

June 14,2020

## **FIRST SET OF COMMENTS, REQUESTS, AND RECOMMENDATIONS FROM DENF to Draft EAP March 20, 2020**

1. **At issue:** Exemptions from building coverage and bulk plane standards. (L.4 and L.5.) The current draft of the Plan calls for the exemption of added accessory dwelling units from building coverage and bulk plane standards. Such exemptions will allow for the building of large second units on lots that currently allow only single-family homes.

Recommendation: These provisions should be eliminated in their entirety. They are inconsistent with the feedback the City received from residents and a transparent backdoor attempt to provide for upzoning, increases impervious surfaces and increases the heat island effect. Moreover, because the East Area can accommodate the number of units needed to facilitate growth in the area without these changes, the exemptions are unnecessary. They will encourage the purchase of existing homes by developers who will take the opportunity to build second units which, apparently, will not need to be affordable. Neighborhood character will be destroyed for the benefit of developers

2. **At Issue:** High Capacity Transit Options (page 177)

While there have been numerous efforts over a number of years to address transit technology along Colfax Avenue, the current proposal for center-of-the-road transit on Colfax represents a siloed, narrow scope alternative.

- Recommendation: Set aside the center-of-the-road proposal for Colfax transit, until full information is provided to the public on other transit options, including but not limited to outside lanes with Business Access and Transit (BAT) design.
- Recommendation: Delay the center-of-the-lane option until an interjurisdictional process with Aurora is established to look at the entire East Colfax corridor.
- Recommendation: Invite an outside expert panel to review and make recommendations on transit technology options, including options that allow north-south transit alignments to be consistent with the east-west alignment along Colfax Avenue.
- Recommendation: Develop a comprehensive mobility strategy for the entire planning area that addresses connectivity and compatibility with adjacent neighborhoods and planning areas. Develop travel plans for streets parallel to Colfax Avenue in a manner that addresses continued and seamless travel for all modes east-to-west.
- Recommendation: Enlist a study of other cities in the US which altered main thoroughfares, which ended up modifying the redesigns or restoring them to original configurations, e.g., State Street in Chicago.

- Recommendation: if the City concludes after study that center-running bus transit and elimination of traffic lanes are the best course forward, have the public vote on a measure that specifically asks voters to approve both center-running bus transit and elimination of traffic lanes on Colfax. The City needs to stop pretending that the measure voters approved addressed such matters.

### 3. **At Issue:** Parking.

- Recommendation: With the potential passage of group housing (currently at a minimum of five adults and unlimited number of children), it is critical that areas on Colfax be identified for garages.

4. **At Issue:** Community Benefits: The City has usurped the community benefits identified by Hale, Montclair and South Park Hill and placed its own goal of affordable housing as the priority goal. While we support affordable housing as a Citywide goal everywhere, we do not believe the City should pick and choose what goals to make as a priority for our neighborhoods.

- Recommendation: To be a “strong and authentic neighborhood”, please include the building of new recreation centers and libraries as you did for East Colfax and the Far Northeast Plan. Parks is dealt with below. (Goal of City to be environmentally resilient).

### 5. **At Issue:** Infrastructure

We have continually requested that the City address the infrastructure.

- Recommendation: The infrastructure should have a comprehensive environmental justice plan and the “right and left hand of public works” should be kept up to date prior to implementation. This would include proper drainage and floodplain planning, addressing heat indexes, upgrading utilities, traffic mitigation, planning density to decrease pollution from all sources and to provide density so that quality of life for the present and future residents remain equitable throughout the City.

### 6. **At Issue:** Anti-displacement strategy (see page 10)

- Recommendation: The anti-displacement strategy should apply to the entire EAP.
- Recommendation: The strategies should include but not be limited to promoting programs that help current households maintain their existing homes.
- Recommendation: A goal of the City should be to maintain the housing stock adjacent to Colfax (“missing middle”) and avoid displacement of these residents.

- Recommendation: Restaurants and stores should not be allowed to purchase and repurpose adjacent homes for business use as these are irreplaceable housing stock.

