

Michael B. Hancock
Mayor



City and County of Denver

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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