



TO: City Council
FROM: Sarah Showalter, CPD Planning Services
DATE: April 18, 2019
RE: **Comprehensive Plan 2040**

Community Planning and Development is pleased to submit *Comprehensive Plan 2040* to the Denver City Council for final adoption. The plan was unanimously approved for filing by the Land Use, Transportation & Infrastructure (LUTI) Committee on April 2, 2019.

The Denver Planning Board unanimously approved the plan after holding a required public hearing on March 20, 2019.

The final draft of *Comprehensive Plan 2040* is attached to this report. Also attached are written comments received since the Planning Board hearing until the date of this report. Hundreds of written comments were received on the first two public review drafts of the plan, which may be found on the Denveright *Comprehensive Plan 2040* webpage in the form of public comment logs.

This memorandum documents the planning process, briefly summarizes the plan's content, and documents *Comprehensive Plan 2040's* consistency with the code requirements for a comprehensive plan.

Planning Process

Comprehensive Plan 2040 is based on an inclusive, robust three-year public engagement process. The plan is one of five plans developed through the Denveright planning process, which launched publicly in May 2016. "Denveright" is a term for the planning process for five citywide plans to create an inclusive, healthy and connected city. *Comprehensive Plan 2040* advances the vision from Denveright and serves as the overarching framework for the other Denveright plans. The following summarizes key components of community input throughout the Denveright process:

- **Summary of all Denveright Outreach**
 - Over 25,000 touch points for all Denveright between May 2016 and March 2019
 - 191 in-person events at 101 different venues across all 11 council districts:
 - 65 street team events
 - 43 community meetings
 - 40 task force meetings
 - 32 surveys

- 10 office hours
- 3 Denveright community think tank meetings

Throughout the planning process, the city worked to reach as many Denverites as possible. This included traditional community meetings, where child care and Spanish language interpretation were provided. The city used other methods to reach those who are not as likely to attend a meeting. This included online surveys, focus groups with underrepresented populations, and a street team who went to meet residents at events in their neighborhood – including concerts in the park and neighborhood block parties.

- **Visioning Workshops and Surveys** – in the fall of 2016, the city hosted five workshops across the city to ask Denverites about their vision for Denver. This engagement window included online surveys, through which hundreds of residents provided feedback. The community values and six vision elements in Comprehensive Plan 2040 came directly from the community’s input during the visioning phase.
- **Comprehensive Plan 2040 Public Review Draft #1** – in August 2018, a full draft of the plan was released for public review. The community submitted hundreds of comments over a 4-month period, which were incorporated into the second draft.
- **Comprehensive Plan Public Review Draft #2** – in January 2019, a second full draft of the plan was released for public review. Community input that draft was incorporated into the Planning Board draft.

Plan Content

Comprehensive Plan 2040 contains an introduction chapter and a chapter on each of the six vision elements. The final chapter focuses on Denver’s role within the larger metropolitan region. For each vision element, the plan contains a set of goals and strategies to advance the vision. *Comprehensive Plan 2040* also calls out additional citywide plans where the reader can find more specific strategies around implementation for each vision element.

The six vision elements are listed on the following page. See the plan for the goals and strategies that advance each vision element.



In 2040...

Denver is an equitable, inclusive community with a high quality of life for all residents, regardless of income level, race, ethnicity, gender, ability or age.



In 2040...

Denver's neighborhoods are complete, unique and reflective of our city's diverse history.



In 2040...

Denver is connected by safe, high-quality, multimodal transportation options.



In 2040...

Denver is a global city with a robust economy that reflects the diversity of our community.



In 2040...

Denver is a thriving, sustainable city connected to nature and resilient to climate change.



In 2040...

Denver is a city of safe, accessible and healthy communities.