#### 7. **At Issue:** Existing Housing (page 18)

- Recommendation: Prioritize the retention of existing housing for all current residents living in the planning area.
- Recommendation: Prioritize housing retention as a primary element in addressing affordable housing.
- Recommendation: Develop programs to provide assistance to elderly and disabled residents who cannot afford to renovate their current homes. There should be **meaningful** surcharges for demolition (landfill) so that developers are encouraged to maintain existing buildings.
- Recommendation: Much of the “missing middle” stock is along the Colfax corridor. Steps should be included in the plan for the retention of these existing mid-market homes in order to ensure that they remain available to families who seek “missing middle” housing. Development should not deplete the current stock of homes affordable to middle-class families.
- Recommendation: Retention of existing mid-market homes in addressing the “missing middle” should be a goal of this plan. (page 40).

#### 8. **At Issue:** Parks. The plan identifies park space as deficient in the planning area. Your recommendations/information need to be strengthened. (page 131)

- Recommendation: City must first develop a strategy for doubling the amount of park land in the planning area and map this out; plan for a minimum of 13 acres of park land for every 1,000 residents. With 38,000 residents, we are short 331 acres.
- Recommendation: Once the above number has been met, developers must provide for 13 acres per each additional resident. Do not permit new development on vacant or underutilized land unless there is a commitment to provide significant park land to close the park deficiency gap.
- Recommendation: We request that the City map out the potential sites such as National Jewish on the east side and the VA hospital – what should be mapped there for affordable units AND park space?
- Recommendation: Please identify where the City currently owns land in the EAP for DENF.
- Recommendation: Map out the 10-minute walks to a park (without crossing busy streets) in order to identify where potential parks should be located. (45% of residents do not have a ten-minute walk to a park – a Blueprint Denver goal.) Once this is done,

identify potential park sites... What opportunities might there be for linear greenways along portions of Colfax? : (See: Langston Park along Colorado Boulevard (linear, 2900 to 3200 blocks) Morrison Park along Martin Luther King Jr. Boulevard (Lafayette Street to High Street), John W. Barnes Green on Quebec Street (300 to 600 blocks), Viking Park and Highland Park along Federal Boulevard (at Speer and at 32<sup>nd</sup> Avenue).

**9. At Issue:** City has mislabeled areas as open and park space. (page 133-134)

- Recommendation: This depiction is outright disingenuous. Street trees along a thoroughfare are not park land. Street landscaping is desirable and should be required; however, it should not be “counted” in calculating park and open space.
- Recommendation: In addition, do not show church-owned and college-owned lands as “open space.” Again, this is disingenuous.

Please correct these items.

**10. At Issue:** Up zoning (page 32)

- The Colfax Avenue corridor was already updated within the past decade with the classification of “main street zoning.”
- Recommendation: Residents do not want further up zoning and up zoning is not needed to provide the East Area’s share of additional needed units. Provisions allowing for increased heights and/or the addition of ADUs without regard for maximum surface area limits should be eliminated from the Plan. An environmental STUDY NEEDS TO BE DONE to maintain or reduce the current impervious surfaces and the heat island affect, a goal of Blueprint Denver to make these plans and therefore Denver environmentally sustainable and resilient.

**11. At Issue:** Mayfair Center (page 34)

Briefly, some of the issues we have with the Mayfair Center Plan are as follows:

Grocery shopping is one of the best benefits in the neighborhood with Safeway next to King Soopers at 14th and Krameria and Trader Joe’s at 9<sup>th</sup> and Colorado. East Area Plan at p. 29.

- Recommendation: Retain these stores. We want to retain the same number of parking spaces and the accessibility of those spaces so that shopping is easy at these stores. We are concerned that adding an additional 4,000 residents AND the building of dense housing developments will reduce accessibility around our Grocery stores.

- Recommendation: The park should be relocated to another corner at 14<sup>th</sup> and Krameria--either the Northeast or Northwest corners so that parking can be preserved for these stores. (Note- we want to know how many acres this proposed park is.)
- No upzoning in this area.

We want to speak with you to the advantages of a small area plan at the Mayfair Town Center. Meanwhile our recommendations are as follows:

- the street fronts of the blocks immediately adjacent to it.
- address the character and nature of the park block (including whether the park block will be owned and maintained by the City and County of Denver Parks Department).
- address the retention of businesses currently in this district, including grocery stores and other businesses that serve the neighborhood.
- address parking and parking management for business access.
- zoning in the area should be no greater than 3 to 5 stories for properties immediately adjacent to the park block and immediately transition to the heights of existing residential structures at alleys and adjacent properties.

