

Emailed Public Comments – 20 Responses

July 6, 2020

From Susan Stein

Thanks Kathleen for the explanation. This is not an easy task. But we are doing it. I applaud the focus on the “additional issues in Downtown”. You are doing great work. Susan

July 15, 2020

Hi Kathleen,

Thanks for taking comments from the public! Here are mine (I also commented on the doc, with essentially the same "visions" expressed here):

- Keep the al fresco dining on Main Street, post-Covid-19. This is a WONDERFUL feature, to add to "the Littleton experience". If not year-round, then perhaps from Memorial Day to Halloween... with a big event at Halloween!
- Ebikes are coming and Littleton should be a part of this change, by becoming a "bike-friendly and pedestrian-friendly mecca"! Adding to the already-enjoyed biking access, by expanding access within city streets and beyond, making bike commuting a realistic option, would only make for more traffic via bikes (and less via cars). People on bikes are looking for places to go and things to do when they get there... make Littleton one of those places and the businesses here those destinations.

On a side note, making improvements to the riverbanks of the South Platte, and Mary Carter Greenway, would make Littleton even more attractive, to more ebikers and pedal-bikers, from neighboring cities.

The possibilities are constantly expanding, when you step back from a car-centric vantage point..

I hope this helps and finds you well!

Thanks for listening,

Karen Hawes

July 17, 2020

I'd be interested to know if ADUs have been or will be part of the conversation. Many of us are pinched between aging parents and young ones struggling to launch, and would love to create a quality garage apartment for a loved one. Denver recently changed their codes to allow them. With as many apartments and condos being built in Downtown Littleton, surely crowding isn't a reasonable reason not to allow them.

Thanks,

Carrie Wampler

July 21, 2020

Hi Kathleen,

I wanted to pass along some feedback regarding the proposed plan for Downtown Littleton. Thanks for passing this along.

I have been a resident in District 2 for over 8 years and I run North Littleton Promise, an organization who serves immigrant kids and families. My oldest graduated from Heritage High School and I have one at East Elementary with the youngest soon to follow. My 85 year old mother lives in an apartment in District 2 as well, over by Littleton Prep.

I often feel like the needs of the vulnerable, including immigrants but also lower income families and the elderly are unheard in these discussions. We have to keep their housing needs at the forefront when making these plans. Our communities are richer and healthier because of them.

The CompPlan and Housing Study have identified that housing is a huge need in our community, to the tune of 6,500+ units. I don't see how this current plan for the downtown area addresses that need. It seems to me that each of the new plans need to account for some portion of the 6,500 units we need, with a commitment to affordable housing as well! Am I missing something here?

I appreciate any insight you can provide as well as passing along my feedback.

Respectfully,
Maureen Shannon
Executive Director
North Littleton Promise

July 27, 2020

Members of the Littleton City Council
City of Littleton Staff

Re: Comments/Feedback on Phase II Amendments of the City Code – Focused on Downtown

Dear City Council and Staff,

South Metro Land Conservancy (SMLC) is a 501 (c)(3) nonprofit organization founded more than 25 years ago. SMLC is mostly known for its extensive work purchasing and acquiring open space in the south metro area. The organization has held conservation easements and has initiated or participated in land preservation projects totaling over 10,300 of protected open space. SMLC has been a partner with both the City of Littleton and South Suburban Parks and Recreation on adding buffers to South Platte Park (Newton Trust, Ensor and Superchi) and Wynetka Ponds Park to name a few projects.

Today, SMLC also is working to increase awareness of the importance of natural areas in neighborhood parks as these areas provide important habitat close to home; create opportunities for children to enjoy and learn about nature; and increase connectivity of the trail system. SMLC is dedicated to educating community members on the importance of these values in an increasingly urbanized region.

As a partner in Envision Littleton, South Metro Land Conservancy is pleased to contribute comments on the Downtown Littleton Code Amendments. Our comments mostly address environmental sustainability; they are both specific to the current proposed changes and more general to the entire code. We expect that we will weigh in as the ULUC is further developed.

In addition, we recognize that some of our comments will be viewed as related to policy rather than code. Nonetheless, the SMLC board wishes to weigh in on environmental sustainability as half of our board are newly appointed within the last year. SMLC's direction is evolving as a result.

