

Statement to Denver City Council in Opposition to Approving and Accepting the Park Hill Golf Course Small Area Plan. Courtesy Hearing 22-1430

I am a resident of the Park Hill neighborhood, and a physician specializing in environmental public health who is expressing strong opposition to the Park Hill Golf Course Small Area Plan. These written comments will supplement my brief statement at the Courtesy Hearing.

1. The Department of Community Planning and Development used a flawed approach to find a "prevailing vision" that favored residential and commercial development on the former PHGC. In my opinion, the approach taken by the Department of Community Planning and Development to conclude that "the prevailing vision" of the community considered it appropriate to preserve approximately one half of the total acreage of the former PHGC for open space and recreation was biased and unreliable. The methods supported by the City to inquire about the "vision" of the people of Denver never offered residents the option to endorse a plan that would require *the entire* 155 acres of the former PHGC to be utilized for recreation and open space. In actuality, as evidenced by their votes in favor of Measure 301 and against Measure 302 in November 2021, Denver voters overall and the Park Hill neighborhood in particular decisively rejected the stated position of the Westside developers to favor some residential and commercial development.

The survey cited by the City and Westside as a basis to claim that the prevailing vision of residents living within one mile of the former PHGC was to favor "mixed-use" was biased for several important reasons. First, the initial and main question on the survey asked respondents to choose between use of the land exclusively as a golf course, or as a mixed-use site with residential development and park land. This dichotomous choice was by design biased to favor endorsement of mixed use. A fair and unbiased survey of opinion would have presented more options, including not only mixed use, but also full residential and/or commercial development, and full preservation as parkland and open space. Second, there was no demonstration that the survey in fact reached a representative sample of the intended audience, nor that the number of responses received were statistically adequate to reflect the targeted community. Third, there was no valid reason to restrict the survey to residential addresses within one mile of the site. These biases, particularly the limited choice of options, was particularly objectionable in view of the City's knowledge that an active grass roots movement expressed vocal support for full preservation of the former PHGC as open space or parkland.

The process undertaken by the City to promote a plan that would devote approximately half of the former PHGC for commercial and residential development was performed without a scientifically valid environmental and public health impact analysis intended to impartially present the costs and benefits of various options, including preservation of the entire PHGC site as open space and parkland. This is in contravention to best practices for consideration of major development projects under consideration by a public entity such as the City and County of Denver. For example, the relative impact of "mixed use" versus full conservation as parkland and open space on factors such as urban heat island effects, air pollution from traffic, access to open

space and parkland for recreation and physical exercise was never impartially and scientifically assessed.

2. Preservation of the former PHGC entirely as parkland and open space would address substantial environmental and public health needs of Denver. Based upon peer-reviewed research, and my experience as a physician and academic specializing in environmental health and public health, it is my opinion that environmental and public health factors strongly favor preservation of the entire PHGC site as open space and parkland. Consider the following:

1. Between 2010 and 2019, Denver was the country's fifth fastest growing large city. [<https://wallethub.com/edu/fastest-growing-cities/7010>]. Growth has come with an increased number of cars, roads, parking lots, shopping plazas and other buildings in our community. In fact, nearly half the land in Denver's city limits is paved or built over. [<https://www.denverpost.com/2019/01/13/denver-green-space-urban-density/>]

At the same time, the percentage of City land devoted to open space and parkland has fallen behind that of most other cities. With only 5% of its land used for parks and recreation, Denver has fallen from 13th place in 2012 to 18th place in the 2021 Trust for Public Land Park Score for America's 100 largest cities. In comparison, the percentages of land used for parks and recreation in some other cities are: Washington, D.C.—21%; New York City—16%; San Francisco—21%; San Diego—21%; Portland, Oregon—14%; Boston—19%; Minneapolis—10%; Los Angeles—13%; Seattle—11% and Chicago—9%. According to the Trust for Public Lands, the 2021 national median percentage of land used for parks and recreation in America's 100 largest cities was 15%. [<https://www.tpl.org/parkscore>]. Use of the former PHGC entirely as parkland would substantially strengthen the park system of our increasingly densified and developed city.

