

Comment	Name	Date	Format
Stop enabling nimbyisum	John Riecke	May 18, 2019	Comment Card
Provide broader notice	Lorette Koehler	May 18, 2019	Comment Card
all references to the “secretary of the interior’s standards” be consistent throughout as The Secretary of the Interior’s Standards for the Treatment of Historic Properties	Gary Petri	April 30, 2019	email
question about the added language at the bottom of page 16, regarding temporary structures. If this provision is included in the final ordinance, will that mean that we would not have to review a submittal to put the “tiny homes” in a historic district?	Gary Petri	April 30, 2019	email
The last sentence on page 6 (In evaluating the structure's or district's eligibility for designation the commission shall consider the structure's or district's historic context.") seems to hang out there without any context. Could it be deleted? If not, the task force had talked about including a summary of the criteria categories above the list of 10 to make that list easier to understand for an applicant. Perhaps it could be moved above the list and include wording for the categories architecture, geography, and culture.	Rosemary Stoffel	April 30, 2019	email
Will the information required by an applicant for economic hardship on pages 22 and 23 be moved to rules and regs?	Rosemary Stoffel	April 30, 2019	email
I recall during our discussion of the criteria/cases of non-profit schools that there was some ability (or we wanted some ability) to consider "community serving uses" in the balance of design review requirements. We are limiting economic hardship on pages 22-23 to demolition, which sounds right. But I don't see anything about the criteria for considering community serving impacts in design review in the ordinance, which may be fine, you might have mentioned it is already allowed in another spot, or that it could be handled in regs, but just want to make sure that nothing we are doing loses that consensus?	Councilwoman Kniech	May 2, 2019	email
I don't see the historic district city-sponsored meeting, is that happening in regs?	Councilwoman Kniech	May 2, 2019	email
On page 10, in paragraph 9 - Action by City Council - the last line says "if no bill is filed within 90 days..." Does this mean that city council can just sit on a recommendation from the LPC for 90 days without doing anything?	Ruth Falkenberg	May 6, 2019	email
Page 2, Definitions: Consider including a definition or provide local examples of “Exceptional Significance” to clarify the meaning of this term.	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 10, Line 23, Recording of Designation: We have been advised, anecdotally, that the City and County recording process for properties that are designated has been inconsistent and that designation information may be lacking in some instances. Please consider means to ensure consistency of this process.	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 11, Line 1, Letter to Owner Upon Designation. We applaud this procedure. We recommend that this letter notification procedure also occur when the property changes hands.	West Highland Neighborhood Association	June 18, 2019	emailed letter

Page 11, Line 22, Protection from Demolition During Designation Proceedings: The text discusses protection from demolition specifically. Please consider if this should expand to include protection from construction of additions or alterations during designation proceedings	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 13, Lines 10-14, Notice of Intent to File: The text describes three residents are now required when intent to file notification is submitted. The text is silent concerning City Council members ability to do this. Please consider if this should be specifically stated.	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 15, Line 15, Notice of Intent to File: same as comment above	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 15, Lines 17- 28, Mandatory Meeting: We applaud this new requirement. The text notes the landmark application will not be accepted by LPC until after the mandatory meeting, thus the incentive to participate by designation proponents is clear. However, the text is silent on any incentive for the designation opponents to participate. Consider elaborating on how the process would move forward should opponents decline to participate in the mandatory meeting	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 24 Lines 1-5. Professionals: The text refers to “professionals with experience in preservation and rehabilitation”. Please consider if this phrase should be better defined. You may wish to consider utilizing the Secretary of the Interior's Professional Qualification Standards These can be found at the web site: https://www.nps.gov/history/local-law/gis/html/quals.html	West Highland Neighborhood Association	June 18, 2019	emailed letter
