The division is seen as crucial for cohesive transportation and transit planning, equitable representation at STAC, and addressing the evolving needs of the communities within the current IMTPR.



In compliance with HB 23-1101, CDOT's thorough data analysis underscores the necessity for dividing the IMTPR. The Town of Frisco concurs with CDOT's findings and believes that division will better balance representation for municipalities within the current IMTPR.

Respectfully,

DocuSigned by:  
  
DF20277B4CAF42F...

Rick Ihnken, Mayor Pro Tem  
Town of Frisco  
[RickI@townoffrisco.com](mailto:RickI@townoffrisco.com)

cc. Thad Renaud, Esq. (Counsel to the Town), Tom Fisher (Town Manager)



BOARD OF COUNTY COMMISSIONERS

970 453 3414 ph | 970 453 3535 f  
summitcountyco.gov

208 East Lincoln Ave. | PO Box 68  
Breckenridge, Colorado 80424

March 4, 2024

To: Transportation Commission of Colorado

Subject: Support to divide the Intermountain Transportation Planning Region (IMTPR) into two Transportation Planning Regions (TPR)

Reference: HB 23-1101 Transportation Planning Region Study

Dear Commissioners,

Per the instructions provided by the Colorado Department of Transportation (CDOT) in their email of January 29, 2024, regarding the proposed changes to 2 CCR 601-22, this letter provides our formal written comments that enthusiastically support the proposed change to divide the IMTPR into two TPRs.

The reference study conducted by CDOT is comprehensive and provides very compelling data, based on required statutory factors, that support dividing the IMTPR into two TPRs. The study points out that the TPR boundaries were established in 1992 and have not changed since that time. A lot has changed in the past 32 years, especially with the IMTPR when compared to the other TPRs. We have provided graphics of various CDOT study data to highlight some significant changes. For example, the study shows that the IMTPR has had the largest population increase as a percentage (more than doubled) than all other TPRs since 1990, and it currently has the fourth largest population of all TPRs – larger than two of the five Metropolitan Planning Organizations (MPO) and larger than all nine other rural TPRs (see figure 1).

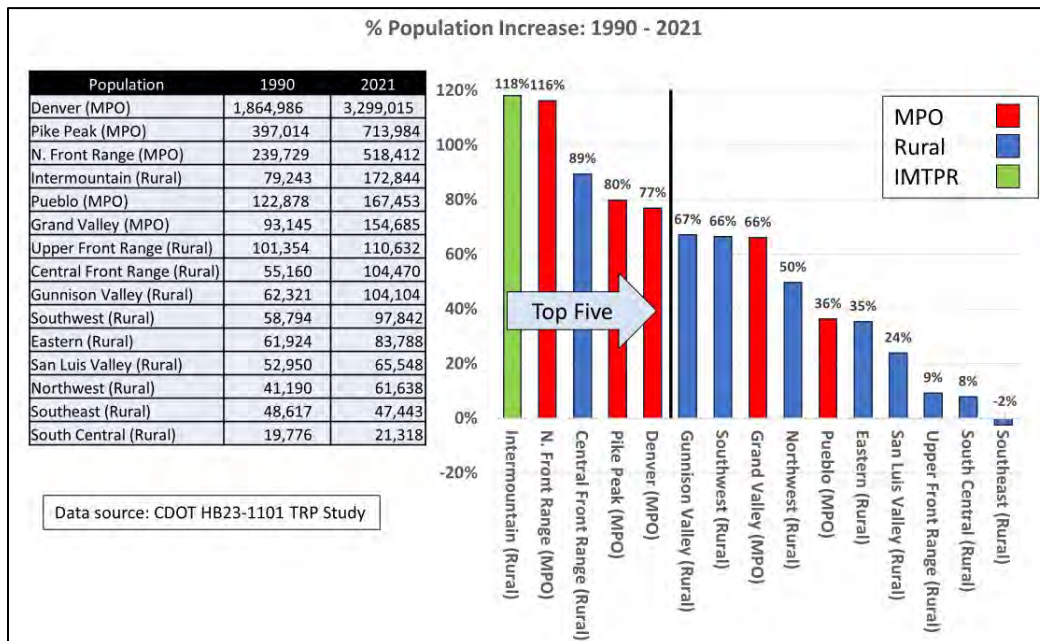


Figure 1

The IMTPR currently has the third highest daily Vehicle Miles Traveled (VMT), which is more than three of

the five MPOs and more than all nine other rural TPRs (see figure 2). Also, the IMTPR has had the second highest VMT increase since 2000, which is only topped by one of the MPOs (see figure 3).

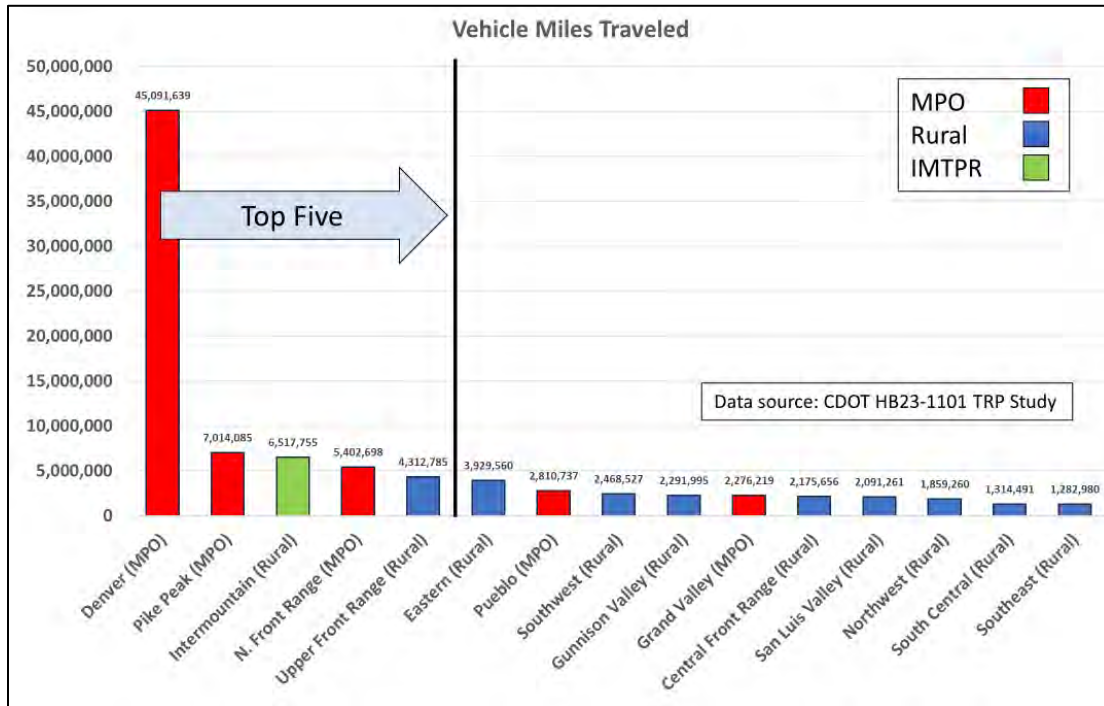


Figure 2

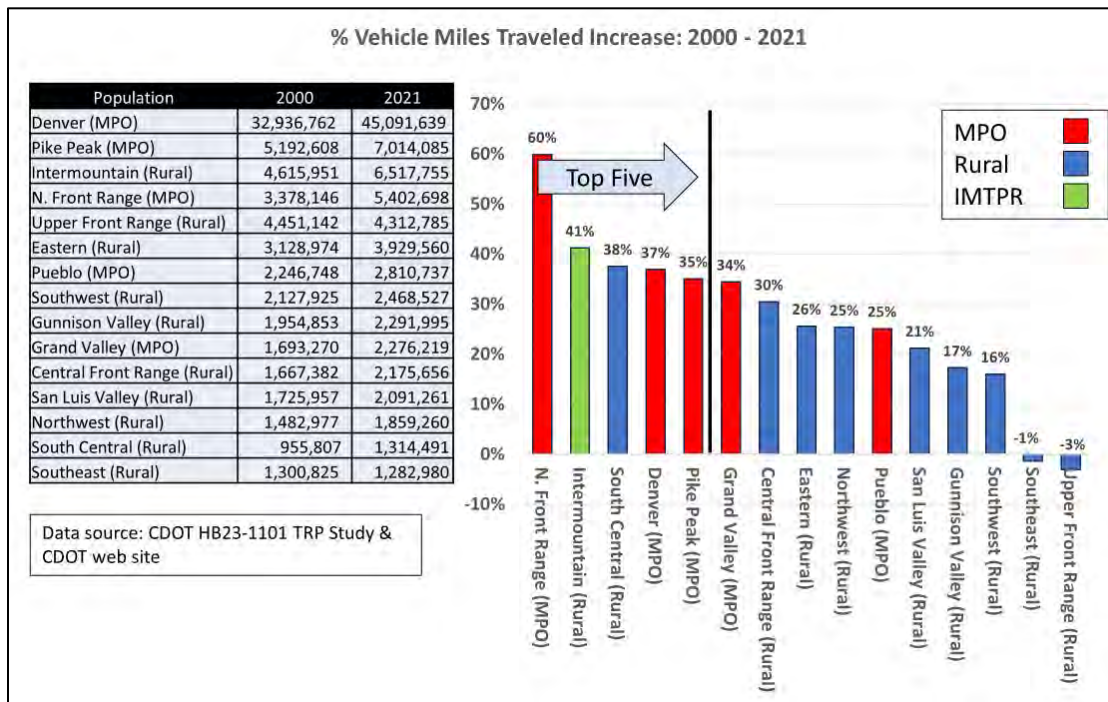


Figure 3

Additional significant statutory factors identified in the CDOT study that support dividing the IMTPR into

two TPRs include:

- IMTPR Truck VMT is currently fourth highest of all 15 TPRs – currently more Truck VMT than four MPOs and seven rural TPRs
- Vehicle Crashes (Safety factor) in the IMTPR are the fourth highest of all 15 TPRs – currently higher than two MPOs and all nine other rural TPRs.
- Tourism spending in the IMTPR is second only behind the Denver MPO – currently higher than four MPOs and all nine other rural TPRs (see figure 4).