Comprehensive Plan Supplements

The ordinance for *Comprehensive Plan 2040* includes a list of all plans to be adopted as supplements to the plan. The majority of existing plans are being re-adopted as supplements to *Comprehensive Plan 2040*. Through the creation of new small area plans, which will be adopted as future comprehensive plan supplements, outdated small area plans will be replaced.

Compliance with Code Requirements

Section 12-61 of the Denver Revised Municipal Code (DRMC) sets the requirements for Denver's comprehensive plan.

Section 12-61(a) of DRMC states "*Description and purpose*. The comprehensive plan shall provide an expression of the city's vision for the future with a listing of goals and objectives. Once prepared and adopted, the plan will guide and influence decisions that affect the future of the city."

Comprehensive Plan 2040 meets the description and purpose described above. It provides a holistic vision for the future of Denver, based on the community's input, and includes a complete set of goals and strategies to advance that vision.

Section 12-61(b) of DRMC states "*Form*. The comprehensive plan hereinafter provided for may include and consist of maps, charts, drawings, exhibits and other descriptive matter. The plan may consist of one (1) unit, may consist of several component parts, may be adopted in whole or may be adopted in parts, but, in any event, shall be comprehensive in that its scope encompasses the entire city."

Comprehensive Plan 2040, and its adopted supplements, meet the form described above. The plan itself is comprehensive and multidisciplinary. It covers the entire city of Denver and advances a holistic vision with multiple components. It is advanced by several supplements, including:

- Blueprint Denver – the city's land use and transportation plan. Blueprint Denver is also being updated through Denveright and will be adopted as a supplement to *Comprehensive Plan 2040*
- Game Plan for a Healthy City – a citywide long-range parks and recreation plan. This plan is also being updated through Denveright and will be adopted as a supplement to *Comprehensive Plan 2040*
- Small area plans – the city has multiple small area plans that will be re-adopted as supplements to *Comprehensive Plan 2040*. In the future, new small area plans will also be adopted as supplements to the comprehensive plan.

Section 12-61(c) of DRMC states "*Contents*. The comprehensive plan may include, but is not limited to, any or all of the following elements:

- (1) Land use;
- (2) Transportation including streets and highways, public transit, pedestrian and bicycle circulation, railroads, airports, and other aspects of the transportation system;
- (3) Capital and community facilities;
- (4) Parks and recreation;
- (5) Urban design;
- (6) Historic preservation;
- (7) Areas for development and redevelopment;
- (8) Housing;
- (9) Neighborhood revitalization;
- (10) Environment;
- (11) Economic development;
- (12) Human services; and
- (13) Metropolitan planning.”

Comprehensive Plan 2040 addresses all of these components, as summarized below.

- Land use – covered by multiple goals in the following comprehensive plan chapters: Equitable, Affordable and Inclusive; Connected, Safe and Accessible Places; Strong and Authentic Neighborhoods; and Denver and the Region. Land use is further advanced by the comprehensive plan supplement Blueprint Denver.
- Transportation – covered by comprehensive plan chapter Connected, Safe and Accessible Places. Transportation is further advanced by the comprehensive plan supplement Blueprint Denver.
- Capital and community facilities – covered by comprehensive plan chapters Strong and Authentic Neighborhoods and Healthy and Active. This is further advanced by the comprehensive plan supplement Game Plan for a Healthy City.
- Parks and recreation – covered by comprehensive plan chapters Equitable, Affordable and Inclusive; Connected, Safe and Accessible Places; Environmentally Resilient; and Healthy and Active. Parks and recreation is further advanced by the comprehensive plan supplement Game Plan for a Healthy City.
- Area for development and redevelopment – covered by comprehensive plan chapters Equitable, Affordable and Inclusive; Connected, Safe and Accessible Places; Strong and Authentic Neighborhoods; and Denver and the Region. This topic is further advanced by the comprehensive plan supplement Blueprint Denver.
- Urban design and Historic presentation – covered by comprehensive plan chapter Strong and Authentic Neighborhoods. Both are further advanced by the comprehensive plan supplement Blueprint Denver.
- Housing – covered by comprehensive plan chapters Equitable, Affordable and Inclusive. This item is also advanced by the comprehensive plan supplement Blueprint Denver.
- Neighborhood revitalization - covered by comprehensive plan chapters Strong and Authentic Neighborhoods and Economically Diverse and Vibrant. This item is also advanced by the comprehensive plan supplement Blueprint Denver.

