

AGENDA
REGIONAL TRANSPORTATION COMMITTEE
Tuesday, August 17, 2021
8:30 a.m.
VIDEO/WEB CONFERENCE
Denver, CO

1. Call to Order
2. Public Comment
3. July 20, 2021, RTC Meeting Summary
(Attachment A)

ACTION ITEMS

4. Public Engagement Plan Amendments
(Attachment B) Lisa Houde, Public Engagement Planner
5. TAC Membership Annual Review
(Attachment C) Jacob Riger, Long Range Transportation Planning Manager

INFORMATIONAL BRIEFINGS

6. Nondiscrimination Plans Update
(Attachment D) Alvan-Bidal Sanchez, Transportation Planner
7. Complete Streets Toolkit Update
(Attachment E) Jacob Riger, Long Range Transportation Planning Manager
8. Greenhouse Gas (GHG) Rulemaking Update
(Attachment F) Ron Papsdorf, Division Director, Transportation Planning & Operations

ADMINISTRATIVE ITEMS

9. Member Comment/Other Matters
10. Next Meeting – September 14, 2021
11. Adjournment

ATTACH A

ATTACHMENT A

MEETING SUMMARY
REGIONAL TRANSPORTATION COMMITTEE
Tuesday, July 20, 2021
Note: Meeting held virtually via GoToMeeting

MEMBERS PRESENT:

Karen Stuart	Colorado Department of Transportation
Don Stanton	Colorado Department of Transportation
Heather Paddock (Alternate)	Colorado Department of Transportation
Paul Jesaitis (Alternate)	Colorado Department of Transportation
Douglas Rex	Denver Regional Council of Governments
Wynne Shaw	Denver Regional Council of Governments
Ashley Stolzmann (Chair)	Denver Regional Council of Governments
Kevin Flynn (Vice Chair)	Denver Regional Council of Governments
Joan Peck	Denver Regional Council of Governments
Mike Silverstein	Regional Air Quality Council
Kate Williams	Regional Transportation District
Debra Johnson	Regional Transportation District
Vince Buzek	Regional Transportation District
Bill Van Meter (Alternate)	Regional Transportation District

Others Present:

Deborah Mulvey (Alternate)	Denver Regional Council of Governments
Ron Papsdorf (Alternate)	Denver Regional Council of Governments
Jim Dale (Alternate)	Denver Regional Council of Governments

Public: Lauren Pulver, Danielle Glover

DRCOG Staff: Todd Cottrell, Steve Cook, Emily Lindsey, Alvan-Bidal Sanchez, Cam Kennedy, Sang Gu Lee, Steve Erickson, Josh Schwenk, Melissa Balding, Robert Spotts, Matthew Helfant, Brad Calvert

Call to Order

Chair Ashley Stolzmann called the meeting to order at 8:33 a.m.

Public Comment

There was no public comment.

Summary of June 15, 2021 Meeting

The summary was accepted.

ACTION ITEMS

FY 2022-2023 Transportation Demand Management (TDM) Services Set-Aside Eligibility
Steve Erickson, Communications & Marketing Director, discussed that the FY 2020-2023 TIP Policy established \$1.8 million in federal funds for TDM non-infrastructure projects over the four-year period. Eligible projects include marketing and outreach, as well as market research. Mr. Erickson presented the proposed process and criteria for selecting TDM non-infrastructure projects for fiscal years 2022 and 2023. The primary goal of these projects is to reduce traffic congestion and improve air quality, and secondarily to pilot projects that will demonstrate effectiveness of an approach that might be scaled or replicated across the region.

The FY 2022–2023 call for projects will be for \$900,000.

Wynne Shaw MOVED to recommend to the DRCOG Board of Directors the eligibility rules and evaluation process for selecting non-infrastructure (marketing, outreach and research) projects to be funded through the Transportation Demand Management Services Set-Aside of the Fiscal Years 2020-2023 Transportation Improvement Program. The motion was seconded and passed unanimously.

FY2022-2023 Unified Planning Work Program (UPWP) for the Denver Region

Josh Schwenk, Assistant Planner, discussed that the Unified Planning Work Program (UPWP) outlines the transportation planning activities and tasks to be conducted within the region with federal transportation planning funds. The document also lists other major transportation planning activities performed by local governments and partner agencies.

The new FY2022-FY2023 UPWP outlines activities to be conducted from October 1, 2021, through September 30, 2023, and was prepared with input from CDOT, RTD, and local government staff. It represents over \$18 million in planned expenditures with over 70 deliverables.

Some key priorities over the next two years include:

- Administer the core Metropolitan Planning Organization transportation planning program and the metropolitan transportation planning process is conducted in compliance with applicable federal and state laws and regulations.
- Maintain and implement Metro Vision and the 2050 Regional Transportation Plan.
- Collect and disseminate regional bicycle facility counts.
- Prepare and adopt the FY2024-2027 Transportation Improvement Program (TIP) Policy.
- Conduct calls for projects and prepare and adopt the 2024-2027 TIP.
- Update, compile and report on the implementation of federally-required transportation performance measures.
- Maintain the regional transportation operations program and update the DRCOG Regional Intelligent Transportation Systems Architecture.
- Maintain and continue implementing the Taking Action on Regional Vision Zero Plan.
- Maintain and continue implementing the Active Transportation Plan.
- Lead/coordinate corridor plans for priority regional multimodal corridors.
- Lead/coordinate community-based transportation plans to improve mobility options for low-income and disadvantaged populations.

Kevin Flynn MOVED to recommend to the Board the draft *FY2022-FY2023 Unified Planning Work Program* (UPWP). The motion was seconded and passed unanimously.

INFORMATIONAL BRIEFING

FY 20-23 Transportation Improvement Program (TIP) Dual Model process and FY 24-27 TIP Policy Development Process/Schedule

Todd Cottrell, Senior Transportation Planner, discussed that the TIP identifies all federally funded and state funded transportation projects, in addition to regionally significant non-federal

projects, in the Denver region over a four-year period. Projects are selected through a cooperative process, considering submittals from local governments, CDOT, RTD, and other eligible agencies. DRCOG and its planning partners decide on a process and criteria for including projects in the TIP and awarding DRCOG-directed state and federal funds, which allows the region to set and agree upon its transportation priorities.

Overall, the model provided flexibility for member governments to apply local values to the TIP process within the framework of Metro Vision and the Regional Transportation Plan (RTP). The foundation of the dual model process is its three major elements: set-aside programs, regional share, and subregional share. After the set-aside funds were allocated off-the-top, remaining funds were split 20% to the regional share and 80% to the subregional share. Unlike previous project selection methods, project ideas and applications were discussed at each subregional forum and were submitted individually through each subregion instead of to DRCOG directly.

The next four-year TIP will be for FY 2024-2027. The first step to create the next TIP is to develop the FY 2024-2027 TIP Policy. Mr. Cottrell presented anticipated topics that staff intends for discussion, review, or action to incorporate into the draft FY 2024-2027 TIP Policy for final action by the Board. Staff anticipates the Policy will be considered for adoption in January 2022.

ADMINISTRATIVE ITEMS

Member Comment/Other Matters

Commissioner Don Stanton informed the committee that last week the Transportation Commission authorized CDOT staff to commence Greenhouse Gas emissions rulemaking for transportation planning. Executive Director Doug Rex continued the topic by saying that the DRCOG Board will begin having a conversation regarding the rulemaking during the August Board Work Session and Board Meeting. A conversation ensued between various members regarding greenhouse gas emission levels and funding at the local, state, and national level.

Next Meeting – August 17, 2021

Adjournment

The meeting adjourned at 9:23 a.m.

ATTACH B

ATTACHMENT B

To: Chair and Members of the Regional Transportation Committee

From: Lisa Houde, Planner – Public Engagement, Communications & Marketing
303-480-5658 or lhoud@drco.org

Meeting Date	Agenda Category	Agenda Item #
August 17, 2021	Action	4

SUBJECT

Amendments to DRCOG's public engagement plan, *People-centered planning, projects and services*.

PROPOSED ACTION/RECOMMENDATIONS

Staff recommends approval of the amended public engagement plan.

ACTION BY OTHERS

[July 26, 2021](#) – TAC recommended approval

SUMMARY

DRCOG adopted a public engagement plan, [People-centered planning, projects and services](#) in May 2019. Staff is proposing amendments to address some issues that emerged in the first two years of implementing the plan:

- First, since engagement strategies transitioned to fully virtual during the COVID-19 pandemic, it became clear that more discussion and direction regarding virtual participation is necessary.
- Second, the public engagement plan does not include any direction about how to revise the plan, so revision procedures are proposed.
- Third, while completing the 2050 Metro Vision Regional Transportation Plan, DRCOG staff worked with the Colorado Department of Transportation, Regional Transportation District, Federal Highway Administration, Federal Transit Administration, and Environmental Protection Agency to develop specific revision procedures for different types of potential amendments to that plan.
- These proposed amendments to the recently adopted public engagement plan also provide an opportunity to make some minor formatting and text changes.

The draft amended public engagement plan was the subject of a public hearing at the June 16, 2021 Board of Directors meeting. One attendee provided public comment and requested that the Denver Regional Mobility & Access Council (DRMAC) be included into the list of potential participants in Appendix C. This additional change has been made on page 40 of the tracked change document below.

PREVIOUS DISCUSSIONS/ACTIONS

N/A

PROPOSED MOTION

Move to recommend the Board of Directors approve the amended public engagement plan.

ATTACHMENTS

1. Staff presentation
2. [Public Engagement Plan with tracked edits](#)

ADDITIONAL INFORMATION

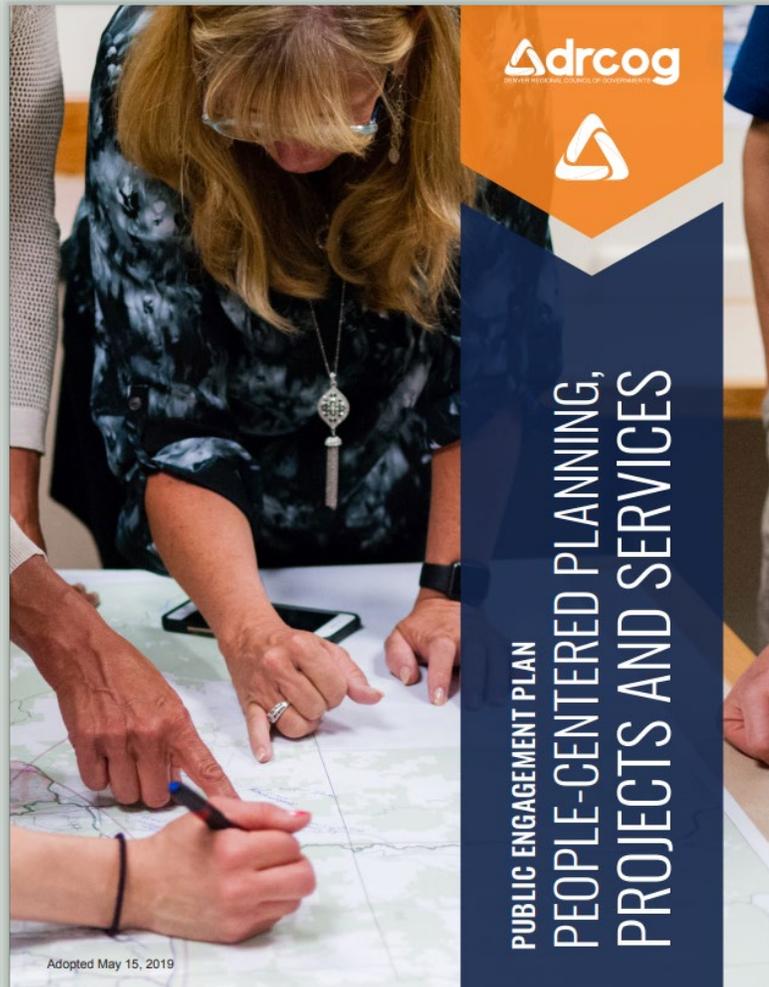
If you need additional information, please contact Lisa Houde, Planner - Public Engagement, Communications & Marketing, at 303-480-5658 or lhouded@drccog.org, or Alvan-Bidal Sanchez, Transportation Planner, Transportation Planning & Operations, at 720-278-2341 or asanchez@drccog.org.

Amendments to the Public Engagement Plan

Regional Transportation Committee
August 17, 2021

Lisa Houde | Alvan Bidal Sanchez

What is the public engagement plan?



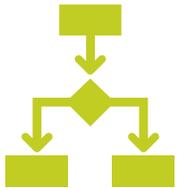
- A **guidebook** to help DRCOG staff plan and implement **effective public engagement**
- A **statement of DRCOG's commitment** to providing the region's residents with **opportunities to participate** in regional planning decisions.
- Helps residents understand the **guiding principles, goals and implementation strategies** for ensuring effective engagement.



Incorporating additional guidance for **virtual participation methods**



Providing direction for **revising the public engagement plan**



Specifying a process for **different types of amendments to the regional transportation plan**



Fixing **minor formatting and text changes**

- Posted for **public review and comment** Apr. 29 – June 16
- Public hearing **notice** in Apr. 29 Denver Post
- Promoted through **social media, website, and eblasts**
- Public hearing at **June 16 Board of Directors** meeting

Join the public hearing on Wednesday, June 16.

No images? [Click here](#)



Review proposed amendments to DRCOG's public engagement plan

Public hearing

6:30 p.m.

Wednesday, June 16

Virtual meeting only

Join virtually by computer or phone — [visit this link](#) the week of the public hearing to find the link and phone number.



Denver Regional Council of Governments

June 15 at 1:13 PM · 🌐

Time is running out! Share written comments on DRCOG's revised public engagement plan before tomorrow's public hearing, or speak at the hearing tomorrow, June 16. Review the amended document and find out how to submit comments. drcog.org/pephearing



 Like

 Comment

 Share

Proposed motion

Move to recommend the Board of Directors approve the amended public engagement plan.





Thank you! Questions?