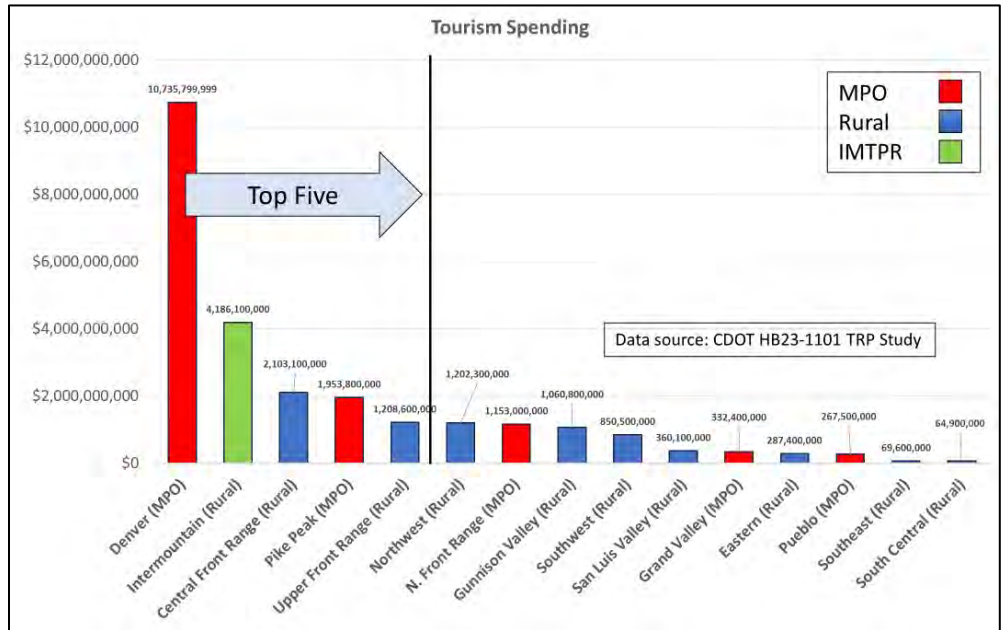
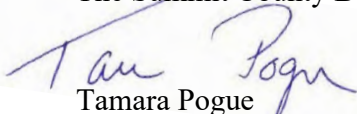


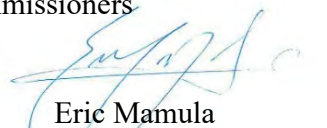
Figure 4


We appreciate that CDOT has determined that TPR realignment is critically important after boundaries have remained static for over a generation – a lifetime for a large portion of our citizens. The data shows significant changes during this timeframe, and the Commission is acting entirely appropriately to adjust boundaries for inequities resulting from significant growth in our community. The IMTPR has experienced some of the highest increases and changes in the statutory factors that CDOT was mandated to consider for TPR boundary changes, and the CDOT study bears this out. In short, the study shows that the IMTPR has outgrown its rural status and could easily be designated an MPO. Since that is not an option, the most appropriate decision would be to divide the IMTPR, thus each new TPR would maintain rural status.

Within Summit County we have met with officials from all our towns – Breckenridge, Frisco, Silverthorne, Dillon, Blue River, and the newly incorporated Keystone – and all support splitting the IMTPR. So again, Summit County Government enthusiastically supports CDOT's recommendation to divide the IMTPR into two TPRs.

Sincerely,  
The Summit County Board of Commissioners

  
Tamara Pogue  
County Commissioner

  
Eric Mamula  
County Commissioner

  
Nina Waters  
County Commissioner



601 Center Circle • P.O. Box 1309 • Silverthorne, Colorado 80498

March 4, 2024

To: Transportation Commission of Colorado

Subject: Rule Making Concerning Transportation Planning Regions – 2 CCR601-2

Dear Commissioners,

This letter provides the Town of Silverthorne's formal written comments supporting the proposed change to the transportation planning regions as proposed in the Transportation Commission of Colorado rule revision for 2 CCRE 601-22. Specifically, creating a new transportation planning region of Summit, Lake and a portion of Eagle County.

The study conducted by CDOT, per HB 23-1101, provides compelling data that supports dividing the Intermountain Transportation Planning Region (IMTPR). The TPR boundaries were established 32 years ago and the IMTPR has undergone tremendous changes since that time. The communities in the IMTPR are not the same as they were in 1992 and are one of the most visited areas of the state. Having proper representation for an area that provides such a significant economic engine for the state is of vital importance.

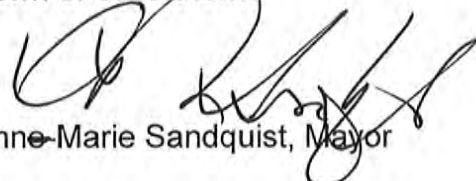
The IMTPR is the largest of the rural TPRs when looking at the statutory factors and larger than some of the metropolitan planning organizations. This would indicate that the planning region is spread very thin and could be established as an MPO.

The Town of Silverthorne believes that realigning the TRPs, as defined in the rule making, will provide better representation for the IMTPR communities. The other Summit County members of the IMTPR support the realignment as well.

Please support the proposal in the rule making and provide Silverthorne and the Summit County Communities the representation we deserve.

Respectfully,

Town of Silverthorne



Anne-Marie Sandquist, Mayor

General Government (970) 262-7300, Fax (970) 262-7312,  
Public Safety (970) 262-7320 Community Development (970) 262-7360,  
Public Works (970) 262-7340, Recreation & Culture (970) 262-7370



March 4, 2024

TO: Transportation Commission of Colorado

Subject: Support to divide the Intermountain Transportation Planning Region (IMTPR)

Dear Commissioners:

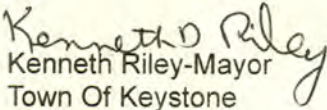
The Town of Keystone is less than a month old since incorporation on February 8, of this year. Nonetheless, transportation and highway issues have been of great concern to the citizens of this area for many years. The Town is bisected by US Highway 6, which has several problematic pedestrian safety areas, is heavily impacted by resort skier traffic, and serves as the Loveland Pass hazmat truck route. We look forward to working with the Commission and other local governments to address these issues in the near future.

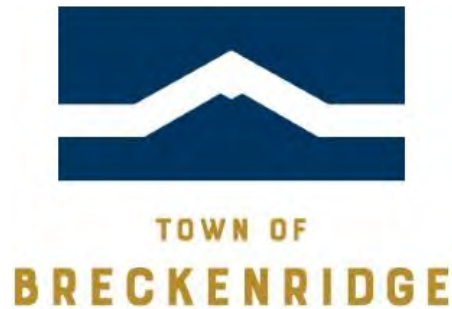
We were encouraged to learn that the Colorado Department of Transportation (CDOT) has determined and now has proposed to divide the current Inter Mountain T PR into two separate Transportation Planning Regions (TPRs). The Town of Keystone views this realignment as very appropriate, long overdue and believes the citizens of the two new TRPs will both be better served. We note some of the compelling statistics cited in the Summit County Board of County Commissioners letter dated March 1, 2024, supporting this change.

- The IMTPR was established 32 years ago with no boundary adjustments since that time.
- The population of the IMTPR has more than doubled, the largest percentage increase of all the other TPRs in Colorado.
- The IMTPR has the third highest Vehicle Miles Traveled (VMT) in the State and the second highest VMT increase since 2000.
- Truck traffic VMT is fourth highest of all 15 TRPs. This statistic is especially of interest to the Town of Keystone.

In summary, the Town of Keystone supports the comments made by Summit County and the Towns of Blue River, Breckenridge, Frisco, Dillon, Silverthorne, and Montezuma. We fully support the CDOT proposal to divide the current IMTPR into two separate TPRs.

Thank you for the opportunity to comment on this important matter.

  
Kenneth Riley-Mayor  
Town Of Keystone



March 05, 2024

To: Transportation Commission of Colorado

Subject: Support to divide the Intermountain Transportation Planning Region (IMTPR) into two Transportation Planning Regions (TPR)

Reference: HB 23-1101 Transportation Planning Region Study

Dear Commissioners,

This letter provides our formal written comments that enthusiastically support the proposed change to divide the IMTPR into two TPRs.

The reference study conducted by CDOT is comprehensive and provides undeniable data, based on required statutory factors, that support dividing the IMTPR into two TPRs. The study points out that the TPR boundaries were established in 1992 and have not changed since that time. A lot has changed in the past 32 years, especially with the IMTPR when compared to the other TPRs. We have provided graphics of various CDOT study data to highlight some significant changes. For example, the study shows that the IMTPR has had the largest population increase as a percentage (more than doubled) than all other TPRs since 1990, and it currently has the fourth largest population of all TPRs – larger than two of the five Metropolitan Planning Organizations (MPO) and larger than all nine other rural TPRs (see figure 1).

