

*Denver without its history
is a city without
its soul.*

Denver Historians Colloquium
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<https://dr-colorado.com/>

14 September 2018

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

Subject: Comments on *Denveright Comprehensive Plan 2040* and *Denveright Blueprint Denver*

We represent a group of Denver-based historians from many different walks of life – authors, educators, former officials, design experts, preservation advocates, and more. Our pattern is to meet most weeks throughout the year and discuss current projects related to historic preservation, including research, writing, historic tours, restoration efforts, and design.

We are transmitting comments to you on the historic preservation and urban design provisions in the recently released draft plan documents titled *Denveright Comprehensive Plan 2040* and *Denveright Blueprint Denver*.

Urban Design and Historic Preservation As Addressed in the *Denveright* Plans

Thank you for including a series of goals addressing urban design in the draft *Comprehensive Plan*, including goals addressing quality urban design (2.2; 2.2.A; 2.2.B), aspirational design (2.2.C), design and health (2.2.D; 2.9.A), street standards (3.3.B), and park and parkway connectivity (5.6.B). We also welcome the goals that address historic preservation, including a citywide preservation plan (2.3.A), public awareness (2.3.B), and neighborhood preservation (2.3.C; 2.3.D).

We also acknowledge that in the *Blueprint* draft, there is a subsection on urban design that calls for studies and tools for design, including area-specific design standards (03.A) and street design guidelines (04.). That subsection also calls for historic resources surveys (06.A), a citywide preservation plan (06.B), and preservation incentives (06.D)

Requested Revisions, Additions, and Changes to draft *Denveright Comprehensive Plan 2040*

1. The goal language in the document is soft: "support," "enhance," "empower," "ensure", "embrace," "promote." This sounds suggestive, rather than directive or prescriptive. Please replace with strong action verbs that give these goal statements a sense of standing.
2. It is unclear how to apply the document for decision-making. Clarify how goals will be used in various official functions of the city, including decision-making by the mayor and city council.
3. Colorado Revised Statutes identify "Urban Design" as an element for comprehensive plans. We request a stand-alone *Urban Design Element* that brings together all of the design and preservation goals into a single section.
4. The Plan's introduction needs to include a foundation for planning based on Denver's (1) natural setting and (2) historic context. That should be prominent in the introduction and throughout. The focus in the draft on accommodating future growth should not be presented without setting the stage based on the city's history and character. This foundation also needs to address the sense of place the area has had for indigenous peoples.
5. There is no mention of City's civic facilities or civic spaces – i.e., no mention of libraries, schools, community centers, civic buildings, or civic structures in parks. These facilities have signification design, cultural and historic value. Please include goals and policies to address preservation and maintenance of these facilities, as well as providing quality civic design for new facilities.
6. There is no mention of the City's historic districts or structures. Please add this to the Plan, along with a listing of districts in the City.
7. There is no mention of the City's parkway and boulevard system. Please include language calling for the completion of the system per the original City plan for parkway design. Add provisions calling for expanding and extending the parkway and boulevard system with quality design throughout all portions of the City.
8. There is no mention of the Denver Mountain Parks. Please include provisions calling for their preservation and maintenance in their natural states. Also include director for expansion of the mountain parks system commensurate with City and metropolitan area growth in population. Pursue both purchase and land trades.

*Leave our city more beautiful than
we found it.*

9. Colorado Statutes also identify that comprehensive plans include an evaluation of the relationship of the natural environment and the built environment. Please include provisions (i.e., clear and direct goals and policies) that address where the city's natural environment has been harmed and now requires action for restoration.

