



Inter-Neighborhood Cooperation-

November 12, 2013

Mr. Rocky Piro, Manager
Department of Community Planning and Development
City and County of Denver
Rocky.Piro@Denvergov.org

Re: Resolution on General Development Plan Open Space Requirements

Dear Manager Piro:

Established in 1975, Inter-Neighborhood Cooperation (INC) is a city-wide association with current membership of 98 Registered Neighborhood Organizations. INC's mission is to advocate for Denver citizens by bringing together, informing and empowering Denver neighborhood organizations to actively engage in addressing City issues.

At its monthly delegate meeting on Saturday, November 9, 2013, upon strong recommendation of the INC Parks and Recreation and Zoning and Planning Committees, and after discussion, INC delegates passed the attached "Resolution on General Development Plan Open Space Requirements" by a vote of 29 in favor, 1 opposed and 7 abstentions.

Thank you for your attention to this issue and diligence in maintaining the highest standards by pursuing the best practices in community planning and development.

Respectfully yours,

President, INC

Cc: Mayor Michael B. Hancock
Denver Planning Board
Laurie Dannemiller, Manager, Parks and Recreation
Denver City Council
Katie Fisher, Co-Chair INC Parks and Recreation Committee
Michael Henry, Chair, INC Zoning and Planning Committee
INC Executive Committee



Resolution of Inter-Neighborhood Cooperation General Development Plan Open Space Requirements

To ensure a high quality of life for current and future residents, it is urgent that the City and County of Denver acquire additional parkland and provide adequate publicly accessible open space in new developments. This is because our population is increasing, we have a very low percentage of city land devoted to parkland and inadequate open space within developments places additional demands upon Denver's parks system.

For example, at present, the City and County of Denver has approximately 5,900 acres of parkland and open space within the city limits. Of the 43 U. S. cities of comparable density, with 9.8 acres per 1000 residents, Denver ranks 29th in the number of acres per 1000 residents. With regard to area of park land as a percentage of city land area, at 6%, Denver ranks 26th. Six percent compares poorly to 38.2% for Fremont, California, 19.7% for San Diego, California and 18.7% for Albuquerque, New Mexico, the top three cities of comparable density in the list. The top quarter of comparable cities has more than double the percentage of city land devoted to parkland than has Denver. (*Trust for Public Land, City Park Facts, 2012*).

The threat to quality of life to Denver's residents posed by inadequate parkland and publicly accessible open space will only increase in light of population growth and new development. U. S. Census Bureau data show that for the fourth time in the past five years, Denver has led the state in population growth, with a 2.42 percent population increase between 2011 and 2012 alone (denverurbanism.com/2013/03/census-estimates). As a result, it is critical that our public policies support an enthusiastic expansion of the proportion of land within the City and County of Denver devoted to parkland and publicly accessible open space.

It was with this in mind and to clarify ambiguities that existed in the old Zoning Code that in 2010 the new Denver Zoning Code clearly set minimum standards as part of the General Development Plan approval process. Therefore, Inter-Neighborhood Cooperation (INC) does now resolve that:

Whereas the Denver Zoning Code Ordinance Section 12.4.12.5 Minimum Open Space requirements for a GDP reads:

All applications for a General Development Plan shall comply with the following open space standards:

A. Minimum Amount required

A minimum of 10% of the total GDP area (including the Primary Area plus any Secondary Areas) shall be included in the GDP as open space

B. Design Criteria

1. The required open space shall be provided in one (1) or more areas.
2. The required open space shall remain publicly accessible and usable.
3. The required open space shall result in one or more of the following public benefits:
 - a. Enhanced connections to transit facilities, plazas, or streets;
 - b. Enhanced pedestrian environments; and/or Enhances or creates public spaces.

Whereas, a determination has been made by Denver Community Planning and Development that the publicly accessible open space is net and not gross, which allows the deduction of right-of-ways and results in lower required open space, and

Whereas, the requirements for publicly accessible open space in General Development Plans is intended to be a minimum amount and that as a public policy goal, more open space rather than less is desirable, and

Whereas, the “determination” that a lower amount of publicly accessible open space than that required by the Zoning Code ordinance will set a dangerous and unacceptable precedent in regard to the impact of any new large development in all Denver neighborhoods,

Now therefore, does the Parks & Recreation Committee, the Zoning and Planning Committee and the Delegation of INC declare that the Denver Planning Board require that 10% of Total (Gross) General Development Plan Areas, (including primary and secondary areas) for all General Development Plans be devoted to publicly accessible open space as is clearly required in the new Zoning Code, and

Furthermore, it is the position of INC that the Denver Planning Board shall not approve any General Development Plans deficient in open space that would have the effect of diminishing the average per person amount of parks and publicly accessible open space available to Denver residents.