

Michael B. Hancock
Mayor



City and County of Denver

OFFICE OF THE MAYOR
CITY AND COUNTY BUILDING
DENVER, CO 80202-5390
TELEPHONE: (720) 865-9090 • FAX: (720) 865-8787
TTY/TTD: (720) 865-9010

October 31, 2014

Don Hunt, Executive Director
I-70 East Project Team
Colorado Department of Transportation
4201 E. Arkansas Ave.
Denver, CO 80222

Dear Mr. Hunt,

Thank you for the opportunity to comment on the I-70 East Supplemental Draft Environmental Impact Statement (SDEIS) that was released in August 2014. The City and County of Denver ("Denver") supports the Partial Cover Lowered Alternative ("PCL") as the best and most viable option to deliver a project that will serve the complex needs of our residents, commuters and the region as a whole, as noted through the regional leaders' letter from June 2013 and the Denver City Council resolution from April 2014. We value the large investment that CDOT is making in this critical piece of highway infrastructure for our state. To get this right, it is imperative that this project support the Elyria, Swansea and Globeville neighborhoods as well as Denver as a whole. On behalf of the residents of Denver, my administration will continue to ensure that the I-70 East SDEIS supports the vitality and strength of the surrounding communities.

This letter accompanies and summarizes the key items in the comments submitted by Denver that will protect and improve the quality of life, safety and health of our residents and highway users. We believe the issues we have raised can be resolved in partnership with the Colorado Department of Transportation (CDOT) and incorporated into the Final Environmental Impact Statement (FEIS) scheduled to be released in August 2015.

Today, Denver has several major redevelopment and infrastructure projects taking place that provide a connection from Denver Union Station to Denver International Airport. Termed the Corridor of Opportunity, the nearly 23-mile stretch is one of the most compelling commercial investment opportunities in the world, with thousands of developable acres. The I-70 East project plays a critical role within the Corridor of Opportunity. Specifically, the I-70 East project is one of six critical redevelopment projects in north Denver that provides a unique and historic opportunity to rebuild a connected community and energize a gateway to downtown Denver, also known as the North Denver Cornerstone Collaborative.

We value CDOT's partnership to uplift this cornerstone of Denver. City staff members have worked closely with CDOT, the Federal Highway Administration (FHWA) and the public to find an alternative that will have the greatest public benefit while minimizing negative impacts to the surrounding community. My administration remains committed to relieving congestion and providing safe travel on I-70 East as

important elements to improving Denver's overall transportation system. Continuing to collaborate and connect with the Elyria, Swansea and Globeville communities will be important to meet the needs of the residents and businesses throughout the life of the project.

During the course of this Environmental Impact Statement (EIS), Denver has provided staff support and leadership for this analysis of alternatives and environmental impacts for future improvements of I-70 East from I-25 to Tower Road. Due to our level of involvement, Denver believes that the PCL will knit the communities back together by eliminating the physical, visual and safety barriers posed by the existing highway viaduct. The cover over I-70 will improve connectivity as well as the ability to walk, bicycle and drive within the neighborhood. Placing I-70 below grade will provide additional community open space that will be activated with community services and programs based on neighborhood input and needs.

As Mayor, my greatest concern is that the impacts of this project could potentially be borne disproportionately by the surrounding minority/low-income communities. While CDOT has identified many mitigation elements, the proposed mitigations do not fully compensate for the impacts. Appropriate mitigation of these impacts, both during construction and after completion, is critical to our city and residents.

The following summarizes the City and County of Denver's issues for further review and input:

- **Neighborhood Health and Quality of Life.**
 - Denver requests to collaborate with CDOT to develop more effective and aesthetically pleasing noise solutions beyond the noise mitigation plan proposed in the SDEIS, solutions that fit into the neighborhood and are less intrusive on the views. The existing highway has significant noise impacts to the surrounding communities.
 - Denver requests to collaborate with CDOT to increase the tree canopy in the neighborhoods to help buffer the visual effect of noise walls and create a sense of ownership by community members toward their neighborhood and public property.
 - Denver requests that CDOT work collaboratively with the city and area residents to develop space that is a true amenity to the communities, including but not limited to establishing a program for long-term maintenance of the cover over the PCL. The PCL is a very progressive solution by CDOT to stitch the surrounding communities back together. We must have a plan to maintain it.
 - Denver requests that CDOT consider providing operational costs for new home infrastructure in addition to the currently proposed opportunities for homeowners to rehabilitate homes through improvements to doors, windows and ventilation systems. Residents should not bear the cost of these mitigations.
 - Denver requests to collaborate with CDOT to identify public services and social support structures needed during the construction period to enhance community stability and strength. These should include health care access, employment development, and a health and wellness center. CDOT should assist nonprofits, especially those organizations serving non-English speaking populations, and Denver Health in providing services that help residents navigate community resources.
- **Second Cover.** Denver requests that CDOT enable the development of a second cover between Steele St./Vasquez Blvd. and Cook St. to improve connectivity, to introduce services such as a grocery store, to reduce the visual presence and associated impacts of I-70, and to develop space that is a true amenity to the communities where none exists today. As documented in the