Page 25, Line 18, Period of Significance: The draft ordinance text refers to “Period of Significance” six times. This concept is well understood in the preservation environment, however, in carefully looking at the Landmark application form there is no specific place to provide this information. Possibly calling out a period of significance is implied under the history criteria but a specific period is not asked for. Please consider if this item should be clearly called for in the application form	West Highland Neighborhood Association	June 18, 2019	emailed letter
Incentives for Designation: We note that financial incentives for residential owners of historic properties primarily consists of state income tax credits. These come into effect only when the owner conducts appropriate rehabilitation work on their structure. We encourage some kind of financial incentive, outside of specific rehabilitation work, for residential property owners to seek designation, and to preserve and maintain their historic structures. Please consider exploring a program like the tax rebate to help offset property tax rates for historic residential property owners as currently in place for the Downtown Historic District.	West Highland Neighborhood Association	June 18, 2019	emailed letter
We commend members of the task force and your staff for a worthwhile effort on this challenging task. We believe that significant improvement in the process will arise from this	West Highland Neighborhood Association	June 18, 2019	emailed letter
Generally I think the changes are good. They appear designed to address problems that have occurred in recent years as development in Denver has increased beyond anything imagined when the original ordinance was passed	Marilyn Quinn	June 28, 2019	emailed letter

Sec 30.5(1)(b)For a structure that is not pending designation as a structure for preservation or as part of a district for preservation at the time an application for demolition is received by CPD, the executive director shall review the demolition application within ten (10) working days to determine whether the structure has potential for designation. ..." The Task Group did not change the existing time period allowed for this critical first step in the process. I suggest increasing the time period to at least fifteen (15) working days. This review is conducted by the Landmark Preservation Commission, an agency whose staff seems to have remained consistent for the past 15+ years, while development pressure has increased many times over. This may be an unachievable mission.	Marilyn Quinn	June 28, 2019	emailed letter
Sec. 30.5 (1) (b) (i)"During the ten (10) working day review period no demolition permit shall be issued unless the structure is determined not to have potential for designation by the executive director. Any time after the executive director makes a determination that the structure does not have potential for designation or if the ten working day period has elapsed without such a determination , and provided no application for designation has been received by CPD, the demolition approval shall be issued upon compliance with all Denver Building and Fire Code requirements. The demolition approval under this section will be valid for three (3) years from the date of issuance. " This section gives undue advantage to demolition at a part of the process that is just too time limited. With a large and growing workload, it is easy to imagine that some reviews will not be completed on time and demolition permits will be issued that could result in loss of important historic structures. This part of the process is just too tight and clearly defaults to demolition. I suggest striking the first highlighted phrase, and give adequate time for staff review	Marilyn Quinn	June 28, 2019	emailed letter
Approval of a demolition permit for 3 years seems an unreasonably long period of time. In the current development environment, 2 years would be more reasonable. Denver should not be giving consideration of demolition of existing/historic buildings unless there is an approved plan for development. A 3-year period suggests the property owner is trying to market vacant land, eliminating the possibility of adaptive re-use. Many sites in my neighborhood that once provided excellent housing have been demolished only to have a property sit vacant for 5 years and longer while the owner sought developer or the best deal. This hurts Denver's ability to provide adequate affordable housing and harms neighborhoods	Marilyn Quinn	June 28, 2019	emailed letter
I feel it would be reasonable to require that developers / property owners obtain preliminary approval for a re-development plan or replacement structure before issuance of a demolition permit for any structurally sound buildings, even if they are not eventually deemed historically significant. This would assure that we do not end up with vacant lots interspersed in neighborhoods	Marilyn Quinn	June 28, 2019	emailed letter