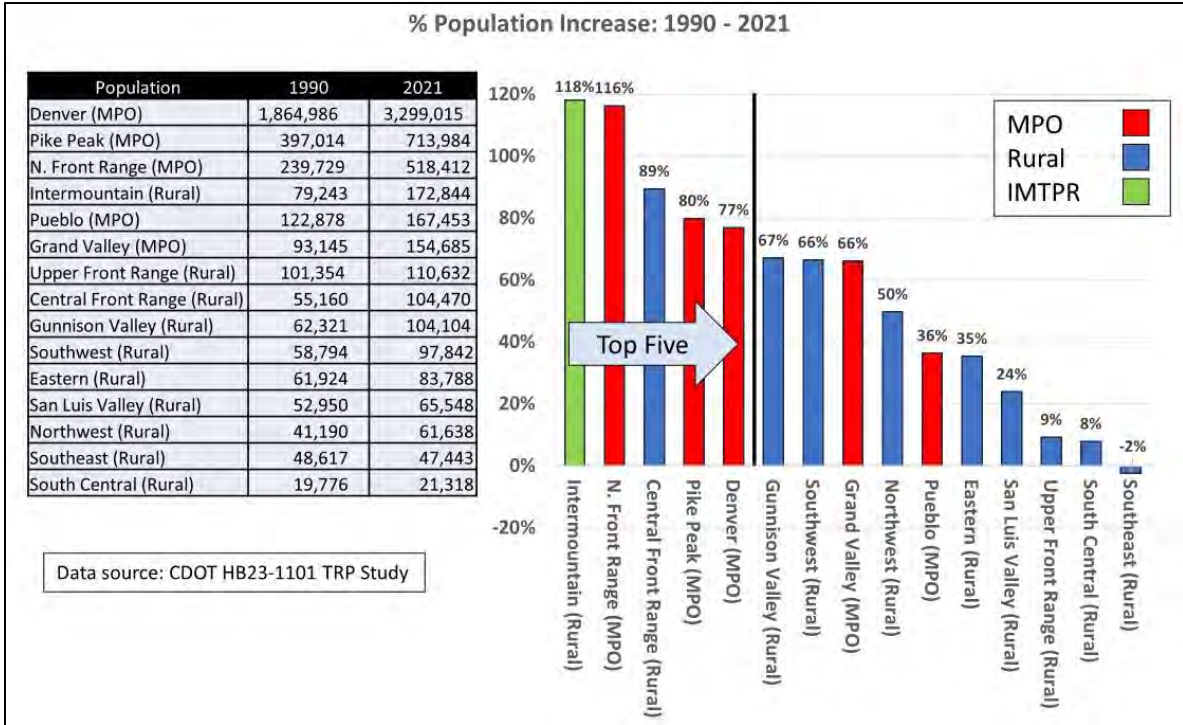


Figure 1

The IMTPR currently has the third highest daily Vehicle Miles Traveled (VMT), which is more than three of the five MPOs and more than all nine other rural TPRs (see figure 2). Also, the IMTPR has had the second highest VMT increase since 2000, which is only topped by one of the MPOs (see figure 3).

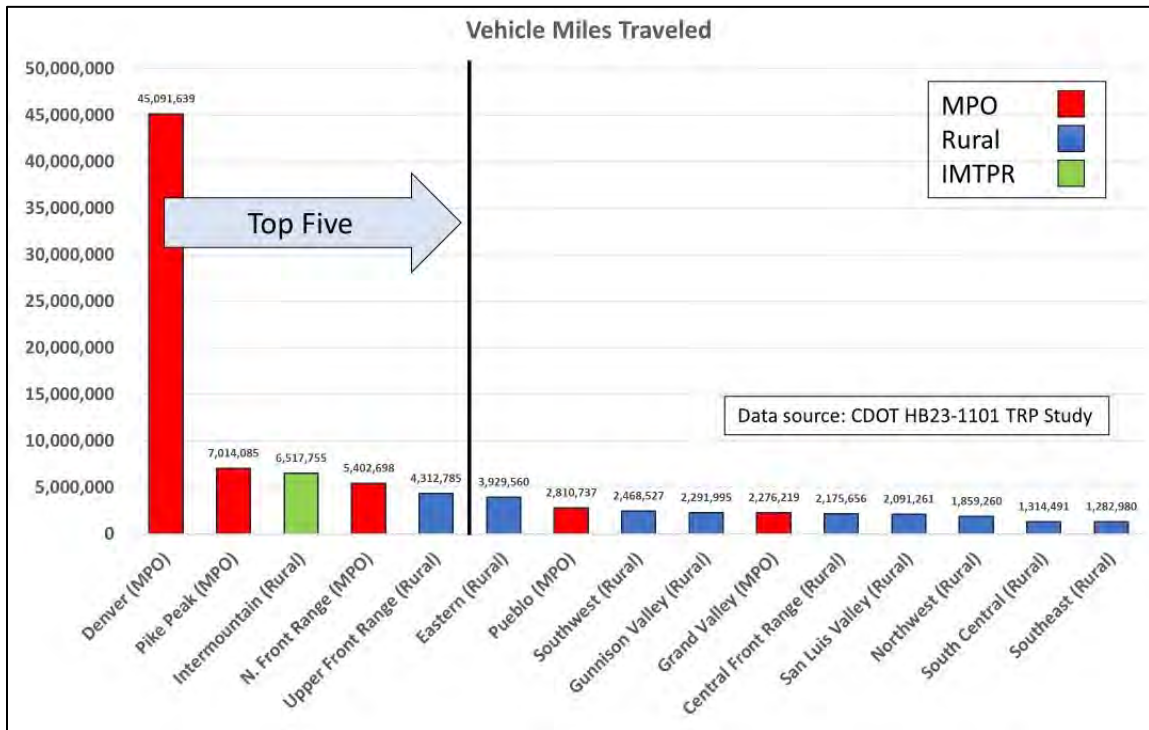




Figure 2

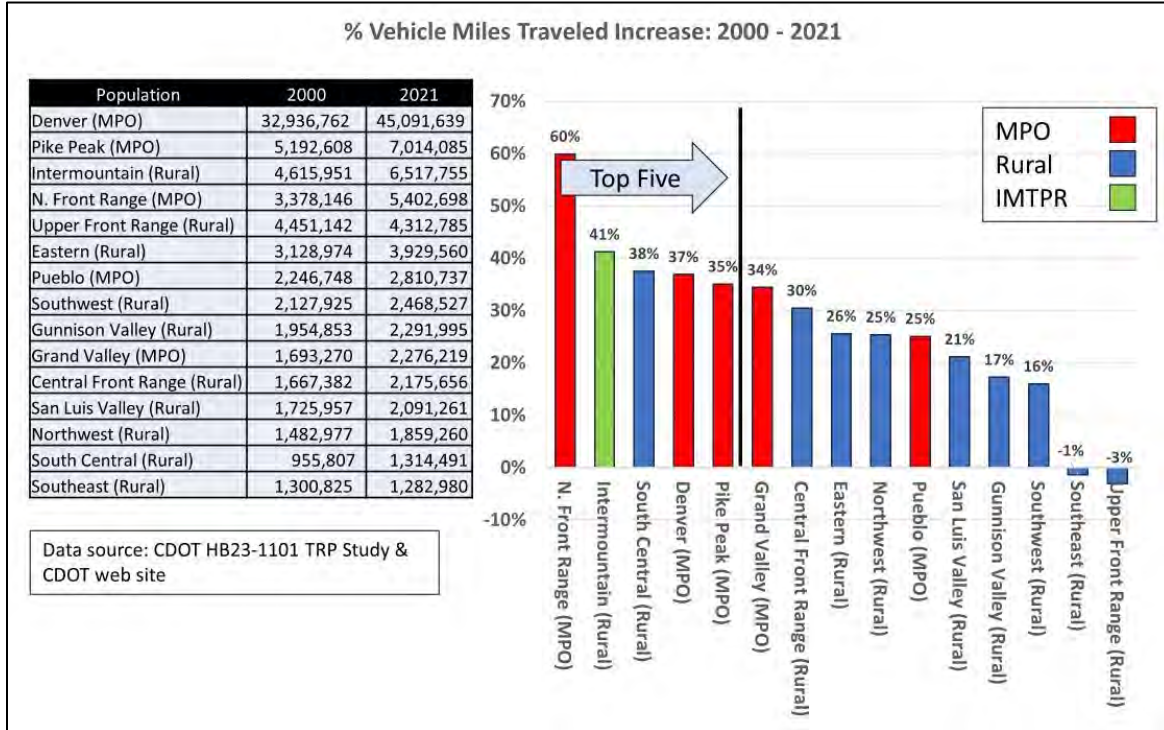


Figure 3

Additional significant statutory factors identified in the CDOT study that support dividing the IMTPR into two TPRs include:

- IMTPR Truck VMT is currently fourth highest of all 15 TPRs – currently more Truck VMT than four MPOs and seven rural TPRs
- Vehicle Crashes (Safety factor) in the IMTPR are the fourth highest of all 15 TPRs – currently higher than two MPOs and all nine other rural TPRs.
- Tourism spending in the IMTPR is second only behind the Denver MPO – currently higher than four MPOs and all nine other rural TPRs (see figure 4).