- Environment – covered by comprehensive plan chapter Environmentally Resilient.
- Economic development – covered by comprehensive plan chapter Economically Diverse and Vibrant.
- Human Services – covered by comprehensive plan chapter Equitable, Affordable and Inclusive.
- Metropolitan planning – covered by comprehensive plan chapter Denver and the Region.

Staff finds that *Comprehensive Plan 2040* meets all of the DRMC requirements for Denver’s comprehensive plan.

Staff Recommendation:

Based on the findings that the plan is consistent with the Denver Revised Municipal Code, staff recommends **adoption of Comprehensive Plan 2040.**

From: Bridget Brophy
To: [Planningboard - CPD](#)
Subject: [EXTERNAL] Blueprint Denver Public Comment
Date: Tuesday, March 19, 2019 8:53:01 PM

There is a burden that needs to be addressed with the Blueprint Denver and Comprehensive 2020 plans. It is that of adjacent residents to short-term rentals and then proposed ADU's.

How many uses can someone squeeze on to a 25' lot? I think two is quite enough. When our neighbor who wanted to build an ADU not for a long-term, affordable rental option but for a short-term rental via AirBNB, she couldn't do it thankfully because her lot size wasn't large enough. She took it to the BOA zoning appeals process where one member stated that she could not be more intrusive on her neighbors (us). So she built a garage instead in 2018 with a zero setback as allowed by zoning. If the city wants to allow ADU's everywhere, there should still be a 3' setback. Plus only one additional use on small lots should be allowed. Using this neighbor as a further case in point, she built an addition that is used exclusively for STR's. If she were allowed to build an ADU, then she could have a single residence, an addition that is used as a 365 days a year STR, and then an ADU that would most probably be used for a rental at market rates not an affordable rate to low income since she stated that she needs to make money. As is her case, she is not one needing to make all this money to keep her house. It is for making more money to pad her income. We have not seen any people who are lower or moderate income building ADUs to keep their houses at this point. For one, where would they access the credit at a good rate?

While a lot of air time is used up talking about affordable housing, what happens on the ground due to policies and market forces are another matter. We had two old duplexes down the block that were low income a few years back. They were sold and torn down and a very large, single family home sold at market rate was put on that lot. Those are the kind of decisions and forces that affect affordable housing in the city. But then the city forces people who bought a single family home on a residential block to now live next to a motel (short-term rental at 365 days a year), and then potentially another unit sold as an ADU, it is too much.

[Sent from Yahoo Mail on Android](#)

From: Mark Camacho
To: [Rezoning - CPD](#)
Cc: [Micah Kimball](#)
Subject: [EXTERNAL] March 20th Planning Board Public Meeting
Date: Wednesday, March 20, 2019 5:56:11 AM

Regarding public testimony::

Planning Board Public Hearing Mar 20 2019 - Mar 20 2019 Start Time: 3:00 p.m. End Time: 5:00 p.m. Location: Parr-Widener Room (#389) City and County Building 1437 Bannock Street, Denver CO 80220

Dear Denver Planning Board, Blueprint Denver,

Please accept my following comments as my opportunity to offer public testimony, as you deliberate and vote on approval of Comprehensive Plan 2040 and Blueprint Denver in the city and county building on March 20th at 3pm.

My name is Mark Camacho, a Lower Highlands business and property owner since 1998.

I am the property owner of 2 buildings in the heart of Lower Highlands-Denver - 1643 and 1649 Boulder st. One property is an office building and the other property is a small house.