2. The neighborhoods that include and generally abut the PHGC land south of I-70 are the Northeast Park Hill neighborhood that is east of Colorado Boulevard, and the Elyria-Swansea, Clayton, and Cole neighborhoods that are west of Colorado Boulevard. These neighborhoods have substantial communities of color. The percentage of non-white residents in each neighborhood are as follows: Northeast Park Hill: 78.3%; Elyria-Swansea: 87.54%; Clayton: 67.1%, and Cole: 66.2%. [see <https://statisticalatlas.com/neighborhood/Colorado/Denver/>]. Many residents of these neighborhoods have limited income. For example, a recent assessment found the median household income for Northeast Park Hill was \$37,501. [<https://statisticalatlas.com/neighborhood/Colorado/Denver/Northeast-Park-Hill/Household-Income>]. These neighborhoods, which are close to the I-70 corridor and industrial sites, are among the most polluted neighborhoods in Denver. For example, the 80216 zip code, the area in which the Elyria Swansea neighborhood lies, in 2017 had the highest environmental hazard rating of any zip code in the United States. [<https://www.attomdata.com/news/risk/2017-environmental-hazard-housing-risk-index/>].

These neighborhoods now have a pressing need for open space and trees. For example, the Northeast Park Hill neighborhood ranks 473 out of 483 Denver census blocks in the Tree Equity Score created by the national conservation organization, American Forests. Only two percent of the land in this neighborhood has a tree canopy cover, which compares poorly with the 24% tree canopy cover that the organization American Forests considers optimal. The Tree Equity Scores and tree canopy cover numbers for the other three neighborhoods in the vicinity are comparable to the deficient Northeast Park Hill neighborhood numbers. [<https://www.treeequityscore.org/map/#11/39.7136/-104.9222>] Protection of the PHGC land conservation easement would protect the existing tree canopy and increase equity of access to open space for low-income communities of color.

3. Because of the relative lack of open space and tree cover in the four neighborhoods generally abutting the PHGC land and south of I-70, the Denver Department of Public Health and Environment has given two of them (Northeast Park Hill and Swansea-Elyria) a rating of "High", the most severe rating, and the other two (Clayton and Cole) a "Medium-High" rating on the 2021 Neighborhood Heat Vulnerability Index. [<https://dashboards.mysidewalk.com/denver-health-assessment/healthy-environments#c-13201793>]. Commercial and residential development of the PHGC land, combined with increasing air temperatures associated with climate change, would contribute to the development of "heat islands" which, in turn, would threaten the health and well-being of those living and working in these neighborhoods. Urban heat islands are associated with heat exhaustion, heat stroke, heat-related respiratory problems, and death. Conversely, trees and vegetation play key roles in directly countering urban heat islands and the negative health effects with which they are associated. [<https://www.epa.gov/heatislands/using-trees-and-vegetation-reduce-heat-islands>; <https://www.epa.gov/heatislands/heat-island-impacts>].The City's eventual acquisition of the PHGC land for a designated park would offer the opportunity for the City to augment the land's critical tree canopy thereby reducing heat island issues.

3. Preservation of the entirety of the former PHGC as parkland and open space is the only option that fulfills the City of Denver's stated goals for climate action. In November 2020, the Denver voters overwhelmingly approved Measure 2A, the Climate Protection Fund, which was referred to the ballot by the City Council on the recommendation of the Climate Action Task Force. According to the November 2021 report issued by the Office of Climate Action, Sustainability and Resiliency entitled, "Climate Protection Fund Five Year Plan": "In addition to strategies that directly eliminate emissions, Denver will pursue nature-based solutions to sequester carbon, including preservation of shortgrass prairie, *preservation and expansion of the urban tree canopy*, and preservation and maintenance of forests in the Denver Mountain Parks" [emphasis added] (see report page 15). Maintaining the former PHGC as verdant open space and parkland, supplemented by additional planting of trees, would be the course of action most supportive of this goal. In addition, the report specifically cites the importance of environmental justice concerns as part of Denver's climate action. As a metric to address climate equity, the report identified "Reduction in disparities in pollution and climate-related vulnerability between

communities in Denver” (see report page 37). As noted earlier, the fact that the Denver neighborhoods adjacent to the former PHGC now experience the highest heat vulnerability index and have the lowest tree canopy cover, argues strongly in favor of preserving the site entirely for parkland and open space. City of Denver Forester Mike Swanson acknowledged this when he told the Denver Post “Yes, Denver needs more trees. And we need to stop pouring concrete.” [Denver Post, January 3, 2021, <https://www.denverpost.com/2021/01/03/denver-tree-planting-greenspace-heat-islands/>].

The former PHGC tract, on which the City and County of Denver holds a conservation easement, represents an irreplaceable opportunity for Denver to utilize parkland to promote the health and well-being of city residents. There are ample opportunities for commercial and residential development to be pursued at alternative locations.

Respectfully submitted,

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