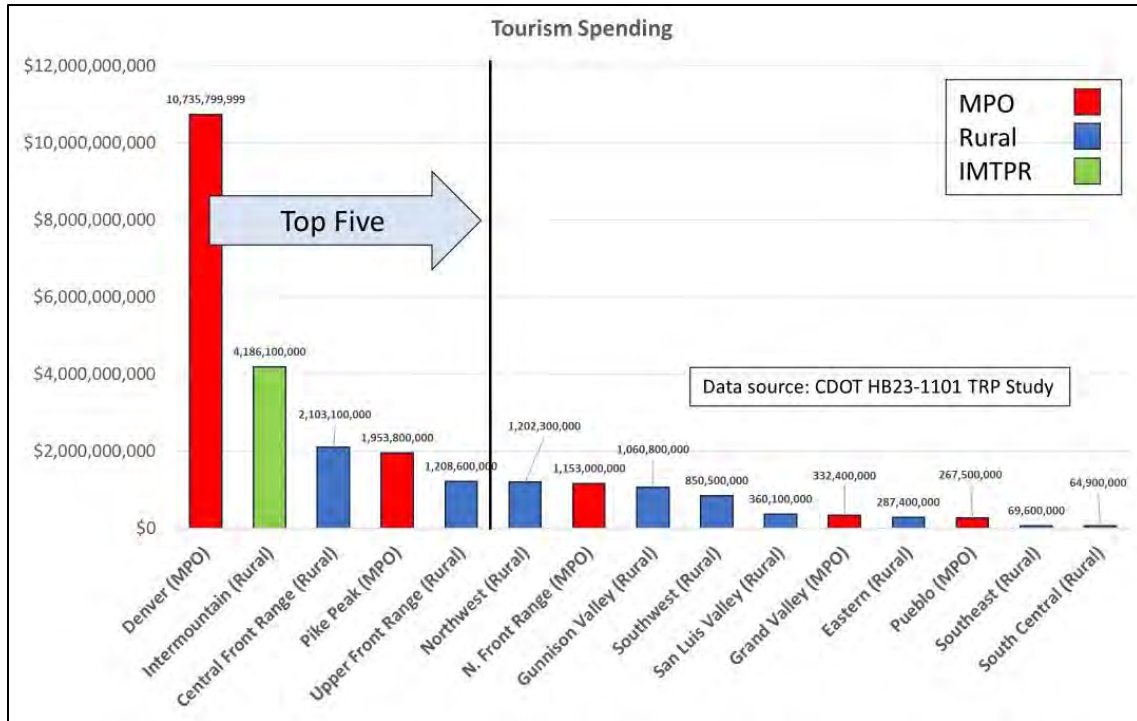


Figure 4

Some would argue that the TPR boundaries should remain the same because the TPR planning process has worked for the past 32 years. That is simply not the case. The fact that the data shows significant changes during this timeframe, yet the boundaries have not changed, should be alarming. The IMTPR has experienced some of the highest increases and changes in the statutory factors that CDOT was mandated to consider for TPR boundary changes, and the CDOT study bears this out. In short, the study shows that the IMTPR has outgrown its rural status and could easily be designated an MPO. Since that is not an option, the most appropriate decision would be to divide the IMTPR, thus each new TPR would maintain rural status.

Within Summit County we have met with officials from all our towns –Frisco, Silverthorne, Dillon, Blue River, Montezuma, and the newly incorporated Keystone – and all support splitting the IMTPR. The Town of Breckenridge enthusiastically supports CDOT's recommendation to divide the IMTPR into two TPRs.

Sincerely,

Shannon Haynes  
 Town Manager  
 Town of Breckenridge

----- Forwarded message -----

From: **Terry Hofmeister** <[terry.hofmeister@phillipscounty.co](mailto:terry.hofmeister@phillipscounty.co)>

Date: Wed, Mar 6, 2024 at 1:13 PM

Subject: TPR Boundaries

To: [jamie.grim@state.co.us](mailto:jamie.grim@state.co.us) <[jamie.grim@state.co.us](mailto:jamie.grim@state.co.us)>

With only a couple of Counties in favor of making TPR Boundary changes and 62 Counties against the change it seems like a simple decision. Do Not Make the Change! Other option would be to make the ultimate change and make a new TPR which will take a "Rule Making" change.  
Terry

Terry Hofmeister  
Phillips County District 1 Commissioner

Eastern Transportation Planning Region  
310 Ash, Suite A  
Wray, CO 80758

March 7, 2024

Colorado Transportation Commission  
2829 W Howard Place  
Denver, CO 80204

RE: ETPR Input Regarding CDOT Staff Recommendations – HB23-1101 TPR Boundary Study

Dear Chairman & Commission Members,

After careful review and discussion of the recommendations contained within the CDOT Staff Report prepared pursuant to HB23-1101, the Eastern Transportation Planning Region (ETPR) respectfully submits our input for your consideration. We appreciate the extensive effort to represent a wide range of views and issues and believe that while most of the recommendations in the report have a high degree of merit, others will be harmful to the existing regional structures and strong habitual relationships forged over decades of cooperative planning.

Firstly, and most importantly, the ETPR strongly objects to the recommendation outlined in the “TPR Boundary Recommendations” section of the report regarding the restructuring of transportation planning regions (TPRs) within the state. We oppose the suggestion to split the Intermountain TPR into two separate planning regions and to merge the South Central and South-East Planning Regions.

We firmly believe that such a restructuring is not the best solution for the TPRs of the regions that would be impacted if such a recommendation were to be adopted by the Transportation Commission. Instead, we recommend that CDOT pursue legislation that would authorize the establishment of an additional TPR (an option precluded by the authorizing language of the study itself, so therefore not a recommendation CDOT staff could make). This solution would maintain the integrity and effectiveness of existing regional planning structures in the southeast and allowing a more focused approach to the issues impacting the current eastern and western portions of the intermountain areas.

Additionally, while we advise the Commission to take an approach different than recommended by CDOT staff regarding collapsing two current TPRs and splitting another, we fully support the recommendations presented under the "Recommendations for CDOT Staff" and the proposed "TPR Governance Recommendations,"

Finally, we have reservations regarding certain aspects of the recommendations put forth under the "STAC and TRAC Recommendations." Especially concerning are proposals related to the rotation of STAC leadership roles and the imposition of term limits, and limitations suggested as to who planning bodies may choose from within their membership as STAC representation.

While we acknowledge the importance of ensuring diversity and fresh perspectives within leadership positions, we believe that the imposition of strict rotation requirements and term limits may inadvertently hinder the effectiveness of these bodies. It is essential to strike a balance between continuity and innovation to ensure the continued success of our transportation planning efforts. We assert that the voting members of the STAC and the TPRs/MPOs have the collective wisdom to choose in each election cycle the best leadership for their body, without the imposition of potentially arbitrary changes and or limitations.

In conclusion, the ETPR urges the Colorado Transportation Commission to reconsider the proposed restructuring of TPRs and instead focus on legislative measures that support the enhancement and expansion of existing regional planning structures. Additionally, we encourage careful consideration of the implications of proposed changes to STAC and TRAC governance, with a focus on maintaining the effectiveness and stability of these vital organizations.

Thank you for considering our concerns and recommendations. We look forward to continued collaboration in advancing transportation planning and improvement efforts throughout the state.

Sincerely,

Scott Weaver  
Yuma County Commissioner  
ETPR, Co-Chair

Chris Richardson  
Elbert County Commissioner  
ETPR, Co-Chair

STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

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**RE: Public comment on the Planning Rule closes Friday**

1 message

**Brendon Adams** <BAdams@utemountain.org>

Wed, Mar 13, 2024 at 9:11 AM

To: CDOT Rules <cdot\_rules@state.co.us>, Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Amber Paoloemilio - CDOT <amber.paoloemilio@state.co.us>, Andrew Hogle - CDOT He Him <andrew.hogle@state.co.us>

We at Ute Mountain Ute Tribe have read/studied the Planning Rule and we have no comment at this time.

**Brendon Adams**

Transportation Specialist

Ute Mountain Ute Tribe

Cell: 970-238-0823

Office: 970-564-5634

**From:** [herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us) [mailto:[herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us)] **On Behalf Of** CDOT Rules**Sent:** Wednesday, March 13, 2024 8:10 AM**To:** Herman Stockinger - CDOT <[herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us)>; Jamie Grim - CDOT <[jamie.grim@state.co.us](mailto:jamie.grim@state.co.us)>; Uebelher - CDOT, Jennifer <[jennifer.uebelher@state.co.us](mailto:jennifer.uebelher@state.co.us)>; Amber Paoloemilio - CDOT <[amber.paoloemilio@state.co.us](mailto:amber.paoloemilio@state.co.us)>; Andrew Hogle - CDOT He Him <[andrew.hogle@state.co.us](mailto:andrew.hogle@state.co.us)>**Subject:** Public comment on the Planning Rule closes Friday

Planning Rule Stakeholders,

This email is to remind you that we will close public comments on the Planning Rule on March 15, at 5:00 pm. If you have been wanting to comment on the rule, you still have time! As a reminder, we are including as part of the Exhibits for this rule all written comments we received during the rulemaking process and also that we received during the TPR Study process last year.

Additionally, I am attaching an slightly updated version of the Proposed Rule. The edits are non-substantive and increase the clarity and readability of the Rule. You'll find the new changes in green font.