Lisa Houde, AICP | lhode@drcog.org

AlvarBidal Sanchez, ASanchez@drcog.org

ATTACH C

ATTACHMENT C

To: Chair and Members of the Regional Transportation Committee

From: Jacob Riger, Manager, Long Range Transportation Planning
303-480-6751 or jriger@drcog.org

Meeting Date	Agenda Category	Agenda Item #
August 17, 2021	Action	5

SUBJECT

Confirming the special interest seats on the Transportation Advisory Committee (TAC) nominated by Board Chair Ashley Stolzmann as part of the annual review of TAC membership.

PROPOSED ACTION/RECOMMENDATIONS

Staff recommends confirming the seven TAC special interest nominations made by Board Chair Ashley Stolzmann.

ACTION BY OTHERS

N/A

SUMMARY

The DRCOG Board of Directors adopted the TAC committee description, composition, and operating procedures documented in the [Transportation Planning in the Denver Region](#). The TAC assists the Board of Directors and the Regional Transportation Committee (RTC) by reviewing the work of the transportation planning process, advising on methods of planning and implementation, and working with staff to develop policy options and, as appropriate, recommendations to the RTC.

The seven special interest members (*Environment, Freight, Transportation Demand Management/Non-Motorized, Aviation, Business/Economic Development, Non-RTD Transit and Senior Interests*) are annually reviewed and nominated by the DRCOG Board Chair and confirmed by the RTC. Board Chair Ashley Stolzmann is proposing to reappoint six (6) members and appoint one (1) new member (highlighted in yellow) to fill the vacant Business/Economic Development seat, as shown in Attachment 1. The appointments will become effective with the first TAC meeting following RTC's confirmation.

PREVIOUS DISCUSSIONS/ACTIONS

N/A

PROPOSED MOTION

Move to confirm the membership recommendations for the seven special interest seats on the Transportation Advisory Committee.

ATTACHMENT

1. TAC special interest seats membership nominations

ADDITIONAL INFORMATION

If you need additional information, please contact Jacob Riger, Manager, Long Range Transportation Planning, at 303-480-6751 or jriger@drcog.org.

Attachment 1

Transportation Advisory Committee Membership Nominations – 2021

SPECIAL INTEREST SEATS

AVIATION

Member: David Ulane
Aeronautics Director, CDOT Division of Aeronautics

FREIGHT

Member: Kelly Heaton, HNTB

TDM/NON-MOTORIZED

Member: Carson Priest
Program Manager, Smart Commute Metro North

BUSINESS/ECONOMIC DEVELOPMENT

Member: Frank Gray
President/CEO, Castle Rock Economic Development Council

ENVIRONMENT

Member: Rick Pilgrim
Vice President, HDR Engineering

SENIORS

Member: Carol Buchanan
Director of Programs, Denver Regional Mobility and Access Council
(DRMAC)

NON-RTD TRANSIT

Member: Frank Bruno
CEO, Via Mobility Services

ATTACH D

ATTACHMENT D

To: Chair and Members of the Regional Transportation Committee
From: Alvan-Bidal Sanchez, Transportation Planner, Transportation Planning & Operations
720-278-2341 or asanchez@drcog.org

Meeting Date	Agenda Category	Agenda Item #
August 17, 2021	Informational Briefing	6

SUBJECT

DRCOG's Title VI Implementation Plan, Limited English Proficiency Plan, and Americans with Disabilities Act Program Access Plan.

PROPOSED ACTION/RECOMMENDATIONS

N/A

ACTION BY OTHERS

N/A

SUMMARY

The Denver Regional Council of Governments is a recipient of federal financial assistance. All agencies that receive federal funds are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 which forbids discrimination against anyone in the U.S. because of race, color or national origin.

Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection, including the Americans with Disabilities Act of 1990 which prohibits discrimination against people with disabilities in all areas of public life. DRCOG is also committed to engaging and involving all residents of the Denver region, including those with limited English proficiency, in its activities.

Every three years, DRCOG prepares the Title VI Implementation Plan, Limited English Proficiency Plan and Americans with Disabilities Act Program Access Plan to document the ongoing Title VI-related activities pursued by DRCOG over the previous period.

The drafts of the three nondiscrimination plans were the subject of a public review and comment period July 1- July 31.

PREVIOUS DISCUSSIONS/ACTIONS

N/A

PROPOSED MOTION

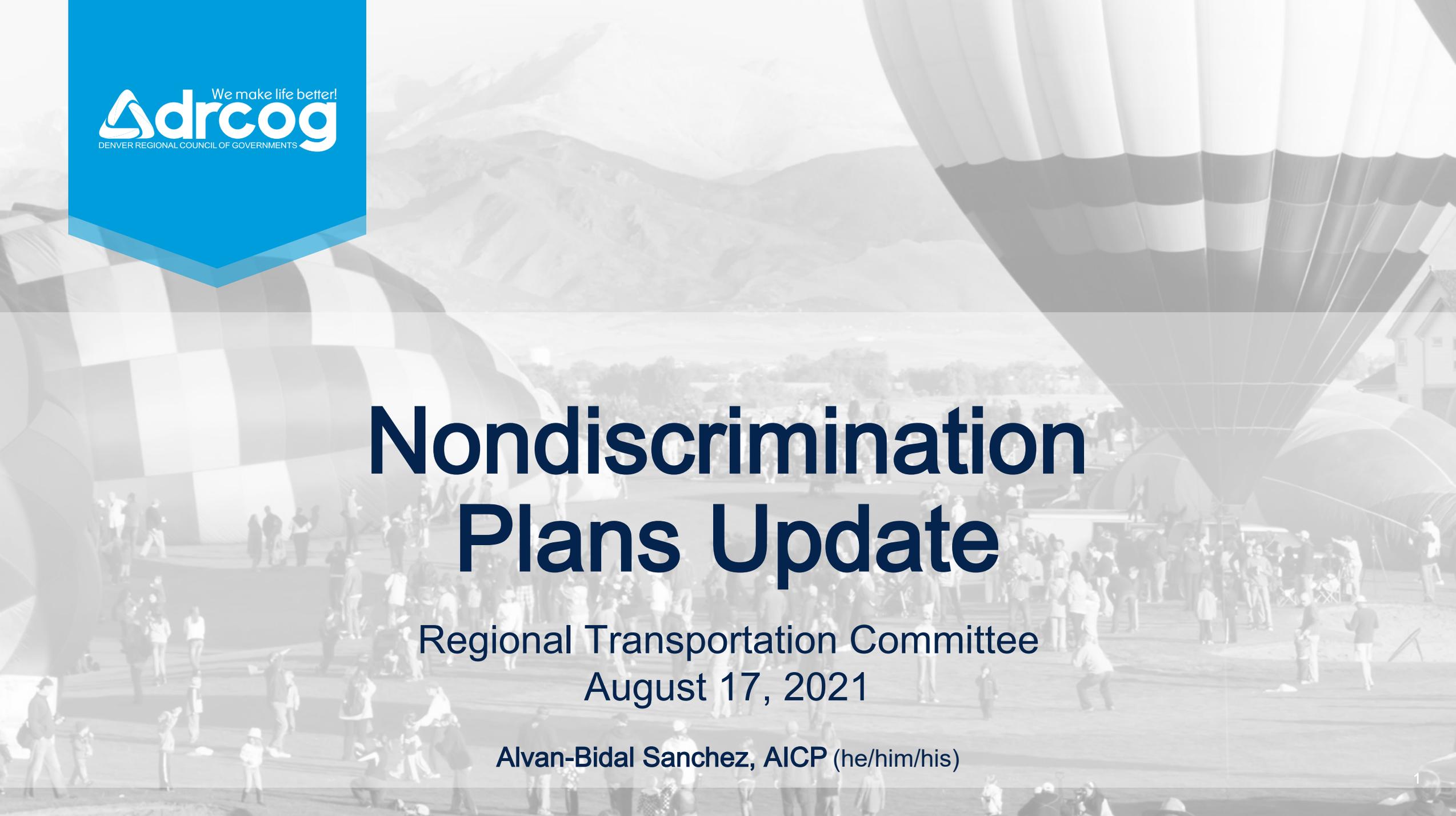
N/A

ATTACHMENTS

1. Staff presentation
2. [Draft Title VI Implementation Plan](#)
3. [Draft Limited English Proficiency Plan](#)
4. [Draft Americans with Disabilities Act Program Access Plan](#)

ADDITIONAL INFORMATION

If you need additional information, please contact Alvan-Bidal Sanchez, Transportation Planner, Transportation Planning & Operations, at 720-278-2341 or asanchez@drcog.org.



Nondiscrimination Plans Update

Regional Transportation Committee
August 17, 2021

Alvan-Bidal Sanchez, AICP (he/him/his)

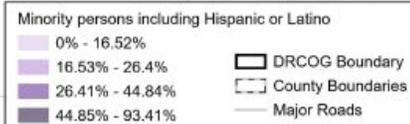
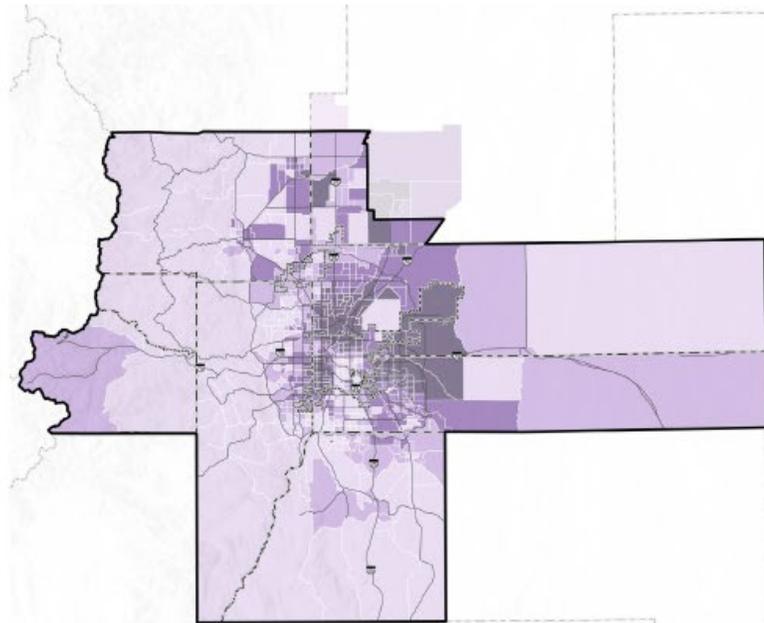
Title VI Implementation Plan



- Demonstrates DRCOG has the procedures and resources to ensure services are provided in a nondiscriminatory manner.
- Documents related activities conducted by DRCOG over the previous three years, including major plans and programs.
- Informs the public and recipients of the standard process for reviewing programs, projects and recipients to ensure compliance.

Demographic profile of the Denver region

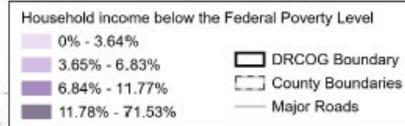
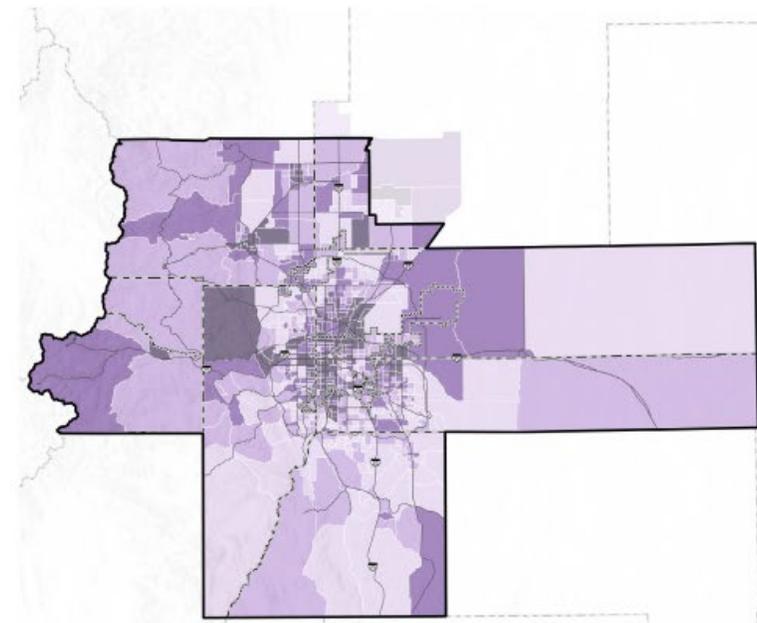
Map 2.1 Distribution of communities of color



SOURCE: DATA: DRCOG, ACS, GIS. See Appendix B for more information and disclaimer in appendix.



Map 2.2 Distribution of low-income households



SOURCE: DATA: DRCOG, ACS, GIS. See Appendix B for more information and disclaimer in appendix.