**12. At Issue:** Transition from proposed new multi-use and multi-family to existing residential. (page 41)

- Recommendation: The proposed transitions are too extreme. Transition to existing residential should allow structures immediately adjacent to existing residential areas to be no higher than 1 to 3 stories, depending on the lot size.
- Lots smaller than 10,800 square feet should not be up zoned. These can be identified as pocket parks, recreation centers, libraries, gathering centers.
- Recommendation: Nothing in the current plan should allow buildings to be even closer to the nearby residential homes. Current setbacks should be increased to ensure that nearby residences are not dwarfed by new buildings.
- Recommendation: New buildings next to existing homes should be no more than 1 story.
- Recommendation: Strike out C2 until the residents understand where parking will be achieved.
- Recommendation: Housing adjacent to restaurants cannot be changed to non-residential uses.

**13. At Issue:** Impaired waterways (page 139) The draft includes a map showing impaired streams and waterways. Any strategy for restoring waterways to a healthy functional state is not clear in the current draft.

- Recommendation: Develop a comprehensive strategy to identify all damaged portions of the ecosystem, including contaminated soils, impaired and/or polluted waterways, concentrations of air pollution, and heat islands that have adverse impacts on climate. Repair environmental damage so that natural systems can function in a manner that is healthy for humans and other life.

**14. At Issue:** “Consistency” with Comprehensive Plan 2040 and Blueprint Denver. (see page 7)

- Request: You assert that the EAP is consistent with and furthers the policies and recommendations of Comprehensive Plan 2040 and Blueprint Denver. Please detail what specific policies and recommendations from these two documents that are the basis for making a determination of consistency in the EAP. Cite any policies or recommendations that are inconsistent.
- We request that a determination of consistency with policies and recommendations be made in all other citywide plans.
- We note that the EAP is inconsistent with Blueprint Denver in that it fails to provide additional park and open space in the East Area. While the Park Hill Golf Course is not in East Area, we wish to note that, as nearby undeveloped land, it could be readily preserved as park or open space that would benefit residents of the East Area.

**15. At Issue:** Forecast numbers for population and employment (overall)

The draft identifies DRCOG regionwide forecasts, City and County of Denver projections, and allocation work performed by a consultant.

- Question: Was there any public engagement to determine population and job numbers to be used for planning purposes in these east Denver neighborhoods?
- Question: When were these numbers updated and will these numbers be reevaluated periodically? How often?
- Question: These projections need to be supported by a by a citywide buildable lands’ analysis process. Has that been done and when? If so, please provide a copy to us.
- Recommendation: Given what is going on right now in our communities, please develop and provide us with a low range of working population numbers based on a flat-growth scenario (informed by recession, pandemic, genuine public engagement). If this has been done already, please submit a copy to us.

**16. At issue:** Forecasting of 30% on page 35.

- Request: Please rerun these numbers given the current events. When was this current number attained and how frequently will this number be re-examined? (See: 30% on page 35.)
- Request: Please rerun the numbers on page 50.
- Question: By what standard was it determined the East Area is “short 1400 housing units?”
- Question: Was a citywide and/or East-Area-wide buildable land analysis performed to identify vacant and underutilized lands that might provide infill opportunities within existing planning and zoning? If not, why not? If such analysis has been performed, please provide copy to DENF.
- Request: Please break down the number per AMI and in what neighborhood these affordable units reside in.
- Request: State the number of affordable housing units being directed to each area for which a neighborhood planning initiative is planned.

## **ZONING ISSUES**

**17. At Issue:** Proposed building heights on 11<sup>th</sup> Avenue east of Syracuse Street. (page 31)

- Recommendation: The City should revise the proposed building heights in this area to be compatible with the building heights in adjacent neighborhoods.

**18. At Issue:** Upzoning at vicinity of Colfax Avenue and Quebec Street. (page 32)

- Quebec Street, north and south of Colfax, is a linear street with housing in a state of good repair.
- Recommendation: The City should maintain existing residential zoning along Quebec Street, with the exception of parcels that directly front Colfax Avenue. On those parcels, current zoning should be retained. DENF submits that all transit corridors in EAP should be considered in distributing affordable housing as not all residents will have a start and stop along the Colfax line.
- No upzoning in this area.

**19. At Issue:** Yosemite and Colfax Ave. (page 169)

Yosemite Street is the city limit with Aurora. The draft shows changes in land use on the west side of Yosemite Street (i.e., the Denver side)

Recommendation: The East Area planning process should coordinate land uses along the City's entire shared border with the City of Aurora. Land Uses at Yosemite and Colfax should demonstrate compatibility of uses in Denver and in Aurora.

