



September 21, 2018

Brad Buchanan
Executive Director
Community Planning and Development

Eulois Cleckley
Executive Director
Denver Public Works

Dear Brad and Eulois,

We are writing on behalf of the Denver Streets Partnership (DSP) to submit comments on the draft Blueprint Denver Plan. The DSP is a coalition of community organizations advocating for people-friendly streets in Denver. On people-friendly streets, walking, biking, and transit are the first choice of transportation for all people regardless of age, income, and ability. People-friendly streets are more than just layers of concrete and asphalt. They are living conduits that connect us to jobs, schools, services, and amenities, and they enable everyone to participate in and benefit from Denver's growth.

We are pleased to see that many aspects of the draft Blueprint Denver Plan will support the creation of more people-friendly streets. The DSP strongly endorses the following elements.

- Goals
 - Develop high-quality mobility options that prioritize walking, biking, and transit and connect people of all ages and abilities to their daily needs.
 - Focus higher intensity growth in walkable, mixed-use centers and along high-frequency and high-capacity transit corridors.
 - Promote a healthy community with equitable access to healthy living for all residents.
- Metrics/Targets
 - Increase the number of neighborhoods where at least 50% of households have access to quality transit, jobs, and retail within walking distance.
 - Reduce the percent of commuters who drive alone to work.
- A preferred growth strategy that directs almost two-thirds of new jobs and half of the new households into highly walkable places with high quality, frequent transit service.

- A new, more context-sensitive street typology, and a mandate to revise street design standards, rules, and regulations to implement the Blueprint Denver street types, modal priorities and a holistic vision for complete streets.
- Policies and Strategies
 - Build streets that are safe for everybody and implement the Vision Zero Action Plan, while prioritizing people walking over other modes of transportation on all streets.
 - Implement the bicycle, pedestrian and transit networks in Denver Moves plans, and pursue funding mechanisms to raise revenue to fund multimodal infrastructure improvements and maintenance.
 - Designate modal priority streets to be designed and operated in a way that prioritizes the comfort and convenience of people walking, biking or using transit, and creates complete networks for each of those modes.
 - Provide equitable opportunities to improve streetscaping and placemaking along city streets, recognizing trees and the natural environment as vital pieces of civic infrastructure.
 - Make transit more affordable to Denver residents, incentivize affordable housing in areas near transit, and mitigate the involuntary displacement of residents and local businesses that may result from major transit investments.
 - Study and implement maximums for off-street parking in private development to encourage the use of alternative modes of transportation.
 - Maximize the use of curb space according to the land use context.
 - Reduce impacts from development to pedestrian and bicycle mobility during construction.

To further strengthen Blueprint Denver, the DSP recommends the following changes and additions.

State the real problem: The conflict between reliance on cars as a primary mode of transportation and other community needs. The introduction to the Mobility Recommendations on page 78 states:

“Denver has a finite street network, but greater demands are being placed on the public right-of-way. These recommendations address how to balance the competing needs for space on streets including safety, moving people and creating attractive public spaces.”

Denver does indeed have limited street space, but safety, moving people, and creating attractive public spaces are not competing needs. Addressing all three of these needs simultaneously is entirely feasible. Collectively, these three needs do compete with reliance on cars as a primary mode of transportation. The plan fails to acknowledge that for many years, by prioritizing cars, Denver’s policies resulted in a transportation system that is unsafe, moves people inefficiently, and degrades the quality of public spaces along many of our city’s major corridors. Prioritization of cars also competes with other Blueprint Denver goals, including

providing mobility options beyond driving for people of all ages and abilities and promoting a healthy community with equitable access to healthy living for all residents.

Clarify priorities for the overall transportation system: The safest, healthiest, most space-efficient modes. Given that cars will continue to be part of Denver's transportation system for the foreseeable future, the Blueprint Denver plan should more clearly state the desired place for cars within that system. Specifically, a clear statement that this update to Blueprint represents a break from previous policies and now views cars, particularly single-occupant vehicles, as lower priority than other modes would provide a more coherent framework for evaluating the real trade-offs that our community must make. The description of the "Complete Network" concept on page 150, however, does not clearly indicate whether the overall system prioritizes any one mode over the other. To actually achieve Blueprint Denver's goals, the overall system - not just individual components - must prioritize the safest, healthiest, and most space-efficient modes. We applaud the plan for clearly asserting that people walking are prioritized over all other modes on all streets, and we urge the City to further assert that for trips that are too long to walk, the overall transportation system prioritizes people using transit, bicycles, and other "small vehicles" that are about the size and speed of bicycles (e.g., scooters). This means that on every street, tradeoffs such as reducing vehicle speeds, restricting turning movements, reducing on-street parking, installing more frequent traffic signals or stop signs, and narrowing or eliminating travel lanes may be called for if these changes increase safety, make more efficient use of space, increase access to healthy mobility options, and/or reduce reliance on cars.