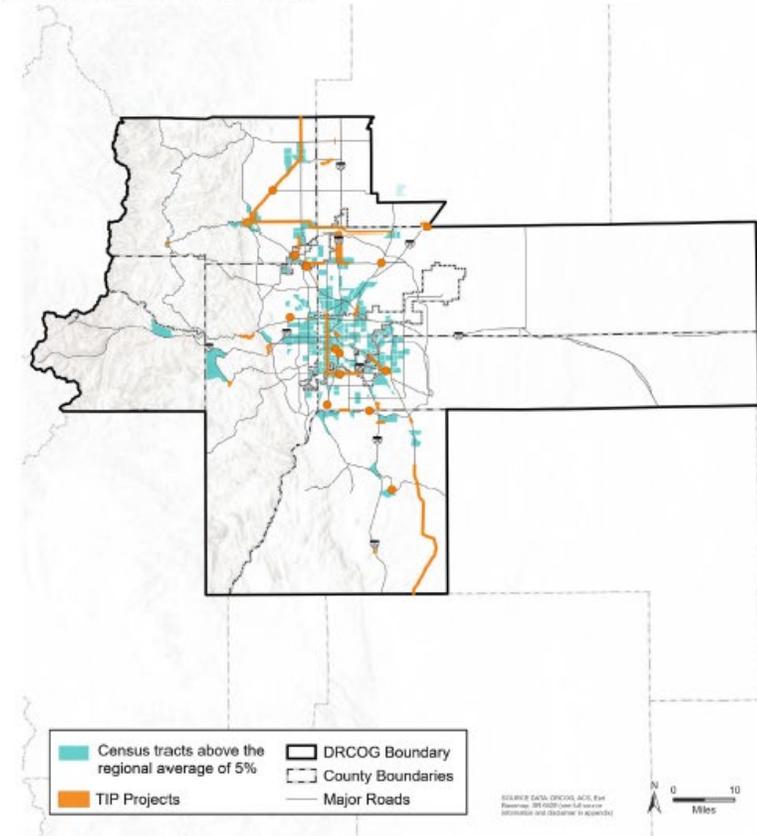
Transportation investment analysis



Households without a motor vehicle

Map 4.7 illustrates information related to households without a motor vehicle within the Denver region. The information was collected at the census tract level. The estimated population without access to a motor vehicle accounts for approximately 5% of the total population within the region.

Map 4.7 Transportation investments compared with concentrations of households without a motor vehicle



Additional information included



Policies and procedures



Board and committee structure



Staff divisions and major plans and programs



Subrecipient monitoring (**new**)



Data



Public participation

Limited English proficiency assessment of the Denver region

Map 3.1 Distribution of individuals with limited English proficiency

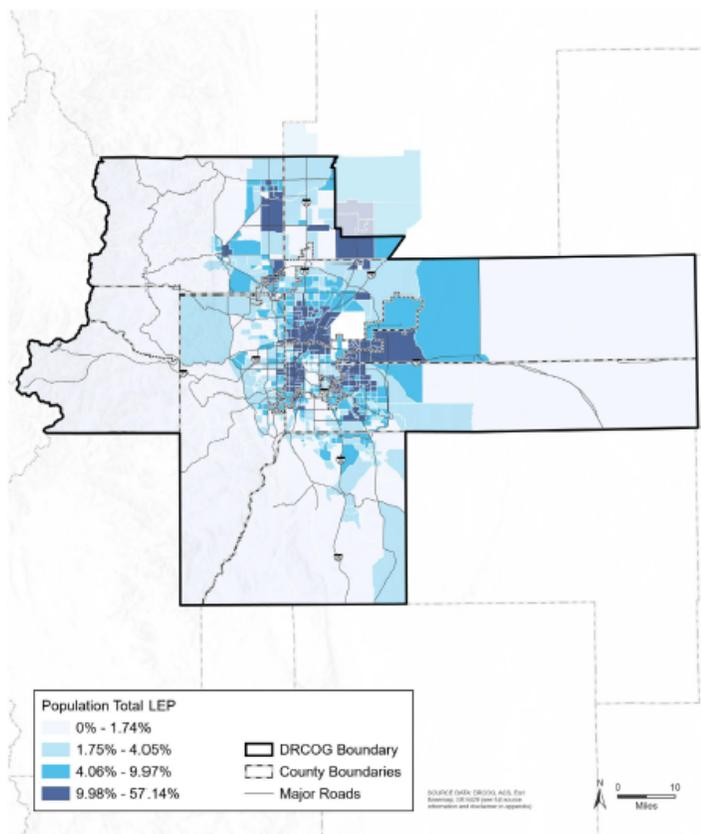


Table 3.1: Individual language spoken at home by individuals 5 years and older with limited English proficiency

Language	Total	Percent
Spanish or Spanish Creole	148,704	5.22%
Vietnamese	9,807	0.34%
Chinese	8,452	0.30%
African languages	7,328	0.26%
Korean	5,965	0.21%
Russian	5,907	0.21%
Other Asian languages	4,159	0.15%
Other Indic languages	3,437	0.12%
Arabic	2,922	0.10%
French (Including Patois, Cajun)	2,014	0.07%
Other non-English languages	16,305	0.57%
Total population with limited English proficiency	215,060	7.55%
Total regional population	2,850,084	100%

Table 3.1, derived from the 2015-2019 American Community Survey, shows top individual languages spoken at home in the Denver region by the number of individuals 5 years old and older with limited English proficiency that speak those particular languages. Spanish or Spanish Creole is by far the most common non-English language spoken at home. The second-most common language is Vietnamese.

DRCOG staff has developed maps B.1 through B.5 in [Appendix B](#) to illustrate the geographic distribution of the top five non-English language groups in the Denver region.

Table 3.2, also derived from the 2015-2019 American Community Survey, shows the top 10 languages spoken

by people 5 years old and older with limited English proficiency, by county, within the DRCOG planning area. Geographic concentrations of people with limited English proficiency who speak certain languages is considered for specific events or project outreach.

In addition to the regional data presented on the previous pages, the U.S. Department of Transportation and the Colorado Department of Transportation recommend consulting school board data because it is easy to obtain, reliable and accurate. Such data for the entire state, compiled by the Colorado Department of Education, is available in [Appendix C](#) as a map limited to the Denver region.

Four-factor analysis

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- **Factor 2:** The frequency with which LEP individuals come in contact with the program.
- **Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to people's lives.
- **Factor 4:** The resources available to the recipient and costs.





- Outlines the requirements of the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 that apply to DRCOG.
- Documents how DRCOG makes its programs, activities, and services accessible to individuals with disabilities.

Additional information included



Office space



Website features



Public meetings



Planning process



Subrecipient monitoring (**new**)

- Posted for **public review and comment** Jul. 1 – July 31.
- Promoted through **website, social media, and eblast.**
- Shared with **CDOT, RTD, FHWA, and FTA** for review and feedback.

Share your feedback on the plans by Saturday, July 31. [No images? Click here](#)



Nondiscrimination documents available for review through July 31

Review the draft Title VI Implementation Plan, Limited English Proficiency Plan and Americans with Disabilities Act Program Access Plan by July 31.

Share your thoughts on drafts of DRCOG's Title VI Implementation Plan, Limited English Proficiency Plan, and Americans with Disabilities Act Program Access Plan.

[Review the documents](#)

What's the significance of the nondiscrimination plan?

The Denver Regional Council of Governments is a recipient of federal funds. All agencies that receive federal funds are required to comply with federal nondiscrimination laws and regulations, including **Title VI** of the Civil Rights Act of 1964.



Denver Regional COG @DRCOGorg · 1h

DRCOG has released its draft Title VI Implementation Plan, Limited English Proficiency Plan, and Americans with Disabilities Act Program Access Plan. Review the nondiscrimination documents and discover how to share written comments at [https://drcog.org/draft-nondiscrimination-plans](#)

draft Nondiscrimination Plans
Notice is hereby given that the Denver Regional Council of Governments draft Title VI ...
drcog.org

2 2 



Denver Regional Council of Governments · 1h · 

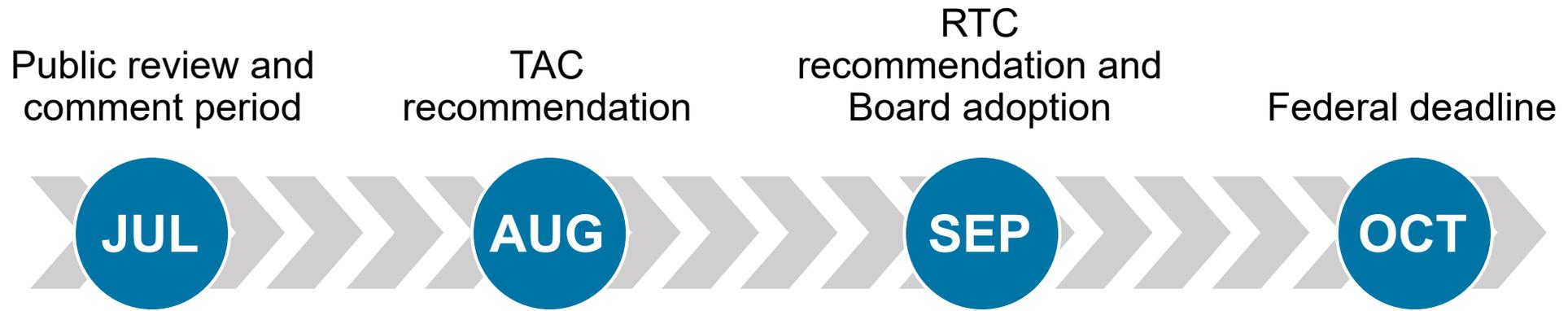
DRCOG has released its draft Title VI Implementation Plan, Limited English Proficiency Plan, and Americans with Disabilities Act Program Access Plan. Review the nondiscrimination documents and discover how to share your written comments at <https://drcog.org/draft-nondiscrimination-plans>

DRCOG.ORG

Draft Nondiscrimination Plans

Notice is hereby given that the Denver Regional Council of Governments draft Title VI Implementation Plan, draft Limited English...

 Like  Comment  Share



- Public review: **Jul. 1 – July 31**
- TAC meeting: **Aug. 23** – Recommendation to RTC
- RTC meeting: **Sep. 14** – Recommendation to Board
- Board meeting: **Sep. 15** – Adoption
- Federal deadline: **Oct. 1**



THANK YOU!
QUESTIONS?

Alvan-Bidal Sanchez, AICP | asanchez@drcog.org



ATTACHE

ATTACHMENT E

To: Chair and Members of the Regional Transportation Committee

From: Jacob Riger, Manager, Long Range Transportation Planning
303-480-6751 or jriger@drco.org

Meeting Date	Agenda Category	Agenda Item #
August 17, 2021	Informational Briefing	7

SUBJECT

Update on Regional Complete Streets Toolkit project.

PROPOSED ACTION/RECOMMENDATIONS

N/A

ACTION BY OTHERS

N/A

SUMMARY

Complete Streets are safe, context sensitive, inclusive, equitable, and flexible. They provide pedestrians, bicyclists, transit riders and other multimodal travelers the same access to safe comfortable streets as motorists.

DRCOG is developing a Regional Complete Streets Toolkit for the Denver region. The Toolkit will provide guidance for local governments to plan, design, and implement Complete Streets. It will provide strategies and give support to decision makers, planners, and designers to ensure that multimodal elements are appropriately and effectively incorporated into transportation projects. The Toolkit will also:

- Support connectivity and the development of a safe and comfortable transportation network for all modes and all users.
- Promote the use of the latest design criteria and guidelines for multimodal facilities.
- Establish a vision for how local governments could adopt and apply a complete streets policy.
- Create awareness and provide guidance on a variety of street design measures available to local jurisdictions in planning and engineering safe and comfortable streets for all users of the regional transportation system.

The Complete Streets Toolkit is also integrated with the 2050 Regional Transportation Plan (2050 RTP) and the 2024-2027 Transportation Improvement Program (2024-2027 TIP). The Toolkit's street typologies are incorporated in Chapter 2 of the 2050 RTP to work in tandem with the Regional Roadway System. And the Toolkit is intended to assist project sponsors in developing multimodal projects for the 2024-2027 TIP that help implement the 2050 RTP's project and program investment priorities and the Metro Vision Plan's outcomes and objectives.

The draft Toolkit was reviewed by the project's Steering Committee in late July, with a public comment period planned in mid-August to mid-September.

PREVIOUS DISCUSSIONS/ACTIONS

N/A

PROPOSED MOTION

N/A

ATTACHMENTS

1. Staff presentation

ADDITIONAL INFORMATION

If you need additional information, please contact Jacob Riger, Manager, Long Range Transportation Planning, at 303-480-6751 or jriger@drcog.org

Regional Complete Streets Toolkit Update

Regional Transportation Committee
August 17, 2021

Jacob Riger, AICP
Alvan-Bidal Sanchez, AICP

The Toolkit provides:

- 1) guidance for local governments to **plan, design and implement Complete Streets**, and
- 2) strategies and support to decision makers, planners and designers to **ensure multimodal elements are incorporated into transportation projects.**



Project goals

- Support connectivity and the development of a safe and comfortable transportation network for all modes and all users.
- Promote the use of the latest design criteria and guidelines for multimodal facilities.
- Establish a vision for how local governments could adopt and apply a Complete Streets policy.
- Develop a multimodal street design typology.
- Develop a Complete Streets toolkit to create awareness and provide guidance on a variety of street design measures
- Provide project definition design/function guidance for project sponsors applying for funding



Function of the Toolkit?



Inform DRCOG project prioritization



Encourage cross-jurisdictional collaboration



Incentivize Complete Streets planning/design



Provide resources

What is a street typology?