If you missed the public hearings, you can find the recording of those as well as the entire Planning Rules Exhibit Packet here: <https://www.codot.gov/business/rules/proposed-rules>. The second public hearing recording will be posted today or tomorrow, and the entire hearing packet will be finalized and updated on Monday.

Please let us know if you have any questions.

Herman





STATE OF  
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Rules - CDOT, DOT\_ <dot\_rules@state.co.us>

## Comments on Proposed Permanent Rule Changes to Transportation Planning Processes

1 message

**Mark Westhoff** <mwesthoff@prowerscounty.net>  
To: dot\_rules@state.co.us

Wed, Mar 13, 2024 at 12:58 PM

To whom it may concern:

I am writing to you today in both my professional capacity as Prowers County Administrator, as well as my personal capacity as a longtime resident of southeastern Colorado and the son of a retired CDOT Regional Engineer.

My comments on the Proposed Permanent Rule Changes to the Transportation Planning Process and Transportation Planning Regions can be summed up in short: Do NOT combine the Southeast Transportation Region (SE TPR) and South Central Transportation Region (SC TPR).

2 CCR 601-22 states the following regarding Disproportionately Impacted Communities:

Historically, communities have been impacted unequally by transportation project design and construction, including a lack of access and connectivity. Negative impacts -- both to air quality by virtue of proximity to highways as well as limited non-driving options in neighborhoods proximate to highways -- have often concentrated in Disproportionately Impacted Communities, often minority neighborhoods in urban and industrial areas. These rules are an important opportunity to ensure CDOT's planning process and greenhouse gas requirements fully consider these communities and this history.

Based on the proposed rule changes in this same document, Prowers County and the rest of the communities in the SE TPR and SC TPR meet *multiple* criteria to be defined as Disproportionately Impacted Communities. Combining the SE TPR and SC TPR does not meet the standard of these well-intentioned ideals, and will have cascading negative impacts on Prowers County and the rest of southeastern and south central Colorado - communities that already face uniquely difficult challenges compared to the rest of our State. Those unique challenges include: lack of representation, lack of funding for key economic and safety projects, and lack of access and connectivity.

### Lack of Representation

In so many arenas, southeastern and south central Colorado are underrepresented at the State level. Due to our lower population, we are easily discarded and our circumstances carry little weight in Denver. Currently, this region is afforded two votes on the Statewide Transportation Advisory Committee (STAC) - one for the SE TPR and one for the SC TPR. Combining the TPRs would obviously remove a vote from the region, leading to further disenfranchisement - rather than greater inclusion - of Disproportionately Impacted Communities.

### Lack of Funding for Key Economic and Safety Projects

The SE TPR and SC TPR are each home to vital and unique transportation and freight corridors, [US 287/US 50](#) and Interstate 25, respectively. These corridors are crucial in moving goods and people into and out of the State of Colorado, and they each have a growing list of critical road projects that need completed to ensure the safety and economic growth of Disproportionately Impacted Communities in their boundaries. Combining the TPRs will lead to less funding for and greater competition between these projects. For example, the Lamar Reliever Route is long overdue, but what hope does this community have to receive priority funding for such a project when it will suddenly be competing with similarly important projects on I-25? The communities in *both* corridors desperately need these projects to be addressed and combining the TPRs will serve to push them out even further. Please further consider that these transit corridors also serve borders with three other states, Oklahoma, Kansas, and New Mexico. The first impression that visitors to our great State have of Colorado is often, "What a terrible road we just drove onto." When transportation funds are funneled to the Front Range and mountain TPRs, the rural and remote areas nearest to our Welcome to Colorful Colorado signs suffer tremendously.

### Lack of Access and Connectivity

This issue is tied up within the Funding concerns, but I felt it deserved its own focus. The Disproportionately Impacted Communities in the SE TPR and SC TPR are in part so impacted due to their lack of access to resources and neighboring communities. As of today, the main means of access we have is via highway. As funding decreases, so will the condition of the roadways, which is already at a critical stage in some areas. If the roadways are not safe, access to resources



disappears entirely! Understanding that not all residents in these communities can afford a highway-worthy vehicle, the communities in the SE TPR have come together to create a regional public transit program. Public transit in rural areas faces unique challenges, not least of which is funding, which I have discussed at length already. Once again, if the pool of available transportation dollars for this region is reduced, the most disadvantaged in our communities would take the biggest hit.

I hope that you can take into account that the communities in these two TPRs are some of the most disadvantaged in the State of Colorado. If you do not believe your own metrics, see the recently released Distressed Communities Index: <https://eig.org/distressed-communities/?geo=counties&lat=38.86&lon=-103.25&z=6> The residents here do everything we can to raise those standards, but often it feels like we are fighting a Sisyphean struggle against Denver and the Front Range. And unfortunately many here have given up and become bitter after years of that battle. This doesn't have to be true, though! We can work together to help southeastern and south central Colorado thrive! Imagine that map of Distressed Communities showing no red across the entire State. Combining the SE TPR and SC TPR will not solve all the problems in these communities, but it won't actively make those problems worse, and could show to the residents here that our voices *are* being heard.

Please remove the new rule combining the SE TPR and SC TPR. If the Intermountain TPR needs more attention, please instead support legislation to change the statute and create a new TPR to meet their needs.

Thank you for your time.

## **Mark Westhoff**

**Prowers County Administrator**

*Prowers County Admin Office  
301 South Main St, Suite 215  
Lamar, CO 81052*

[mwesthoff@prowerscounty.net](mailto:mwesthoff@prowerscounty.net)

(719) 336-8029

[Book an appointment with me at this link](#)

STATE OF  
COLORADO

Rules - CDOT, DOT\_ &lt;dot\_rules@state.co.us&gt;

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**Re: Public comment on the Planning Rule closes Friday**

1 message

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**jean.sykes@bentcounty.net** <jean.sykes@bentcounty.net>

Thu, Mar 14, 2024 at 11:57 AM

To: CDOT Rules <cdot\_rules@state.co.us>, Herman Stockinger - CDOT <herman.stockinger@state.co.us>, Jamie Grim - CDOT <jamie.grim@state.co.us>, "Uebelher - CDOT, Jennifer" <jennifer.uebelher@state.co.us>, Amber Paoloemilio - CDOT <amber.paoloemilio@state.co.us>, Andrew Hogle - CDOT He Him <andrew.hogle@state.co.us>

I find this ruling very disheartening. The South East TPR members sent numerous letters of opposition based on the huge land mass adding Las Animas and Huerfano counties to our TPR. We lose a seat at the table again hurting the rural counties of SE Colorado. Our previous letters stated numerous financial concerns, number of highway miles etc that would be affected by this change.

We met in person at least two times as well and I feel not one word of our concerns in making this decision. I feel all of our legitimate concerns were completely ignored.

It's appears the final decision was made before the affected members of SE TPR were even heard and no consideration of our requests were given. I'm just very disappointed.

---

**From:** [herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us) <[herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us)> on behalf of CDOT Rules <[cdot\\_rules@state.co.us](mailto:cdot_rules@state.co.us)>

**Sent:** Wednesday, March 13, 2024 9:11:24 AM

**To:** Herman Stockinger - CDOT <[herman.stockinger@state.co.us](mailto:herman.stockinger@state.co.us)>; Jamie Grim - CDOT <[jamie.grim@state.co.us](mailto:jamie.grim@state.co.us)>; Uebelher - CDOT, Jennifer <[jennifer.uebelher@state.co.us](mailto:jennifer.uebelher@state.co.us)>; Amber Paoloemilio - CDOT <[amber.paoloemilio@state.co.us](mailto:amber.paoloemilio@state.co.us)>; Andrew Hogle - CDOT He Him <[andrew.hogle@state.co.us](mailto:andrew.hogle@state.co.us)>

**Subject:** Public comment on the Planning Rule closes Friday

Planning Rule Stakeholders,

This email is to remind you that we will close public comments on the Planning Rule on March 15, at 5:00 pm. If you have been wanting to comment on the rule, you still have time! As a reminder, we are including as part of the Exhibits for this rule all written comments we received during the rulemaking process and also that we received during the TPR Study process last year.

Additionally, I am attaching an slightly updated version of the Proposed Rule. The edits are non-substantive and increase the clarity and readability of the Rule. You'll find the new changes in green font.

If you missed the public hearings, you can find the recording of those as well as the entire Planning Rules Exhibit Packet here: <https://www.codot.gov/business/rules/proposed-rules>. The second public hearing recording will be posted today or tomorrow, and the entire hearing packet will be finalized and updated on Monday.

Please let us know if you have any questions.

Herman

March 12, 2024

CDOT Rulemaking Process  
Delivered via email  
[dot\\_rules@state.co.us](mailto:dot_rules@state.co.us)

Dear Colleagues at the Colorado Department of Transportation:

We appreciate the opportunity to comment on the Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions (TPR). We participated in House Bill 23-1101 and supported the Northwest Colorado TPR retaining its current composition of Rio Blanco, Moffat, Routt, Grand, and Jackson Counties (2.02.13). Thank you for keeping the boundaries of our TPR the same.

We also appreciate the thoughtful consideration being given to ensuring consistency and transparency across TPRs, as is noted in 2.07. It will be a great step forward to ensure that TPR information can be found on the internet as noted in 2.07.13. We also support the clarification being given in sections 2.07.7-2.07.9 that meetings are open to the public and must be publicly noticed; agendas and meeting minutes are available and accessible to the public and that regularly scheduled meetings shall allow time for public comment on the agenda.

