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## 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:

- 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:

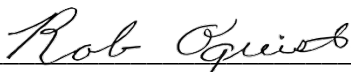
The planning process is difficult with 6 counties and even 2 counties. Due to our large coverage area, we feel this will further inhibit our members from participating.

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,



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Rob Oquist, Chairman



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Tim Knabenshue