Xeriscape/Native Plants

Language should be added to strongly encourage the use of xeriscape strategies and materials. In addition, there are numerous resources available that address low water use landscaping and native plants and examples should be given. Even though downtown Littleton is a predominantly urban environment, it does not need to be a habitat wasteland. The

various downtown character areas, whether predominantly commercial or single-family residential, should be encouraged to use xeriscape and native plants. It would be helpful if the City could provide guidance on plantings and landscape design to further encourage this.

Water Conservation Language

The code should express encouragement of water conservation in general. While Littleton is not a water provider, careful stewardship of water resources is critical to environmental sustainability and should be included as a principle in any proposed changes to the zoning codes.

Enhance Existing Parks

There are two parks in the downtown area, Geneva Park and Bega Park. The code should present opportunities to showcase xeriscape, native and foraging plants in these parks. Again, these two cherished parks provide opportunities for water conservation and to encourage and educate about the importance of locally grown food.

Tree Canopy

We applaud the City's emphasis on increasing and enhancing the tree canopy as the city is losing significant tree canopy. We encourage diverse species examples be given in the code.

Streetscape and Trees

Trees that are part of the streetscape with tree lawns are an important character element in Littleton's downtown. However, property owners need guidance about how to plant and care for these areas if they do not wish to use water-consuming turf. Preserving this character -- while also conserving water and ensuring healthy trees -- needs to be addressed in the code.

Stormwater – As a Municipal Separate Stormwater System (MS4) permit holder, Littleton has a responsibility to manage both the quantity of quality of stormwater produced in the city. Impervious surfaces generate more stormwater than other surfaces and will be especially relevant in the downtown area which is intensely paved. Currently the requirements of the MS4 permit are siloed from the zoning codes and these two regulatory responsibilities need to be married together. Some areas where the two efforts overlap are listed below.

- Permanent stormwater control feature maintenance – especially in Skunk Hollow in the Downtown area, there is an opportunity to incorporate environmental improvements with changes in the zoning codes. For example, xeric landscaping materials should be incorporated in the stormwater improvements and potentially be used as a model for other areas in downtown. Brighton Boulevard in Denver has recently installed innovative stormwater features that could be suited to Downtown Littleton. Littleton could both comply with their MS4 permit and model stormwater protection becoming an amenity in the downtown area. The details of how that could happen should be included in the proposed zoning code changes to the downtown area and incorporated into improvements being planned in Skunk Hollow.
- Encourage Stormwater Best Management Practices (BMPs) – there is a field of study about effective ways to control stormwater. BMPs should be considered and incorporated into any zoning changes. The only way Littleton is going to achieve compliance with its MS4 permit responsibilities is if the requirements are woven into all land use activities, including zoning codes.
- We encourage the City to resist the development of surface parking lots and widening the alleyways to avoid creating more impervious surface. Where increasing impervious areas cannot be avoided, the use of regional cisterns should be considered following the practices at Sterling Ranch. To be clear, it's best to avoid increasing impervious surfaces but where it can't be avoided, allowing for construction of cisterns should be included into the zoning code.
- Currently the waterway running through the downtown area, Little's Creek, has been channelized and sunk below surface grade, separating it from people and diminishing its value as an amenity. Consideration should be given to encouraging projects that renovate the waterway, making it a community amenity and connecting people to it, much like the ongoing work along the South Platte River.

Composting

Littleton should consider incorporating onsite composting into the land use code. Composting may be particularly practical in denser areas such as downtown.

Community Gardens

Community gardens should be considered as a use for Geneva Park as well as the large expanse of turf on the east side of the Arapahoe County Administration Building.

Finally, SMLC applauds the City's effort to update the code and look forward to working with you toward a more environmentally sustainable community. Thank you for your consideration.

Sincerely,

Patricia Cronenberger, President

July 27, 2020

Dear Patrick, We are happy that you are serving as our District 1 representative. We have lived in old downtown Littleton on Prince street since 1972. So many changes over the years, with ups and downs, but definitely much for up these last 5 plus years.

One things that has astounded me (Marti) is the amount of very expensive, multi-unit condos or townhomes. Some in the DNR area, where we reside, have not met the Envision guidelines for unobstructed open space and greenery. I guess that is because the Envision plans have not be adopted yet. However, the new buildings don't meet the standards we had in the past, either, at least not to my memory. I haven't found the old standards to check.