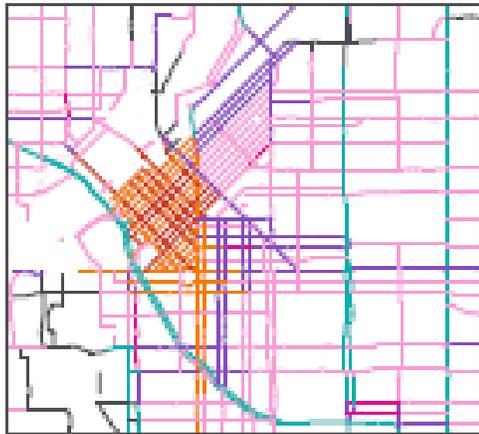
- A collection of common street designs
- Each prioritizes users and various elements based on the context and character
- Based on roadway function, modal priorities, and built environment
- Does not replace functional classification
- Changes along segments of a roadway
- Aspirational

Street types in the Denver region

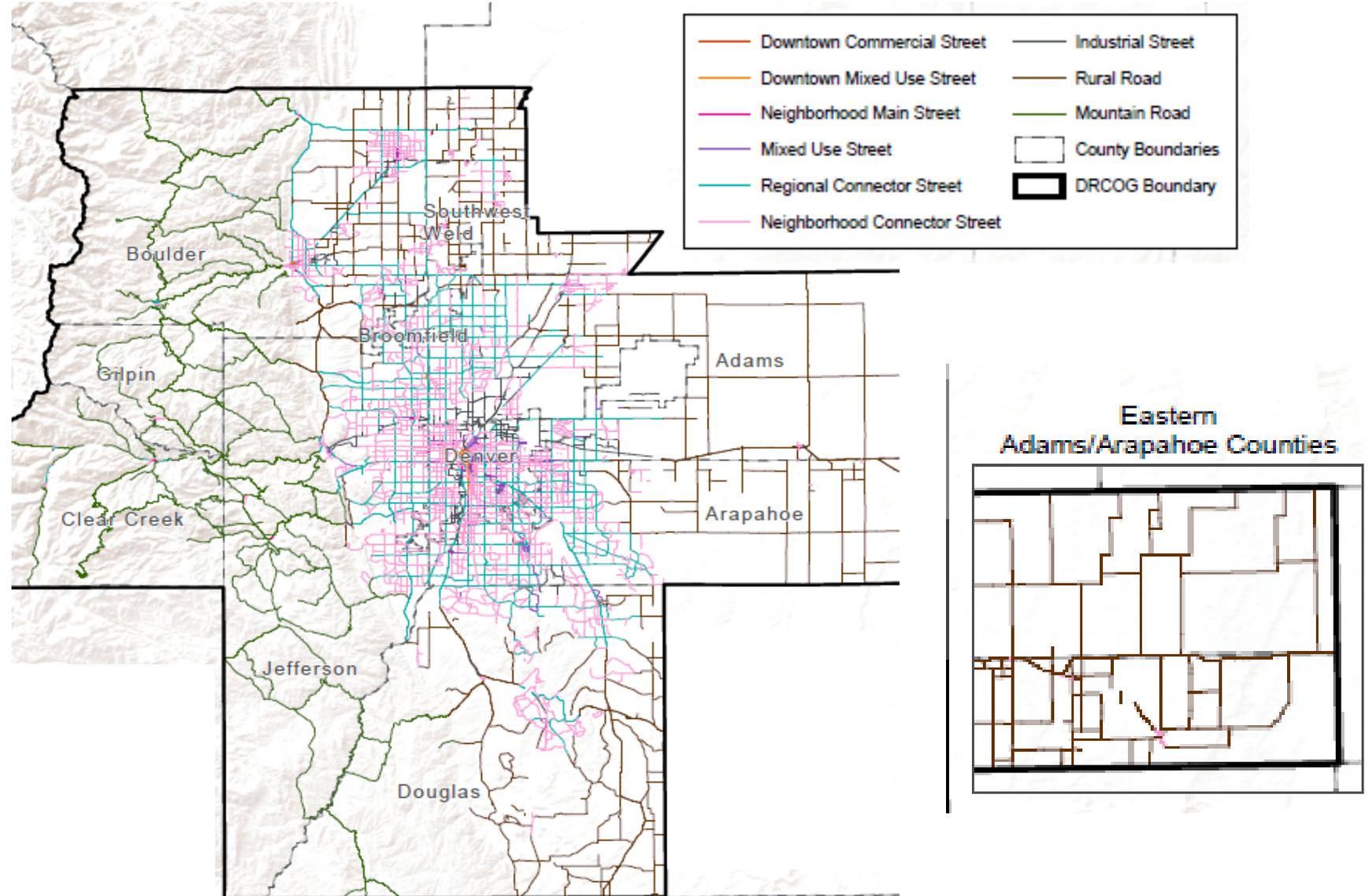
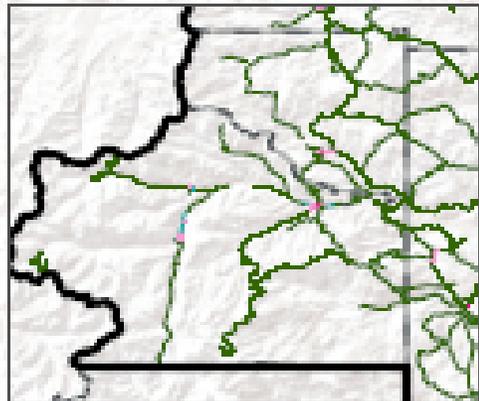
1. Downtown Commercial Street
2. Downtown Mixed Use Street
3. Neighborhood Main Street
4. Mixed Use Street
5. Regional Connector Street
6. Neighborhood Connector Street
7. Industrial Street
8. Special Street
9. Rural Road
10. Mountain Road
11. Limited Access Highway

Regional Complete Streets Typology map

Denver Downtown

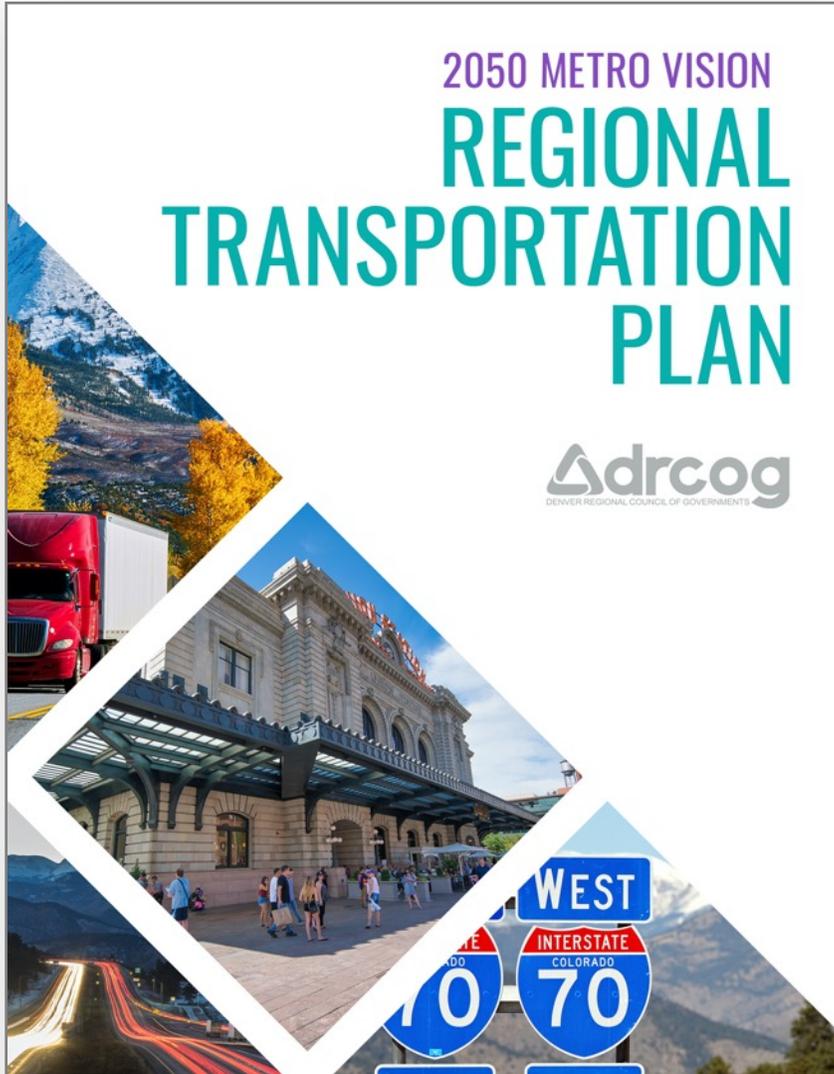


Western Clear Creek County



Eastern Adams/Arapahoe Counties





Integrated into 2050 Metro Vision Regional Transportation Plan

Regional Complete Street typologies are included in the 2050 RTP to assist with defining investment priorities and strategies.

What will the Toolkit include?

Neighborhood Main Street

Neighborhood Main Streets are generally located in smaller communities or commercial areas, support a continuous building face with ground-floor retail, include a highly activated pedestrian realm, and support gathering and community events.



Modal Priority



Design Element Compatibility

Pedestrian elements		
H Sidewalks	H Street furniture	
H Lighting	H Shade	
General roadway elements		
H Traffic calming		M Travel lanes
H Access management		L Medians
Bicycle/micromobility elements		
H Bicycle/micromobility parking		M Bicycle facilities
Transit elements		
H Transit stops	H Mobility hubs	L Transit lanes
H Transit signal priority		
Intersection and crossing elements		
H Crosswalks	H Curb extensions	M Signalization
H Curb ramps	H Hardened centerlines	M Bikeways at intersections
H Raised crossings		M Protected corners
		L Median refuges
Curbside elements		
H Loading	H Wayfinding	
H Placemaking	H Parking	
Landscaping and irrigation elements		
H Street trees		
H Green infrastructure		

For each street type:

- Illustrative graphic
- Modal priority
- Design element compatibility

What will the Toolkit include?

PEDESTRIAN ELEMENTS

Street Furniture

Street furniture includes an array of elements, including benches, trash and recycling receptacles, bollards, transit stops and shelters, decorative planters, and more. Seating is a critical component to each street and includes temporary and permanent fixtures such as chairs, benches, seat walls, steps, and raised planters. The location and type of seating element should respond to adjacent land uses, available shade from either structures or street trees, the presence of parallel parking buffering the seating area from vehicular traffic, and the width of the amenity zone.

Trash and recycling receptacles are important for active, busy streetscapes and are necessary to minimize litter. Receptacles should be located in areas with high volume of travel and all transit stops. Other street furniture such as bollards, transit stops and shelters, and decorative planters are important for many types of streets. Site-specific conditions and project goals will dictate where these elements are most appropriate.

Street furniture is most applicable to Downtown Commercial Streets, Downtown Mixed-Use Streets, Neighborhood Main Streets, Mixed-Use Streets, and Special-Use Streets.

Planning and design guidance

Permanently installed furnishings must not impede pedestrian access to adjacent structures or create conflicts with the opening of car doors and access to fire hydrants.

Durable, vandal resistant materials and designs should be selected to withstand both climate and urban environments, as well as sun damage and deter pest infiltration. Internal trash or recycling bins should be readily accessible by and convenient for maintenance crews.



Street furniture includes an array of elements and should not impede pedestrian access.

PEDESTRIAN ELEMENTS

Shade

Providing much-needed shade in the arid, high altitude climate in the Denver Region, is important. During warm seasons, shade can provide relief, make streets more attractive, provide an opportunity for public art, and create a comfortable and pedestrian-friendly environment. Shade is a critical element of inviting plazas and reclaimed spaces, and also helps to reduce the urban heat island effect.

Shade as a design element is most applicable to Downtown Commercial Streets, Downtown Mixed-Use Streets, Neighborhood Main Streets, Mixed-Use Streets, and Special-Use Streets.

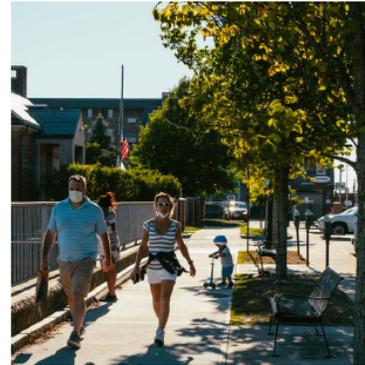
Planning and design guidance

Consider providing shade structures or native trees adjacent to street seating and within the vicinity of transit stops. Large shade trees are ideal for delineating outdoor spaces; select appropriate species that support a diverse urban forest. Consider daily temperature differences and a locations' orientation to the sun when planning and designing shade to be most effective during the hottest part of the day. Also consider any conflicts with sightlines or visibility.

Supporting resources

[Colorado State University – Native Trees for Colorado Landscape](#)

[Environmental Protection Agency – Heat Island Resources](#)



Shade can provide much needed relief and creates a pedestrian-friendly environment.

High-level design element guidance for multiple categories:

- Pedestrian
- General roadway
- Bicycle and micromobility
- Transit
- Intersections and crossings
- Curbside
- Landscaping



THANK YOU!
QUESTIONS?

Jacob Riger, AICP | jriger@drcog.org

Alvan-Bidal Sanchez, AICP | asanchez@drcog.org

ATTACH F

ATTACHMENT F

To: Chair and Members of the Regional Transportation Committee

From: Ron Papsdorf, Division Director, Transportation Planning & Operations
303-480-6790 or rpapsdorf@drcog.org

Meeting Date	Agenda Category	Agenda Item #
August 17, 2021	Informational Briefing	8

SUBJECT

Update on Greenhouse Gas (GHG) transportation planning rulemaking.

PROPOSED ACTION/RECOMMENDATIONS

N/A

ACTION BY OTHERS

N/A

SUMMARY

House Bill 19-1261 was signed into law on May 30, 2019. The bill concerns the reduction of greenhouse gas pollution and establishing statewide greenhouse gas pollution reduction goals. The law sets statewide goals to reduce greenhouse gas emissions from 2005 levels by at least 26% by 2025, at least 50% by 2030, and at least 90% by 2050.

On January 14, 2021, Colorado released its [Greenhouse Gas Pollution Reduction Roadmap](#). The Roadmap establishes a pathway to meet the state's HB19-1261 climate targets. An executive summary of the Roadmap (also included in the full report) is available in [English](#) and in [Spanish](#).

The Roadmap shows Colorado's largest sources of GHG emissions, in order, are **transportation, electricity generation, oil and gas development and fuel use in homes, business, and industrial applications**. Findings show that meeting the 2025 and 2030 goals is achievable with existing cost-effective technologies but progressing toward these goals will require additional policies beyond the actions the state has taken already.

SB21-260 includes new requirements for CDOT guidelines and procedures for the Department and the state's MPOs related to transportation planning and projects. CDOT is embarking on a rulemaking process to develop a new pollution reduction planning framework for the transportation sector. On July 15, 2021 the Colorado Transportation Commission adopted a resolution authorizing CDOT to commence the rulemaking process to establish a greenhouse gas (GHG) pollution-reduction standard, including compliance and enforcement requirements in accordance with HB19-1261 and SB21-260.

