

# DRAFT

## Subtopic E1: Travel Demand

For the E1: Travel Demand subtopic, 104 public and agency comments were received. From those 104 comments, 20 common concern statements were generated. Themes associated with the E1: Travel Demand subtopic include:

- Capacity expansion is not justified for recreational trips.
- The travel demand model overestimated traffic growth so that alternatives appear to be congested sooner than they might otherwise.
- The ridership survey is inadequate and its assumptions are flawed.
- The project termini are not logical, and as a result, the comparisons are invalid.
- Highway expansion will induce trips, not solve the congestion problem.
- There are shortcomings associated with the alternative comparisons.
- There are concerns about the ski industry assumptions used in the Draft PEIS.
- There is room for additional, dependable, and frequent bus service on I-70, which would reduce the number of vehicles on the highway.
- The AGS would be the best alternative for handling peak demand.
- The PEIS underestimated the number of travelers who would use a reliable, safe Transit alternative.

CCS No.	Transportation Common Concern Statements (CCSs)
<b>Subtopic E1: Travel Demand</b>	
E1-a	<p><b>Capacity Expansion Not Justified for Recreational Trips</b></p> <p>Taxpayer dollars should not be spent to serve people on vacation. I-70 is congested only during peak periods of discretionary recreational use by nonresidents of Clear Creek County. The motivation for this project appears to be protecting the growth and profitability of recreational interests, particularly the ski resorts. If ski and tourist traffic is kept off I-70, the existing four lanes could accommodate through traffic for many years to come.</p>
E1-b	<p><b>Highway Expansion and Congestion</b></p> <p>Highway expansion is a controversial issue with many opinions on its effectiveness to resolve the congestion issues in the Corridor. Opinions include the following:</p> <ul style="list-style-type: none"> <li>• Highway widening offers a solution because as technology changes the interstate will become more efficient and safe.</li> <li>• Highway widening should be sufficient to handle congestion for the next 100 years.</li> <li>• Highway widening is a short-sighted solution that will not solve the congestion and mobility problems in the long term and represents unsound planning.</li> <li>• Highway widening will provide no noticeable improvement, will result in the same level of congestion upon completion, and will be disruptive.</li> <li>• The Highway alternatives mean only more growth for the Corridor area.</li> <li>• Highway capacity improvements are the cause of increased traffic, not the solution to congestion, because traffic expands to fill available space. Increasing I-70 capacity by 50 percent will also result in increasing traffic on local roads by 50 percent.</li> <li>• Highway alternatives, in the absence of substantial other modal investments, might induce excessive vehicular travel—causing similar congestion problems over the long term. It is not possible to build enough lanes to accommodate peak period traffic.</li> </ul>
E1-c	<p><b>Innovative Technologies Needed</b></p> <p>CDOT has failed to employ multiple technologies to address the diverse and changing transportation needs of state travelers.</p>

