

February 26, 2019

To: Denveright planning team
CC: Denver City Council
CPD Interim Executive Director Jill Jennings Golich
DPW Executive Director Eulois Cleckley

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

Thank you for the opportunity to review and comment on the second drafts of the Denveright plans, and thank you for the many changes made between the first and second drafts (or in the case of the Denver Moves family, the final drafts) of the plans. We will not use this space to recount all of the ways in which both drafts are compatible with our Platform, as noted in our first letter, but we continue to appreciate those elements of the plans.

In this review, we seek to compare the previous requests for changes made by our committee to the first drafts to what is now found in the revised documents in order to provide specific feedback on those outstanding points.

As before, 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.

Joel Noble
Chair, INC Transportation Committee

INC Transportation Platform section: Principles

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

- ☑ The new *Blueprint Denver* draft clarifies high-level funding strategies for implementation of mobility improvements by clarifying that its recommendations are intended to be used to inform annual budget and work plans, CIP priorities. The addition of consolidated strategies and recommendations in the implementation matrix improves the ability to reference the plan on an ongoing basis. While it is in the nature of high-level plans that specific assurance cannot be given on funding the priorities identified – which is a major concern in of our members – the new draft provides an appreciated improvement.

- ⊗ Since the first draft of *Blueprint Denver* was published, City Council and DPW have made progress on clarifying where low-speed vehicles such as electric scooters may be used, but as yet we have no guidance as to where space should be allocated to store them, balancing proximity to destinations with appropriate space allocation, and avoiding impeding sidewalks for those walking and rolling. Policy 11, Strategy B, assigned to DPW, calls for maximizing use of curb space including “shared mobility and on-demand services, including transportation network companies” – **we recommend adding “and storage of personal mobility vehicles such as dockless bike share, scooter share, personal bike corrals” to Policy 11, Strategy B on page 113 to emphasize the need to consider these non-automobile needs for curb space.**
- ☑ The new *Blueprint Denver* draft extensively promotes the Vision Zero goal and key elements of the *Vision Zero Action Plan*, such as the High Injury Network. Thank you!
- ⊗ The High Injury Network could helpfully be incorporated into more of the maps, such as the Pedestrian Enhanced map, Bicycle Priority Map, and Transit Priority map, reinforcing the combined priority that overlaps in these modal maps with the HIN should have.

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* has added more high-level measures of mobility improvement, including the Vision Zero goal and the Mayor’s mobility mode-shift goal, on pages 52-53.
- ⊗ **Tracking the completion of the Denver Moves plans at a high level would be an excellent way to show the trajectory of implementation and highlight if investment levels are sufficient to complete the pedestrian, bicycle, and transit networks in a reasonable time.** Today, we tend to focus too narrowly, talking about what gets done in a year, rather than having a perspective as to the rate of change towards the network goals as our primary measurement. Elevating this into regular *Blueprint Denver* reviews would allow a more strategic perspective.
- ⊗ **DPW may be able to recommend additional high-level metrics worth tracking in regular reviews, such as “pavement quality index,” which is important to mobility of all modes.**

INC Transportation Platform section: Planning and Funding

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

- ☑ Thank you for clearly calling for a Complete Streets policy, in addition to an update of comprehensive street design guidelines. (*Blueprint Denver* Policy 4, Strategy B on page 109). When implemented with a commitment at the highest levels, a Complete Streets policy will flow through to day-to-day street design decisions and have a major effect on the rate of implementation of safe, multimodal streets.

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 remains unclear in key plans, such as *Denver Moves: Transit* and *Blueprint Denver*, that implementation will require a high level of coordination with surrounding communities.** In fact, despite acknowledging this feedback in the “summary of changes” transit plan document, the paragraph added to the plan on page 1-2 makes no mention of surrounding communities. Similarly, no acknowledgement of this need was found in *Blueprint Denver*. We sincerely hope this doesn’t indicate a “blind spot” that will become a problem during implementation.

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 new *Blueprint Denver* draft extensively promotes the Vision Zero goal and key elements of the *Vision Zero Action Plan*, such as the High Injury Network. Thank you!

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.