SDEIS, a second cover would eliminate the need for noise walls in this location, further mitigating the impacts of I-70. The proposed reconfiguration of the existing Steele/Vasquez interchange presents an immense opportunity to connect two segments of the neighborhood and create a special place for the community. This cover is different than the cover adjacent to Swansea Elementary School. That cover provides an open space amenity near the school and adjacent existing residential communities. The second cover would provide an opportunity to completely re-imagine its immediate surroundings, to open up multiple acres of land for additional rooftops and to introduce the type of development that the community has clearly stated it is missing.

- **Air Quality.** Denver requests CDOT include monitoring of air quality impacts before, during and after construction on site of PM 10, PM 2.5, Nitrogen Oxides and other pollutants. Significant concern has been raised by Denver and area residents about air quality impacts. Of particular concern are the impacts during and after construction in the neighborhoods, at the school and at the ends of the cover.
- **Highway “Footprint.”** Denver requests variances in the dimensions and geometrics of the highway width and interchanges. Reduced shoulder width and less-than-full-standard geometries for accel/decel lanes should be thoroughly examined as a joint effort between Denver and CDOT. These are reasonable adjustments to minimize the overall footprint of the highway without significantly impacting the safety or operations of the highway.
- **Connectivity.** Denver requests to closely coordinate with CDOT on ramp and local street closures during construction to ensure connectivity for residents to easily access and utilize all available modes of transportation throughout these neighborhoods. One of the longstanding challenges for these communities, further aggravated since the original construction of I-70, has been the lack of vehicle, pedestrian, and bicycle connections within the neighborhoods and to adjoining areas. This will become acute as construction of I-70 commences, with limited access on and off the highway for residents and others wanting to use I-70. East/West and North/South connectivity is needed on both sides of the highway to allow neighborhood residents to use all modes of transportation to safely travel, to revitalize these communities, and to ensure that industrial and truck traffic stay on appropriate thoroughfares. Improved connectivity is also necessary to address emergency vehicle access, particularly during the construction period. The PCL eliminates some North/South connectivity that must be re-examined. The reconfiguration of 46th Avenue, as requested by Denver, is an important contribution, as is the addition of a cover over the highway.
- **47th and York.** Denver requests to collaborate with CDOT to develop appropriate alternatives for connectivity in and around 47th and York, with the goal of identifying solutions that are multi-modal and minimize further impacts to the community. Prior to the original construction of I-70, there were at grade railroad crossings in this area, which have since been eliminated, thus causing additional barriers to mobility for community residents.
- **Steele/Vasquez and Colorado Boulevard Interchanges.** Denver requests that CDOT work collaboratively with the city and area residents and businesses surrounding the Steele/Vasquez and Colorado Boulevard interchanges to devise the most appropriate combination of strategies and infrastructure that respects the affected neighborhoods and allows good access to support local businesses. The PCL and modified PCL shown in the SDEIS show two different access

configurations at these locations. Denver believes both of these options – 1) split diamond between the two interchanges and 2) no access at Steele/Vasquez with full diamond at Colorado Boulevard – have significant challenges and will create unacceptable impacts to the local businesses, the neighborhoods and the level of service at the interchanges.

- **Housing and Relocation.** Denver requests that CDOT work collaboratively with the city and area residents to re-establish a critical mass of residential housing units by developing a plan for the type, character and amount of replaced housing. The viability of the surrounding neighborhoods was diminished after the original construction of I-70 and will be further diminished with the planned loss of additional housing units under the proposed action. Funding for replacement housing should be channeled through the Denver Office of Economic Development, which can provide a fair, open and coordinated process to complete the housing redevelopment.
- **Drainage and Water Quality.** Denver requests that CDOT maintain its work with the city to find alternate solutions that will allow some of the drainage infrastructure and detention facilities to be above ground—thus creating a visually pleasing amenity for the surrounding communities. CDOT should work with Denver staff on water quality strategies as well to develop more specificity to be included in the FEIS. The SDEIS shows a system of drainage infrastructure that includes, for the most part, underground pipes to drain excess water to the South Platte River. Green Infrastructure and other Best Management Practices (BMPs) should be further developed, which will treat runoff from impervious surfaces that are part of the I-70 East project and from other sources.
- **Community Outreach.** Denver invites CDOT to remain engaged in additional community outreach following the conclusion of the SDEIS. Denver will develop supplemental approaches to educating and soliciting input from the affected neighborhoods. CDOT has put forth an enormous effort in engaging the communities and other stakeholders since 2003. However, Denver will maintain engagement with the community regarding the issues outlined in Denver’s comments.