I have two comments you may be able to help with: 1) After perusing the online DT Area Envision info, I wanted to utilize the "survey" to give guided feedback. However, I can't get the site to open a survey; other areas that the Envision Homepage Menu refers me to aren't accessible or helpful, either. How can I get access to a survey? 2) The Envision plan also invites residents to participate, by appointment, in a discussion with an employee at either 9 am or 2 pm on weekdays. It invited me to click and sign up for a time, but all it does is take me to the video interaction application. It had me looking at myself, but I discovered no way to actually sign up to talk with someone. How can I do that?

I know the City groups, such as Envision, want public feedback. Today and yesterday, I haven't been able to participate, for the reasons stated above. Thanks, Patrick, and keep up the hard work. Every day is a new adventure and a new opportunity to hone our skills and better the world for everyone.

Sincerely, Marti Bitts (and Bob Bitts) 5513 S. Prince St.

July 29, 2020

Hi Kathleen,

While I do work for the housing authority, I also live here. And it's my favorite place I've lived in Colorado. I'm originally from the Chicago area. I would like to submit just a couple comments on the downtown area land use, and beyond.

I ask that consideration is given to future land use that is used to build small, energy-efficient individual homes (2-beds, 2-baths, 2-car garage, small yard) that cost \$400,000 or less. This type of housing opportunity in Littleton would give single professionals, couples, and small families making \$75,000 - \$120,000 a real opportunity to purchase a home in Littleton, and become a part of the community long term, without becoming "house-poor."

Homeowners stay as estimated 8 - 10 years in their home, versus renters at 1 -3 years. Homeownership is a real path to success for families, communities, and municipalities. There are many people living in apartments in Littleton at that income level who wish to be homeowners, but have no real options for what they can afford. This is a concerning trend for the future, and perhaps there is a solution to incorporate this important part of the tax paying society into this wonderful community.

It would also be nice to see incentives for builders to incorporate more progressive design ideas and green build options, such as rooftop gardens, solar use, rainwater harvesting for plants/yard, xeriscaping, compost options, recycling programs, using repurposed and environmentally-friendly materials, energy-use programs, lighting design, etc. (the smaller home build is also part of the green solutions)

I appreciate the opportunity to share my thoughts with the City!

Thank you very much,

Kimberly DeCero
Marketing & Communications
South Metro Housing Options

July 29, 2020

Hello!

Since buildings are built for the next 60-80 years, I'd like to see green building codes adopted for energy efficiency, roof gardens and permeable driveways, similar to Denver's new green building codes.

I would also like to see an update to the code for adequate space in waste enclosures for additional waste services like recycling and composting.

Thank you!

Jasmin Barco

July 29, 2020

Hi Kathleen Osher,
I wanted to add my opinions to how Littleton can go sustainable in the future. I care very much about sustainability and I think everyone does too.

Here is my list.

I hope you can add these ideas to your Envision Plan for Littleton.

- 1.Green building codes adapted for energy efficiency. Similar to the ones Denver has
2. Roof gardens and permeable driveways
3. Update the codes for adequate space in waste enclosures for additional waste services like recycling and composting.
4. Switch to organized hauling where everyone can have access to trash, recycling and composting!
5. Make Littleton a tree forest, plant more trees in Littleton.
6. Declare Littleton a plastic free zone, excluding medical supplies.
7. Make Littleton a chemical free zone, stop using chemicals on public spaces and suggested other residences do the same.

Thank you for working on sustainability for our beloved city.
Kris Elletson

July 31, 2020

Hi Kathleen!

I'm excited to have the opportunity to provide feedback and before I get there just a quick note to let you know that I've found it quite difficult to navigate your website. Given that the survey is so important to Envision's mission it's unfortunate that it is so difficult to find. I would have thought it there would be a link or button on the landing page.

Also the survey seems to be intentionally confusing and ridiculously difficult to navigate. As someone with little experience in our local housing codes there was no easy way to navigate. Finding the document that the survey is referring to was not intuitive and even after finding it realized that the page references on the survey do not align with the page numbers in the document. Nor do the titles always match.

To make it more user friendly, at the very least each section should have links to the document you are referring too. I'd also suggest having a similar approach to outlining the pros/cons of these changes so that people without a land code background have more context to the survey.

Also after it finally finished the survey and submitted it, it cleared my form because there was one area that I didn't fill out. Frustrating to say the least.

Overall, I believe that it's essential to Littleton's future to have more affordable and multifamily housing to support local businesses. We would be amiss to not grow in a diverse, smart, and sustainable manner as the state of Colorado grows and our building codes need to reflect that.