Some of the issues that DRCOG staff have been discussing relate to 1) the stages of the regional transportation planning process (RTP vs. TIP) and on what schedule the rule should apply; 2) the GHG emissions targets DRCOG's transportation planning process will be subject to; 3) the scale and effectiveness of VMT reduction strategies; and 4) appropriate compliance enforcement.

CDOT has indicated their intent to release the proposed rule with an official rulemaking notice August 13, 2021. The Transportation Commission has asked CDOT to hold multiple rulemaking hearings around the state during the written comment period.

PREVIOUS DISCUSSIONS/ACTIONS

N/A

PROPOSED MOTION

N/A

ATTACHMENTS

1. Staff presentation
2. CDOT Memo, July 2, 2021
3. CDOT Memo, July 7, 2021
4. CDOT GHG Briefing Memo, July 13, 2021

ADDITIONAL INFORMATION

If you need additional information, please contact Ron Papsdorf, Division Director, Transportation Planning & Operations, at 303-480-6747 or rpapsdorf@drco.org.

Greenhouse Gas Transportation Planning Rulemaking

Regional Transportation Committee
August 17, 2021

Ron Papsdorf
Division Director, Transportation
Planning & Operations

- HB19-1261: reduce greenhouse gas pollution and establish statewide GHG reduction goals.
- GHG Pollution Reduction Roadmap: establishes pathway to meet HB19-1261 climate targets.
- SB21-260: new requirements for CDOT guidelines and procedures for the department and MPOs related to transportation planning and projects.



- By **July 1, 2022** CDOT shall establish and propose to the Transportation Commission for its review **implementing procedures and guidelines** that require CDOT and MPOs to take **additional steps** in the planning process for **regionally significant transportation capacity projects** to account for the impacts on the amount of **statewide GHG pollution** and statewide **vehicle miles traveled** that are expected to result from such projects.
- The guidelines and procedures shall **apply to adoption of the next 10-Year Plan** and subsequent planning cycles and shall fully evaluate the potential environmental and health impacts on **disproportionately impacted communities**.
- Other requirements specific to CDOT for environmental study process for regionally significant projects and its public engagement program.

- Minimum requirements for CDOT and MPOs –
 - **Implement relevant rules and regulations** issued by Air Quality Control Commission, pursuant to CRS 25-7-105;
 - **Reduce GHG emissions** to help achieve the statewide GHG pollution reduction targets (HB19-1261);
 - Modify guidance documents to ensure same level of **analytical scrutiny** is given to **GHG pollutants** as given to other air pollutants, including consideration of impacts on GHG emissions of **induced demand** resulting from regionally significant transportation capacity projects; and
 - **Consider the role of land use** in the transportation planning process and develop strategies to **encourage land use decisions** that reduce VMT and GHG emissions



- On or after **October 1, 2022**: Unless CDOT has adopted implementing guidelines and procedures that satisfy the requirements of Section 30 and **DRCOG** and NFRMPO have **updated their RTP** to comply with the guidelines and procedures, **expenditures from certain MMOF revenues** shall only be made for multimodal projects that will **help bring the RTP into compliance** with the requirements of Section 30.



- The stages of the regional transportation planning process (RTP vs. TIP) and on what schedule the rule should apply
- GHG emissions targets DRCOG's transportation planning process will be subject to
- Scale and effectiveness of VMT reduction strategies
- Appropriate compliance enforcement

DRAFT Rulemaking Timeline

subject to change and refinement due to TC action and rulemaking development



Next Steps – Further Conversations

- August 18 Board Meeting: review proposed rule (tentative)
- September 1 Board Work Session: Board direction/position on proposed rule?
- September 15 Board Meeting: Board direction/position on proposed rule?



THANK YOU!
QUESTIONS?

Ron Papsdorf | rpapsdorf@drcog.org



MEMORANDUM

DATE: July 02, 2020
TO: Transportation Commission
FROM: Rebecca White, DTD Director
Theresa Takushi, Greenhouse Gas Climate Action Specialist
SUBJECT: GHG Pollution Reduction Planning Update and Next Steps

Purpose

This memo explains the status of the GHG Transportation Pollution Reduction Planning Rule.

Action

To approve the final changes to the GHG Policy Memo.

Background

One of the key recommendations stemming from the Governor's Greenhouse Gas Pollution Reduction Roadmap is the adoption of a new pollution reduction planning framework for the transportation sector. CDOT staff have been updating the Commission on a monthly basis as this concept has evolved.

Last month, staff provided TC with a number of key updates, including new language provided in SB260. The TC also received a draft policy memo that discussed key policy issues inherent in the rule and provided larger context for this work. This month, staff will present a final copy of the memo, which has been refined based on input from the TC and stakeholders. Additionally, staff will seek approval from the TC to officially commence a rulemaking to incorporate the new GHG standards into the statewide planning rules.

Next Steps

CDOT staff will provide monthly updates throughout the rulemaking process and will continue to work closely with Commissioners selected to serve on the GHG working committee.





COLORADO
Department of Transportation

GHG Policy Memo & Pollution Reduction Planning for Transportation

Transportation Commission Briefing - July 14, 2021



Progress Since June

Updating stakeholders on SB260 language and new approach to rulemaking.

Continued engagement on policy paper and key policy issues inherent in rule.

Upcoming rulemaking opportunity noticed on CDOT rule and GHG website with sign up link.

Coordination with TC inter-agency ad hoc committee members.



Rulemaking Notice

Rule Number	Rule Contact	Rule Title	Proposed Revisions	Deadline	Public Comments	Sign Up for Rulemaking Updates
<u>2 CCR 604-1</u>	<u>Natalie Lutz</u>	Emerging Small Business (ESB) Program	Proposed Redline <u>(PDF)</u>	December 4, 2020	<u>Written Comments</u>	
<u>2 CCR 601-22</u>	<u>Natalie Lutz</u> <u>Theresa Takushi</u>	Statewide Transportation Planning Process and Transportation Planning Regions				<u>Greenhouse Gas Pollution Reduction Planning Rulemaking Sign Up</u>

<https://www.codot.gov/business/rules/stakeholder-engagement-protocol-workshops>



DRAFT Rulemaking Timeline

subject to change and refinement due to TC action and rulemaking development

Authorize Rulemaking

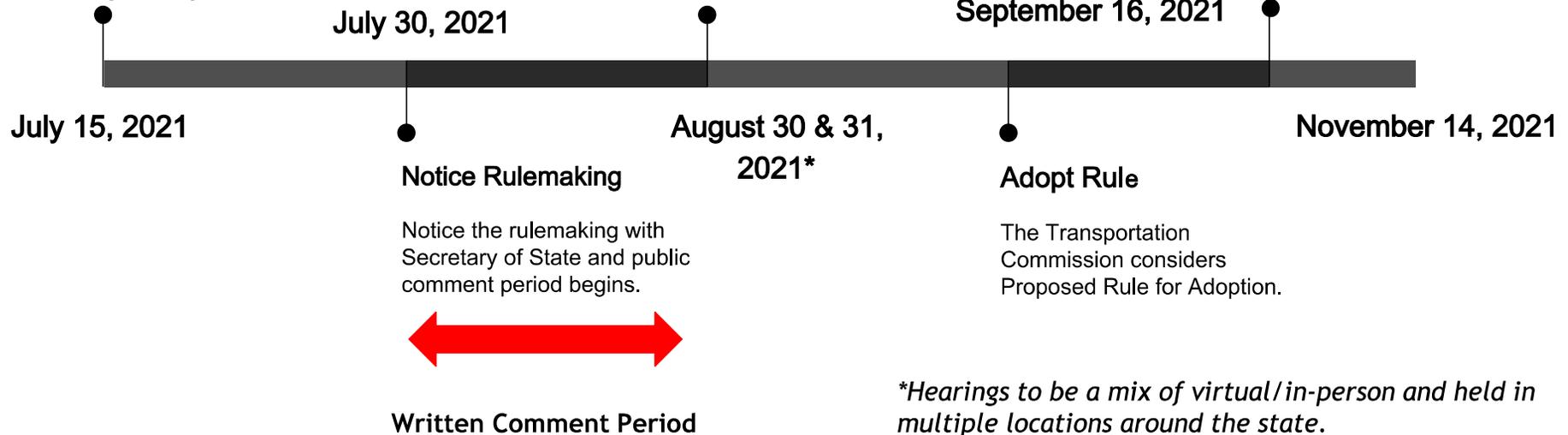
Transportation Commission authorize staff to commence rulemaking and delegates a Hearing Officer to conduct rulemaking hearing.

Rulemaking Hearing

Opportunity for Public Testimony and Submission of Written Comments

Rule Effective

Rule becomes effective.





Public Engagement in Rulemaking Process

User-friendly and Inclusive Rulemaking Process

- Party Status is not necessary- all interested parties are encouraged to fully participate in the rulemaking process
 - <https://www.codot.gov/business/rules/stakeholder-engagement-protocol-workshops>
- Multiple Opportunities for Public Comment
 - Department rulemaking often includes one or more stakeholder sessions/opportunities to review potential rules and issue so that we may consider stakeholder comments even before filing the rules
 - Submission of written comments prior to the Rulemaking Hearing
 - Oral testimony and submission of written comments at Rulemaking Hearing



CDOT GHG Policy Paper

- Explains intent of rule and key policy issues
- Builds understanding around concept and its intricacies
- Provides initial drafting for rulemaking and format to advance regulatory concepts in a more plain-english format



Key Comment Areas Based on TC and Stakeholder Feedback

- **Timeline of rule & how stakeholders can engage**
 - How equity will be addressed
- **Clarity on Language - regionally significant projects, mitigation/offset**
- **How the scenarios relate to the rule itself and the range**
 - Help establish the GHG target levels
 - For use in the cost benefit analysis
- **More clarification around vehicle miles traveled (VMT)**
- **MPO Role/relationship to CDOT/authority**



Additional Commision feedback on policy paper



Next Steps on GHG Rulemaking

Proposed resolution to commence rulemaking process.

- This step would officially begin both the timeline and process steps under the APA.

Statewide public meeting on July 22 (tentative).

Continued engagement with key stakeholder groups.



COLORADO

Department of Transportation

Office of Policy and Government Relations
2829 W. Howard Place
Denver, CO 80204-2305

MEMORANDUM

DATE: July 07, 2020

TO: Transportation Commission

FROM: Rebecca White, DTD Director
Theresa Takushi, Greenhouse Gas Climate Action Specialist
Herman Stockinger, Deputy Executive Director and OPRG Director
Natalie Lutz, Rules, Policies, and Procedures Administrator

SUBJECT: **Authorize Commencement of Permanent Rulemaking for 2 CCR 601-22, Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions**

Purpose

To authorize the Colorado Department of Transportation (“the Department”) to commence the rulemaking process by opening the Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions (“the Planning Rules”), 2 CCR 601-22 for the establishment of a greenhouse gas (“GHG”) pollution-reduction standard, including compliance and enforcement requirements, in accordance with House Bill 19-1261 and Senate Bill 21-260.

Action

To pass a resolution authorizing the Department to commence rulemaking to update the Planning Rules for the establishment of a GHG pollution-reduction standard, including compliance and enforcement requirements, and delegate authority to an Administrative Hearing Officer to conduct a public hearing.

Background

Senate Bill 21-260 was enacted into law and directs the Transportation Commission to adopt procedures and guidelines requiring the Department and Metropolitan Planning Organizations (“the MPOs”) to take additional steps in the planning process for regionally significant transportation projects to account for the impacts on the amount of statewide GHG pollution and statewide vehicle miles traveled that are expected to result from those projects. To accomplish this requirement, SB 21-260 specifies implementing relevant rules and regulations pursuant to § 25-7-105, C.R.S.; reducing GHG emissions to help achieve statewide GHG pollution reduction targets established in House Bill 19-1261 (now codified in § 25-7-102(2)(g) and 105(1)(e), C.R.S.); and considering the role of land use in the transportation planning process.

Pursuant to § 43-1-106(8)(k), C.R.S., the Transportation Commission has broad authority to make all necessary and reasonable orders, rules, and regulations to carry out its authority and duties. One of the Transportation Commission’s duties is to assure the preservation and enhancement of Colorado’s environment in the planning, selection, construction, and operation of all transportation projects in Colorado. Additionally, the Transportation Commission has the authority to promulgate rules regarding the formation of the state plan through a statewide planning process pursuant to § 43-1-1103(5), C.R.S. The state plan encompasses a multitude factors, such as land use planning, multi-modal transportation considerations, targeting of infrastructure investments, safety enhancements, strategic mobility and multimodal options, environmental stewardship, and reduction of greenhouse gas



emissions. In 2012, the Transportation Commission codified the Planning Rules to establish the statewide transportation planning process and the formation of the state plan.

On May 20, 2021, the Transportation Commission established the Ad Hoc Agency Coordination Committee (“AAC Committee”) and appointed Commissioner Hickey, Commissioner Thiebaut, and Commissioner Vasquez. Since Commissioner Thiebaut’s term ended at the end of June, Chair Hall appointed Commissioner Stuart to serve on the ACC Committee. The purpose of the ACC Committee is to act as liaison for the Commission throughout the rulemaking process, work with staff to amend 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.

Details

The Department proposes the Transportation Commission amend the Planning Rules to integrate the establishment of a GHG pollution-reduction standard in accordance with House Bill 19-1261 and Senate Bill 21-260. The proposed amendments will be contained included in a new section “Transportation GHG Planning” and consist of the following provisions that outline the Department and MPO applicability, including:

- New definitions to define items such as the Ten-Year Plan, Multimodal Mitigation Options Fund, Disproportionately Impacted Communities, GHG Reduction Measures, and more.
- Statewide and MPO level “GHG Transportation Planning Reduction Levels”, including emissions reduction tables covering the 2005 Baseline and target levels for future compliance years
- Compliance requirements, including setting out details of what must happen by October 1, 2022 (per SB 21-260 requirements) and the process for the state and MPOs to submit their plans for review.
- Enforcement requirements that detail what actions must be taken if the Department or an MPO are unable to meet requirements, including a restriction on the use of certain funds.