Section 30-6 (1)(b)(i) on page 12, line 26, new language gives the demolition “approval” validity for 3 years while in Section 30-6 (1)(c), if an owner has obtained a “certificate” for eligibility of demolition, the certificate “shall prevent an application for designation going forward without the owner’s consent for.... 5 years.” (Page 14, line 15). These should both be 2-3 years, not 5. Is this a typo?	Marilyn Quinn	June 28, 2019	emailed letter
In Section 30-1, there are two subsections “8” that were 4.1 and 4.2 respectively. Does, the language “historic contexts” on page 6, line 32 refer back to subsection 8(that was 4.1)? It would be helpful to clarify that by making a direct reference.	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-1 (10) (was #6), the addition of “historic or” to physical integrity on the meaning of noncontributing will hopefully diminish the effectiveness of demolition by neglect.	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-4 (9), on page 10, line 15 is new language “council may approve the designation...” and on line 18, the new language says “council may deny...” Where in any other city ordinance does council have permission to deny an application when the subject property meets the ordinance’s criteria for eligibility?	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-6 (1)(b)(i) on page 12, line 26, new language gives the demolition “approval” validity for 3 years while in Section 30-6 (1)(c), if an owner has obtained a “certificate” for eligibility of demolition, the certificate “shall prevent an application for designation going forward without the owner’s consent for.... 5 years.” (Page 14, line 15) Is the demolition “approval” referenced in 30-6 (1)(b)(i) the same as the “certificate” referenced in 30-6 (1)(c)? Why the difference in terminology? Why the difference in years? If the terminology refers to the same actions, 3 years should be used in both subsections. Extending one “action” out five years creates a greater risk for demolition by neglect.	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-6 (1)(a), page 11, line 28, I would say "unless and until", instead of just "until the commission denies the application....".	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-6 (c), page 14, Lines 13 - 17: though it's not new text this seems awkwardly worded. At the right-hand margin of Line 13, I wonder if the words "If issues," should be inserted before the word "Said"?	Sarah McCarthy	June 28, 2019	emailed letter
In Section 30-6 (1)(c)(iii)(1), page 15, lines 30-32, requires the meeting facilitator or mediator to produce a written record of the meeting that “will be incorporated” into the record of any.... public hearing.” The written record should specify that it is to summarize or record only agreements reached, if any, rather than a blanket report of the meeting. As drafted, all the information shared at this/these meeting(s) becomes part of the public record, which would have a chilling effect on robust and potential negotiations between the property owner and the community that is considering the filing of an application for nomination.	Sarah McCarthy	June 28, 2019	emailed letter
Section 30-8 (a), (page 21, line 25), Is there a definition of “reasonable beneficial use”? If not, one should be developed and included in the new ordinance.	Sarah McCarthy	June 28, 2019	emailed letter

Section 30-6 (8)(a)(iii), (page 21, line 25- 26) as written might preclude the denial of a petition for economic hardship after review of “self-imposed hardships, such as demolition by neglect or intentional destabilization....” As drafted, this proposed language is confusing and might have suggested to the previous owner of the Bosler House to continue the historic property’s destabilization and eventual destruction if it was in effect when considering this situation. On page 21, line 25, either delete the phrase “A request for” or use different words than “does not include”, such as “shall not consider...”	Sarah McCarthy	June 28, 2019	emailed letter
Section 30-8 (b), page 23, Line 10: I would insert the words "of economic hardship" immediately after the word "determination".	Sarah McCarthy	June 28, 2019	emailed letter
Section 30-9 (4), page 25, Line 1: I would suggest inserting the words "or City Council" after the word "commission". It seems to me that if City Council is the final decision maker as to awarding a designation or not, then you'd want to be able to appeal that to the Denver District Court. Am I missing something there?	Sarah McCarthy	June 28, 2019	emailed letter
Page 2: Would it be useful to include a definition of the term “accessory”? The term is defined only for limited purposes later on in the ordinance (used on page 19 in redline)	Ginette Chapman	May 2, 2019	emailed letter
Page 2, line 13: I suggest “architectural features of a designated structure for preservation or <i>structures within a</i> district for preservation.” A district itself, as a geographic area, probably cannot be said to have architectural features.	Ginette Chapman	May 2, 2019	emailed letter