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E1-d	<p><b>Congestion Limited to Weekends</b></p> <p>With congestion in the Corridor no worse than that which occurs in the Denver metropolitan area every weekday, this project appears to benefit only weekend recreational travelers, and It makes no sense to spend a lot of money to correct a weekend problem. Traffic is very manageable most of the time, with congestion occurring only during limited peak travel times, and it seems a shame to destroy the Corridor due to a minimal congestion period, and the cost in dollars, environmental damage, and traffic disruption during construction are enormous in comparison to transportation benefits (especially at Mount Vernon Canyon).</p>
E1-e	<p><b>Inadequacy of the Ridership Survey</b></p> <p>The PEIS ridership study is flawed and statistically inadequate for the following reasons:</p> <ul style="list-style-type: none"> <li>• It provides only a snapshot profile of users on one summer weekend and one winter weekend in 2000.</li> <li>• It does not address door-to-door connection issues or transport of recreational equipment.</li> <li>• It does not provide sufficient detailed cost/funding options.</li> <li>• Users' license plates were photographed for telephone interviews up to two months later. Consequently, many respondents had no memory of their travel on that specific weekend and were asked to speak generally. A substantially more in-depth ridership study is needed to support any transit mode.</li> </ul>
E1-f	<p><b>Flawed Ridership Assumptions</b></p> <p>Ridership assumptions presented in the Draft PEIS are flawed for the following reasons:</p> <ul style="list-style-type: none"> <li>• The assumptions about likely transit ridership were made without adequately studying the full experience of using a transit system and without projecting the roundtrip cost to users of the system.</li> <li>• The PEIS underestimates the percentage of travelers who would use a reliable safe transit alternative (especially commuter and resort destination travelers). It should be noted that transit ridership has been underestimated before on other projects such as the Light Rail line on Santa Fe in Denver.</li> <li>• The PEIS should have included a travel behavior study that considered willingness to ride transit and the factors that cause people to continue using their cars.</li> </ul>
E1-g	<p><b>Travel Demand Model Input and Growth Projections</b></p> <p>Concerns associated with input and growth projections of the travel demand model include the following:</p> <ul style="list-style-type: none"> <li>• The travel demand model input is questionable (projections are too large) and may overestimate traffic growth so that alternatives appear to be congested sooner than they might otherwise.</li> <li>• The growth projections used in the travel demand model are in doubt and do not account for important factors such as water supply, land availability, and recreation growth, making the model results invalid.</li> <li>• The travel demand projections are based on growth predictions that are often dramatically wrong and will result in an outdated solution. Highway widening may not be sufficient to accommodate the projected 50 to 100 percent growth in statewide population.</li> </ul>
E1-h	<p><b>Suppressed Travel as a Form of Demand Management</b></p> <p>If no action is taken, travel will naturally be suppressed. Suppressed demand might just be delayed demand. Suppressing demand at peak times and transferring it to off-peak times will have travel time benefits. People will learn to adjust their departure times out of necessity. Limited growth in skier visits between the 1993-1994 season and the 2003-2004 season shows that trip suppression is already occurring.</p>

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E1-i	<p><b>Peer Review Committee</b></p> <p>The following concerns were expressed regarding the peer review committee:</p> <ul style="list-style-type: none"> <li>• CDOT refused to turn over the travel demand model for inspection, asserting that an expert peer review committee would provide quality control. The model peer review committee met once, criticized the methodology, and was never convened again.</li> <li>• The travel demand model peer review committee was dismissed without a final and thorough review of the model results.</li> <li>• The travel demand model input was altered so that the results are not reproducible or verifiable as pointed out by the peer review committee. For example, one of the consultants was forced to change the forecast volume on a bridge in Eagle County from 10,000 vehicles per day to 30,000 vehicles per day.</li> </ul>
E1-j	<p><b>Shortcomings of Alternative Comparisons</b></p> <p>CDOT has done a reasonable job of providing the requisite alternative comparisons at a programmatic level. There are some shortcomings that would normally require additional effort before finalizing the document, but such an effort is pointless because the alternatives are not comparable. As a result the affected environment and environmental consequences are not comparable, thereby defeating the purpose of an EIS. Alternatives that are not limited to address only the project need must be reconfigured to address the project need prior to comparing the alternatives.</p> <p>Specific issues include the following:</p> <ul style="list-style-type: none"> <li>• The Highway alternatives are designed to address only the project need. Thus, discussions on direct and indirect impacts from this alternative are irrelevant.</li> <li>• Transportation mode alternatives allow for construction that extends more than twice the distance beyond the stated project need. Naturally the direct and indirect impacts, as well as operation and maintenance costs, may be double that needed to meet the project need. As a result, the requirement for sharply defining the issues and providing a clear basis for choice among options is defeated.</li> <li>• The project termini are not logical in light of the need for the project: <ul style="list-style-type: none"> <li>• The C-470 terminus serves to foreclose opportunities to consider Transit alternatives.</li> <li>• The Draft PEIS should be supplemented to include an evaluation of the project with the Denver International Airport (DIA) as the eastern terminus.</li> <li>• The western terminus of all alternatives (Transit and Highway) should be changed to Silverthorne to better meet the travel demand needs before an alternative is selected; and the new analysis should be made available for public review.</li> <li>• The travel demand analysis should include a detailed survey of traffic at each exit point that might provide information to support different transit termini (not all the way to Eagle Airport).</li> </ul> </li> </ul>
E1-k	<p><b>Inability to Comprehend Traffic Evaluation</b></p> <p>The traffic evaluation is beyond comprehension to a layperson and, therefore, is contrary to CEQ guidelines.</p>