Next Steps

Staff and the ACC Committee will proceed with the next steps to comply with the rulemaking requirements set forth by the Administrative Procedure Act, including gathering public comments from stakeholders and holding a public rulemaking hearing.

Attachments

None.





DATE: July 13, 2021

TO: GHG Pollution Standard Stakeholders

FROM: Colorado Department of Transportation

RE: Transportation GHG Roadmap Briefing Update

Executive Summary

The passage of HB-1261 set Colorado on a course to dramatically reduce greenhouse gas emissions across all sectors of the economy. As the leading source of Greenhouse Gas (GHG) emissions in Colorado (and nationwide), transportation has a critical role to play in helping achieve these goals. The state's 2020 Greenhouse Gas Pollution Reduction Roadmap (Roadmap) identified nine different strategies for transportation. Of these, two are underway now--the Employee Trip Reduction Rule proposed in May by the Air Quality Control Commission (AQCC) and a rulemaking on pollution reduction planning for transportation discussed in this memo; one has been accomplished through SB 260 - securing new revenue to fund infrastructure and incentives for electric cars, trucks and buses; and one has begun through HB 1117 and HB 1271 - offering incentives for land use decisions by local governments that reduce vehicle miles traveled (VMT) and GHG emissions. Collectively, these strategies, as they are implemented over the next several years, combined with the effects of low and zero emission vehicle rules, are designed to achieve the 2030 target of reducing GHG pollution from transportation by 12.7 million tons per year below 2005 levels. Importantly, the pollution reduction planning rule that this memo describes, while an essential and important element of this strategy, is only one element of a comprehensive strategy and is not intended to achieve the targets in isolation.

This paper focuses on the intricacies of establishing a pollution-reduction framework that is among the first of its kind in the U.S. The thinking shared here reflects months of still-ongoing conversations with transportation planners, elected officials, industry, environmental groups, other state transportation departments and thought leaders across the country. In particular, the state's five metropolitan planning organizations (MPOs) - CDOT's partners in transportation planning - have provided countless hours of input. Our intent here is to describe the collective and draft work and thinking to date and elevate those issues that merit particular focus in the coming weeks and months as these rules and policies move forward. For that reason, the

adopted, final rule should be viewed as the official outcome of this process.

This paper also discusses the broader context for this effort. Making progress towards the transportation targets will also require actions by other agencies and across a number of areas, such as ongoing focus on the medium and heavy duty truck sector, and contributing to the development of post-2025 light duty vehicle standards. This sector encompasses the millions of individual choices people make every day that have an impact on climate, and the variety of strategies outlined below are all collectively necessary to achieve the state’s ambitious and necessary climate goals. The policies contemplated by CDOT and the Transportation Commission are neither the first nor the last steps needed to achieve the totality of Roadmap goals for the transportation sector, and should be viewed as one step among many.

<p><u>TABLE OF CONTENTS</u></p> <p><u>I. Overview</u></p> <p><u>II. Embracing the challenge of addressing greenhouse gas pollution at CDOT</u></p> <p><u>II.A. Staffing and Governance</u></p> <p><u>II.B. Electrification and Clean Vehicles</u></p> <p><u>II.C. Expanding Transportation Choice and Multimodal Options</u></p> <p><u>II.D. Improving Modeling and Planning Conventions within CDOT</u></p> <p><u>II.E. Bringing more voices into the transportation conversation</u></p> <p><u>III. Pollution Reduction Planning Approach</u></p> <p><u>III.A. Tackling outstanding questions</u></p> <p><u>IV. Conclusion</u></p>

I. Overview

In response to the new legislative language in SB260¹ and months of stakeholder discussions on this concept, CDOT proposed in July of 2021 that the Transportation Commission (TC) undertake a formal rulemaking process for pollution reduction planning, which would amend the current state planning rules in order to reduce greenhouse gas pollution from transportation. This would separate targets for CDOT and MPO transportation plans. This rule will include establishment of processes to demonstrate and enforce compliance.

From a broader standpoint, this proposal helps the state make progress towards its legislatively adopted GHG reduction goals² and fulfill a key recommendation from the [Greenhouse Gas Pollution Reduction Roadmap](#) to reduce vehicle miles traveled by “Integrat(ing) State GHG Pollution Standards and Analysis in Regional, and Statewide Plans.” Altogether, the Roadmap

¹ SB260 spells out statutory requirements for the TC to adopt procedures and guidelines requiring the Department and Metropolitan Planning Organizations (MPOs) to “[i]mplement relevant rules and regulations issued pursuant to [Section 25-7-105](#)” (CRS) and “[o]therwise reduce greenhouse gas emissions to “help achieve the statewide greenhouse gas pollution reduction targets established in [Section 25-7-102 \(2\)\(g\)](#).”

² The 2019 Climate Action Plan to Reduce Pollution (HB 19-1261) set a series of statewide greenhouse gas reduction goals (at least 26% in 2025, 50% in 2030 and 90% in 2050).

includes nine recommendations for the transportation sector, including improving the performance of light, medium, and heavy duty vehicles, transportation demand management, and incentivizing smart local land use, electrification infrastructure and fleet turnover. The sum of emissions reductions from all of these strategies, once fully developed, would be designed to add up to the 2030 transportation sector targets set in the Roadmap and to align with the 2050 goals adopted in HB 19-1261.

The 9 recommendations put forth in the Greenhouse Gas Roadmap are:

- 1. State GHG pollution standards for transportation plans.**
- 2. Trip reduction/Transportation Demand Management (TDM) requirements and encouraging telecommuting for large employers.**
- 3. Clean trucking strategy with multiple components including infrastructure investments, incentives for fleet turnover, and evaluation of regulatory options.**
- 4. Secure new revenue to fund infrastructure and incentives to transition to electric cars, trucks, and buses.**
- 5. Offer incentives for land use decisions by local governments that reduce vehicles miles traveled, reduce GHG and other pollutants, and support greater access to housing near jobs.**
- 6. Indirect source standards for some types of new development.**
- 7. Expand public transit, including front range rail and RTD completing the statutorily required Fastracks system that voters passed in 2004.**
- 8. Develop an EV Equity study to ensure access to EV's for all Coloradans.**
- 9. Provide input into development of new clean car standards by both the federal government and for state-based standards.**

The Transportation Commission rule would focus on the connection between public sector-funded transportation projects and vehicle travel; namely that what we build, combined with the emissions of vehicles themselves, influences driving patterns and commensurate GHG pollution. As this briefing paper will discuss, this connection is exceedingly complex in practice, particularly given the number of independent actors -- namely every traveler and vehicle owner-- who have discretion over their personal travel choices and will not be governed by this rule and policy. Thus, the rules must isolate what role state and regional governments play in affecting travel through decisions about where and how to build infrastructure. Upon completion of this rule, Colorado will become only the second state in the nation to establish GHG-related reduction requirements on transportation planning--and the first in the Intermountain West. Colorado's policy would be unique in structure, leveraging the competencies and authorities of specific institutions that govern transportation planning within the state.

Given the intricacies involved with establishing this largely unprecedented rule and the importance of doing so in a manner that reflects the Colorado Way, there are a number of key details of particular importance in this rule: what the pollution standards should be for the state and regions; the precise mechanics of how the compliance and enforcement cycle should

operate and the underlying dynamics between the two relevant agencies (CDOT and CDPHE) and commissions (TC and AQCC); initial implementation timelines; and -- importantly -- the accounting for specific policy choices and mitigations within project plans.

This document seeks to address all of these key details and other related considerations as this process moves forward.

II. Embracing the Challenge of Addressing Greenhouse Gas Pollution at CDOT

In 2020, transportation surpassed electricity as the leading source of GHG pollution in Colorado. In recognition of the importance of this issue, the Colorado Department of Transportation (CDOT) and the Transportation Commission have embarked on a massive undertaking over the last two years to reimagine the Department's approach to clean transportation, working in tandem with the Colorado Energy Office (CEO), the Colorado Department of Public Health and the Environment (CDPHE), local partners, and stakeholders across the transportation sector. These changes are reflected in areas including **staffing and governance, enhanced focus on electrification and clean vehicles, expanding transportation choice and multimodal options, and undertaking significant improvements to modeling and planning conventions within the Division of Transportation Development**. Importantly, these efforts go hand in hand with an enhanced focus on improving community outreach across the state, and in disproportionately impacted communities, to ensure that Coloradans voices are represented in the choices that we make and the priorities that we establish as a Department.

II.A. Staffing and Governance:

In order for CDOT to equip itself as an organization to address today's challenges, we must prioritize them within the organization. Within the Department, the last few years have brought significant improvements towards integrating air quality and climate considerations throughout the organization--as we strive to improve the quality and efficiency of departmental output overall and across disciplines.

Two years ago, CDOT established the Office of Innovative Mobility (OIM), which integrates the Department's multimodal efforts through the Division of Transit and Rail with an emerging focus on incorporating electrification and other zero emissions vehicles into our system and equipping our infrastructure to accommodate them. This office reports directly to the executive director. OIM has recruited new leadership to elevate the role of DTR, along with expanding expertise on electrification and mobility choices.

The Division of Transportation Development (DTD), which houses CDOT's planning and modeling functions as well as its research arm, has also strengthened its institutional capacity, both overall and with particular respect to the environmental impacts within CDOT's influence. New leadership within the research division has made air quality a priority, including instituting a new air quality monitoring program to test state of the art technology for measuring pollution in communities living adjacent to the highways. Moreover, DTD has hired the Department's first ever GHG specialist, and an expert to focus on partnering with local communities to more fully

contemplate land use implications when designing infrastructure projects across the state.

Importantly, most of CDOT’s work “on the ground” takes place in our five planning regions, all of which have strengthened their capacity to integrate multimodal factors into project plans -- with several regions bringing on specialists in areas like transit and multimodal planning. Indeed, improving our air is an all-of-CDOT effort that requires technical capacity and collaboration across the organization.

MPO Staffing

Just as CDOT needs to equip itself to meet the GHG challenge, the MPOs may need to make adjustments in their planning process. Each MPO is different and each has their own unique challenges based on the land area they serve, funding and staffing levels and the industries that make up their region’s overall economic base. CDOT will continue to be a good partner to the MPOs and provide technical assistance, data and partnering opportunities that is appropriate in the context of that region’s unique needs. Denver will have different needs than Pueblo and CDOT will continue to be nimble to provide the appropriate assistance to each region.

II.B. Electrification and clean vehicles:

Colorado has a lot to gain from electrifying the transportation sector because of the rapid gains we are making with decarbonizing our electrical generation systems, which results in vehicles that are both cleaner today and will become cleaner over time as more renewable sources are added to the grid. Electrification of vehicles can also provide reliability benefits to the grid by spreading peak loads over a longer period of the day, making use of excess renewable energy resources that are currently curtailed, and potentially - as technology develops - serving as flexible and resilient energy storage by sending electricity from vehicles back to the grid at times when it is most needed.

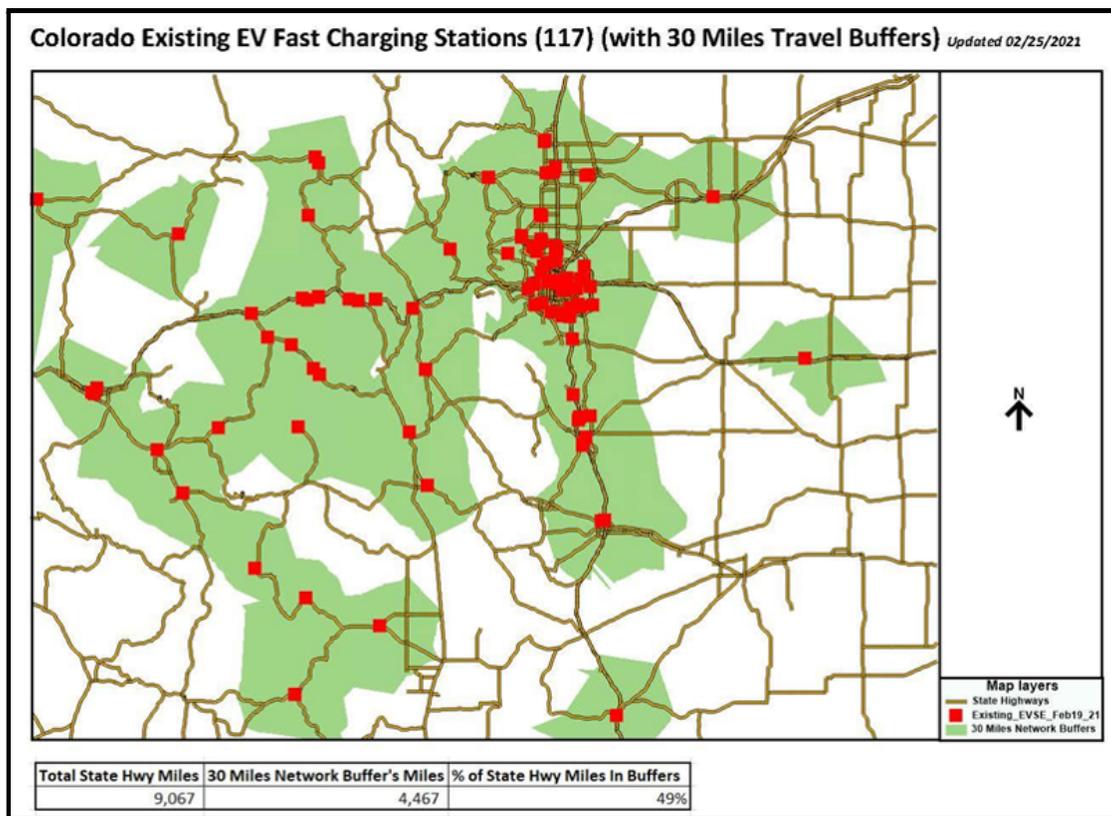
One key advancement in 2019 was the exploration and eventual adoption of a ZEV standard, through AQCC’s Colorado Low Emission Automobile Regulation³, with Colorado becoming the first state in more than a decade and the first non-coastal state to do so and the first ever to do so with support from the auto manufacturing industry. The rule, which included incentives for early action, has helped motivate manufacturers to focus on making ZEV stock available to Colorado consumers faster. CDOT played a key role in securing the negotiated agreement of the auto industry for our ZEV rule.