In 2017, I was granted non historic designation on both properties.

The total land size is 14,000 feet of ground, or .32 acres.

In recognition of Blue Print Denver's initiative to ensure continued vibrant communities in the lower highlands neighborhood, I highly encourage you to grant my property the opportunity to rezone for higher density.

Currently, my 2 properties are zoned for 3 story development.

I believe 5 story density is much more conducive to the emerging development of the neighborhood.

My properties are located on Boulder st, facing the beautiful skyline of downtown Denver. At 5 story height, the view would be unobstructed and highly desirable. Also, there are no properties behind me, just Hirshorn Park. Therefore, my 5 story height would not block other residential sites.

Also, my adjacent neighbor to the west is zoned 5 story, which would yield a nice aesthetic flow to the block if I were granted 5 story height.

Please consider my plea for consideration of rezoning to 5 story density - 1643 and 1649 Boulder st.

I believe my plea is consistent with the direction of Comprehensive Plan 2040 and Blueprint Denver.

Thanks!

Mark Camacho,
Lower Highlands property owner since 1998.

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Mark Camacho | Director / Producer |
81 Media International | 303-455-5430 |
303-359-1886 Cell
Mark@81mediainternational.com | Twitter - [@81_Media](https://twitter.com/@81_Media) |
81mediainternational.com | [Facebook](#) |



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March 19, 2019

To the Planning Board:

I am overwhelmed by 1600 pages of pictographs and tiny print and maps, and wonder how a Council representative can possibly wade through this and tell her/his constituents that he or she now sees a clear vision for Denver. Hundreds or thousands of hours put in by consultants and staff members, getting every conceivable details into these plans and maps, and I want to recognize the hard work involved. But in the end we can't see the forest for the trees.

How many (and which) of the 78 Statistical Neighborhoods met with CPD?

How how many specific neighborhoods met with the city to grapple with on all the changes embodied in the text and maps? Did CPD meet with each and every neighborhood about to be bound by the Comp Plan, Blueprint and the maps? I understand residents could attend a variety of map sessions and input meetings, as well as make comments online, but the Planning Board should provide a list of the neighborhoods that it sat down with as well.

Difficulty Navigating Plans and Maps:

Having been involved in development issues for many years, I felt that I or other Board members in the RNO could go back and forth with David Gaspers to get a copy of a map, to ask them to meet with our RNO, to ask them to walk us through (again) how to access the maps, to answer questions. Yet – even with the ability to get help – I still (today!) have trouble getting to each plan and, in particular, finding the very tiny line of print that brings you to link to downloadable maps. (Before the hearing Wednesday, I would ask each one of you to google one of these plans, and to navigate your way to the Neighborhood Context Map and print it.) I wonder how many residents really read the plans and looked at the maps. The recent map sessions held by CPD were great opportunities, and I attended two of them, but there were very few attendees. The larger sessions also had maps and illustrations on boards, but even those sessions were difficult to navigate. And I am still at a loss on why the Comp Plan came so late.

Comprehensive Plan Grab bag:

I have looked at the Comprehensive Plan. (I am omitting many of my specific concerns to try to focus on the big picture.) It captures input and has lots of great words and images and graphics, but grasping the policies, goals, and strategies and understanding how to think about 500 strategies is quite difficult.

Applicants for rezoning have always included a long list of the elements of the Comp Plan, BP and other plans that their proposals are consistent with. Now – with over 500 strategies for achieving the “vision” – we have an even larger grab bag and it is anyone’s guess how many strategies applicants will latch onto when rezoning. The writing on the wall is clear: an Applicant can find support for almost any rezoning proposal in almost any neighborhood in this grab bag.

In addition, the strategies are not prioritized, nor are they articulated in a way that makes clear their impact on the budget.

The timeline for implementation of all these strategies is unclear, and we don’t know which strategies are on the short list, the long list, or the wish list for 20 years from now. For the Denver Moves Transit Plan, for example, we learn we need to wait for Phase 2 before any of this becomes a reality.