Recommendation: Work on the Plan should include Aurora as a partner. Connectivity and compatibility among neighboring jurisdictions should be foundational in this planning process.

**20. At Issue:** Diversity measures (page 47)

These measures are unclear. Is there an expectation that each individual part of the city must achieve all 5 measures? The draft shows that the East Area "meets" 3 of the 5 diversity measures.

- Request: Clarify when it is appropriate for parts of the city to be achieving 2, 3, or 4 of the 5 measures.

**21. At Issue:** Figure listed stating the planning area is short 1400 housing units. (page 50)

Please provide the supporting documentation where this number has come from. How often will this number be evaluated?

- How many units were assigned to each area plan?
- We request that the city perform a citywide buildable land analysis to determine where vacant and underutilized lands across the entire city are evaluated for infill opportunities.

**22. At Issue:** Auto-related businesses (page 59)

Auto-related businesses are a service needed for residents. Easy to access business have a benefit. They have been here for over 40 years and enjoy a good neighborhood relationship.

- Please state where the auto-related businesses are expected to locate.
- Recommendation: No displacement of small businesses because they do not belong to the Fax Partnership and the Colfax/Mayfair BID. They should have a voice in this plan even though they do not belong to these organizations. Address opportunities to rehabilitate structures and sites with auto-related businesses, including landscaping and separation of sidewalks from paved areas.
- Recommendation: Partner with these businesses for shared and joint use of on-site parking throughout the course of a day.

## MOBILITY

### 23. **At Issue:** Mode Split Goals (pages 68-70)

The information provided shows that ridesharing is a larger modal sector than transit. However, carpooling is not addressed as a mobility strategy.

- Recommendation: Redo the mode split goals to include ridesharing as a prominent mode for near-term and longer-range mobility.
- Recommendation: Adjust the transit goal to reflect the role ridesharing provides in future mobility.

### 24. **At Issue:** Inconsistent transit systems. (pages 74-76)

The draft shows Colorado Boulevard as having arterial transit on the outside lanes, while on Colfax arterial transit is shown in the center of the thoroughfare. The Colfax center-of-the-road terminates at Yosemite Street (the city limit with Aurora).

The East Area plan is seriously **flawed** by addressing transit on one arterial independently of an areawide systems approach.

- Recommendation: The introduction of arterial rapid transit throughout the region should be consistent – consistent for transit users, consistent for other traffic (including bicyclists, pedestrians, motorists, goods delivery, and scooters).
- Recommendation: We should delay additional work on center-of-the-road transit concept for Colfax Avenue. Develop a supplemental study based on outside lane transit service along Colfax in partnership with Aurora, that is, using the same system approach along Colfax to the R-line rail station at the Anschutz urban center.
- Recommendation: Provide information on cost of outside lane transit alignment as opposed to middle of a thoroughfare. With the decrease in ridership due to pandemic, financial problems of RTD, and higher transportation priorities statewide, we need to have additional studies done on side transit AND impact on surrounding neighborhoods. Aurora opted out of center lane service due to impact on side streets.
- Recommendation: The measure approved by the residents in the 2017 Question 2A Bond measure was to “add rapid transit service and pedestrian safety improvements along Colfax Avenue to reduce congestion and increase safety.” We did not approve center-lane bus service and the elimination of traffic lanes. The City needs to stop promoting this as a truth.
- Recommendation: No upzoning should be considered until BRT is fully funded.

### 25. **At Issue:** Street design.

Denver has plans for complete streets, green streets, and living streets. It is not clear how those designs are incorporated into the draft Plan.

- Question: Please clarify how these modes of transportation will work together.

**26. At Issue:** Denver's Historic Parkways (pages 82, 84, 87)

The parkways currently have grass medians and grass shoulders: 6<sup>th</sup> Avenue Parkway, 17<sup>th</sup> Avenue Parkway, Hale Parkway, Monaco Parkway.

- Residents want the current parkways in their present design and configuration: The current 100-year-old design allows for walking without the introduction of impervious pavement. The current design provides environmental benefits, as well as community character and sense-of-place. This is part of preserving the character of the neighborhood.

