

November 8, 2018

To: Denveright planning team
CC: Denver City Council

Re: INC Transportation Committee comparison of Denveright plans to *INC Transportation Platform*

Thank you for the opportunity to review and comment on the first drafts of the Denveright plans, and for the extension which allowed our committee, which meets every alternate month, to complete our review.

In 2015 by unanimous vote of our neighborhood delegates, Inter-Neighborhood Cooperation adopted the *INC Transportation Platform*. Concluding today at our regular Transportation Committee meeting, we have reviewed the initial drafts of the Denveright plans *Blueprint Denver*, *Denver Moves: Transit*, and *Denver Moves: Pedestrians and Trails* against the related points in our platform. This review summary was approved by vote of the Transportation Committee attendees today, with 19 voting in favor and zero voting against.

Although some transportation-relevant goals are in the *Comprehensive Plan 2040* draft, if the goals are missing in *Blueprint Denver* but are relevant to points in our platform, their absence will be highlighted here.

This review is focused solely on comparison with the *INC Transportation Platform*, and as such is citywide and high-level in nature and should be additive to the specific and more-detailed comments submitted by RNOs, organizations, and individuals.

We look forward to seeing changes in the next drafts based on public input.

Joel Noble
Chair, INC Transportation Committee

INC Transportation Platform section: Principles

Item 2: Neighborhoods and citizens should have meaningful engagement in transportation planning and evaluation of tradeoffs that are inherent in implementation.

- ☒ Thank you for appointing neighborhood representatives from across the city to the task forces for each plan, and to the “Think Tank” community review group.
- ☒ As we move from planning to implementation in 2019, we strongly urge that active engagement with neighborhoods continue, particularly as tradeoffs in how right-of-way is allocated can only benefit from high levels of collaboration with the community.

Item 4: Denver's transportation network should continuously evolve to move people safely and efficiently by various modes.

- ☑ The Denver Moves suite of plans provides a framework for evolution of separate yet interdependent modes of travel, and *Blueprint Denver* brings together the modal priority networks in order to set expectations for overall priority on many streets.
- ⊖ None of the plans sufficiently address funding strategies for implementation, running the risk that the plan vision will not be implemented in a reasonable timeframe, as has been the case thus far with *Denver Moves: Bikes* (2011). The next draft of *Blueprint Denver* should have clearer direction for funding priority, and with adoption by City Council, should actively guide investment.
- ⊖ *Blueprint Denver* does not yet incorporate the *Vision Zero Action Plan*'s goal of eliminating traffic deaths and serious injuries by 2030, which needs to be the cornerstone of transportation safety planning. The *Vision Zero Action Plan*'s High Injury Network should also be incorporated into *Blueprint Denver* and referred to in policy recommendations and as a key goal in the new street design guidelines.
- ⊖ While many future technology changes are speculative, adoption of a new *Blueprint Denver* in 2019 really should have more to say about dockless bike share, scooter share, and similar powered and unpowered devices already seen today. As it is, we do not have clear guidance as to where such devices should operate safely and where they should be stored. Public Works is considering these topics today, and should be able to recommend appropriate language for *Blueprint Denver* goals and strategies.

INC Transportation Platform section: Communications/Transparency

Item 1.6: Denver and other transportation agencies should adopt comprehensive data-driven approaches to manage and improve all travel modes, considering capacity, delay, collisions, injuries, fatalities, and infrastructure quality. This data should be open and available to the public to enable exploration and insights as part of a continuing dialogue on managing the public right-of-way.

- ⊖ *Blueprint Denver* calls for many measurements of progress, however very few travel related measurements are called for. The INC Transportation Platform's item 1.6 provides a starting point for these additions, and publicly-available measurements should be incorporated into the regular *Blueprint Denver* metrics tracking.

INC Transportation Platform section: Planning and Funding

Item 2.6: We strongly urge that the planned update to Blueprint Denver in 2015 and 2016 go further than the original 2002 plan in linking transportation capacity with land use recommendations, placing a priority on increasing the total ability to move people on corridors and in areas where the community-driven plans call for more development.

- ☑ *Blueprint Denver* takes a cautious approach to recommending land use changes along the future *Denver Moves: Transit* corridors, deferring land use recommendations until those corridors are ready to meet their High Frequency / High Capacity service goals. This is appropriate, and neighborhood plans need to be sequenced logically in order to find consensus on land use evolution as these transit corridors are upgraded.
- ☑ *Blueprint Denver* builds on the *Strategic Transportation Plan* by focusing on people movement by all modes, rather than automobile movement.

Item 2.7: Ensure that neighborhoods are actively involved in the development and adoption of a more comprehensive “complete streets” policy and design guidelines.

