



# Board of County Commissioners

## Prowers County

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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

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