Page 2, line 24: The phrase “significance of the district for which it was designated,” which appears below as well, is confusing. On initial reading, I thought the intended meaning was “significance of the district for which the structure was designated,” in which case it would be clearer to say “significance of the district <i>in</i> which the structure was designated.” On a closer read, however, I am guessing the intended meaning is ““significance of the district for which <i>the district</i> was designated.” Changing the wording accordingly would improve reader comprehension.	Ginette Chapman	May 2, 2019	emailed letter
Page 2, line 29: The reference here to “other means for designating contributing structures . . . specified in the ordinance” is a bit of a loose end—it suggests that there should be an additional subsection under “Contributing,” identifying a fourth means for how a structure can be deemed contributing, e.g., “That was designated as contributing in accordance with the means for designating contributing structures specified in the ordinance establishing the district.”	Ginette Chapman	May 2, 2019	emailed letter
Page 3, line 3: The newly drafted portions of the ordinance make inconsistent use of the serial comma. The existing portions of the ordinance generally do not use the serial comma, so the new portions should not either. Thus, I recommend excising the comma in “customs, and practices” and making similar edits globally.	Ginette Chapman	May 2, 2019	emailed letter
Page 3, line 8: I wonder if this should be revised as: “ . . . structure or improvement and its <i>designated</i> surrounding environs or a group of structures or improvements or both, and their <i>designated</i> surrounding environs.” Simply using the term “surrounding” leaves open questions as to the scope of the environs.	Ginette Chapman	May 2, 2019	emailed letter

Page 3, line 12: I wonder if it would be helpful to make clearer that paint color is not an “exterior architectural feature.” I think the current definition is not entirely clear on this point, especially to people not familiar with the landmark rules.	Ginette Chapman	May 2, 2019	emailed letter
Page 3, line 16: I suggest substituting “through” for “by.”	Ginette Chapman	May 2, 2019	emailed letter
Page 3, line 18: As a matter of grammar, this should read “conditions that existed <i>at</i> a certain time and place.” (Conditions cannot exist <i>during</i> a certain place.)	Ginette Chapman	May 2, 2019	emailed letter
Page 3, line 29: remove "historic or physical" when referring to integrity. This confuses all preservationists.	Architectural historians working group		
Page 4, lines 21-26: I had significant difficulty navigating subsection 10(b) due to the confusing use of “and” and “or.” I recommend reworking this provision for better reader comprehension. In addition, the “it” on line 24 should be excised. I also note as a matter of legal drafting that the provision regarding staff on lines 25-26 is not ideally located in a definitional section.	Ginette Chapman	May 2, 2019	emailed letter
Page 5, lines 18 and 22: The use of “the following” in these two locations is not ideal as a matter of legal drafting and reader comprehension. A possible fix is to edit line 18 along the following lines: “it meets the criteria listed in subsections (a), (b), and (c) below.”	Ginette Chapman	May 2, 2019	emailed letter
Page 6, line 32: As a commission member, I found myself wondering what “shall consider the structure’s or district’s historic context” would be directing me to do. This phrase is somewhat vague, and I wonder what value it adds. That said, it does not strike me as a significant problem	Ginette Chapman	May 2, 2019	emailed letter
Page 7, line 21: Should the reference to “eligible” here be to “potentially eligible”? (See subsection 3 directly below.) Also, I suggest rewording as “If preliminary review determines <i>the application to be complete</i> and the structure . . .”	Ginette Chapman	May 2, 2019	emailed letter
Page 7, line 25: Substitute “demand as a matter of right” for “require.”	Ginette Chapman	May 2, 2019	emailed letter
Page 7, line 26: Substitute “the application” for “it.”	Ginette Chapman	May 2, 2019	emailed letter
Page 8, lines 5-7: As grammar matters, rephrase as “no fewer” and “and no more,” insert a comma after “record,” and insert a comma after “office.”	Ginette Chapman	May 2, 2019	emailed letter
Page 8, line 13: Excise comma after “hearing.”	Ginette Chapman	May 2, 2019	emailed letter
Page 8, lines 23-26: Rephrase as “no fewer.” Also, I question whether this provision comports with actual practice and whether it is necessary. In practice, the commission does not give notice of actions such as this to CPD staff.	Ginette Chapman	May 2, 2019	emailed letter