Eliminating Areas of Stability and Areas of Change:

This has fallen beneath the radar but deserves attention. Eliminating Areas of Stability – in and of itself – will do nothing to guarantee affordable development. Imperfect as the A/S and A/C tools were – they provided some moderation in the development game. The enormous pressure on Elyria and Swansea and Globeville (Globeville has both A/S and A/C) from NWC development has been relentless. Once those three areas no longer have the A/S designation, it will be open season from investors.

Without providing new regulatory tools or mechanisms to protect affordable housing stock we will not be able to meet Goal #4 of the Comp Plan. The strategies for this goal are primarily existing strategies, which have an important role, but

have only made a dent in the problem and will not keep pace with relentless investors on the lookout for the next deal.

GOAL 4 Preserve existing affordable housing.

STRATEGIES

A. Expand existing tools, such as tax relief programs, to preserve the long-term affordability of housing throughout Denver.

B. Create additional tools, including community land trusts and regulatory incentives, to preserve existing affordable housing.

C. Incentivize the reuse of existing smaller and affordable homes.

Most Denver Council Districts cover *extensive* areas of stability, (see map), and existing housing stock in those areas currently provides the main source of affordable choices for families. It doesn't take a crystal ball to know the homes in Globeville, in the Virginia Village area near the new Kentro development at Colorado & Arkansas, will be gobbled up by investors and quickly upzoned using the argument that "conditions have changed," that these areas are now "on the edge" of the new development, and that such redevelopment is supported by some of the 500 new strategies in this Comp Plan.

The vision or goal of Strong and Authentic Neighborhoods also remains elusive in the Comp Plan. The Plan gives lip service to maintaining neighborhoods, avoiding displacement, increasing affordability; however, the tools are not there. Unless a neighborhood has historic value and can get landmark designation, or some reason to seek protection with a conservation overlay or other tool, they will have little to protect them. The know how required to create one of these overlays or designations is insurmountable for most neighbors. Areas that have no unique architectural gem or history, yet currently are comprised of modest, affordable housing stock, will be targeted first for scraping and reinvestment.

I wonder what we would find if we did the math to see what we have already lost in terms of housing for families? It is not just a matter of counting new units (and determining how many new units are truly affordable) but someone has to be tracking the number of viable affordable units we are losing on a monthly basis.

Home ownership

The importance of home ownership in establishing wealth is continually raised as a key to economic success. While many choose apartment dwelling, we cannot ignore those who place great stock on ownership. Take a look at what Globeville residents highlighted as important about their neighborhood in the Globeville Neighborhood Plan:

- * ***Multi-generational***
- * *People here have been here for a long time*
- * *Stable neighborhood with high home ownership*
- * *Affordable home ownership opportunities*
- * *Habitat for Humanity is working in the neighborhood*
- * *Housing diversity and character of existing housing*
- * *Calmness – lots of quiet streets*

The stability of high ownership rate was deemed important to Globeville residents and, development pressure aside, home ownership is still part of the fabric of many Denver neighborhoods. It is pie in the sky to think that the mere elimination of A/S will result in more affordable and diverse housing in all neighborhoods throughout Denver.

I realize I singled out only a couple of concerns with proceeding with the Comp Plan and BP (and its maps) in this letter. I wrote about my concern with the maps in another letter. And I have questions about the Neighborhood Planning Initiative as well, but think I have probably gone on too long as is! Please consider asking CPD to first focus on the Comprehensive Plan and see if it can be narrowed and centered around sustainability. I think water and air quality and sustainability needs to be at the core of all planning, and in this plan it is included in a resiliency chapter, rather than being at the forefront.

Thank you for considering my input in this process.

