



10/14/2021

Subject: Green House Gas Emissions Rulemaking – Recommendations for a more equitable process

The undersigned members of the Denver-based Land Use Work Group (LUWG) led by Mile High Connects, Denver Streets Partnership, and YIMBY Denver applauds CDOT in its stakeholder outreach and thanks you for the opportunity to provide input on the draft Rules Governing Statewide Transportation Planning Process and Transportation Planning Regions. The LUWG is a Denver-based group of nonprofit advocacy organizations, nonprofit developers, Business Improvement Districts (BIDs), and residents tracking and amplifying local efforts while advocating for policy change to reflect the nexus of housing and transportation and ensure that investments in the built environment reduce racial disparities, maintain community, build a culture of health, and respond to the climate crisis.

While the draft rule proposes important policies to mitigate transportation pollution, it fails to adequately and directly promote climate-friendly land use, a key near-term strategy listed in the state's GHG Pollution Reduction Roadmap.

More investment in multimodal transportation is essential to reducing VMT and should be coupled with smart land use policies to locate housing, jobs, schools, goods, and services near one another. Achieving a 11% VMT reduction target by 2030 requires a comprehensive approach that integrates transportation and smart land use planning.

The following recommendations seek to create a more equitable approach that responds to the needs of community:

- **Strengthen and Review Travel Demand Modeling:** Fundamentally, the success or failure of a project depends on the modeling involved, and yet state DOT models have a track record of being inaccurate. To improve the accuracy of project assumptions, modeling scenarios must be strengthened and periodically reviewed to ensure that modeling results reflect real world data. Additionally, Both CDOT and MPOs should be required to model the impacts of transportation projects to evaluate plans for compliance. CDOT should also maintain its commitment to project-level modeling in addition to program or transportation-plan level

modeling. Finally, to prevent conflicts of interest and ensure accuracy, CDOT should require an independent agency to verify and validate results produced by all compliance models.

- **Center People and Climate Justice for Greater Equity:** CDOT should seek to strengthen public engagement in the decision-making process, with an emphasis on climate resilience and advancing equity. We believe that, while engagement has been positive, this is an opportunity to test innovative solutions to gather meaningful input. The rule should incorporate the following:
  - Adopt a transportation equity framework identifying equity-related performance measures adopted at the state and national level, and indicators that drive local decision-making. Assessing equity includes quantitative and qualitative analysis, and a decision-making process that is inclusive and representative of communities that are most burdened, leading to a more equitable outcome. Incorporating an equity lens provides a complete picture of the overall impact.
  - Support capacity building, including education about planning processes, to realize meaningful engagement and powerful collaboration among community organizations and CDOT in implementing the rulemaking.
  - Transparency in the equity evaluation process is crucial to emphasize inclusion in numerous ways – at the staff level, decision-making level, and through deliberate community engagement.
- **Lead with Smart Land Use Strategies:** DRCOG’s Metro Vision 2050 Scenario Modeling compares different transportation and land use scenarios to identify pathways to achieve their Metro Vision GHG and VMT targets. One scenario would invest \$16 billion in transit over 30 years, resulting in a 2% decrease in VMT per capita by 2050. A second scenario combines the same \$16 billion transit investment with a land use scenario that focuses two-thirds of all new housing and employment in existing urban centers and along high-frequency transit corridors. The result is a 25% reduction in VMT per capita. CDOT and MPOs are required by Senate Bill 21-260 to “consider the role of land use in the transportation planning process and development strategies to encourage land use decisions that reduce vehicle miles traveled and greenhouse gas emissions.” Reports have shown that daily VMT are about three times higher in suburban areas, than in compact multimodal neighborhoods ([VTPI, 2021](#)). Therefore, CDOT should aim to incorporate smart land use policies within transportation funding to reduce car dependence and overall VMT, specifically among suburban locations. Furthermore, CDOT should consider the role of specific land use policies such as ADUs, equitable transit-oriented development, up zoning in dense urban areas, reduced parking requirements, etc. in transportation planning efforts. The rule should incorporate land use metrics in the evaluation of each transportation project by requiring CDOT and MPOs to:
  - Measure the VMT and VMT per capita impacts of individual transportation projects in all planning and programming, including the RTPs and 10 Year Plans, and the TIP and Four-Year Prioritized Plan project selection process.

- Gather baseline data on transportation-efficient land use for each local government in Colorado.
  - Once baseline data is determined, local governments should be required to report on specific land use metrics in each plan to demonstrate progress toward VMT and GHG reduction targets.
- Consider local land use and development patterns and the extent to which they contribute to VMT per capita reductions for the proposed transportation project.
- Prioritize projects that incorporate additional smart growth strategies such as up zoning, mixed-use infill development, and transit-oriented development.
- Create a bonus for projects that advance equity by incorporating affordable housing and TDM programs that lower the combined housing and transportation costs for low-income households.

We appreciate your commitment and efforts to reduce greenhouse gas emissions from the transportation sector, improve air quality, and provide more travel options throughout Colorado, and your consideration of these recommendations.

Sincerely,

Mile High Connects

YIMBY Denver

Denver Streets Partnership

All In Denver

JJK Places