Please feel free to contact Public Works Executive Director Jose Cornejo at 720-865-8712 with your questions or thoughts. We look forward to continuing the productive partnership with CDOT, the FHWA, the surrounding communities and other affected stakeholders as we move this important project forward.

Respectfully,

A handwritten signature in black ink, appearing to read 'M. Hancock', with a long horizontal flourish extending to the right.

Michael B. Hancock
Mayor



June 6, 2013

Don Hunt, Executive Director
Colorado Department of Transportation
4201 E. Arkansas Ave
Denver, CO 80222

Dear Mr. Hunt:

It has come to our attention that a small number of people believe the decision by CDOT and the I-70 PACT stakeholder group to leave I-70 on its current alignment should be disregarded and that the option of realigning I-70 along the I-270 route should be unilaterally pursued. The City and County of Denver, Adams County, and the City of Commerce City continue to support CDOT's decision to keep I-70 on its current alignment and place it below grade for the following reasons:

- The City and County of Denver, Adams County and the City of Commerce City continue to honor the tremendous work of the I-70 PACT, which consisted of key stakeholders, including residents, businesses and community leaders. The I-70 PACT spent many months carefully analyzing all available data, objectively reviewing every alternative and listening openly to everyone affected by the alignment alternatives. CDOT relied heavily on the I-70 PACT's recommendation to leave I-70 on the current alignment. We trust and respect the work of the I-70 PACT and intend to honor its thoughtful recommendations.
- It is crucial that I-70, I-76 and I-270 remain separate, regional routes so incident responders have non-congested options on the freeway. These freeways also serve as critical evacuation routes from east to west.
- The I-70 PACT was extremely concerned about the negative impact realigning I-70 along the I-270 route would have on the National Western Stock Show facility, the new FasTracks station planned for the NWSS and Denver Coliseum, as well as the very negative impact this alignment would have on the potential for Transit Oriented Development around the NWSS FasTracks station. The I-70 PACT believed that new TOD development around the NWSS light rail station will be a key catalyst to the overall continued revitalization of the neighborhoods, including the proposed re-investment of the National Western Complex into a year-round destination in this area, which will have positive local, regional and statewide economic impacts.

- This proposed realignment would also impact the region's access to major attractions such as Dick's Sporting Goods Park, the Rocky Mountain Arsenal National Wildlife Refuge, and the former Mile High Greyhound Park, which is planned as a major retail and professional site.
- Realigning I-70 to I-270 would significantly impact and alter economic growth planned for the area since Commerce City is a hub for logistics and advanced manufacturing. As an example, this April, Rush Trucking Centers of Colorado finalized a deal to relocate from Denver to Commerce City selecting a site with easy access to I-270. Rush projects bringing \$13.3 million in capital investment to the community.
- Additionally, I-270 is rapidly deteriorating and decreasing in its ability to handle traffic volumes, which leaves us uneasy in its future ability.
- This alternative will knit this north Denver community back together by eliminating the physical, visual and safety barriers posed by the viaduct. The cover over I-70 will improve the connectivity, walkability and drivability of the neighborhood.
- Placing I-70 below grade will further provide additional community open space that could be activated by a nonprofit to provide community services and programs based on neighborhood input and needs.
- The proposal allows Swansea Elementary School to remain in the neighborhood within walking distance for many families and continue to be an asset to the community.

Last year, we congratulated CDOT on developing a workable solution that would improve I-70 on its existing alignment. The proposal addressed concerns expressed by the surrounding communities, specifically Swansea and Elyria. This innovative solution reconstructs a portion of I-70 below ground, provides open space for community uses, and appears workable for all involved, including the Adams County communities.

We continue to support CDOT and the efforts to achieve consensus within the community. In the months ahead, we implore you to keep in mind how realigning I-70 along the 76 and 270 interstates would negatively impact the region and urge you to move forward with the proposed solution to lower the grade of I-70 in its current alignment.