Thanks for accepting feedback and hopefully a few adjustments can be made to the next attempt so that the feedback you receive can be incorporated.

-Lauren Acres

July 31, 2020

"Greetings, I'm not sure if I" in response to "Envision Littleton - What's Next?"

Comment: Greetings, I'm not sure if I've arrived at the right place to comment on the sweeping downtown rezoning? I can't understand why this is all being rushed through and not studied on an area by area basis. In looking at the 'recommendations', some of them no sense to me.

Why did the colors on the map change?

July 31, 2020

Hope you and your families are doing well. Mark - I am including you because I needed another name to send my comments.

Please find below my comments/questions submitted as requested in an e-mail from Kathleen:

- The modifications are extensive and it is unreasonable to comment on 376 pages.
- Are the definitions complete? Are you planning on using the definitions for all areas of the City? Sustainability is a missing definition.
- How is the code more restrictive or less restrictive than what currently exists?
- I think the parking requirement is convoluted for a downtown area. Look at 5151 Rio Grande Apartments. The previous standard of 1.5 parking spaces does not begin to have enough parking for that facility. Bottom line is you need a car, uber or lift to get to a grocery store from the downtown area as well as a car to enjoy the amenities of this area. The incentives for light rail or RTD won't improve parking downtown. Parking has been an issue for as long as I remember.
- Consider how your parking tables on pages 70-71 will be enforced based on night, day and evening requirements. It might be difficult without giving parking enforcement specific tools.

- Open Space requirements are completely inadequate. Saying open space must be "sufficient " or "visible" from the street is not adequate.
- Sustainability requirements are non-existent.
- Why is Nevada Place and Littleton Crossing in a DTU area? They are relatively new buildings and hopefully won't be in transition for another 30 years? It's like saying a newly rebuilt King Soopers on Broadway and Littleton Boulevard or the newly built Breckenridge Brewery are blighted.
- The property north/east of Prince and Santa Fe is not zoned. I have heard the city entertained two development proposals for fast-oriented food. Does it need to be zoned? I don't know if what I have heard is correct.
- How are historical properties such as the Richard Little's House, Town Hall Arts Center, Carnegie Library, Columbine Mill, Geneva Village and many other properties adequately preserved?
- Downtown Mixed Use on Main and Santa Fe - Just south of the Melting Pot/Carnegie Library. There is a piece of property not owned by anyone that has been rezoned as mixed use. Can or should this be done if there is no owner of record in county data?
- Skunk Hollow (north of the Melting Pot) and owned by the City is not rezoned. What does the City plan to do with the property? I don't think it is legitimate open space given the properties environmental problems and proximity to Santa Fe. I talked with Sheridan. The developer trucked all the hazardous materials out to build Riverpoint. They still have drain pipes for the methane.
- Apartments (on p. 64) are excluded as a use from the DNR and DMS area. There are currently apartments downtown in the DNR area. What about the apartments building on Prince and Main holding section 8 housing?
- How do you validate employers and residents providing RTD passes?
- We have enough box-y structures in Littleton. On page 232-234 specifically 233 4 c) it shows box stucco apartments. Does Littleton really want more box apartments with no visual interest?
- Has the city walked through scenarios of using this proposed code changes how developers can build out properties in all four downtown areas such as:
 - Melting Pot
 - The Columbine Mill
 - Geneva Village
 - A house in the Transition Area
 - A house and business in the mixed use area
 - Business in the Downtown Area
 - Business in the mixed use area
 - Libby Bortz
 - Churches
 - South Metro Housing Options
 - Restaurants in Mixed Use Areas
 - Restaurants in Transition Areas?
- Does this really preserve the character of the area or change the character of the area so downtown is unrecognizable?
- How is this document focused on residents of downtown rather than developers?
- Review the use table. Is it reasonable? How will the uses stack up to existing code? What are the differences? For example apartments aren't allowed on Main Street yet they are there. Also animal grooming is allowed in the DMU area. Do you want that?
- Are the view corridors adequately protected on p. 238?
- Height limits should be included. To use Alta/Berkshire Aspen Grove as an example, two story buildings quickly become three to five story buildings depending on how you measure. Also define how heights are measured (including before and/or after land is leveled).
- Add comments from Planning Commission and City Council to this document. Their input is valuable.
- Page 112 through 133, you have a CA district listed on the tables. Should this be changed to "D?"
- South Metro Housing Options is zoned as DTA? Should it be zoned as institutional?