The Northwest Colorado TPR's meetings have been run as public meetings with agendas, minutes, good information flow, and a clear opportunity for public comment. However, we have not been able to make materials available on the internet as described in 2.07. Given new rules regarding the accessibility of digital content, we wonder if the responsibility of making this content available should fall to the TPR or to CDOT who already has information on its website regarding TPRs.

Sections in the redline document speak to the elections of TPR officers and STAC representatives (2.07.5, 2.07.10). However, there is still a lack of definition about who is eligible to serve as officers of the TPR and the STAC. Must officers also be members of the TPR? Our Intergovernmental Agreement (IGA) defines TPR membership as

“2. Membership and Participation. The governing bodies of the parties to this Agreement shall each nominate one primary representative and one alternate representative to the Regional Planning Commission for the Northwest Transportation Planning Region.”

We have sought clarification of this question and all legal opinions we have received note that the IGA is “silent on this matter.” We believe the rulemaking process presents an opportunity to clarify whether officers of the TPR and STAC must be members of the TPR or if they can be members of the public. If they can be members of the public, we suggest that a process be defined by which the TPR solicits participation from the public.

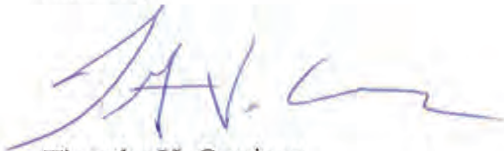
All opportunities to serve on Routt County (and other local governments') Boards and Commissions are publicly posted and made available to anyone who wishes to serve. Interviews are then

conducted to better understand candidates' interests in serving and to select the best candidate. This is a basic best practice that honors fairness, transparency, and equal opportunity. We believe it should be extended to the TPRs in the course of the rulemaking process.

Lastly, regarding the State Transportation Advisory Committee (STAC), we feel strongly that the STAC Representative and STAC Alternate be TPR members who have been appointed by, and are accountable to, one of the governing bodies pursuant to the IGA. Once again, our IGA is silent on this matter.

Thank you for the opportunity to weigh in on this important topic. We look forward to tracking the rulemaking process and remain available should there be questions about our comments.

Sincerely,



Timothy V. Corrigan  
Routt County Commissioner, Chair

State Representative  
JULIE McCLUSKIE  
Colorado State Capitol  
200 East Colfax Avenue, Room 307  
Denver, Colorado 80203  
Office: 303-866-2952  
Cell: 970-977-0021  
Email: julie.mccluskie.house@coleg.gov



SPEAKER OF THE HOUSE  
Chair:  
Executive Committee of the  
Legislative Council  
Legislative Council Committee

**COLORADO**  
**HOUSE OF REPRESENTATIVES**  
State Capitol  
Denver  
80203

March 13, 2024

To: Transportation Commission of Colorado

Subject: Support to divide the Intermountain Transportation Planning Region (IMTPR) into two Transportation Planning Regions (TPR)

Reference: HB 23-1101 Transportation Planning Region Study

Dear Commissioners,

I am writing to express my strong support for the proposed change to divide the IMTPR into two TPRs. As a State Representative from the Western Slope region, improving the efficiency and safety of transportation is a priority for me and the communities I represent. Based on the reference study conducted by CDOT, I feel strongly that dividing the IMPTR will be a beneficial change. The comprehensive and undeniable data based on required statutory factors supports the division's finding.

The study points out that the TPR boundaries have not been changed since they were established in 1992. A lot has changed in the past 32 years, especially with the IMTPR compared to the other TPRs. For example, the study shows that the IMTPR population has more than doubled since 1990, which is the largest increase since then, and it currently has the fourth-largest population of all TPRs. The IMTPR also has the third-highest Vehicle Miles Traveled (VMT) in the State and the second-highest VMT increase since 2000.

In conclusion, I urge you to support the CDOT proposal to divide the current IMTPR into two separate TPRs. Thank you for your time and consideration of this critical matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie McCluskie".

Julie McCluskie  
Speaker of the CO House of Representatives

Gary Beedy  
Eastern Transportation Planning Region  
State Transportation Advisory Committee Representative  
Genoa, CO 80818

March 15, 2024

Colorado Transportation Commission

2829 W Howard Place  
Denver, CO 80204

Regarding 2 CCR 601-22 Rulemaking

Dear Chairwoman and Commissioners,

After careful review of the Staff recommendations to changes of 2 CCR 601-22 these are my concerns and support.

First the recommended changes to TPR governance and CDOT involvement for consistency and public input all make a lot of sense to better engage the public and have consistency throughout the state. Even the governance recommendations for STAC have merit. I do question the need to require term limits for an advisory group especially when the recommendation includes alternating urban and rural leadership role. I think that should be left entirely up to the STAC membership to determine in their bylaws and not put in the rules.

In response to the recommended Boundary changes of Combining Southeast and South Central TPR's Eastern TPR has strong concerns. When looking at the data in the study the recommendation would remove representation for an area of the state that has a large area of disproportionately impacted communities on low income and minorities. The two regions being combined also have different travel patterns for their residents and would decrease their representation to be heard at the state level for planning consideration. In addition, the very large area between the two TPR's will make it harder to have the local stakeholder involvement on a regular basis. This change seems counter to the rule recommendations highlighting disproportionately impacted communities. It is disheartening to see a recommendation to reduce their representation.

In response to the splitting of Intermountain TPR the data does make a case for such an action and strongly leans to actually make them an MPO (although that is set by federal highways) so the state needs to consider interim options. Some comments have indicated that the boundary change would help the split region get more projects when the only way that would happen is if funding is taken from somewhere else. Current funding allocation planning takes into

consideration many of the evaluation criteria already so more projects are unlikely to happen, it may only change which ones get prioritized within that TPR.

Eastern TPR recommends not to move forward with the boundary changes at this time by the commission and consider asking the legislature to allow the adding of TPR's to address travel pattern areas and continue the effort to have a strong **Statewide planning** group to advise on the **Statewide transportation system**. Also consider the impact of the splitting of the Intermountain TPR if they were to become an MPO in the near future.

Thank you for your consideration of the Statewide system and your planning partners.

Sincerely,

Gary Beedy  
Eastern TPR STAC Representative



March 11, 2024

Colorado Transportation Commission  
Colorado Department of Transportation  
2829 W. Howard Place  
Denver, CO 80204

Re: Final HB 1101 Report on TPR alignment

Members of the Transportation Commission:

We are writing to you today on behalf of the Transportation Steering Committee of Colorado Counties, Inc. (CCI). CCI is a membership organization representing 63 of Colorado's 64 counties.

During our recent steering committee meeting, we had the opportunity to discuss the proposed changes to the TPR alignment following the completion of the report required by HB23-1101. It goes without saying that the Statewide Transportation Advisory Committee (STAC) affords county governments an invaluable voice in the management of our shared transportation network. Any change that alters the composition of the STAC and the ability of local governments to have a voice in these funding priority conversations is a critically important issue for our membership.

Being a statewide organization, we do not have an official position on whether the proposed changes to the TPR structure (combining the Southeast and South Central TPRs and creating a new TPR in the Intermountain region) are appropriate. We do, however, bemoan the fact that our state has consistently underfunded our transportation network, creating competition between the TPRs and these kinds of "winners and losers" situations.

Transportation funding needs are an issue in every region of the state. Pitting the needs of our agricultural producers in Southeast Colorado against the ever-growing tourism industry in the Intermountain region ignores the reality that **both** are critical to our state's economic well-being and the quality of life of our citizens.

As a state, we must continue the fight to enhance transportation funding so that we are not reduced to bickering and competing for these precious financial resources. It might be preferable to instead amend the statute (CRS 43-1-1102) through legislation and simply increase the number of TPRs in order to accommodate the growth in the Intermountain region.



We thank you for your time and consideration of these comments.

Jim Candelaria, Chair

CCI Transportation Steering Committee

Chris Richardson, Vice Chair

CCI Transportation Steering Committee



**PROWERS  
ECONOMIC  
PROSPERITY**

March 15, 2024

Colorado Department of Transportation  
Transportation Commission of Colorado  
2829 W. Howard Place  
Denver, CO 80204  
Emailed to: [Jennifer.uebelher@state.co.us](mailto:Jennifer.uebelher@state.co.us)

Dear Transportation Commission:

I am writing this letter for Prowers Economic Prosperity (PEP) to express the Boards strong opposition to the recommendation by the Colorado Department of Transportation (CDOT) to combine the Southeast Transportation Planning Region (SE TRP) with the South Central Transportation Planning Region (SC TPR).

PEP is the economic development organization working in Prowers County to promote business attraction, expansion, and retention. Prowers County serves as a major logistics hub for commercial goods making road infrastructure a critical component of economic development.

Prowers County is one of the 6 counties in the southeast corner making up the SE TPR. The SE TPR area encompasses 9,570 square miles. The proposal aims to combine the SE TPR and SC TRP. This would add 6,368 square miles to the boundaries of the already large TPR. PEP believes this addition would create an unmanageable area already stressed with lack of representation for each county and municipality.

Please consider the challenges SE TPR already faces with the lack of representation. Combining the TPRs will add to the current challenges giving Southeast Colorado a disadvantage.

