



Inter-Neighborhood Cooperation  
Zoning and Planning Platform  
Blueprint Denver Comments

Denveright planning teams in Community Planning and Development,

Thank you for the opportunity to review and comment on the first draft of the Blueprint Denver plan, and for the 30-day extension which allowed our committee to meet once more to review our comments.

In 2014, Inter-Neighborhood Cooperation adopted the [\*INC Platform for Zoning and Planning\*](#). Our Zoning and Planning Committee and our Co-Chairs have been involved on the taskforce throughout the development of the Blueprint Denver Plan. We have reviewed the initial draft of Blueprint Denver against the related points in our platform.

This **attached review** is focused solely on comparison with the *INC Zoning and Planning 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 draft based on public input, and you should expect a second round of comments from our group.

Please note the numbering below come from sections directly from our platform.

## **2.1 Neighborhood Participation & 3.3 Inclusiveness**

Neighborhood representatives from throughout the city served on each Denveright taskforces.

## **3.4 Regulating Plans**

Blueprint Denver should recommend officially removing this from the Denver Zoning Code. To our knowledge there haven't been regulating plans developed recently. This is a confusing, and poorly-considered part of the zoning code, and no more Regulating Plans should be created.

## **3.8 General Development Plans**

Blueprint Denver should recommend the principles that guide the revision/replacement of the General Development Plan (GDP) process. We understand there is a growing

consensus that the GDP tool needs to be replaced, with the community-centered and city-led neighborhood plan / small area plan process as the sole vision-setting adopted plan process, not developer-led GDPs. As such, it would be helpful if Blueprint Denver provided guidance for this hopefully near-future change. We are aware that Community Planning and Development has already begun this process. If placed in Blueprint it will help guide it through the process, and would be a quick accomplishment on the list.

#### **4.1 City Plan Updates & 6.1 Funding**

Our Platform called for review and update of the Comprehensive Plan and Blueprint Denver, which is being done. Though the timing of the Comprehensive Plan, not coming before the development of the other plans. This of course being a diversion from previous planning efforts. After meeting staff regarding the Comprehensive Plan, we were informed as to the reason for this methodology, but we ask will updating smaller plans and adding them to the comp plan become the new norm rather than a more comprehensive process? We believe that the community should be involved in this decision making process.

Our platform INC ZAP called for regular review of these city plans every 8-10 years. Review of Blueprint Denver adopted in 2002 began in 2016, a 14-year gap. The draft plan recommends more regular reviews to track progress on recommendations and measurable outcomes, which is an improvement. Perhaps a recommendation that dedicates funding to ensure that our planning process become more regularly.

Our platform calls for neighborhood / small area plans every 15 years for every neighborhood, which Has been initiated with the Neighborhood Planning Initiative (NPI). Blueprint Denver will be the first document adopted by City Council to capture this NPI intent and keeps the city focused on this important goal. Therefore, the Blueprint Denver language should be extended to capture the iterative “every neighborhood every 15 years” goal, and should explicitly recommend sufficient ongoing funding for NPI so this vital community planning process continues to be appropriately resourced.

#### **4.2 Area Plan Changes**

Updating the zoning map after a new area plan is adopted is called for in our Platform, and is referenced in Blueprint - Policy 11, page 51

#### **4.3 Sign Code**

Blueprint Denver draft does NOT include any language on updating the Sign Code as part of the Denver Zoning Code. Community Planning and Development is well aware of the need to update the sign code, particularly to address missing illumination levels from all sign types, including newer LED sign technologies that have emerged in regular use since 2002. Delay in updating the sign code is contributing to an urgent situation, with an increasing number of signs causing glare, distraction, and light pollution. Blueprint Denver should recommend a near-term study and replacement of the sign code, with significant community involvement.

#### **4.4 Area Plan Amendments**

INC ZAP Platform contains the first call for Denver to be able to amend adopted area plans when changes in the community vision need to be captured, and particularly when new and unanticipated large changes occur (e.g. when an institutional use leaves an area). The ability to amend plans is often the most appropriate path in such cases, with full and inclusive community involvement, rather than developer-led GDPs attempting to set the vision. CPD has responded to INC's request with a new practice of amending neighborhood & small area plans, including 38th/Blake and the Downtown area plan. It is good to see this practice officially recognized and recommended in the draft BP text (pg. 37) and extending to the ability to amend Blueprint Denver itself (pg. 35).

#### **4.5 Periodic Evaluation**

Blueprint Denver calls for periodic review of progress on goals. We strongly encourage this and would like to be involved in those reviews. We also suggest the creation of work plan, there are many goals within this plan, and without a near and long term plan, we believe the goals will not be efficiently and effectively implemented.

#### **5.1 Fully implement 2010 zoning code**

Blueprint Denver calls for the updating of all property to the new zoning code on page 45. Again, we believe this should be done in the near term.

#### **5.2 Compatibility with Adjacent Neighborhoods & 5.3 Areas of Change**

Blueprint places a new emphasis on "context" and this is promising. However, the achievement of this goal is also going to depend heavily on the success of design quality strategies and tools. We acknowledge that there is much discussion about design review tools. And we would like to thank Community Planning and Development for participating on our Design Review Symposium.

#### **5.5 Balance**

INC ZAP's platform calls for improving the quality and affordability of living in Denver. Blueprint Denver has important recommendations throughout for design quality, open space, and affordability, which need to be given high priority for implementation. Though drafters have made clear that they believe legally we cannot require affordable housing, it has become clear through the Equity analysis and Blueprint Taskforce dialogue that it is our wish to include goals, that we write it however necessary to legally to explore opportunities to lobby to achieve affordability throughout the city.

#### **6.6 Historic Preservation**

Blueprint Denver needs to adopt and re-assert the intention in the *Pedestrian Master Plan* to preserve flagstone sidewalks in areas where that is important to the historic character. This has been long called for in INC's Sidewalk Position Statement brought forth by the ZAP committee to the delegation, and was re-adopted by INC in 2015.

#### **7.1 Land Use and Transportation & 7.4 Transit**

The Places Map of Blueprint Denver does not prematurely recommend overall higher intensity along the Denver Moves: Transit frequent corridors, leaving it to be revisited with additional planning as and when the frequent transit vision is actually being funded implemented. This represents an important move by Community Planning and Development to truly link land use with creation truly high-quality transportation options, rather than along corridors that have bus service levels that are inadequate to meet the demand of increased density.

## **7.2 Sidewalks**

Blueprint Denver correctly identifies the importance of pedestrians and sidewalks.

However, funding of sidewalks is not identified as a strategy, yet it must be.

The *Pedestrian Master Plan* correctly identified the key issue of how funding installation and repair of sidewalks is done as the key problem resulting in our poor sidewalk situation today. Unfortunately, the tactical *Denver Moves: Peds and Trails* plan does not focus on this overarching issue. It would be very appropriate for a strategic, long-range adopted plan such as Blueprint Denver to identify a goal of finding a more efficient, reliable, and sustainable way to fund and perform sidewalk installation and maintenance. As a long-time INC position represented in earlier position statements and in current ZAP and Transportation Platforms, we strongly request that Blueprint add text in this regard.

Sincerely,

Charles Nadler - Co-Chair

Ean Thomas Tafoya - Co-Chair