Thank you,



Commissioner Eva Henry
Adams County



Mayor Michael B. Hancock
Denver



Mayor Sean Ford
Commerce City

PROCLAMATION



City and County of Denver

Proclamation No. 14-0247

Concerning the reconstruction of Interstate 70 through Northeast Denver

WHEREAS, while the Globeville Elyria and Swansea communities are already endowed with a vital constellation of unique community assets, from school and recreation facilities such as Swansea Elementary School and Swansea Park, Argo Pool, and the Colorado Miners Recreation Center; to resource providers such as Clínica Tepeyac, Focus Points Family Resource Center, Street Kids, and Valdez-Perry Library; the many historic churches; to community gathering spots such as The Growhaus, and Globeville Community Center, the reconstruction of I-70 has the potential to better connect local families and children to these assets and better leverage the important resources already available within the community for its residents to build upon and improve their own quality of life; and

WHEREAS, Denver City Council acknowledges the generations of Globeville Elyria and Swansea residents who have endured the daily disadvantages imposed by living in the shadow of the elevated I-70 Viaduct, and supports furthering the work of the many stakeholders and residents and business owners who have been diligently collaborating for several years to determine the best possible design of the now-deteriorating 50 year-old transportation facility; and

WHEREAS, it is the vital function of the I-70 corridor to continue to serve nearly 700 local businesses, including many large freight distribution centers and other freight-dependent enterprises, maintaining direct and convenient highway access to the National Western Complex, which is vital to the long-term success of the National Western Stock Show, and providing safe and swift vehicle passage between downtown Denver and Denver International Airport; and

WHEREAS, these concerns are supported by many adopted City goals and neighborhood plans including the revitalization of specific neighborhoods with the understanding that it is important to facilitate moving people through various means of transportation rather than just vehicles; and reducing vehicle miles traveled and greenhouse gas emissions through appropriate environmental standards; and

WHEREAS, in 1964, I-70 was designed through the neighborhoods of Globeville Elyria and Swansea (GES), having a devastating impact on the neighborhoods from the loss of homes and residents, the loss of sustainable resources and access to resources within a community, and the overall loss of value of homes; and

WHEREAS, Federal policy says that if a program will have a disproportionately high and adverse effect on minority or low-income populations—that program may only be carried out if further mitigation measures or alternatives avoid, minimize or mitigate disproportionately high and adverse impacts. Some of the adverse effects on the minority and low-income residents in GES should be mitigated and include:

- Air quality, fumes and emissions, noise, traffic counts;
- Displacement of residents and loss of overall housing and residents to the community;
- Connectivity and Quality of Place; and
- Jobs and Education for residents to rebuild the community.

NOW, THEREFORE, BE IT PROCLAIMED BY THE COUNCIL OF THE CITY AND COUNTY OF DENVER THAT:

Section 1. That the Denver City Council supports the City team's design vision and detailed planning which focuses on neighborhoods, safety, environmental impacts, and regional connectivity; this project is also part of the "Corridor of Opportunity" and a critical component of the North Denver Cornerstone Collaborative; which will help to promote facilitation of economic development and employment opportunities that would lead to a higher quality of life for the families, children, and businesses in this entire corridor.

Section 2. That the Denver City Council supports the reconstruction of I-70 in its current location and alignment, and places the new structure below grade between Brighton Boulevard and Colorado Boulevard. This alternative, also known as the Partially Covered Lowered (PCL), will replace the viaduct with a lowered highway and will provide enhanced multimodal connectivity and strengthen the existing Globeville Elyria and Swansea communities through a partial cover over the highway.

Section 3. That the Denver City Council encourages Colorado Department of Transportation and the City and County of Denver to continue working together toward the best possible modifications to enhance the connectivity across I-70 and to restore critical connections between Globeville Elyria and Swansea neighborhoods, and to all areas of the City, so as to provide mobility relationships for all City residents and businesses, thereby creating a new sense of place and community that has been long represented by the City's Northeast neighbors.

Section 4. That the Denver City Council encourages the Colorado Department of Transportation (CDOT) to work closely with Denver Environmental Health agency to proactively monitor air quality issues associated with the new design and deploy assertive technologies to mitigate pollutant impacts.

Section 5. That the Denver City Council stresses the importance of all stakeholders to work together to identify land and resources to replace housing lost to the project within the neighborhoods, at similarly attainable prices, to ensure residents of low and moderate incomes can continue to live near the new amenities far into the future.

Section 6. That the Denver City Council and the City and County of Denver in partnership with CDOT will continue to explore additional options in order to enhance connectivity and to strengthen existing neighborhood historical fabric; and finding alternatives to improving the quality of life, environment, and economic vitality of this area in conjunction with balancing the overall regional transportation needs.

Section 7. That the Clerk of the City and County of Denver shall attest and affix the seal of the City and County of Denver to this proclamation and that a copy transmitted to Don Hunt, Executive Director, Colorado Department of Transportation.



PASSED BY THE COUNCIL April 7, 2014

Maya Babaloman

PRESIDENT