Respectfully,

*Cheryl Sanchez*  
Cheryl Sanchez  
Executive Director



800 Harrison Ave  
Leadville, CO 80461

Dana Greene, Mayor  
Cell: 719-207-2072  
[dgreene@leadville-co.gov](mailto:dgreene@leadville-co.gov)

March 20, 2024

RE: Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions 2  
CCR 601-22

The City of Leadville sits at the intersection of two highways connecting it with Summit County (Hwy 91) and Eagle County (Hwy 24). These highway connections are vital to Leadville for commuters who work in Summit and Eagle as well as for visitors coming from these counties to Leadville. Leadville and Lake County therefore have a vested interest in transportation planning with both Summit County and Eagle County.

In concordance with the letter of support from the the Lake County Board of Commissioners, we wholeheartedly support the the proposed changes to the Transportation Planning Regions in the posted proposed rule, as amended on 1/31/24.

Respectfully,

A handwritten signature in blue ink that reads 'Dana Greene'.

Dana Greene  
Mayor, City of Leadville

**Exhibit 11**



**COLORADO**  
Department of Transportation

2829 W. Howard Place  
Denver, CO 80204-2305

**MEMORANDUM**

To: Office of Policy and Government Relations

From: Herman Stockinger, Acting CDOT Rules Advisor

Date: January 18, 2024

RE: Permanent Records Retention of Rule File regarding 2 CCR 601-22: "Rules Governing the Statewide Planning Process"

Please establish an official rule making file for the Rule Making Process and Hearing pursuant to § 24-4-103(8.1), C.R.S. which requires that "an agency shall maintain an official rule-making record for each proposed rule for which a notice of proposed rule-making has been published in the Colorado register. Such rule-making record shall be maintained by the agency until all administrative and judicial review procedures have been completed pursuant to the provisions of this article. The rule-making record shall be available for public inspection."

For retention purposes, this file should be considered permanent.

Please contact me if you need additional information.

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**Exhibit 12**

**DEPARTMENT OF TRANSPORTATION**

**Transportation Commission**

**RULES GOVERNING STATEWIDE TRANSPORTATION PLANNING PROCESS AND  
TRANSPORTATION PLANNING REGIONS**

**2 CCR 601-22**

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- 1.11 Disproportionately Impacted Communities - defined in §24-4-109, C.R.S. as a community that is described in § 24-4-109(2)(b)(II)(G) or (2)(b)(II)(H), C.R.S. or that is in a census block group, as determined in accordance with the most recent five-year United States bureau of the census American community survey and meets one or more of the following criteria.
  - 1.11.1 The proportion of the population living in households that are below two hundred percent of the federal poverty level is greater than forty percent;
  - 1.11.2 The proportion of households that spend more than thirty percent of household income on housing is greater than fifty percent;
  - 1.11.3 The proportion of the population that identifies as people of color is greater than forty percent;
  - 1.11.4 The proportion of the population that is linguistically isolated is greater than twenty percent;
  - 1.11.5 A statewide agency determines, after a community presents evidence of being and requests to be classified as a disproportionately impacted community, that the population is disproportionately impacted based on evidence, presented in a relevant statewide agency decision-making process, that a census block group is disproportionately impacted because it has a history of environmental racism perpetuated through redlining or through anti-indigenous, anti-immigrant, anti-Latino, or anti-Black laws, policies, or practices and that present-day demographic factors and data demonstrate that the community currently faces environmental health disparities;
  - 1.11.6 The community is identified by a statewide agency as being one where multiple factors, including socioeconomic stressors, vulnerable populations, disproportionate environmental burdens, vulnerability to environmental degradation or climate change, and lack of public participation may act cumulatively to affect health and the environment and may contribute to persistent disparities;
  - 1.11.7 The community is a mobile home park, as defined in section 38-12-201.5 (6), regardless of whether the mobile home park is a census block group; or
  - 1.11.8 The community is located on the Southern Ute or Ute Mountain Ute Indian reservation, regardless of whether the community is a census block group.

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**2.00 Transportation Planning Regions (TPR).**

- 2.01 Transportation Planning Region Boundaries. TPRs are geographically designated areas of the state with similar transportation needs that are determined by considering transportation commonalities. Boundaries are hereby established as follows:
- 2.01.1 The Pikes Peak Area TPR comprises the Pikes Peak Area Council of Governments' metropolitan area within El Paso and Teller counties.
  - 2.01.2 The Greater Denver TPR, which includes the Denver Regional Council of Governments' planning area, comprises the counties of Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Gilpin, Jefferson, and parts of Weld.
  - 2.01.3 The North Front Range TPR comprises the North Front Range Transportation and Air Quality Planning Council's metropolitan area within Larimer and Weld counties.
  - 2.01.4 The Pueblo Area TPR comprises Pueblo County, including the Pueblo Area Council of Governments' metropolitan area.
  - 2.01.5 The Grand Valley TPR comprises Mesa County, including the Grand Valley Metropolitan Planning Organization's metropolitan area.
  - 2.01.6 The Eastern TPR comprises Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Phillips, Sedgwick, Washington, and Yuma counties.
  - 2.01.7 The Southeast TPR comprises Baca, Bent, Crowley, Huerfano, Kiowa, Las Animas, Otero, and Prowers counties.
  - 2.01.8 The San Luis Valley TPR comprises Alamosa, Chaffee, Conejos, Costilla, Mineral, Rio Grande, and Saguache counties.
  - 2.01.9 The Gunnison Valley TPR comprises Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel counties.
  - 2.01.10 The Southwest TPR comprises Archuleta, Dolores, La Plata, Montezuma, and San Juan counties, including the Ute Mountain Ute and Southern Ute Indian Reservations.
  - 2.01.11 The West Intermountain TPR comprises Garfield and Pitkin counties, and the portion of Eagle County that is within the boundaries of the Roaring Fork RTA.
  - 2.01.12 The East Intermountain TPR comprises Lake and Summit counties, and the portion of Eagle County that is within the boundaries of the Eagle Valley Transportation Authority.
  - 2.01.13 The Northwest TPR comprises Grand, Jackson, Moffat, Rio Blanco, and Routt counties.
  - 2.01.14 The Upper Front Range TPR comprises Morgan County, and the parts of Larimer and Weld counties, that are outside both the North Front Range and the Greater Denver (metropolitan) TPRs.
  - 2.01.15 The Central Front Range TPR comprises Custer, El Paso, Fremont, Park, and Teller counties, excluding the Pikes Peak Area Council of Governments' metropolitan area.
- 2.02 Boundary Revision Process.



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- 2.02.1 TPR boundaries, excluding any MPO-related boundaries, will be reviewed by the Commission at the beginning of each regional and statewide transportation planning process. The Department will notify counties, municipalities, MPOs, Indian tribal governments, and RPCs for the TPRs of the boundary review revision requests. MPO boundary review shall be conducted pursuant to 23 U.S.C. § 134 and 23 C.F.R. Part 450 Subpart B and any changes shall be provided to the Department to update the Rules. All boundary revision requests shall be sent to the Division Director, and shall include:
- 2.02.1.1 A geographical description of the proposed boundary change.
  - 2.02.1.2 A statement of justification for the change considering transportation commonalities.
  - 2.02.1.3 A copy of the resolution stating the concurrence of the affected RPC.
  - 2.02.1.4 The name, title, mailing address, telephone number, fax number and electronic mail address (if available) of the contact person for the requesting party or parties.
- 2.02.2 The Department will assess and STAC shall review and comment (as set forth in these Rules) on all Non-Metropolitan Area TPR boundary revision requests based on transportation commonalities and make a recommendation to the Commission concerning such requests. The Department will notify the Commission of MPO boundary changes. The Commission may initiate a rule-making proceeding under the Colorado Administrative Procedure Act, § 24-4-103, C.R.S. to consider a boundary revision request. Requests received for a MPO or non-metropolitan TPR boundary revision outside of the regularly scheduled boundary review cycle must include the requirements identified above.
- 2.02.3 In the event that the Commission approves a change to the boundary of a TPR that has a RPC, the RPC in each affected TPR shall notify the Department of any changes to the Intergovernmental Agreement governing the RPC as specified in these Rules.
- 2.03 Transportation Planning Coordination with MPOs.
- 2.03.1 The Department and the MPOs shall coordinate activities related to the development of RTPs, the Statewide Transportation Plan, TIPS, and the STIP in conformance with 23 U.S.C. § 134 and 135 and § 43-1-1101 and § 43-1-1103, C.R.S. The Department shall work with the MPOs to resolve issues arising during the planning process.
- 2.04 Transportation Planning Coordination with Non-MPO RPCs.
- 2.04.1 The Department and RPCs shall work together in developing RTPs and in planning future transportation activities. The Department shall consult with all RPCs on development of the Statewide Transportation Plan; incorporation of RTPs into the Statewide Transportation Plan; and the inclusion of projects into the STIP that are consistent with the RTPs. In addition, the Department shall work with the RPCs to resolve issues arising during the planning process.
- 2.05 Transportation Planning Coordination among RPCs.
- 2.05.1 If transportation improvements cross TPR boundaries or significantly impact another TPR, the RPC shall consult with all the affected RPCs involved when developing the RTP. In general, RPC planning officials shall work with all Planning Partners affected by transportation activities when planning future transportation activities.