Page 9, line 5: Excise “preservation,” since it looks like there’s an effort to consistently use “commission” rather than “preservation commission” throughout the ordinance.	Ginette Chapman	May 2, 2019	emailed letter
Page 9, line 20: The reference to “tapes” seems antiquated. Rephrase as “recordings”?	Ginette Chapman	May 2, 2019	emailed letter
Page 9, line 22: Excise “preservation.”	Ginette Chapman	May 2, 2019	emailed letter
Page 9, line 24: Excise the comma after “approve” for grammar	Ginette Chapman	May 2, 2019	emailed letter
Page 9, line 28: The commission does not in practice issue findings of fact. The wording in this line strongly suggests a requirement to make a written recommendation. I suggest rephrasing. Same issue on page 10, line 7.	Ginette Chapman	May 2, 2019	emailed letter

Page 9, line 24: The commission is given authority to “recommend to modify any proposal.” There are no follow-up provisions explaining what this process looks like. This seems like a notable gap that should be addressed in the section governing transmittal to city council, action by city council, and/or elsewhere.	Ginette Chapman	May 2, 2019	emailed letter
Page 10, lines 3-18: There is inconsistent use of “city council” versus “ <i>the</i> city council.”	Ginette Chapman	May 2, 2019	emailed letter
Page 10, line 18: I suggest inserting a period after “hearing” and beginning a new sentence with “City council.” Also, I question whether city council should be strictly limited to basing its decision on consideration of LPC’s recommendations and public comments. The current wording suggests city council is limited in this regard.	Ginette Chapman	May 2, 2019	emailed letter
Page 10, line 25: Excise “preservation.” Also, this provision does not comport with actual practice, so could it be changed to reflect actual practice?	Ginette Chapman	May 2, 2019	emailed letter
Page 11, line 11: Rephrase as: “provided, however, that if a structure.”	Ginette Chapman	May 2, 2019	emailed letter
Page 11, line 25: Excise “or after.”	Ginette Chapman	May 2, 2019	emailed letter
Page 11, line 30: Insert “until” between “and” and “the” in “withdrawn, and the demolition permit...”	Ginette Chapman	May 2, 2019	emailed letter
Page 11, lines 25-32: I haven’t entirely thought this through, but should the possibility of termination of the application process be included here?	Ginette Chapman	May 2, 2019	emailed letter
Page 12 generally: How is demolition defined for these purposes? Looking at the Denver Zoning Code, it appears that “voluntary demolition” is demolition of more than 40% of exterior walls, which is a looser standard than the standard normally used for landmark purposes, though I’m not sure if that’s the definition meant, and I think the reference should be cleaned up for clarity. As a substantive matter, I am wondering whether there is a possibility that applicants will game the system by, for instance, entirely removing a building’s roof, and maybe altering other features, thus not triggering the process for demolition described in this section, yet paving the way for later full demolition of a structure.	Ginette Chapman	May 2, 2019	emailed letter
Page 12, lines 12-15: This section is quite confusing, especially with respect to use of “only” and “and.” I suggest reworking	Ginette Chapman	May 2, 2019	emailed letter
Page 12, line 22: Add “(10)” after “ten.”	Ginette Chapman	May 2, 2019	emailed letter
Page 12, line 28: Add comma after “designation.”	Ginette Chapman	May 2, 2019	emailed letter
Page 13, line 10: Rephrase as “Notwithstanding subsection (ii) above” (same thing applies to page 15 line 15)	Ginette Chapman	May 2, 2019	emailed letter
Page 13, line 14: Add “and” after “posting” (same thing applies to page 15, line 19)	Ginette Chapman	May 2, 2019	emailed letter
Page 13, lines 17-30 (and the same issues apply on page 15):	Ginette Chapman	May 2, 2019	emailed letter
It seems odd to me that there is no designated purpose for the meeting described here. Can that be fleshed out a bit? Along similar lines, is it worth fleshing out the general nature of attendees who might be invited?	Ginette Chapman	May 2, 2019	emailed letter

Moving to other issues, I suggest rephrasing as “CPD shall select a facilitator or mediator to coordinate the meeting. The facilitator or mediator shall identify other attendees of the meeting . . .” The current phrasing improperly suggests that CPD may obligate a facilitator/mediator to coordinate the meeting even if that person does not want to, so the phrasing does not reflect good legal drafting. The use of the term “required attendees” also improperly suggests that individuals may be forced to attend against their will and raises questions about whether the meeting requirement has been fulfilled if those persons do not attend.	Ginette Chapman	May 2, 2019	emailed letter