- ⊖ *Blueprint Denver* does not yet recommend creation of a more comprehensive “complete streets” policy, and we ask that the next draft includes this recommendation. The new policy should be informed by model plans developed through experience in other cities. Adoption of a Complete Streets policy is not redundant to the modal priority maps in *Blueprint*, and future design guidelines, if well-done, will need the type of guidance that a complete streets policy can provide. Denver’s current complete streets policy memo is entirely insufficient.

Item 2.17: Denver’s transportation planning is interdependent on transportation planning in surrounding communities. Ensure that plans across communities are coordinated, while maintaining Denver’s ability to move towards our transportation goals.

- ⊖ It is unclear to what extent Denver has partnered with surrounding municipalities on the creation of the *Denveright* transportation recommendations. Recommendations in the draft plans do recognize the need to coordinate with adjacent cities and with agencies such as RTD. In order to implement the plans within the 20-year planning period, we cannot afford to spend years in potential disagreements over street design and modal connectivity. Coordination needs to be made an early priority in all relevant areas.

INC Transportation Platform section: Safety/Health

Item 3.1: Denver should commit itself, at the highest levels, to the Vision Zero goals of eliminating traffic fatalities and serious injuries, learning from the emerging best practices in other cities. This is a moral issue – life and health are of paramount importance, and the transportation systems and features should lessen the impact when inevitable human errors occur.

- ⊖ As discussed above, the first draft of *Blueprint Denver* does not incorporate Vision Zero goals, strategies, and metrics deeply enough.

- ⊗ It would be appropriate for *Blueprint Denver* to emphasize and prioritize an “inclusive communications campaign to heighten awareness and understanding of traffic safety among the public, public agency staff, and the media,” per the Vision Zero Action Plan. Too many of our residents are unaware of the seriousness of the traffic safety situation. Heightened awareness can drive not only individual behavior change, but also support for needed infrastructure changes resulting in safer streets.

Item 3.3: Speed control for safety should be best achieved by street design, including lane widths, not simply speed-limit signage and police enforcement which are never sufficient to change behavior. Where speeds can and should be reduced, signage may be necessary but is not sufficient.

Item 3.4: Evaluate and revise lane width standards and speed limits using a detailed street typology and considering safety best practices from other cities. Where neighborhoods find that safety and livability would be enhanced by lane width reductions, “road diets,” street realignments, or roadway, viaduct or highway removals, while preserving or enhancing overall transportation effectiveness, such changes must be seriously considered by all departments and agencies.

- ☑ New street design guidelines are called for in Policy 4 on page 81 of *Blueprint Denver*
- ⊗ The policy statement and strategies should be expanded to explicitly bring forward the strategies in the *Vision Zero Action Plan* for incorporation in the new standards. Safety is paramount and must be repeated and ensured.
- ⊗ The absence of any “big move” opportunities identified in this 20-year plan for highway, viaduct, or cloverleaf removals in order to tame traffic and reconnect neighborhoods is a significant missed opportunity. Not even the Colfax/Federal cloverleaf was called out for study.

Item 3.5: Traffic speeds in residential neighborhoods should be lower than speeds on main arterials between neighborhoods. “Neighborhood slow zones” are a promising design/policy response to the safety effects of cut-through traffic. The City should amend its design standards to include speed humps as an option for traffic calming.

- ⊗ *Blueprint Denver* suggests that all arterials should be higher speed, even though the typology that Public Works uses and which *Blueprint Denver* refines includes arterial streets within residential neighborhoods. The diagram on page 144-145 is particularly alarming, suggesting that the key safety strategy of lowering speeds within neighborhoods, specifically on neighborhood arterials, is being overlooked.
- ⊗ Similarly, the dangerous suggestion on page 144-145 that driveway access with curb cuts should be “frequently allowed” on residential streets directly contradicts years of efforts, in zoning code and Public Works standards, to stop dangerous crossings of sidewalks by vehicles, particularly where alley access is available. This diagram is overly simplistic and presents real risk of recommending counterproductive strategies for safety.
- ⊗ *Blueprint Denver* should specifically call for the creation of “neighborhood slow zones” as a Vision Zero strategy.

INC Transportation Platform section: Walkability

Item 4.1: The pedestrian network is fundamental to making all other modes of transportation possible, including transit and biking.

- ☑ *Blueprint Denver* and *Denver Moves: Pedestrians and Trails* make this point well.
- ☑ *Denver Moves: Pedestrians and Trails* provides a logical prioritization for new sidewalk construction, linked to *Denver Moves: Transit* and Vision Zero Action Plan priorities.

Item 4.2: Denver should adopt measures to preserve and complete sidewalk networks, including flagstone sidewalks where that is part of the established character of an area.