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E1-l	<p><b>Ski Industry Assumptions</b> Expressed concerns involving the travel demand assumptions for the ski industry include the following:</p> <ul style="list-style-type: none"> <li>• The skier visits used for the travel demand analysis should be substantiated based on the fact that Eagle County skier numbers were significantly lower in prior years and because the base year ski season used in the PEIS was the lowest in the last 10 years.</li> <li>• The PEIS should ensure that the skier projection input would not result in incorrect travel demand predictions.</li> <li>• The Colorado Ski Country USA past skier visit data are not a valid predictor of future visits, and such projections should not be used to predict future travel demand.</li> <li>• The PEIS should consider other factors that affect skier visits, including the following:               <ul style="list-style-type: none"> <li>• Increased international visitors</li> <li>• Front Range growth</li> <li>• Wide availability of low-priced pass products</li> <li>• Good snowfall years</li> <li>• Skier travel behavior specifics</li> <li>• Limited opportunities to adjust recreation travel times (peak demand spreading and increased overnight trips have already reached their maximum potential)</li> </ul> </li> <li>• The travel demand assumptions for the ski industry did not consider the effects of global warming.</li> </ul>
E1-m	<p><b>Corridor Congestion</b> Causes for Corridor congestion include the following:</p> <ul style="list-style-type: none"> <li>• The fundamental congestion problem is caused by driving skill variations and multiple vehicle type operators.</li> <li>• Congestion at the Twin Tunnels is caused by drivers braking before entering the tunnels.</li> <li>• Weekday traffic is not a problem except for occasional accidents. Peak traffic and numerous insane and impatient drivers are the main problems.</li> <li>• A wider highway will not eliminate people driving too slowly in the left lane. Instead the completed Six-Lane Highway alternative would become the Speedway of the Rockies.</li> </ul>
E1-n	<p><b>Immediate Solutions to Address Congestion</b> The following are offered as immediate solutions for addressing congestion:</p> <ul style="list-style-type: none"> <li>• Expand capacity of the congested mode. Building a rapid transit alternative before expanding the highway will not get enough cars off I-70.</li> <li>• Address trucking issues (chain laws) and manipulating lanes (based on traffic needs) during peak travel times</li> <li>• Address “pinch points”</li> <li>• Add climbing lanes</li> <li>• Incorporate small efforts, such as a traffic light at Dumont, straightening of “S” curves at Fall River, and an increased winter maintenance program</li> <li>• Address the congestion between Silverthorne and Denver in two areas: the EJMT and the curves between the Twin Tunnels and US 6.</li> </ul>
E1-o	<p><b>Rapid Transit</b> Rapid transit in the Corridor will be essential given projected population growth. However, bus-in-guideway does not serve the western part of the Corridor (especially Eagle County) well. On the other hand, travel to destinations such as the White River National Forest and Loveland Ski Area may be amenable to transit. In addition, there appears to be plenty of room for additional, dependable, and frequent bus service on I-70, which would reduce the number of vehicles on the highway by a large number and significantly reduce congestion.</p>

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<b>CCS No.</b>	<b>Transportation Common Concern Statements (CCSs)</b>
E1-p	<b>Move People, not Vehicles</b> The objective is to move people, not vehicles. With FasTracks, suburban communities are evolving to where people are counting on transit rather than their cars.
E1-q	<b>Consideration of FasTracks and Changes in Travel Behavior</b> The following should be considered when developing a solution for the I-70 Mountain Corridor: <ul style="list-style-type: none"><li>• A solution designed based on 1990s travel behavior will be outdated. Old models have proven to be grossly inaccurate.</li><li>• Higher fuel prices, increased telecommuting, and expanded availability of flextime will result in fewer peak period vehicle trips.</li><li>• The entire transportation environment changed dramatically in November 2004 with the approval of FasTracks. Lack of consideration of the FasTracks transit feeder system is a major deficiency and should be evaluated before an alternative is selected.</li></ul>
E1-r	<b>Inclusion of Area of Influence in Problematic Areas</b> The Executive Summary of the Draft PEIS states that problematic areas were expanded to include the area of influence related to congestion. This leap is not substantiated and has led to a six-lane solution throughout Clear Creek County.
E1-s	<b>Questionable Travel Time Analysis</b> The travel time analysis (Table 2-14 in the Draft PEIS) seems very questionable because the Six-Lane Highway 65 mph alternative has only a 1-minute improvement over the Six-Lane Highway 55 mph alternative (westbound over the entire Corridor). This discounts the credibility of the travel time analysis.
E1-t	<b>AGS Alternative's Ability to Handle Peak Demand</b> The AGS alternative is the best alternative for handling peak demand.