**27. At Issue:** Colorado Boulevard (page 85)

Colorado Boulevard is both a boulevard, as well as a designated parkway in the city's historic parks and parkway plan. Parkway elements along Colorado Boulevard have been compromised over time, due to widening of lanes, lack of consistent sidewalk treatments, poor maintenance of landscaping, and the removal of and/or absence of landscaping.

- Recommendation: Restore parkway elements to Colorado Boulevard throughout the planning area and include consistent sidewalk treatments for transit users and pedestrians.

**28. At Issue:** Quebec Street (page 88)

Quebec Street is an incomplete street through the eastside of Denver, with a major portion of the street in the East Area being incomplete.

- Recommendation: Include the completion of Quebec Street in the area plan. Address continuous vehicle lane patterns from 11<sup>th</sup> Avenue to 26<sup>th</sup> Avenue, including complete street features with consistent sidewalk treatments along this 2+ plus mile segment.

Comment: Denver has a legacy of creating parks and parkways along major thoroughfares. Examples include: Langston Park along Colorado Boulevard (linear, 2900 to 3200 blocks) Morrison Park along Martin Luther King Jr. Boulevard (Lafayette Street to High Street), John W. Barnes Green on Quebec Street (300 to 600 blocks), Viking Park and Highland Park along

Federal Boulevard (at Speer and at 32<sup>nd</sup> Avenue). Such opportunities should be investigated for linear greenways along portions of East Colfax.

**29 At Issue:** Yosemite Street and Colfax Avenue district (p. 169)

Yosemite Street is the city limit with Aurora. The draft shows changes in land use on the west side of Yosemite Street (i.e., the Denver side)

- Recommendation: The east area planning process should coordinate land uses along the city's entire shared border with the City of Aurora. Land Uses at Yosemite and Colfax should demonstrate compatibility of uses in Denver and in Aurora.
- Recommendation: Further work on the plan should include Aurora as a partner. Connectivity and compatibility among neighboring jurisdictions should be foundational in this planning process.

**30. At Issue:** What changes need to be implemented with our current experiences with the pandemic that can be incorporated into our plan now?

**31. At Issue:** What green requirements are going to be required in connection with the approval of new developments? Sidewalks, solar panels, heat efficiency heat and air conditioners? What are you requiring so that new builds can reduce its footprint including the use of green building materials? We only have one time to get this right.

**32. At Issue:** Lack of planning for future green structure. Although transportation and the reduction of gas-powered vehicles is important, there is no mention in this plan regarding electric buses, nor the fact that consumers will begin to switch from gas powered vehicles to electric vehicles and therefore will need parking. We should be incorporating charging stations all along Colfax to accommodate for this change. The plan itself is seriously lacking in green design and planning. The plan itself is seriously lacking in green design and planning. If we are serious about climate change, we would be looking at the top ten solutions in Project Drawdown at pages 222-224 which are:

- Refrigeration
- Wind Turbines
- Reducing Food Waste
- Plant-Rich Diet
- Tropical Forests
- Educating girls

- Family Planning
- Solar Farms
- Silvopasture
- Rooftop solar

Mass transit ranks 37<sup>th</sup> as a solution. Although we realize that some of the top 10 would be difficult or do not apply for cities our city could be focusing on a more comprehensive environmental plan vs thinking everyone will simply ride a bus. When it comes to buildings and cities, we should focus on district heating, insulation, LED lighting, heat pumps, green roofs, net zero buildings, retrofitting, and yes, a walkable city.

**33. At Issue:** Definitions of Low Residential.

**Issue:** In the current draft you have listed Low Residential as predominately one-and-two-unit uses. Along with this language, Plan states” Limited mixed us along arterial and collector streets, as well as where commercial uses have already been established.” All of this language should be stricken and replaced with the original draft language. Original draft language for a single unit residential “includes more traditional houses that are setback from the street with front and rear yards and occasionally side yards. They usually include a prominent front entrance with a porch or stoop. They often have pitched roofs although some low-sloping roofs exist as well.” Please add language:” The single unit may have an ADU. “

For two-unit residential original Plan states: “Two unit Residential includes a mix of single- and two-unit homes, including the duplex or detached in a tandem house form. They often look and feel like a single unit home. Some forms have two entrances that face the street, and some have one prominent entrance and one more discreet entrance from a side street or alley.” Please add language:” The two unit may have an ADU.”

**34. At Issue:** Housing under current Plan along Colfax: Please give us a range of the minimum and maximum units for housing and the number of potential residents in these units.

This is our first submission for discussion.

Thank you, DENF.