What if a resident or the owner refuses to attend the meeting? The current language in subsection 2 seems to presuppose that the meeting will occur and there is no method for determining a path forward if the meeting does not take place. The ordinance does seem to require both owner and resident participation, so it would be fair to read the ordinance as precluding an owner from filing an application with CPD if the owner has not participated. But what about residents who wanted to operate in bad faith? You could rephrase to try to address this, though I’m not sure whether it’s worth doing so. An option: “After the conclusion of the meeting required in subsection 1. above, or after the forty (40) day period if the facilitator or mediator cannot secure at least one resident’s participation in the meeting, a designation application . . .”	Ginette Chapman	May 2, 2019	emailed letter
I’m envisioning a worst-case scenario in which a property owner wants to demolish a structure and does not want to participate in good faith in this process, and the property owner has reason to know of significant community opposition to demolition. The property owner could ask three friends to submit a notice of intent to CPD. The property owner could then have a perfunctory meeting of no value with the three friends, who would then never in fact file for designation. This would render the entire process meaningless. I wonder if there’s any fix for this. I’m not thinking of a great fix, but one option might be to give CPD discretion to determine that a notice of intent (or participation in a meeting) does not reflect a good faith interest in designating the structure as historic and to accept more than one NOI in such an instance	Ginette Chapman	May 2, 2019	emailed letter
Page 14, lines 5-9: Should the option of termination be listed here?	Ginette Chapman	May 2, 2019	emailed letter
Page 14, line 11: Substitute “preservation” for the second “designation.”	Ginette Chapman	May 2, 2019	emailed letter
Page 14, line 14: Insert “from” between “designation” and “going.”	Ginette Chapman	May 2, 2019	emailed letter
Page 15, line 15: Rephrase as “Notwithstanding subsection (ii) above”	Ginette Chapman	May 2, 2019	emailed letter
Page 16, lines 4-17: As a legal drafting matter, these provisions seem organizationally muddled.	Ginette Chapman	May 2, 2019	emailed letter
Page 17, line 12: Excise “preservation.” Also, excise “written”?	Ginette Chapman	May 2, 2019	emailed letter
Page 17, line 28: Insert comma after “commission.” Also, should the possibility of continuing an application be mentioned here?	Ginette Chapman	May 2, 2019	emailed letter
Page 18, line 1: Excise “preservation.”	Ginette Chapman	May 2, 2019	emailed letter
Page 18, line 5: Excise “in writing”?	Ginette Chapman	May 2, 2019	emailed letter
Page 18, line 20: Substitute “COA” for “certificate of appropriateness”	Ginette Chapman	May 2, 2019	emailed letter
Page 18, line 32: I suggest rephrasing as “When dealing with a zone lot amendment encompassing all or part of the land area of a structure for preservation <i>that is not within a district</i> , . . .”	Ginette Chapman	May 2, 2019	emailed letter

Page 19, line 9: I wonder if we really want to preclude issuance of a demolition permit for a primary structure if a <i>site plan</i> can be approved. Normally we might expect a primary structure to be replaced by another primary structure, but is that true in all circumstances? What if a community wants to put a community garden on a lot? Or what if an institution like the Denver Art Museum wants to demolish one of its buildings and provide a courtyard in its place?	Ginette Chapman	May 2, 2019	emailed letter
Page 20, line 20: Excise “preservation.”	Ginette Chapman	May 2, 2019	emailed letter
Page 21, line 23: Insert “application for” before “demolition.”	Ginette Chapman	May 2, 2019	emailed letter
Page 21, line 25: Rephrase along the following lines: “Consideration of a request for a determination of economic hardship may not . . .”	Ginette Chapman	May 2, 2019	emailed letter
Page 21, line 31: Excise the hyphen in “due-diligence”	Ginette Chapman	May 2, 2019	emailed letter
Page 23, lines 13-16: The phrase “significant hardship <i>to the property</i> ” does not make sense, so I would excise “to the property.” These provisions also are muddled as a matter of legal drafting. Consider redrafting along the following lines: “Whether significant economic hardship exists, as evaluated based on consideration of Whether demolition would cause significant harm to the public interest, as evaluated based on”	Ginette Chapman	May 2, 2019	emailed letter
Page 23, line 25: Add “The” before “extent”	Ginette Chapman	May 2, 2019	emailed letter
Page 23, line 28: Rephrase as “The burden of proof to show significant hardship is on the applicant.”	Ginette Chapman	May 2, 2019	emailed letter
Page 24, line 1: Suggest rephrasing as “. . . shall be filed with CPD. Such applications may include, among other things, the valuation”	Ginette Chapman	May 2, 2019	emailed letter
Page 26, line 26: Add “shall” before “generally” for grammar.	Ginette Chapman	May 2, 2019	emailed letter