

September 30, 2019

Development Review Committee
201 W. Colfax Ave.
Denver CO 80203

Re: Large Development Review and Loretto Heights

The undersigned currently serve as Co-Chairs of INC's Zoning & Planning Committee. Due to time constraints and the swift calendaring of the Large Development Review Applicant led community meeting set for Oct. 1, 2019, the request below was not able to be discussed and addressed and submitted to INC's Delegate Meeting, but reflects ZAP's commitment to Historic Preservation, its platform, and the Resolution approved by ZAP prior to the Loretto Heights Area Plan approval.

In September 2019, INC's Zoning & Planning Committee (ZAP) approved a resolution recommending that the Loretto Heights Area Plan "be amended to specifically include the implementation of historic district designation as part of the Large Development Review (LDR) process and prior to development and rezoning applications being submitted to City Council." This suggested amendment was not incorporated into the Area Plan at the Council meeting and, as of now, the Plan contains only a toolbox that the applicant may utilize towards preservation of the Campus.

The Loretto Heights Area Plan promises to ensure preservation of the historic character of the more than 100-year-old Campus while also supporting sustainable, community based, economically viable new development on the site; we believe this includes preserving key historical assets including buildings, landscaping, views to and from the site and building heights.

At City Council Sept. 16, 2019, numerous community leaders expressed their strong support for historic district designation. Indeed, Square Moon Consultants, LLC, commissioned by the City of Denver to perform a comprehensive historical survey, recommended the creation of one or more Historic Districts. *See, "Inventory of Historic Resources and Survey Report" at http://www.shs-co.org/ha_loretto_heights_survey.pdf in particular pp. 47-58 and discussion of two potential historic districts.*

We understand the Loretto Heights Area Plan contains tools that could be used to preserve the iconic character of the key and core areas of the campus, but we remain concerned that the plan does not identify the timing for preservation steps, does not require that preservation of key historic assets take place prior to development and zoning, and does not reflect key findings regarding district designation, such as this section:

A Denver Landmark historic district is ideal for the Loretto Heights campus because the historic context (Refer to Section 4. Historic Context) establishes the shared history of all campus resources, and this designation would allow maximum protection for all important resources (through local design review), including associated landscapes and landscape features, through a single designation. The National Register and Denver Landmark district options together would afford all resources on the campus maximum protections and incentives, through two designations. p. 56

We believe Historic District designation at this campus must be implemented before map amendments, infrastructure planning, site plans etc. To postpone district designation until after redevelopment has been planned is not only counter-intuitive but also contrary to the intent of

Denver's Landmark Preservation Ordinance and the weight of findings in the Inventory of Historic Resources and Survey Report.

We are seeking assurances that the Director of CPD and the Development Review Committee will include designation of one or more Historic Preservation Districts as a key component of Large Development Review and that implementation of district designation be included in applicant's presentation at a Community Information Meeting. We seek assurances this important step will be included in the Large Development Framework report by the applicant and in the final decision by the DRC on the Large Development Framework. If we are misstating the steps during the (new) LDR process, we trust the DRC understands our intent of ensuring that the applicant be required by the DRC to address district designation implementation at the early LDF stage of the process.

Thank you,

**Ean Tafoya & Christine O'Connor
INC Zoning & Planning Co-chairs**