In addition to supporting greater vehicle choice for Coloradans via the ZEV standard, CDOT is also collaborating with its partners to invest in charging infrastructure that fills geographic gaps that exist in the charging network. Some areas of particular focus include the electrification of the state’s 26 Scenic & Historic Byways as well as other rural and recreational destinations such

³ 5 C.C.R. § 1001-24, Part C.

as state parks, ski resorts, trailheads, and the like. These investments play multiple roles: providing “range confidence” for drivers to support greater EV adoption, fostering local economic development for smaller communities [seeking EV tourism](#) and bringing charging options to areas less likely to see private investment in the short-term. On a regional scale, CDOT also actively participates in planning coordination with our 7 neighboring states via the REV West Partnership as a means of fostering more seamless EV charging for interstate travel across the Intermountain West.

Separate from the passenger vehicle market, CDOT also works closely with transit agencies across the state to support the electrification of their fleets, from planning and education to vehicle purchases, charging equipment installation, and sharing of data and best practices. Since 2019 CDOT has awarded more than \$21 million in Volkswagen Settlement funds to 10 agencies for the purchase of 39 electric buses statewide while providing training and support to many other fleets beginning their transition process. Senate Bill 260 adds ongoing funding for this purpose through a new clean transit enterprise housed at CDOT. CDOT’s goal is to deploy at least 1,000 transit ZEVs statewide by 2030.



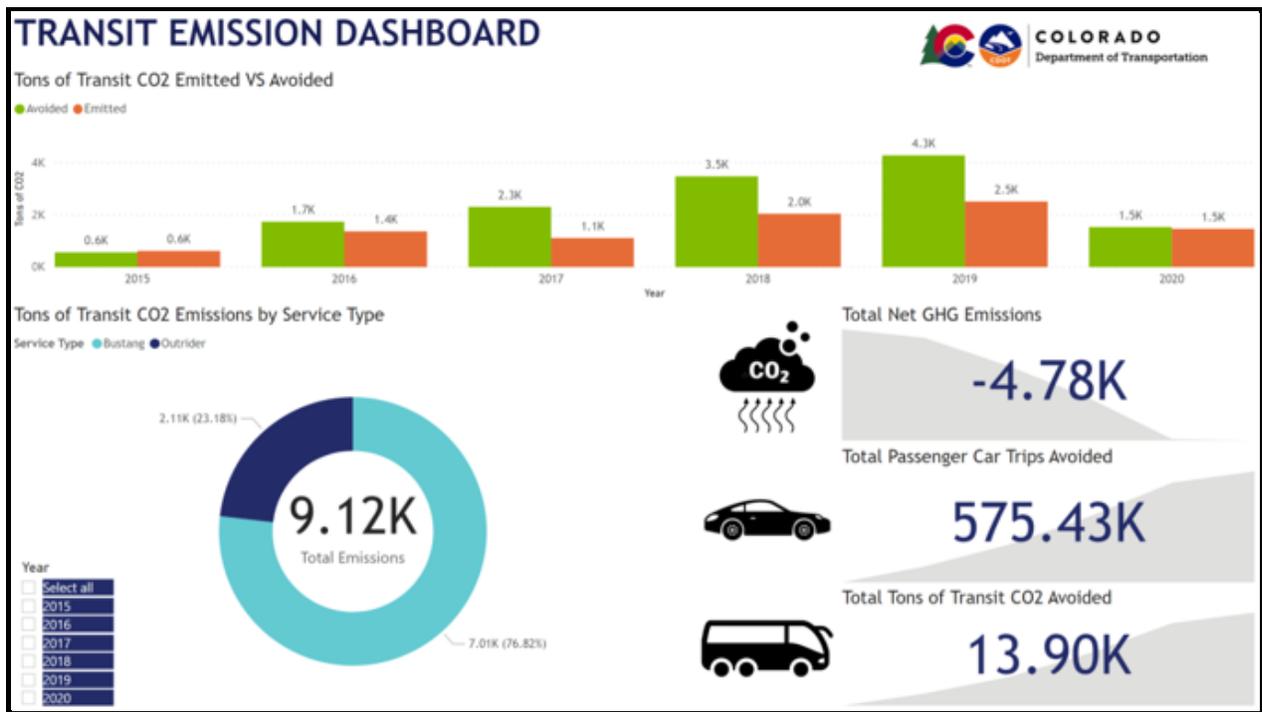
Additionally, CDOT staff is collaborating with CEO, CDPHE, the Colorado Motor Carriers Association (CMCA), and stakeholders across the state to develop a Clean Trucking Strategy that will reduce the GHG and air quality impacts of medium and heavy duty (MHD) freight and delivery vehicles while maintaining the important economic benefits that this sector provides. As part of that effort, Colorado signed an MOU with 14 other states and the District of Columbia to target a 30% MHD ZEV market share by 2030 and a full 100% MHD ZEV market share by

Finally, it is important that CDOT leads by example in the realm of transportation electrification. The percentage of new alternative fuel vehicles ordered by CDOT for our own fleet has continually increased from FY18 to today, with more than 90% of the 61 FY20 vehicles ordered being alternative fuel or electric, and many of them replacing half ton pickup trucks. With the FY21 vehicle order, 41% of the CDOT light duty fleet will be compressed natural gas (CNG), Hybrid, plug-in hybrid electric vehicles (PHEV), or EV. In terms of medium and heavy-duty vehicles, CDOT Maintenance & Operations has purchased 9 plug-in hybrid electric aerial/lift trucks that reduce idling when the vehicles are working on signs, bridges, lights and other structures. CDOT is also in the process of procuring and piloting 2 electric street sweepers partially funded through VW Settlement grants, as well as exploring opportunities for acquiring all-electric pickups as they begin to enter the market.

II.C. Expanding transportation choice and multimodal options:

As in the electrification sphere, there has been a significant transformation in how CDOT supports multimodal options throughout the state. At a leadership level, CDOT created the Office of Innovative Mobility and brought the existing transit division under senior leadership. A primary focus area has been building upon the existing success of the Bustang network, and there is a real strategy behind the development of this transit option that is only growing its appeal for possible users; it is not an accident that Bustang's farebox recovery and popularity are so strong.

CDOT is not only maintaining its existing high-quality transit service, but also going further with expanded Bustang-Outrider service to four new routes. This effort complements the buildout of new and expanded mobility hubs along I-25 that will foster multimodal connections between Bustang routes and local transit services while laying the groundwork for future Front Range Passenger Rail service. From a data and performance tracking standpoint, CDOT is also currently developing a "transit emissions dashboard" to track GHG emissions from our Bustang and Outrider commuter services and how emissions decrease with increased ridership and eventual electrification of the vehicles. CDOT expects to expand the dashboard to include non-CDOT transit services over time.



Over the last year, CDOT also launched multiple efforts supporting main streets throughout the state, through a first of its kind effort to bolster active transportation and outdoor commerce on state and local roads that anchor communities. The [Safer Main Street program](#), focused on the Denver metropolitan area, awarded about \$60 million to more than 30 capital infrastructure projects focused on improving the safety of urban arterial roads. Statewide, the [Revitalizing Main Streets Program](#) has awarded close to \$6 million to more than 100 projects statewide that range from fixing sidewalks, to improving lighting for pedestrians, to helping cities and towns implement safety barriers for outdoor commercial space on roadways. This successful program received an initial \$30 million as part of state stimulus, and CDOT is evaluating applications for forthcoming awards. Moreover, SB260 included future funding to ensure that this important program continues.

CDOT is also one of several agencies focused on reducing emissions through Transportation Demand Management (TDM) — by providing incentives, supporting strategic planning, and leading by example. This past year, the new CanDo Telework Grant awarding \$234,000 for 41 projects to local governments and non-profit organizations to support teleworking both during the pandemic and over the longer-term.

CDOT has taken a variety of planning measures including completed Phase 1 and Phase 2 of the State TDM Plan, which assessed various strategies for their return on investment and found telework and vanpools to be the best performance. Staff have also updated the State TDM website, developed a new Healthy Communities Coordinator position to support TDM projects and programs, and implemented many of these strategies during the construction phases of the Grand Avenue Bridge replacement in Glenwood Springs and I-25 Gap project in Douglas

County, among others.

Finally, CDOT is committed to GHG emissions reductions within our own operations and to the extent possible for our contractors. The new Flexible Work Arrangement Policy Directive makes working from home for our staff 2 to 3 days a week the “norm” instead of the exception. For days when employees are working in CDOT offices, internal employee TDM-Transportation Demand Management efforts including the “Reboot Your Commute” program encourage biking, walking, carpool, vanpool, and transit for the return to work this summer.

II.D. Improving modeling and planning conventions within the department:

The Department has embarked on, and continues to advance, significant improvements in planning and modeling conventions. These continue to evolve and will be complemented by further improvements and steps to codify best practices.

Planning elements including NEPA and 1601: SB260 established new requirements for environmental studies on large projects. Many of these requirements, including additional modeling and monitoring for air quality, are already being implemented on CDOT’s largest projects. CDOT is modeling additional metrics such as fine particulate matter (PM2.5) and induced demand for major projects currently underway, and such analysis will become a consistent expectation in project reviews moving forward. CDOT is also exploring advanced mitigation to proactively identify ways to offset negative impacts of projects, as well as include elements that yield positive benefits for the community during construction and beyond. In the spirit of these efforts, CDOT is also improving internal policies, such as requiring for the first time that communities follow the Department’s process for approving new interchanges, which includes consideration and incorporation of transportation demand management strategies. This may be an area for future consideration given Colorado’s rapid growth and the impact of new interchanges on VMT and GHG emissions.

Improving Travel Modeling: For the last several years, CDOT has worked to develop Colorado’s first-ever statewide travel model, which has included building out a travel forecasting team. A key point in this process was the choice between available travel model structures and software, selecting the newer “activity-based model” (ABM) form over the older and more traditional “trip-based model” form; CDOT adapted the ABM used at DRCOG, expanding it to statewide scale. While the ABM form is becoming common in large metropolitan areas across the US, very few statewide models have yet been built using this structure, which is important for evaluating factors like induced demand and the benefits of active transportation. The advantage of the ABM form is that it includes a much more detailed depiction of both land use and person/household characteristics than does the trip-based form, permitting ABMs to be sensitive to numerous factors that are known to have significant effects on travel choice. This will become a powerful tool for CDOT’s future analysis of its efforts to reduce GHG emissions. CDOT recognizes that each MPO has different modeling capabilities and we are working with MPO staff to determine how CDOT can support access to CDOT’s model or upgrades to the MPO’s

own tools.

CDOT's ABM provides capabilities that are crucial to the GHG analysis now on-going, including:

- Induced demand analysis: CDOT's model permits a thorough evaluation of the effects of roadway capacity expansion on the amount motorists choose to drive, and thus the subsequent impact on GHG emissions.
- Explicit inclusion of walking and biking in the set of modes available for any given trip (older trip-based models as a rule do not include these modes).
- Direct estimates of whether employees work from home or at another location.
- Depiction of household and employment locations at a high level of detail, greatly enhancing CDOT's ability to evaluate the effect on travel demand of various development patterns.
- Depiction of Colorado residents at a level of detail similar to that provided by the US Census, permitting sensitivity to demographic characteristics that affect people's travel choices (e.g., student and worker status, age, income, etc.)

II.E. Bringing more voices into the transportation conversation:

Transportation planning should be a conversation with our neighbors about the real needs that affect their daily lives. To that end, one of CDOT's first efforts during the Polis Administration was to undertake an unprecedented outreach process that took Department leadership and staff to all 64 Colorado counties, to discuss a wide range of transportation needs and priorities that should guide the Department's capital program.

Out of this process, the Department developed a [ten year plan](#) responsive to community needs -- focused on key priorities like fixing roads and bridges across the state ("fix it first"), addressing strategic choke points on the interstate system like Floyd Hill and I-270, and placing a new focus on the safety and vitality of our main streets which carry multiple modes of transportation. The plan also focuses on better integrating transit into critical corridors like I-70 and I-25 to recognize that we can't build our way out of congestion and must take a multifaceted approach to accommodate Colorado's ongoing growth. This includes increasing CDOT's Bustang transit service and investing in new mobility hubs that increase access to transit and carpooling.

As we move to project implementation, and leveraging the relationships built out of the ten year plan process, CDOT is endeavoring to use new approaches to improve our communication with (and involvement of) communities around project planning and execution. This means coordinating early while projects are being designed, and remaining available for community input and dialogue as we manage tactical details such as construction schedules.

CDOT is piloting improvements to our community outreach processes in designing the I-270

process. Out of the necessity created by COVID-19, CDOT adapted public meetings to a virtual format and found that pre-recorded “virtual open houses” — available in both English and Spanish — significantly expanded participation beyond traditional public meetings. By incorporating holistic virtual opportunities in our public outreach portfolio, community members who may not have the ability to join live events have an opportunity to thoroughly engage with the project team. CDOT established a standing advisory group for the I-270 project that includes key local government partners as well as neighboring jurisdictions, community leaders, business owners, environmental justice advocates, and others. The goal of this “steering committee” is to preview ongoing analysis, identify project concerns, and establish a communication network with local communities. Early mitigation implementation is running parallel to these outreach efforts — a dozen air quality monitors will be installed along the I-270 corridor before the project even begins construction.

As these types of improvements are refined, they must become part of CDOT’s standard operating procedure, to ensure predictable and streamlined processes as well as consistent best practice. A key requirement in SB260 will help make this happen. The legislation requires the establishment of a new Environmental Justice and Equity Office within CDOT in order to “work directly with disproportionately impacted communities in the project planning, environmental study and project delivery phases of transportation capacity projects.” CDOT is currently in the process of establishing this Office.