- ⊙ For over a decade, INC has been consistently calling for a method to identify and document areas where flagstone sidewalks are a valued part of the historic character. The *Pedestrian Master Plan* contains an unimplemented Policy 5.4, “Preserve historic character and design including historic flagstone sidewalks, appropriate tree preservation/replacements and respect for the spatial design of parkways,” with a note that “Current City policy requires existing flagstone be replaced with new flagstone in historically designated areas with substantial new development.” This has never been implemented in fact, and the *Denver Moves: Pedestrians and Trails* plan seems unwilling to clearly state this goal and intention, despite INC’s feedback in the preliminary review period for that plan. The new Sidewalk Repair Program and the Public Works inspectors’ practice of actually requiring the removal of flagstone sidewalks adjacent to new development are both accelerating the loss of this historic resource. We call for language similar to “Preserve historic character and design including historic flagstone sidewalks, and develop policies for continued use of flagstone in historically designated areas where this is a part of the area character” be added into policy 2 on page 71 of *Blueprint Denver* under “Ensure residential neighborhoods retain their unique character as infill development occurs,” historic preservation, and again under the Mobility section starting in page 78.

Item 4.3: Denver should replace the current city policy that makes individual homeowners responsible for the cost of installing or repairing walks with alternative sources of funding. Leverage the city’s negotiating power to get the best value on sidewalk installation and maintenance.

- ⊙ The key message of the *Pedestrian Master Plan* is that the existing arrangement of individual property owners being responsible for the cost of installing and repairing sidewalks is at odds with the goal of achieving a complete, maintained, safe pedestrian network. While the *Denver Moves: Pedestrians and Trails* plan takes a tactical approach to identifying and prioritizing gaps, it omits any goal to address this long-term, strategic flaw in how we fund sidewalk installation and maintenance. Therefore, we ask that a strategy be added to recommendation 12 on page 85 (“Pursue funding mechanisms to raise revenue to fund multimodal infrastructure improvements and maintenance”) of *Blueprint Denver*, calling on Denver to study simple, fair, efficient and scalable ways to fund sidewalk installation, enhancement and maintenance citywide.

Item 4.11: Denver should move expeditiously to create a comprehensive Denver Moves: Pedestrians and Trails plan, focused on actionable policy changes and implementation. The plan should include a map of pedestrian priority streets and corridors at the neighborhood level. The plan should also include improved, enforceable design standards for these streets and their intersections

- ☑ Thank you for including *Denver Moves: Pedestrians and Trails* in the Denveright scope, and ensuring good linkage between *Blueprint Denver* and this plan
- ☑ *Blueprint Denver* calls for creation of new design standards for streets and intersections.

Item 4.12: Some sidewalk café patios seriously degrade the pedestrian environment. Streetscape guidelines should prevent the private claiming of large amounts of public right-of-way when it results in pushing pedestrians against moving traffic, or significantly diminishing the sidewalk. The design standards should emphasize the importance of a safe, comfortable pedestrian realm. The Department of Excise and Licenses and the Public Works Department should be involved to explore ways to limit the permanent claiming of public right of way for outdoor cafes that are only used a few hours per week, seasonally.

- ☑ Policy 3 on page 81 of *Blueprint Denver* clearly states “On all streets, prioritize people walking over other modes of transportation,” and further includes the strategy to “Ensure that café seating in the right of way provides adequate space for pedestrians and streetscaping, especially in areas with high pedestrian volumes.”
- ⊖ However, this same recommendation should be strengthened. “Adequate” space today in practice means providing a minimal 5-foot sidewalk with the pedestrians pushed up against moving traffic, when a nice, wide comfortable sidewalk was available prior to the café introduction. Policy 3 is not strong enough to prevent this all-too-common outcome.

Item 4.13: Denver should develop improved streetscape standards, options, and funding mechanisms for street trees, pedestrian lighting, public art, and amenities to promote place-making in pedestrian zones and along pedestrian corridors.

- ☑ *Blueprint Denver* discusses aspirational streetscape goals, and does recommend finding equitable funding sources for upgrading streetscape.
- ⊖ *Blueprint Denver* should clearly identify the key regulatory hurdle impeding truly effective streetscape standards in Denver: the City is not willing to enforce any streetscape standards for what is installed and maintained in the right-of-way by adjacent property owners. Without clearly identifying this problem, we have little hope that Denver will prioritize addressing the problem so that we can benefit from effective streetscape requirements.

Item 4.18: Denver needs to clarify and meaningfully emphasize Pedestrian Priority Zones – these now exist, in areas such as Cherry Creek, but it’s not clear what they mean.

- ☑ *Blueprint Denver* does map Pedestrian Priority Zones, identifying these as areas where further enhancement can create vibrant public spaces.