July 31, 2020

Kathleen Osher,

These are my comments with regards to the Downtown's Land Use and Zoning rather than attempt to fill out the questionnaire due today, 8/31/20.

I miss downtown Littleton's small-town character. How is this small-town character being destroyed? The "green" is being paved over, as Joni Mitchell sings in "Big Yellow Taxi": "They paved paradise, And put up a parking lot."! The structures are filling out the envelope and developers not residents have the ear of some council members and staff.

I now expect the community will lose the Mid-Century Modern character on Littleton Blvd that (an unnamed individual) is so proud of. The west end of Littleton Blvd lost its character and two prized Mid Century Modern structures when Vita dwarfed the Court House - we now take it for granted, so for granted that it hosts Littleton Historic Inc meetings.

I suspect within 4 years, 1) the Littleton City Council, 2) the Planning Commission, 3) the Historical Preservation Board and 4) Historic Littleton Inc will all be complicit again in another monstrosity building that will destroy the Mid-Century Modern character of middle and / or east Littleton Blvd.

If I can't count on the preservation of Littleton's character, I'll try to make money off my prediction.

I challenge anyone to a \$50 bet that within four years another unpopular monstrosity will replace a cherished landmark on Littleton Blvd.

Do I have any takers?

As a side bet let's discuss possible locations for the next monstrosity:

Crestwood restaurant?

Pyramid Liquor?

Across from Dish at Bowles and Santa Fe?

Geneva Village Park?

To sum up my concerns, let's hear Joni Mitchell's words:

Don't it always seem to go

That you don't know what you've got

til it's gone

They paved paradise

And put up a parking lot

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Walking off of Main and Alamo feels like the back side of a Hollywood lot and Potemkin village. Come out of quarantine and eat on the asphalt at Main and Prince and welcome to small town Littleton. However, walk over to Graceful Café and be dwarfed by the full structural envelope of neighboring 6 plex slot home structure.

The purpose of the proposed bet is to begin a civil discussion of how the Grove / Vita occurred and can another monstrosity be prevented again? Earlier this year I was hoping the alumni of the Littleton Leadership Academy would take on this challenge and focus on this calamity and incorporate corrective regulations into zoning; we've heard silence. I assume there is no corrective action and instead I see subtle change to make Geneva Village into mixed use and the next mini Grove / Vita.

Out of town property owners seeking overnight profits

Don't lift the height restrictions!

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I am freighted that no one, I repeat no one, took me up on my proposed bet that our beautiful small-town Mid Century Modern character on Littleton Blvd would be destroyed by another monstrosity equivalent to the Grove / Vita. I was hoping that Historic Littleton Inc would provide me evidence that our town was safe from development that doesn't fit historic downtown.

The purpose of the proposed bet is to begin a civil discussion of how the Grove / Vita occurred and can another monstrosity be prevented? Earlier this year I was hoping the alumni of the Littleton Leadership Academy who are on city council would take on this challenge and focus on this calamity and incorporate corrective regulations into zoning. Instead I've heard silence. I assume there is no corrective action and instead I see subtle change to make Geneva Village into the next mixed use and mini Grove / Vita.

I hear our out of city downtown property owners have ambitions of increasing their profits overnight by raising the building height in downtown Littleton! Maybe Joni Mitchell was lucky to have parking lots instead of urban canyons profiting out of city property owners. I hope the property values in Littleton increases, but I am opposed to it increasing overnight which happens when building height regulations are changed.

I expect the district one council member to lobby for this. I am not surprised that he has received campaign contributions from those who want taller buidings. I am surprised I hear so much silent consent from the rest of the city's councilmembers.

Yes, have a meal at Main and Prince and enjoy the character and ambience of small-town Littleton then walk behind the movie set façade and you witness developers successfully pushing the envelope and turning downtown Littleton into dark urban canyons comparable to the Black Canyon of the Gunnison.

In summary: 1) do join me to discuss the character of Littleton, call 720/260-1493 for details, 2) show faith in Littleton's small-town character and bet me \$50 and 3) let's make a side bet of where the next character destroying monstrosity will go.