Add critical items to the description of how street design and operation vary by street type: Allocation of space, street width, and mixing of modes. A new, more context-sensitive street typology is an essential tool for implementing Blueprint Denver, and we strongly support the typologies identified in the draft plan. However, the diagram on pages 144 and 145 fails to mention a few key elements of street design and operation that should vary across type:

- Allocation of space in the public right-of-way to cars (driving lanes, on-street parking) versus other uses. The Blueprint should aim to minimize space allocated to cars, particularly in high-volume pedestrian areas.
- Street width (between the curbs), which relates directly to pedestrian safety/exposure and travel speeds. The Blueprint should aim to minimize street widths, particularly in residential areas and on local streets.
- Mixing of modes. In areas with very high pedestrian volumes and/or low vehicular volumes, street designs should facilitate mixing of modes through very low speeds (20 mph or less). On streets with higher vehicular volumes, the City should separate modes by speeds, with designated spaces for people walking/using assistive mobility devices (5 mph), people biking or using other small vehicles (15 mph), and people driving personal vehicles (20 - 30 mph).

Add more details on Vision Zero goals, policies, and strategies. While Blueprint Denver references Vision Zero throughout, additional details would more effectively support Denver's commitment to eliminating traffic fatalities and serious injuries:

- Include zero traffic fatalities and serious injuries as one of the key goals/metrics at the beginning of the plan. Currently, this specific goal is only mentioned a few times in obscure locations.
- Highlight the extensive overlap between the High Injury Network and other key geographies identified in the plan, and therefore the urgency of improving safety on these corridors. This overlap includes priority transit and pedestrian streets, and community and regional corridors where the majority of growth is targeted.
- In the Mobility Recommendations section, go beyond merely stating “implement the Vision Zero Action Plan” and describe some of the most important strategies in the plan, including:
 - Prioritize vulnerable communities that are disproportionately victims of traffic fatalities and serious injuries, including people walking and biking, low-income communities, and communities of color.
 - Create a speed management program to systematically evaluate and promote safe speeds, including a focus on reducing speeds on the High Injury Network and citywide.
- When discussing the role of technology (for example, Policy 5 under Mobility Recommendations: “Embrace emerging technologies for mobility and transportation safety”), provide more detailed examples of how technology can and should promote safety, such as:
 - Limit the speed of autonomous vehicles, and require them to always yield to pedestrians.
 - Use geofencing or other techniques to ensure shared vehicles (both small and big) are parked safely and to direct passenger pick-up/drop-off to safe locations.
 - Incorporate automated detection and other technologies into traffic signals that minimize wait times for people walking and riding small vehicles (bikes, scooters, etc.), which will increase compliance with these signals.
 - Use automated enforcement (speed cameras and red light cameras) to promote safety on the High Injury Network.
- When discussing how target operating speeds may vary across different street types (the diagram on pages 144 and 145), highlight the need to reduce speeds on streets citywide, and particularly on the High Injury Network.

More clearly state an intention to reduce Denver resident’s reliance on cars. The description of “Neighborhood Contexts” on pages 146-149 indicates the extent to which residents rely on cars in each of the contexts. However, the plan does not clearly explain how “reliance on cars” is defined or measured, or what percent of residents live in areas that are “reliant on cars” today or in the future envisioned in Blueprint Denver. Given the inherent conflict between continued reliance on cars and achieving Blueprint Denver goals, the plan should explicitly aim to reduce reliance on cars and monitor progress toward this outcome over time.

We greatly appreciate the extensive amount of community engagement, data analysis, and thoughtful discussion that informed the development of the draft Blueprint Denver Plan. The plan plays an extremely important role in establishing a clear, community-supported vision for

the future of our city and guiding transportation and land use decision-making for years to come. The DSP looks forward to actively partnering with the City to implement the final plan adopted by the City Council.

Please do not hesitate to reach out if you or your staff would like to discuss any of the DSP's comments or recommendations. We would be happy to work with City staff to develop specific changes to the text of the document that address our comments.

Sincerely,

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Denver Director, Bicycle Colorado

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