Denveright Planning Teams in CPD and Public Works, City Council and Denver Planning Board,

Thank you for the opportunity to review and comment on the Planning Board drafts of the Denveright plans Comprehensive Plan 2040 and Blueprint Denver, and the final Denver Moves: Transit and Denver Moves: Pedestrians and Trails plans.

In the attached final review, we summarize the entirety of the package of plans in light of the INC Transportation Platform, to produce a comprehensive review that incorporates the many changes that have been made in the last two months in response to our input and the input of active neighborhood participants. Reaction to the most recent changes has been placed in bold face in the attached document for ease of review.

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.

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March 18, 2019

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

Re: INC Transportation Committee comparison of the Denveright Planning Board review drafts of Comprehensive Plan 2040 and Blueprint Denver, and final Denver Moves: Transit and Denver Moves: Pedestrians and Trails plans to the INC Transportation Platform

Thank you for the opportunity to review and comment on the Planning Board drafts of the Denveright plans Comprehensive Plan 2040 and Blueprint Denver, and the final Denver Moves: Transit and Denver Moves: Pedestrians and Trails plans.

In this final review, we summarize the entirety of the package of plans in light of the INC Transportation Platform, to produce a comprehensive review that incorporates the many changes that have been made in the last two months in response to our input and the input of active neighborhood participants. Reaction to the most recent changes has been placed in bold face for ease of review. 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.

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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 many neighborhood representatives from across the city to the task forces for each plan, including as co-chairs of three of the four plans having task forces, 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.

- **Blueprint Denver** 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 intentions captured in the timeframes of the implementation matrix provides an appreciated improvement.

- **Blueprint Denver** draft extensively promotes the Vision Zero goal and key elements of the Vision Zero Action Plan, such as the High Injury Network, which is a vital part of the INC Transportation Platform.

- **Our request to specifically address the need for appropriate storage of dockless mobility devices, such as bikes and scooters, was added to page 113 of the Planning Board review draft of Blueprint Denver.**

- **The High Injury Network has been noted as cross-reference in more places, including on the Blueprint Denver Pedestrian Priority map on page 170-171.**

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.

- **No additional suggested measurements were added since the January draft of Blueprint Denver, but the most important ones were added after the initial public review draft.**

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.

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.

Blueprint Denver now clearly recognizes the need for regional coordination in implementing complete mobility networks, with additional language on page 114.

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!

Safety education and awareness programs are emphasized, not just enforcement, in page 112 of Blueprint Denver’s streets safety policy strategies. This is consistent with the Vision Zero approach.

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 Vision Zero Action Plan recommendations have been significantly brought forward into Blueprint Denver.
The diagram on page 164 of *Blueprint Denver* has been significantly improved, such as by the elimination of the confusing and incorrect “lane width” line from the prior draft.

- “Big move” opportunity identification for reconfiguring the street network, such as cloverleaf reclamation, highway relocation, and the like, is deferred in the Denver right plans, and should become a priority in small area plans and the next evolution of the *Strategic Transportation Plan*.

**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 page 164 of *Blueprint Denver* has been significantly improved, such as by the rearrangement of Design Speed lines to signal that although speeds may vary based on street type, speeds within the city should remain significantly lower than the (implied) higher speeds on the empty right side of the spectrum.
- Text on page 164 of Blueprint Denver now helps avoid confusion about the frequency of curb cuts in residential areas, which is a matter of context (suburban vs. urban), rather than simply street type. Similar supporting text has been added later in the plan in the Suburban, Urban Edge, and Urban street type pages.
- *Blueprint Denver* brings forward the Slow Zone tool from the *Vision Zero Action Plan* at community request, in Mobility Policy 9, Strategy F. Thank you.

**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.

**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 Mobility Policy 10, Strategy B, "Explore partnerships and programs for preserving and maintaining existing flagstone sidewalks where this is a valued part of the area’s character." This has been part of the *INC Sidewalk Position Statement* and its successor *INC Transportation Platform* for over a decade.
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.

- *Blueprint Denver* still does not clearly call for simple, fair, efficient and scalable ways to fund sidewalk installation, enhancement and maintenance citywide. However, Mobility Policy 13, Strategy B (“Explore funding tools to enable increased investments and long-term funding for mobility projects and services”) and Strategy C (“Ensure transportation investments result in equitable access to multimodal infrastructure across the city”) are consistent with this purpose, even if not as obvious as it should be that during plan implementation this should also extend to sidewalks. The community will need to remain vigilant in pursuit of this goal.

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.

☑️ Mobility Policy 3, Strategy C on page 109 of the latest *Blueprint Denver* draft calls for café seating in the right of way to leave “ample and high-quality adequate” space for pedestrians and streetscaping. This is a significant improvement and sets the right goal as we move into plan implementation.

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.
Mobility Policy 4 added text to Strategy C to the Planning Board Review Draft p.119, and now reads: “Coordinate across city departments to revise street design standards, rules, and regulations to implement Blueprint Denver street types, modal priorities and a holistic vision for complete streets, including clearly defining roles and responsibilities for oversight, enforcement and maintenance of the public right-of-way.” CPD assures us that this is intended to include the portion of the right-of-way between the curb and the private property, where streetscape standards and regulations are needed, where long-standing regulatory or practice limitations have prevented effective and enforceable streetscape standards.

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 Enhanced areas, identifying these as areas where further enhancement can create vibrant public spaces, where there are additional opportunities to enhance the pedestrian environment, and areas to enhance placemaking for pedestrians, aligned with centers and corridors in the Places map.

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: Bicycles (as revised), and calls for the full build-out of the plan, which will benefit both bikes and new personal mobility devices. The creation of a Complete Streets policy and new street design guidelines will reinforce this.

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: Bicycles 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.

- 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 provide 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 ½ 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.

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.

- Blueprint Denver Mobility policy 12, Strategy B, calls for the city to “Develop an implementation program to set priorities and a timeline for high- and medium- capacity corridor investments from the Denver Moves: Transit plan” in the 0-3 year timeframe in the implementation matrix. This is the shortest timeframe category in the implementation matrix, and we hope “Phase 2” begins immediately, since so much work depends on it.

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.