Working with Disproportionately Impacted Communities

Specific to the transportation planning rule, CDOT is looking at ways to involve disproportionately impacted communities, not only as part of the rulemaking process, but also through the mitigation of GHGs during project delivery, construction, and ongoing maintenance. This includes both targeted, small group discussions and open public meetings.

III. Pollution Reduction Planning Approach

The purpose of establishing greenhouse gas pollution standards for transportation plans is to determine and limit the GHG emissions which would result from the transportation system if the plan was implemented. Models (as described above) are used to assess the expected impacts that a project (or collection of projects) will have on consumer driving behavior. The goal is for planning level decisions to consider these impacts, among other considerations, and ensure that as state and MPO plans are updated and developed, projects within them fit within a fixed target when measuring cumulative emissions impacts.

From an air pollutant standpoint, connecting transportation planning to emissions is not a new policy area. In fact, transportation conformity provisions within the Clean Air Act approach ozone much the same way. Transportation conformity ensures that federally funded or approved highway and transit activities within a nonattainment area are consistent with

(“conform to”) a state’s plan to reduce emissions. Colorado’s front range has been in ozone nonattainment for many years, which has required the North Front Range and DRCOG MPOs to demonstrate conformity with each plan adoption and amendment.

III.A. Major policy issues and outstanding questions:

The following section provides CDOT’s thinking to date--as informed by stakeholder discussions--on the major policy issues integral to this rule. Specific elements, including definitions, compliance and enforcement will be established in the formal rulemaking. The following sections outline CDOT’s current thinking based on pre-rulemaking stakeholder engagement.

How the pollution reduction planning levels will be determined: Unlike most air quality regulations, this rule cannot rely on known technological improvements (e.g. a scrubber or industrial process change) to determine reduction levels. Instead, we must estimate (i.e. model) the long-term change in travel decisions resulting from a series of potential infrastructure changes and investment decisions. A further challenge is selecting those decisions under the control of CDOT and the MPOs in order to align the reduction levels with the actions of those entities subject to the regulation and further to align the reduction levels to correspond to the upcoming planning cycles and corresponding modeling that is done as part of the plans. This timing is a key consideration that will be further discussed as part of the rulemaking.

To make this determination, CDOT modeled a series of scenarios to evaluate the impact of different measures or investments that CDOT or the MPOs could use to comply with the GHG reduction limits. These scenarios also will be used to calculate the potential costs and benefits of this rulemaking; a required component of the rule.

CDOT selected a number of scenarios to model and determine their impact on VMT and GHGs.

1. Travel Choices
 - Additional sidewalk and bike lanes, increased work from home
2. Travel Choices + Transit
 - Increase in transit service and decrease in fares
3. Travel Choices + Transit + Land Use
 - Change in development patterns
4. Acceleration of Vehicle Electrification

As noted above, it is important to select scenarios that are under the control or influence of MPOs and CDOT. Land use is an area that merits particular consideration. MPOs and CDOT can play a role in incentivizing land use decisions that will be more efficient to accommodate

integrated transportation flows, reducing overall costs and increasing environmental and economic benefits and, perhaps more importantly, partner with local governments interested in transit-oriented development or infill. For example, as cities pursue downtown revitalization and housing, they also seek to add pedestrian features and calm traffic on state highways (which in many cases function as main streets). The traditional role of state highways are as corridors for freight and through-traffic; however more pedestrian-oriented state highways can attract infill housing development that could ultimately reduce greenfield development and the resulting congestion. For this reason, the impact of changes in land use is considered in these scenarios, and in the GHG reduction ranges in the proposed rule. However, it is important to note that land use changes occur slowly as new development or redevelopment occurs. Thus, the potential GHG reductions achieved by land use are best attributed to later target years (e.g. 2040) in the rulemaking.

Magnitude of the GHG Reductions: Based on the scenario development outlined above, CDOT envisions that this rule could reduce emissions by 0.5-1.5 million metric tons in 2030. CDOT anticipates providing a range of reductions for each compliance year in the rulemaking and soliciting input on these ranges. Ultimately, the rulemaking should ensure that the statewide and sub-regional emission reduction targets reflect a realistic upper range of feasible emissions reductions that CDOT and its partner MPOs can achieve. No one solution alone can address these issues - be it electrification or multimodal expansion - but a market basket of best practices and compliance options that can be suited to the project at hand can do so successfully. By working towards realistic but ambitious reduction totals, we can determine the realm of the possible and address the challenge before us.

Offset Measures: In order to maintain a stable and efficient transportation planning process, CDOT believes it is necessary to provide for the use of Offset Measures should a plan be unable to demonstrate compliance. Offset Measures (OMs) reduce GHG but are not “regionally significant” and are thus not included in the set of projects modeled for compliance. For example, offsets could include:

- Measures that reduce vehicle miles traveled, including new segments of sidewalk, or a connection to multi-use resources (e.g. neighborhood retail) that could decrease driving in that neighborhood.
- Operational measures that reduce emissions due to improvements to vehicles traveling through the system in the most emissions-efficient way (e.g. ramp metering).
- Features to facilitate clean vehicle turnover above and beyond what could be assumed to occur without the rule given other incentives for electrification. For example, a highway project along a key freight corridor might include targeted investments in heavy-duty charging to accelerate turnover of the rolling stock within that corridor, specifically. While it will be important to avoid “double counting” with other policies, this readiness for zero emission vehicles, especially

in the medium and heavy duty truck space, will be a critical need in future highway planning that this rule can and should accelerate.

Because these Offset Measures are expected to change over time, the draft rule will outline a process (likely a subsequent policy directive) for establishing an Offset Measure regime. This directive will include a list of approved Offset Measures, a “score” in terms of GHG reductions for different types of projects, as well as a clear evaluation process for how modeling/estimating for OMs should be conducted and approved -- including transparency measures -- to ensure a public conversation about that process as well as a resulting policy that can be nimble and iterative. This evaluation rubric could include metrics for assessing impact “hotspots” within residential neighborhoods, including potentially providing a higher level of credit to interventions based on community impact and health equity. .

The Role of the Transportation Commission: As noted elsewhere in this paper, the approach contemplated in this paper responds to two recent pieces of legislation (HB19-1261 and SB21-260). Specifically, the passage of SB 260 establishes additional requirements on the TC in this space, which is reflected in the approach that is being developed.

In HB19-1261, now codified in part at §§25-7-102(2) and 105(1)(e), C.R.S., the General Assembly declared that “climate change adversely affects Colorado’s economy, air quality and public health, ecosystems, natural resources, and quality of life[,]” and that “many of these impacts disproportionately affect” certain disadvantaged communities.” §25-7-102(2)(d), C.R.S. The Colorado General Assembly’s updated GHG reduction goals are outlined in a footnote on Page 1. Section 25-7-105(1)(e), C.R.S., sets forth the framework for developing GHG abatement rules consistent with the statewide GHG pollution reduction goals in §25-7-102(2)(g), C.R.S. It is expected that the TC rule will, at the outset, set an ambitious target for the pollution reduction planning, under the assumption that this policy will account for a meaningful portion of sector-wide progress in total GHG reductions., but nonetheless be one of many policies contributing towards that goal. Colorado’s transportation planning process is a cooperative process designed to coordinate regional transportation planning and is guided by statewide transportation policies set by CDOT and the TC and by the TC’s Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions, 2 CCR 601-22 (“Statewide Planning Rules”). The TC’s authority to promulgate and adopt the Statewide Planning Rules can be found in §43-1-1103(5), C.R.S., which requires the TC to promulgate rules and regulations governing state transportation planning. The TC also has broad rulemaking authority pursuant to §43-1-106(8)(k), which grants the TC the power to make all necessary and reasonable orders, rules and regulations in order to carry out its authority and duties.

The Role of MPOs: MPOs are necessary entities in this rulemaking given their federally-required role in transportation planning. Colorado’s 5 MPOs have been close partners in developing this policy approach, providing CDOT regular and constructive feedback. CDOT will continue to work with the MPOs as the final details of the draft rulemaking are developed.

Listed below are several issues MPOs have raised to date:

- How to set statewide and regional GHG reduction levels without double-counting projects that appear in both CDOT and MPO plans.
- How to account for Colorado’s rapidly growing population in setting GHG reduction levels.
- Differences in modeling capabilities across MPOs.
- Concerns about MPO ability to influence or change land use patterns.
- Importance of aligning analysis timing requirements with federal air quality staging periods (to prevent onerous, near continuous modeling burden).
- Applying enforcement provisions equally to MPOs and CDOT.

MPO Planning Factors

CDOT has a close working relationship with the State’s Metropolitan Planning Organizations (MPOs). The MPOs are required to implement a performance-driven planning process that:

- (1) Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
- (2) Increase the safety of the transportation system for motorized and non-motorized users;
- (3) Increase the security of the transportation system for motorized and non-motorized users;
- (4) Increase accessibility and mobility of people and freight;
- (5) Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and state and local planned growth and economic development patterns;
- (6) Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- (7) Promote efficient system management and operation;
- (8) Emphasize the preservation of the existing transportation system;
- (9) Improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation; and
- (10) Enhance travel and tourism.

Personal Choice: The Department recognizes that even the best model is imperfect, especially when modeling human behavior. Despite the efforts of CDOT, MPOs and transit agencies to build projects in ways that incorporate new technologies or offer additional travel and mode choice, individual Coloradans are ultimately in charge of how they get from point A to point B, and they may not behave precisely as the models predict. There is a rich and growing body of research on how humans interact with the transportation system including how travel decisions are made and the factors that influence the uptake of emerging and potential future mobility options. In general, people make travel choices based on travel time to their destination, cost and convenience, but different people assign different weights to these factors

and can also bring in additional preferences that reflect unique lifestyle choices, personal values and goals. Once travel preferences are established, they become ingrained habits that can be difficult to change. However, changes in life circumstances such as changing jobs, moving to a new home, having children, changes in health status or improvements to the transportation choices offered can trigger individuals to reassess travel habits. By expanding travel options, and designing projects in a way that incentivizes more efficient behavior including through a connection to sustainable land use, and by providing a wider variety of safe and convenient travel options in addition to driving an individual car, planners provide the opportunity for individuals to make different choices, but whether travelers actually shift into new modes of travel depends on which factors appeal to each unique traveler. This policy is focused on expanding options available to consumers.

Over time, as the state of the modeling practice improves in evaluating the many measures under consideration to reduce GHG emissions, CDOT's modeling tools will also improve in their ability to evaluate the effects of such measures. This is an important reason to include requirements in the rule to re-evaluate reduction levels-and adjust as necessary.

VMT as a Strategy: It is important to note that although VMT reduction is one strategy that can help to reduce GHG in the short-term, as more vehicles convert to electric technology, VMT is less of a factor in the creation of GHG emissions in the longer term. However, some stakeholders have suggested basing the emissions budget around a 10% reduction in VMT, a percentage discussed in the GHG Roadmap, or specifically making VMT the compliance mechanism of this rule. It's important to note that the metric of VMT, which was intended as a 10% reduction relative to business as usual in 2030, was included in a scenario as part of the GHG Roadmap to help achieve a future budget year emissions goals, but the percentage was never intended to be a required strategy for CDOT or the MPOs to achieve the GHG reduction levels. In fact, the proposed rule will show the combined impact of electric vehicles and reduced travel so that stakeholders can understand the varying influence these measures have over time. It's also important to note that this rule is not the only policy relevant to reducing VMT. Other measures such as the ETRP (trip reduction) rule, for example, are more relevant to the user side relative to the infrastructure itself.

Enforcement: Understanding how CDOT and MPOs comply with the pollution reduction planning standards will be complex and will require coordination over many years to come in order to ensure the modeling is reflecting the changes that are occurring in Colorado with respect to population, land use, and transportation electrification. Also, considering how CDOT and the MPOs factor in the cost of pollution reduction will be an important consideration. With significant public input, CDOT intends to recommend that the Transportation Commission (TC) develop an enforcement mechanism, likely related to the conditions and flexibility of federal funds that the TC approves for use by CDOT as well as those typically sub-allocated to MPO areas. There is significant precedent for tying the flexibility of federal aid highway funds to whether certain targets (such as road and bridge condition) are met. Many of the details around enforcement will be developed through the

rulemaking process.

IV. Conclusion and Next Steps

It is important to stress again that the Pollution Reduction Planning rule alone is not intended to achieve all of the emissions reductions identified in the Greenhouse Gas Roadmap for the transportation sector, and the Administration will concurrently advance policy dialogue in other areas, such as clean trucking, future car standards beyond 2025, additional incentives for compact land use and electric vehicle use, and major multimodal investments like Front Range rail, simultaneously with development of this policy. These efforts will require collaboration across multiple governing bodies with their respective expertise and authorities in order to achieve total Roadmap savings for the transportation sector. Each of these and additional policy tools will require rigorous review in assessing the impacts and efficacy observed over the years to come. Invariably, questions will require ongoing dialogue following this proposition and the creation of parallel CDOT policies, and the Department readily makes itself available for such conversations.

It is also important to note that this memo does not address the Air Quality Control Commission's role in measuring and confirming progress in the transportation sector, but is focused on briefing the TC ahead of their initiation of rulemaking specifically applicable to CDOT and sub recipients of transportation dollars. However, CDOT anticipates that the Air Pollution Control Division (APCD) will be responsible for verifying emission reductions and reporting along with CDOT to the AQCC on the determinations of the verification. Following the formal introduction of the TC rule, APCD staff will develop a proposed approach, in coordination with CDOT staff, for accomplishing verification. This verification process will be brought to the AQCC for consideration and will be memorialized in the form of a resolution adopted by the AQCC. The verification resolution will draw from the approach the APCD utilizes for verifying emission reductions from Clean Energy Plans overseen by the PUC.

CDOT staff will seek approval from the TC to officially commence a rulemaking to incorporate the new GHG standards into the statewide planning rules at their July meeting. If approved, the rulemaking could begin with a notice as soon as July 30, 2021. CDOT has updated its [Stakeholder Engagement](#) webpage, where stakeholders can sign up to be part of the rulemaking.