

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.

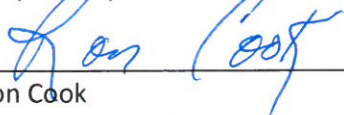
The lack of input during the time that this study was conducted is alarming. Would it not have been wise to include the counties, municipalities and stakeholders, that this change will affect? The region feels this is another example of how decisions are being made for us, without consideration of our 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.

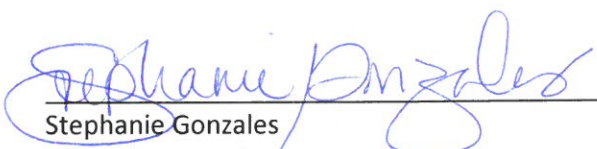
We do not feel that the comparison of the Southeast/South Central TPRs to one that is located along the I-70 corridor yields a fair assessment. We know that we are very rural and as such our needs, the travel and the data that it yields is very different in our regions, but certainly not any less important. 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