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- 2.06 Transportation Planning Coordination with the Southern Ute and the Ute Mountain Ute Tribal Governments.
- 2.06.1 Regional transportation planning within the Southwest TPR shall be coordinated with the transportation planning activities of the Southern Ute and the Ute Mountain Ute tribal governments. The long-range transportation plans for the tribal areas shall be integrated in the Statewide Transportation Plan and the RTP for this TPR. The TTIP is incorporated into the STIP without modification.
- 2.07 Expectations for consistency and transparency of RPC governing documents. To ensure consistency and transparency among TPRs that conduct transportation planning and develop RTPs under Rule 4.00, the governing documents of RPCs must include the following information.
- 2.07.1 The name of the organization, and the membership, including transit membership consistent with and required under 43-1-1103.
- 2.07.2 The duties of the organization, and the ability to spend and receive funds, sue and be sued, and enter into contracts.
- 2.07.3 The ability to terminate and amend its governing documents.
- 2.07.4 An overview of general meeting cadence and locations.
- 2.07.5 A list of officers, process for the elections of officers, and the length of term of officers.
- 2.07.6 What shall constitute a quorum and what the voting structure shall be.
- 2.07.7 An assurance that meetings are open to the public and must be publicly noticed.
- 2.07.8 An assurance that agendas and meeting minutes are available and accessible to the public.
- 2.07.9 An assurance that regularly scheduled meetings shall allow time for public comment on the agenda.
- 2.07.10 The process for identifying how the TPR's STAC representative is chosen.
- 2.07.11 A statement on how the TPR arranges for administrative support for its activities and responsibilities.
- 2.07.12 The inclusion of a Conflict of Interest Statement.
- 2.07.13 An assurance that TPR information can be found on the internet.
- 2.08 TPRs that have governmental jurisdictions that are represented within multiple TPRs are encouraged to work together to ensure no political jurisdiction represents more than one TPR on STAC.
- 3.00 Statewide Transportation Advisory Committee (STAC).**
- 3.01 Duties of the STAC. Pursuant to § 43-1-1104 C.R.S. the duties of the STAC shall be to meet as necessary and provide advice to both the Department and the Commission on the needs of the transportation system in Colorado including, but not limited to: budgets, TIPs of the MPOs, the STIP, transportation plans, and state transportation policies.

The STAC shall review and provide to both the Department and the Commission comments on:

- 3.01.1 All RTPs, amendments, and updates as described in these Rules.
  - 3.01.2 Transportation related communication and/or conflicts which arise between RPCs or between the Department and an RPC.
  - 3.01.3 The integration and consolidation of RTPs into the Statewide Transportation Plan.
  - 3.01.4 Colorado's Mobility requirements to move people, goods, services, and information by furnishing regional perspectives on transportation problems requiring interregional and/or statewide solutions.
  - 3.01.5 Improvements to modal choice, linkages between and among modes, and transportation system balance and System Continuity.
  - 3.01.6 Proposed TPR boundary revisions.
- 3.02 Notification of Membership
- 3.02.1 Each RPC and tribal government shall select its representative to the STAC pursuant to § 43-1-1104(1), C.R.S. The Ute Mountain Ute Tribal Council and the Southern Ute Indian Tribal Council each appoint one representative to the STAC. Each TPR and tribal government is also entitled to name an alternative representative who would serve as a proxy in the event their designated representative is unable to attend a STAC meeting and would be included by the Department in distributions of all STAC correspondence and notifications. The Division Director shall be notified in writing of the name, title, mailing address, telephone number, and electronic mail address (if available) of the STAC representative and alternative representative from each TPR and tribal government within thirty (30) days of selection.
  - 3.02.2 The chairperson of the Transit and Rail Advisory Committee (TRAC) shall be a non-voting member of STAC and is entitled to name an alternative representative in the event the chairperson is unable to attend a STAC meeting and both individuals shall be included by the Department in distributions of all STAC correspondence and notifications. The Division Director shall be notified in writing of the name, title, mailing address, telephone number, and electronic mail address of the STAC representative and alternative representative within thirty (30) days of selection.
- 3.03 Administration of STAC
- 3.03.1 STAC recommendations on Regional and Statewide Transportation Plans, amendments, and updates shall be documented in the STAC meeting minutes, and will be considered by the Department and Commission throughout the statewide transportation planning process.
  - 3.03.2 The STAC shall establish procedures to govern its affairs in the performance of its advisory capacity, including, but not limited to, the appointment of a chairperson and the length of the chairperson's term, meeting times, and locations.
    - 3.03.2.1 In establishing procedures for the appointment of a chairperson and vice chairperson, STAC shall include a provision for term limits for each office so that no individual may serve in either position for more than two consecutive two-year terms.

3.03.2.2 To ensure the STAC's leadership represent both rural and urban Colorado, STAC procedures shall require that when the chairperson is chosen from a rural TPR or tribe, the vice chairperson shall be chosen from an urban MPO area, and each position shall rotate so that no consecutive chairpersons or vice chairpersons come from either a rural TPR or tribe, or urban MPO area consecutively.

3.03.3 The Division Director will provide support to the STAC, including, but not limited to:

3.03.3.1 Notification of STAC members and alternates of meeting dates.

3.03.3.2 Preparation and distribution of STAC meeting agendas, supporting materials, and minutes.

3.03.3.3 Allocation of Department staff support for STAC-related activities.

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# Exhibit 13

<b>Sign Up Sheets for 2 CCR 601-22 Public Hearing</b>		
<b>March 6, 2024</b>		
<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>
Allison	Burns	Mountain Metro
Alma	Sekulich	Innovative Textiles, Inc.
Candace	Payne	East Central COG
Christina	Lara	NorthWestern Railroad Construction, Inc.
Dana	Wood	Northwest Colorado Council of Governments
Devin	Saunders	Colorado Auto Dealers Association
Elizabeth	Relford	Weld County
Evan	Pinkham	Weld County
Greg	Fulton	CMCA
Jacob	Rivera	Town of Gypsum
Philip	Demosthenes	Philip B Demosthenes, LLC
Ray	Beck	CLUB 20
Suzette	Malette	North Front Range MPO
Tracy	Sakaguchi	CMCA
Charity	Markus	SETran
Michael	Koch	Compass Transit Consulting
Brittany	Dixon	Club 20
Brixhina	Hirsch	Denver University
Shannon	Smith	Town of Breckenridge
Tess	Richey	
Stephanie	Gonzales	SECED, Inc. / SE TPR
Tom	Dougherty	Town of Silverthorne
Carla	Perez	HDR
Shawna	Grieger	WCCA
Terry	Hofmeister	Phillips County
John	Galusha	Huerfano County

Michael	McVaugh	HDR
Brent	Spahn	Summit County Government
Joe	Miklosi	
<b>CDOT Staff</b>		
First Name	Last Name	Role
Lindsey	Jaquez	CDOT Staff
Mark	Rogers	CDOT Staff
Herman	Stockinger	CDOT Staff
Jamie	Grim	CDOT Staff
Jennifer	Uebelher	CDOT Staff
Amber	Paoloemilio	CDOT Staff
Marissa	Gaughan	CDOT Staff
Andrew	Holgle	CDOT Staff
<b>Transportation Commissioners and Others</b>		
First Name	Last Name	Email
Karen	Stuart	Transportation Commission
Mark	Garcia	Transportation Commission
Hannah	Parsons	Transportation Commission
Barbara	Bowman	Transportation Commission
Kathy	Young	CO Attorney General's Office

**Sign Up Sheets for 2 CCR 601-22 Public Hearing****March 11, 2024**

<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>
Allison	Burns	Mountain Metro
Alma	Sekulich	Innovative Textiles, Inc.
Candace	Payne	East Central COG
Christina	Lara	NorthWestern Railroad Construction, Inc.
Dana	Wood	Northwest Colorado Council of Governments
Devin	Saunders	Colorado Auto Dealers Association
Elizabeth	Relford	Weld County
Evan	Pinkham	Weld County
Greg	Fulton	CMCA
Jacob	Rivera	Town of Gypsum
Philip	Demosthenes	Philip B Demosthenes, LLC
Ray	Beck	CLUB 20
Suzette	Malette	North Front Range MPO
Tracy	Sakaguchi	CMCA
Charity	Markus	SETran
Michael	Koch	Compass Transit Consulting
Brittany	Dixon	Club 20
Brixhina	Hirsch	Denver University
Shannon	Smith	Town of Breckenridge
Tess	Richey	
Stephanie	Gonzales	SECED, Inc. / SE TPR
Tom	Dougherty	Town of Silverthorne
Carla	Perez	HDR
Shawna	Grieger	WCCA
Terry	Hofmeister	Phillips County
John	Galusha	Huerfano County
Michael	McVaugh	HDR
Brent	Spahn	Summit County Government
Joe	Miklosi	

**CDOT Staff**

<b>First Name</b>	<b>Last Name</b>	<b>Role</b>
Lindsey	Jaquez	CDOT Staff
Mark	Rogers	CDOT Staff
Herman	Stockinger	CDOT Staff
Jamie	Grim	CDOT Staff
Jennifer	Uebelher	CDOT Staff
Amber	Paoloemilio	CDOT Staff



Marissa	Gaughan	CDOT Staff
Andrew	Hogle	CDOT Staff
<b>Transportation Commissioners and Others</b>		
<b>First Name</b>	<b>Last Name</b>	<b>Email</b>
Karen	Stuart	Transportation Commission
Mark	Garcia	Transportation Commission
Hannah	Parsons	Transportation Commission
Barbara	Bowman	Transportation Commission
Kathy	Young	CO Attorney General's Office