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I am surprised that none of the following maps or data bases were cited as being incorporated into the proposed map. Where are: Historic Preservation Plan, Sustainability / Energy Efficiency Plan, an Affordable Housing Plan, Economic vitality Plan, or a Transportation Plan. I do not understand why Geneva Village has changed from government / institutional to mixed use? How is it that the recently designated historic Post Office is not in historic zone, yet the bank across the street is? Is proposed mixed use development on Rapp street designed to block the view of the mountains and Columbine Mill? The Phase II map is not ready for prime time and should be removed from this product.

Sincerely,

Frank Atwood

July 31, 2020

Hi Kathleen,

I very much appreciated the opportunity provided by the city to participate in the July 21 virtual focus group conducted by Elizabeth Kay Marchetti. That forum, questions Elizabeth asked and the accompanying questionnaire provided sufficient latitude for expressing a variety of concerns.

And now, having perused as much of the 374 pages of the “DRAFT Phase II Amendments to the City Code related to Downtown Development” as time allows, I proceeded to use the “online comment form” which you kindly asked us to use to provide comments. But thankfully, you also indicated we may e-mail comments to you, because the response categories outlined in the online comment form are too narrowly restricted to capture concerns surfaced in reading through the draft.

So please enter the following concerns into the public review record for the subject draft. Thank you again for this opportunity to review and comment.

Don Bruns
District IV

Right up front, a Table of Contents page of chapters, with accompanying page numbers and relevant sections in each, would be very useful and helpful.

Chapter 1

Greater clarity needed concerning the draft’s scope?

Your e-mail states “DRAFT Phase II Amendments to the City Code related to Downtown Development.” However, page 1 of the 374-page review draft posted on line instead states only “Title 10 ZONING REGULATIONS.” Indeed, Section 10-1-5 ZONE DISTRICTS CREATED lists multiple titles and abbreviated designators “for the purposes of regulating the use of land within the city.” So it appears that what’s in this draft is intended to apply more broadly to the entire city and not only to the downtown “football.”

Section 10-1-6: OFFICIAL ZONING MAP

This short section affirms that there is such a map, but doesn’t include it. Instead, it states that copies of the map are available from the planning division for a reasonable cost. Why isn’t this map considered an essential element of the review draft?

Section 10-1-10: COMPREHENSIVE PLAN

Subsection A1 states that this plan shows “the general location, character, and extent of proposed land uses.” The adjective “general” is inaccurate and should be replaced with “specific” for several reasons. The City of Littleton made a landmark commitment to design the now completed comprehensive plan around Kendig & Keast’s specific community character types. Although the completed plan did not strictly adhere to that commitment in all areas of the city—having hybridized some character types, the plan nonetheless does not specify general but specific character conditions in most areas of the city.

Secondly, both Kendig & Keast and city officials assured citizens that ensuing zoning ordinance revisions would be informed by and adhere to those specific community character conditions. And this cannot happen if the city’s understanding of the community character types in the comprehensive plan is only perceived as “general” descriptions.

Chapter 2—Zone District Regulations

Section 10-2-1: ZONE DISTRICT REQUIREMENTS

This section’s two subsections list only “(A) Land Use” and “(B) Amendments to Development Standards.” However, a third requirement, “Community Character” is conspicuously missing. Why? What happened to the city’s commitment to make the zoning code implement the character conditions outlined in the completed comprehensive plan? This appears to be a major omission.

Sections 10-2-2 through 10-2-25: ZONE-SPECIFIC REGULATIONS

The specific Zone-specific regulations each incorporate several important elements of design, design elements of which community character is comprised. Now here, the need for anchoring these linguistic and numeric design parameters to

specific community character type conditions assumes an even more critically important dimension. Yet here also the draft omits all reference to any of Kendig & Keast's eight defining community character types. This omission now becomes even more critically important.

Else, how can the city expect anyone to imagine that any effort at all has been made both a) to structure these elements of design to actually achieve the specific community character conditions outlined in the comprehensive plan and b) to enable citizens as well as developers to understand that community character is anything more than a "buzzword" as it has always been in the City of Littleton (i.e., they cannot follow a connection that hasn't yet been established between the zoning code and the comprehensive plan which citizens were told would inform it)?

And here is yet a third way to attempt driving this point home. How are citizens and other affected publics to understand these numeric design limitations were developed? To what are they anchored? Unless this reviewer missed it, the draft does not say how.

An enormous amount of work has gone into preparation of this lengthy draft, as did to development of the comprehensive plan itself. It therefore does not appear unreasonable to ask that the city add these critically important cause-and-effect connections to this document (i.e., cause: comprehensive plan and effect: zoning ordinance).