Christine O'Connor

144 S. Ulster St.

Denver CO 80230

303 906-6627



April 17, 2019

Denver City Council
1437 Bannock Street
Denver, CO 80202

Dear Members of City Council,

We are writing on behalf of Historic Denver, Inc. regarding the Comprehensive Plan and Blueprint Denver currently under consideration. Historic Denver served as an active participant in the Blueprint Task Force over the last two years, and we very much appreciate that many of our comments were included in the revised drafts, which now offer stronger language regarding historic preservation values and strategies, including both traditional preservation tools as well as new ideas that will support the places that make Denver Denver.

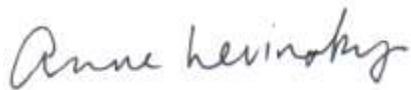
Specific improvements since the first drafts include greater clarity regarding the intent of the Strong and Authentic Neighborhoods vision element, as well as the inclusion of "preservation" in the title and description for the recommendations related to Design Quality and Built Form. We are also pleased to see that a number of the recommendations offer options to add housing options without, or certainly with less, demolition. This not only sustains neighborhood character, but also reduces the waste lost in demolition and can support affordable housing goals by introducing new housing options within existing buildings. We would like to see some of this same thinking applied in centers and corridors as well, including removing barriers to adaptive reuse.

With vision elements and recommendations in place, the implementation matrix is now the key in determining which policies and strategies will move forward earlier, and which later. We do want to point out that nearly all the strategies related to design quality and neighborhood character, such as establishing design standards for projects of a certain magnitude or encouraging the retention of smaller, more affordable homes, are in the more delayed 4-10 year category. Pairing the design quality and preservation strategies with the appropriate growth, land use and housing strategies will lead to much better outcomes with fewer unintended consequences.

Historic Denver, Inc.
1420 Ogden Street, Suite 202 Denver, Colorado 80218
www.historicdenver.org

At the core of Denver's quality of life is the interconnection between people, culture, and the built environment. Blueprint Denver creates opportunities to build-upon these relationships so that our city thrives. There are many elements of both the Comprehensive Plan and Blueprint Denver that we support, and that we believe reflect the value our community places in our historic places and cultural landmarks. We look forward to engaging in neighborhood planning efforts and policy work that can bring these ideas to reality.

Sincerely,



Annie Levinsky
Executive Director



Ellen Ittelson
Chair, Preservation Committee



To whom it may concern,

On behalf of Northeast Transportation Connections (NETC), I would like to share our full support for the City and County of Denver's Denverright plan and recommendations, including the Comprehensive Plan 2040, Blueprint Denver, Game Plan for a Healthy City, Denver Moves: Transit, and Denver Moves: Pedestrians and Trails plan.

With the forecasted growth of 200,000 more people expected to move to Denver by 2040 and far more throughout the region we believe that it is crucial for Denver to have an updated plan from the 2002 Blueprint Denver in order to get ahead of this projected growth. The Denverright plan and subsequent recommendations are creating that vision to align Denver's multiple planning efforts and address the rapid growth in the region.

Throughout this two year project NETC has been deeply involved in the Denverright planning process. NETC helped represent Northeast Denver as a stakeholder on the Denver Moves: Pedestrians and Trails committee as well as the Denver Moves: Transit committee. Through our work on these committee's we have been able to assist in shaping a vision for Denver's mobility future that begins to create the structure for a comprehensive transportation network that looks at mobility as a whole whether you are walking, biking, taking public transit, or someone who needs to drive. The Denverright vision helps address concerns of growth related to increased congestion and reduced air quality while working to create equitable mobility options for every community.

We ask that you give this plan your highest level of support as it is paramount to improving the quality of life for Denver residents through improved mobility for the region. We truly believe this community-driven planning process has sufficient representation from community and its stakeholders. Denver's Denverright plan and recommendations is a clear step in the right direction for Denver and our constituents.

Sincerely,

Angie Malpiede

Executive Director

[Northeast Transportation Connections](#)

7350 E 29th Ave Suite 300, Denver, CO 80238