- ⊗ The diagram on page 164 of *Blueprint Denver* suggests a *huge* difference in lane widths between most streets (DT, R, MU, MS) and commercial & industrial streets (I,C). This is inconsistent with the Vision Zero best practices. 10-foot lanes are sufficient in nearly all cases, and to suggest that commercial streets need much wider lanes is misguided and directly contradicts the need to design for safer speeds. **We recommend eliminating the “Lane Width” line from the diagram entirely. If staff is unwilling to do that, then the fallback position is to move the I and C boxes far closer to the remaining boxes on the left edge of the diagram**, signaling that any difference in width is minor, and that all lane widths are envisioned to be smaller, which has been shown to be safer in practice.
- ⊗ The absence of any “big move” opportunities identified in this 20-year plan, such as 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. Perhaps identifying “big moves” or big opportunity sites to rethink the design of the street network was felt to be outside of this document’s scope – but if not here, where? Intention needs to precede action, and we need to highlight intention in a few big moves. Will an update to the *Strategic Transportation Plan* take on this strategic role, even though big moves will also have big land use implications?

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.

- ⊗ The diagram on pages 164-165 of *Blueprint Denver* continues to send a concerning message on speeds, given the unlabeled horizontal axis. It still appears as if commercial and industrial streets should be *very* fast-moving streets, contradicting the Vision Zero Action Plan. **We recommend condensing all streets on the left hand side of the range for the Design Speed lines, even if the box clusters remain in the same order and relative distance from one another. That would send a powerful message that street design speeds vary, but intra-city streets go at much slower, safer speeds than limited-access highways (which could be the suggested/implied speed of the right edge of the lines).**

- ⊗ The same diagram on pages 164-165 of *Blueprint Denver* continues to send a contradictory message about the frequency of curb cuts in commercial and residential areas in light of contextual zoning changes in 2010 and improvements in DPW policies and practice since then. **We recommend making two lines (using the vertical space freed up by eliminating the Lane Width line), with one for Suburban contexts showing the type of spread currently shown, and the other showing all other more-urban contexts in which driveways/curb-cuts are Rarely Allowed on all street types.** This would be consistent with the intention of the Denver Zoning Code and hard-won safety practice that we should not backslide from. The type of backsliding implied currently is contrary to safety and offensive to the notion that pedestrians are the priority throughout the city.
- ⊗ *Blueprint Denver* should specifically call for the creation of “neighborhood slow zones” as a Vision Zero strategy, which appears in the *Vision Zero Action Plan*.

INC Transportation Platform section: Walkability

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.

- ☑ Thank you for Policy 10, Strategy B, “Explore partnerships and programs for preserving and maintain existing flagstone sidewalks” in the Mobility section. **We recommend the addition of “where this is a valued part of the area character”** to this Strategy B, as it sets up a discussion about identifying areas in the city where the community values these assets, in order to scope the partnerships, programs and policies to follow.
- ⊗ 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 valued part of the area character” be added into policy 2 on page 99 of *Blueprint Denver* under “Ensure residential neighborhoods retain their unique character as infill development occurs.” Flagstone sidewalks deserve mention as much in the historic character section as in the mobility section.

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.

- ⊗ We continue to call for a strategy to be added to Policy 13 (“Pursue funding mechanisms to raise revenue to fund multimodal infrastructure improvements and maintenance”) on page 115 of *Blueprint Denver*, to “Study simple, fair, efficient and scalable ways to fund sidewalk installation, enhancement and maintenance citywide.” The existing strategies speak far too generally about “multimodal infrastructure” for any reader to know whether this long-standing problem with the way we pay for sidewalk installation and maintenance is being considered, or if the identification of this problem in the older *Pedestrian Master Plan* has been forgotten.

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, Strategy C on page 109 calls for café seating in the right of way to leave “adequate” space for pedestrians and streetscaping – however this continues to sound minimal, in line with existing practice in which a minimal 5-foot sidewalk with the pedestrians pushed up against moving traffic is the result, when a nice, wide comfortable sidewalk was available prior to the café introduction. Strategy C is not strong enough to prevent this all-too-common outcome. **We recommend replacing “adequate” with “ample and high-quality”** to better capture the intention implied elsewhere in the document regarding pedestrians having priority.

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** should identify the need to diagnose and correct whatever regulatory limitation is preventing enforcement streetscape design and maintenance 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. This may belong in Quality of Life Infrastructure Policy 5 in page 121, replacing the weak “Encourage” language. It may also belong in an appropriate Mobility strategy. As it is, we can find no acknowledgement of this *de facto* regulatory gap, nor goal to solve it.

INC Transportation Platform section: Transit

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.

- ⊗ 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. 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.
- ☑ The final, updated *Denver: Moves Transit* adds an important near-term recommendation – Strategy 2, Action 2.1 – to develop a stop and station inventory and typologies, prioritize improvements, and develop guidelines for stop siting. This is a significant addition and is greatly appreciated.

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, strategy C on page 110 of *Blueprint Denver* 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. Thank you for the strategy to disincentivize zero-occupancy vehicle trips, should the technology advance to the point where autonomous operations make this congestion-accelerant possible.