

# Elyria-Swansea Neighborhood Association

4653 High Street  
Denver, Colorado 20212

Community Planning and Development  
201 W. Colfax Ave., Department 205  
Denver, Colorado 80202

Subject: **Comments on draft *Denveright* Planning Documents**

Dear Friends,

Our RNO has reviewed and discussed the draft *Denveright* Comprehensive Plan and the draft *Denveright* Blueprint Denver Plan. Below are comments from ESNA that focus on our review.

First off, the sheer volume of material released for public review is quite overwhelming. There are than 1,000 pages of information in the five *Denveright* documents released. Both ESNA and colleagues with the Inter Neighborhood Cooperation have found this release of massive amounts of narrative, charts, and images to be quite challenging and less than user-friendly for City residents. Moreover, in reviewing the draft Comprehensive plan and Blueprint plan, it is confusing to find the same elements and topics addressed with different names in the two plans, as well as a disconnect in the goals from document to document, as well as the policies, and strategies. The two documents are somewhat parallel, and it is not clear why we are producing two similar plans simultaneously. ESNA requests consolidating them into one document – a document that is simple in its outline and presentation of goals, policies, and strategies. This material needs major streamlining to make it usable by citizens, staff, and elected officials.

## **The Environment**

ESNA believes addressing our natural environment should be the foundation for all plans and programs in the City and County of Denver. To that end, the *Denveright* plans fall short. We have areas of the city with serious environmental damage – including neighborhood of Elyria and Swansea. Together with Globeville, our zip code – 80216 – has been identified as the most polluted zip code in the US. Polluted and contaminated lands in our City should be our primary concern in terms of livability, health, and even economic resiliency – yet that is absent in the *Denveright* plans.

ESNA strongly requests that the *Denveright* plans be rewritten to begin with provisions that focus on environmental restoration and protection. Specifically, ESNA requests that an Environmental Element begin each plan and address (1) contaminated and toxic soils, including superfund sites, (2) polluted and unhealthy water and waterways, (3) air pollution (note: the American Lung Association now ranks Denver as 11<sup>th</sup> worst in the US), and (4) concrete provisions for mitigating climate change.

**Land and Soil.** Please include goals, policies, and strategies to identify all contaminated soils in the city, to state priority directives for their clean-up, and provide clean actions for remediation and restoration to healthy functions. We request specific actions be included to address the complete clean-up of all superfund sites.

**Water and Waterways.** Please include goals, policies, and strategies to identify the polluted conditions of waterways in the City, including the sources of the pollution. Again, we request that policy directives state that clean-up and restoration of waterways to healthy conditions is a priority for the City. Include specific actions on restoring our watersheds and repairing our rivers and riparian

corridors. We also feel “trail-oriented development” is problematic and request that the draft provisions calling for “trail-oriented development” be eliminated from all *Denveright* documents. The focus should be on healthy natural corridors and not new areas for development.

***Air and Climate.*** I believe we are at a crisis moment once again regarding the City’s and region’s air quality. Ranking 11<sup>th</sup> nationally in air pollution is inexcusable and demonstrates a failure in leadership and in the stewardship role government should be playing. Please include goals, policies, and strategies to identify specific directives and actions for improving our air quality to levels much better than minimum state and federal standards. In addition, while it is welcome to see climate acknowledged in the *Denveright* plans, the documents lack concrete provisions for mitigating climate impacts. I request specific information be included on existing and forecast climate change conditions in the City. I further request that *Denveright* include clear guidance and actions for reducing greenhouse gas emissions in all manners and forms throughout the City. It is also surprising that there is very little mention of energy – especially clean energy and alternative – in the *Denveright* process. Let’s do more than simply mention climate; let’s commit to concrete steps and show leadership on this issue.

The most egregious example of the City of Denver not standing by its words is in the history of its role in the I-70 expansion process. Throughout the I-70 expansion process, the City has never stood up for the neighborhoods of Elyria and Swansea. The City – specifically the Hancock administration -- has consistently rolled over for whatever CDOT wants. The City of Denver has never been more than a toady to CDOT. This is disgraceful.

### **Health and Wellness**

The provisions on health in *Denveright* are narrow, with a focus primarily on walking or recreational activity. The state of the practice in city planning has become much more expansive and comprehensive in addressing all aspects of health in an urban environment. I request that the focus on active living be expanded to address “healthy communities” and all which that entails.

I request that a stand-alone “Health Element” be included in *Denveright* which begins by identifying the following: (1) areas of the city with unhealthy levels of pollution and contaminants, (2) identification of life-expectancy in all areas of the city, with information on at-risk populations, localized areas of pollution, and disease patterns. The element should then include goals, policies, and strategies that address the following: (1) environmental restoration, including clean water and clean air, (2) personal health and disease prevention, (3) healthy homes and building materials, (4) healthy and complete communities, including access to services and healthy food, (5) healthy and safe transportation, (6) hazards mitigation, and (7) economic stability and resiliency. Health should clearly be identified as a determinant considered at the front end of all plans, programs, and projects in the City. Health factors and impacts should be fully assessed before any projects can go forward. This would include incorporating features in projects and programs that clearly demonstrate health benefits for the community in which they are located. As a practicing architect, I request that provisions be included in *Denveright* to apply green building standards as a mechanism to reinforce best practices in advancing health and wellbeing for all projects in the City.

Also, CPD needs to better explain its maps. There are many errors. Specifically, they call out the Park Hill Golf Course as mixed-use development. The citizens of Denver have a 99-year conservation easement on the PHGC that should not just be torn up for development without a true transparent public discussion. This needs to be corrected. We request that the City staff explain better their maps as shown in *Denveright*.

Furthermore, we request information regarding the role of outside consultants and the process of citizen engagement. We fear that if you have farmed-out the public process, we have a serious conflict of interest, and residents best interests are not being looked after.

Finally, we do not feel that enough time is being given to such a large, important task. This major change that will have decades-long impact should not be rushed in such a manner.

We welcome any follow-up correspondence and look forward to your response to our comments.

Sincerely,

Drew Dutcher  
President  
Elyria and Swansea Neighborhood Association  
4653 High Street  
Denver, CO 80216  
(303) 349-4360  
[drewdutcherdirect@gmail.com](mailto:drewdutcherdirect@gmail.com)

Copies

Inter Neighborhood Cooperation  
P.O. Box 300684  
Denver, Colorado 80218-0684

City Council Members  
1437 Bannock Street  
Denver, Colorado 80202

[sarah.showalter@denvergov.org](mailto:sarah.showalter@denvergov.org)  
[comayl@aol.com](mailto:comayl@aol.com)  
[dencec@denvergov.org](mailto:dencec@denvergov.org)  
districtone@denvergov.org  
kevin.flynn@denvergov.org  
paul.lopez@denvergov.org  
kendra.black@denvergov.org  
marybeth.susman@denvergov.org  
paul.kashmann@denvergov.org  
[districtseven@denvergov.org](mailto:districtseven@denvergov.org)  
christopher.herndon@denvergov.org  
albus.brooks@denvergov.org  
wayne.new@denvergov.org  
stacie.gilmore@denvergov.org  
kniechatlarge@denvergov.org  
ortegaatl@denvergov.org