

Denver Waste Water City Council

Regarding CB-16-0306

Denver needs to defer any decision regarding a fee increase until many questions are answered.

It is clear that some increased infrastructure spending is needed for sanitary sewer and waste water improvements. However, the currently planned projects need additional public input before they are initiated. It is clear from neighborhood meetings and polling that over 1/3 of residents are unaware of the need for this planned fee increase and want additional information before their bills are increased.

It would be unwise for the Denver City Council to endorse the P2P project and the associated financial expense and raise the Annual Storm Drainage Service Charge/Fee to pay for this expense. The proposed fee increase for storm drainage described in CB-16-0306 needs to be revised downward and resubmitted for review by the Denver City Council because there are too many unanswered questions including:

1. The Platte to Park Hill Project proposes to raise the level of flood protection to the 100 year event level for a limited area of Denver and does not help all Denver residents equally. It preferentially benefits an area planned for redevelopment which is already receiving funds from the Bond funding voters approved in 2015.
2. The city's 2014 Storm Drainage Master Plan sets a goal of providing a wastewater level of service for residential areas of sufficient capacity to sustain a 2 year event and for commercial areas sufficient capacity to sustain 5 year event. The price tag to achieve this goal was roughly \$1.5 Billion. Spending such a huge amount on P2P will limit the ability to fund other projects identified in the Master Plan.
3. The need for the Platte to Park Hill Project (P2P), which accounts for 54% of the proposed wastewater improvement, needs to be reconsidered and the fee structure amended to reflect this reassessment.
4. The proposed fee increase is "too much, too fast" and will cause hardship for some Denver residents.
5. This wastewater fee increase is permanent and will be used to finance 30 year bonds that all Denver residents are responsible for paying. As such voter authorization should be required and not administratively authorized.
6. The 100 year level of flood protection is required by the currently favored I-70 redesign choice the "Partial Cover Lowered Alternative." This choice enlarges the highway to almost 200 feet to accommodate 10 lanes and lowers it more than 30 feet below grade in an area subject to regular inundation with 2 year events and passes through 2 drainage basins. For this design to be built surface water must be re-routed so the highway ditch does not fill with run off. Other I-70 redesign alternatives do not require P2P to be built saving \$300+ Million for other projects.
7. In the IGA, the 100 year flood protection project was forecast to cost much less. Current, cost estimates are closer to \$300M. Denver is required to pay 60% of the mitigation. This agreement contains a stop loss for the state. Denver's financial exposure is unlimited.
8. The proposed P2P project involves excavating through known hazardous waste superfund sites. The associated costs cannot be predicted with accuracy and subjects Denver residents to unknown expenses.
9. The proposed P2P funding and the current time table are largely described in an Intergovernmental Agreement (IGA) between the Colorado Department of Transportation and the City and County of Denver. This agreement was approved in July 2015, before the current Denver City Council assumed office and needs to be reviewed as this agreement is not in the best interests of Denver residents.
10. When the I-70 Partial Cover Lowered Alternative option was initially chosen and the IGA executed, the additional non-economic costs associated with the P2P project were not foreseen and the impacts on Denver's historic neighborhoods, City Park and City Park Golf Course were not apparent. This course of action needs to be reconsidered in light of this new information.
11. Since final approval for the proposed Partial Cover Lowered Alternative for I-70 has not been issued, the wisdom of this route and its attendant expense should be reconsidered. Two other CDOT I-70 design options and decommissioning I-70 and re-routing to I-270 / I-76 should be reconsidered since these options do not require this additional \$300M+ expenditure for 100 year event drainage mitigation

Stephen and Victoria Eppler
1254 Clayton St.
Denver, CO 80206
Stepheneppler@comcast.net