Requested Revisions, Additions, and Changes to draft *Denverright Blueprint Denver*

1. The policy language in the draft is soft. Please replace with language that is clear for legal and decision-making purposes.
2. This process needs an analysis of *existing* buildable land – i.e., lands that are vacant and underutilized – before advocating opening up so many of the areas of the city for rezoning. There needs to be clear information first on how much existing land is already available for development, before we undertake tearing down more of current built environment that makes Denver what it is.
3. Address infill and redevelopment on brownfield/greyfield sites in need of repurposing, before more upzoning. Upzoning creates a stress on existing neighborhoods and structures. Focusing on vacant and underutilized sites lessens that stress.
4. The focus should be on redevelopment of surface parking lots, before considering new rezoning that could threaten existing structures. Use tools, such as land value taxation, to move decades-old parking lots from eyesores to development opportunities.
5. There is an overreliance on *rezoning* as a solution. We recommend that rezoning be used very conservatively, i.e., only when there are new issues not previously considered, or where there is a mistake in the Zoning Code. Rezoning should be a last resort, not the first practice that is offered.
6. Please include a strong commitment to preserve existing Denver's neighborhoods into the future. This is part of Denver's legacy.
7. Focus on being more intentional in transition areas between low-density to medium-density, from medium density to higher density – based on best design practices.
8. Commit to design review for all new construction in each neighborhood, center, district, and corridor throughout the City.
9. Commit to urban design review for all street and thoroughfare projects in each neighborhood, center, district, and corridor throughout the City.
10. Commit to design review for all civic facilities in each neighborhood, center, district, and corridor in the City.
11. Commit to expand Denver's parks commensurate with population growth. (Denver's standing with its once legacy park system has fallen in rankings among cities.) Parks and open space should also be expanded in close proximity to areas that are densifying.
12. Regarding the reconstruction of Parkways that are part of the City's designated parkway system – do not allow the compromised or damaged condition today define that they have been lost. Rather commit to full rehabilitation according to historic plans.
13. Require all private development along designated Parkways to conform to landscape standards for vegetation, including street trees – especially the tree canopy - and vegetative ground cover.
14. Restore and extend the tree canopy in all historic districts, as well as in all older and newer neighborhoods.
15. Restore set-backs requirements between the sidewalk and where buildings and structures may be constructed. Such set-backs have been part of Denver's history for development and are an important characteristic that distinctively defines Denver's neighborhoods and districts.
16. Require landscaping for all parking lots – including surface lots existing prior to *Denverright*. Use state-of-the-art water conserving landscaping, with trees to reduce heat island effects.
17. Commit to preserve existing neighborhoods that are historically significant that are immediately adjacent to transit corridors. (Not all corridors are equal and historic structures adjacent to many transit corridors are important to preserve to maintain the character and identity of Denver.)

18. Commit to preserve historically significant structures and sites on campuses that are to be redeveloped. Also, commit to set aside significant green spaces and public places on redevelopment campus sites. This includes preservation of historic cemeteries, Native American burial sites, and other burial sites in the City.
19. Proposals involving the sale of any park properties, including but not limited to nationally and locally designated historic park sites, as well as mountain park sites, shall require a vote of the people with a mandatory 60 percent approval requirement

Additional Comments

1. Incorporate the concept of sustainability in explicit terms throughout the set of *Denveright* planning documents. Sustainability shall include the threefold set of benefits, i.e., (a) benefits to people (social and equity benefits), (b) benefits to the natural environment (including restoration and preservation), and (c) economic benefits (a resilient economy). All three benefits must be demonstrated, and not trade-offs among them.
2. Please revise the documents with language that is more appropriate for the general public, that is, understandable for use by average citizens, as well as by decision-makers and elected-officials.
3. New development proposals shall include an impact analysis that addresses – at a minimum – the following: (a) environmental impacts, (b) health impacts, (c) equity impacts, (d) congestion impacts, and (e) parks impacts.
4. Institute a concurrency ordinance that requires that adequate services for development be demonstrated and in place, or have full funding in place, for the following: (a) traffic and mobility, (b) parks and open space, (c) schools, (d) utilities, and (e) public safety services. Development shall not be approved if concurrency cannot be demonstrated. Funding in place means that the needed services are funded within the current adopted capital improvement program.
5. Parking needs to be fully addressed. Please provide direction for parking management solutions in all neighborhoods, centers, and districts within the City.
6. Given the important role of these documents, there needs to be more educating in the forms of seminars and detailed overviews for citizens to understand more fully the status these plans have and how they are to be used. This education should happen before the public comment period is closed.

As historians and preservationists, let us follow the lead of ancient Athens – whose citizens took an oath to save sacred places and leave our city more beautiful than how we found it.

Respectfully Submitted,

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