- ⊗ However, the terminology throughout the plan is inconsistent (pedestrian enhanced areas vs. pedestrian priority zones), and appears to provide no specific recommendations beyond wider sidewalks.

INC Transportation Platform section: Bikeability

Item 5.2: Denver should work with neighborhoods to prioritize implementation of bicycle facilities, as envisioned in community discussions captured in Denver Moves: Bikes. Focus on the build-out of a network of facilities comfortable for the main population of interested riders who do not feel comfortable riding in fast or heavy traffic. Use data to inform discussions of tradeoffs that are inherent to changes, including on-street parking in some areas.

- ⊗ *Blueprint Denver* highlights high- and medium-ease-of-use recommendations from the second edition maps from *Denver Moves: Bikes* (as revised). However, a complete bicycle network will also include traditional bike lanes and other treatments where speeds are lower, such as in neighborhoods. With the introduction of competitive bike share providers and electric scooters, the clear identification of where different modes should operate is becoming critical beyond the major high-ease-of-use network. Additional language regarding full build out of all *Denver Moves: Bikes* facilities and regarding the creation and adoption of a strong Complete Streets policy should be added to *Blueprint Denver*.

Item 5.4: We support Denver Moves' call for Bike Boulevards ("Neighborhood Bikeways") where developed in conjunction with neighborhoods.

- ☑ The Bicycle Priority map brings forward the *Denver Moves: Bikes* high- and medium-ease-of-use facilities, which appears to include Bike Boulevards/Neighborhood Bikeways.

INC Transportation Platform section: Transit

Item 6.1: We support the creation of the Denver Transit Plan, and call for extensive neighborhood involvement in setting the vision, goals, and approaches in this plan. The plan should set the vision for a transit system that a much higher proportion of citizens will choose to use.

Item 6.3: RTD should improve bus routes and operations to increase ridership. Improvements in route clarity and all-day frequency should be emphasized and key activity centers should be connected.

Item 6.7: The City and RTD should explore the creation of Bus Rapid Transit corridors in Denver to provide enhanced, frequent, attractive and rapid service on major streets without rail service.

- ☑ *Denver Moves: Transit* provides an excellent first vision plan for a network of frequent, rapid, all-day transit that can be implemented at a variety of investment levels depending on the needs of each corridor and technology chosen. Such a network would be easy to understand, involve no up-front planning to use, and would be a solid and attractive alternative that, a much higher proportion of residents would choose based on their trip-by-trip needs.

- ☑ *Denver Moves: Transit* sets out clear, ambitious, measurable and time-bound targets, such as “By 2040, 75% of household and jobs are within 1/4 mile (10-minute average walk) of the Frequent Transit Network, and 1/2 mile from enhanced stops/stations”, increasing transit commute mode share to 15% by 2030 and increasing all-trip transit mode share to 10% by 2040.
- ⊗ The major gap in *Denver Moves: Transit* as an implementation plan is the absence of strategy and prioritization for funding these important improvements to roadways, pedestrian access, and service. Chapter 6 provides a good summary of best practices for governance and funding, and Chapter 4 includes rough current-dollar estimates for different scenarios (although the omission of a high- and medium-capacity BRT scenario should be remedied), but those inputs do not lead to specific funding approach recommendations. It appears that this discussion is being deferred to “Phase 2”. If this plan is to gain traction in time to meet the 2030 and 2040 goals, Phase 2 needs to begin promptly, and continue to have significant public involvement to ensure focus and support.

Item 6.10: Quality, safe transit stops are vital to make transit usable by all, in all weather. Bus stop signs in the mud or ice are unworthy excuses for transit facilities.

- ☑ *Denver Moves: Transit* identifies stop quality and stop amenities as important issues.
- ⊗ Although recognizing in footnotes that no comprehensive inventory of stops in Denver is currently available, the plan does not recommend creating and maintaining such a resource. This inventory is critical, and must be collected and maintained, including accurate descriptions of the conditions at the stops, so the City can prioritize remediating the worst stops immediately. You cannot improve what you do not measure. In the draft plan, stop amenity typologies are discussed, but there is only one small hint (in the appendix on page B-66, as an image caption) at how bad many transit stops currently are.

Item 6.13: Denver should explore innovative transit options from both public and private providers, in order to attract more people to efficient modes of travel for at least some of their trips.

- ☑ Policy 5 on page 82 looks toward emerging technologies for mobility and transportation safety, with a focus on reducing single-occupant-vehicle trips in favor of more efficient modes that move the greatest number of people.
- ⊗ The policy should be further clarified to explicitly seek ways to disincentivize or prevent zero-occupant-vehicle trips if autonomous vehicles circulating for passengers threaten to add to congestion.