Section 10-2-18: DT DOWNTOWN

What the relationship is between the map referred to in Section 10-1-6 (but not included in the draft) and the one included here.

One of the troubling nomenclature challenges of the comprehensive plan was the oft-confused distinction between character and land use (as if they weren't different constructs). A similar confusion appears to be repeated here but is now made even more complex with the addition of development. This really needs to be resolved if the city is going to speak more clearly to citizens, developers and other affected publics about critically important distinctions among "Character," "Development" and "Land Use."

These terms appear to be further confused in the present draft, in several ways:

- 1st: The six areas of downtown labeled as "Character Areas" on the map from page 57 of the draft appear to have hijacked the term character as it is defined by Kendig & Keast and used in the comprehensive plan. Actually, each is comprised of a variety of community character types. All of which leads one to believe that authors of the current draft frankly ignored what is in the comprehensive plan itself.
- 2nd: The boundaries of these six areas appear to be not well correlated with actual community character conditions or those that appear in the comprehensive plan. For example, there remains quite a bit of surviving residential neighborhood lying south between Santa Fe Boulevard and Rapp Street just south of Littleton Boulevard (only separated by main street from the area recognized as Downtown Neighborhood Residential [DNR] farther north).
- 2nd: Definitions and Objectives for each of these six areas following page 57 of the draft instead reveal that these instead appear to be different "Development Areas" because they describe various elements or parameters for development.
- 3rd: What, if any, relationship is intended between:

a) the 24 zone-specific regulations in Section 10-2,

- 10-2-2: A-1 AGRICULTURAL DISTRICT:
- 10-2-3: R-S RESIDENTIAL-SUBURBAN AGRICULTURAL DISTRICT:
- 10-2-4: R-L RESIDENTIAL-LIMITED AGRICULTURAL DISTRICT:
- 10-2-5: R-E RESIDENTIAL-ESTATES DISTRICT:
- 10-2-6: R-1 RESIDENTIAL SINGLE-FAMILY DISTRICT:
- 10-2-7: R-2 RESIDENTIAL SINGLE-FAMILY DISTRICT:
- 10-2-8: R-3 RESIDENTIAL SINGLE-FAMILY DISTRICT:
- 10-2-9: R-3X RESIDENTIAL MULTIPLE-FAMILY DISTRICT:
- 10-2-10: R-4 RESIDENTIAL MULTIPLE-FAMILY DISTRICT:

10-2-11: MH MOBILE HOME DISTRICT:
10-2-12: R-5 RESIDENTIAL MULTIPLE-FAMILY DISTRICT:
10-2-13: B-P BUSINESS AND PROFESSIONAL DISTRICT:
10-2-14: T TRANSITIONAL DISTRICT:
10-2-15: B-1 NEIGHBORHOOD BUSINESS DISTRICT:
10-2-16: B-2 COMMUNITY BUSINESS DISTRICT:
10-2-17: B-3 GENERAL BUSINESS DISTRICT:
10-2-18: CA CENTRAL AREA MULTIPLE USE DISTRICT:
10-2-19: STP SCIENTIFIC AND TECHNOLOGICAL PARK DISTRICT:
10-2-20: I-P INDUSTRIAL PARK DISTRICT:
10-2-21: I-1 LIGHT INDUSTRIAL DISTRICT:
10-2-22: I-2 HEAVY INDUSTRIAL DISTRICT:
10-2-23: PD PLANNED DEVELOPMENT DISTRICT:
10-2-24: OS PARK/OPEN SPACE DISTRICT:
10-2-25: CEM CEMETERY DISTRICT:

b) and these six Development Areas (inaccurately labeled as Character Areas)?

c) and the real community character conditions identified in the comprehensive plan?

Which of those 24 zone-specific regulations applies to each of these six Land Use Areas (or whatever they are)? And which of the eight Kendig & Keast community character types pertain to each of these six areas? The answer could be buried in the 374 pages of the draft, but it does not appear to be readily apparent.

Secondly, the “should” verbiage used in objectives following each of these six areas reflects “squishy” intent. Why “should” instead of “will be”?

Thirdly, none of the regulations contained in this section appear to make any connections or reference to the Kendig & Keast community character types and conditions around which the comprehensive plan was written. Why not? What then is the guiding plan content around which these regulations were written? For reasons stated above, this appears to be another major omission.

This section appears to be yet incomplete. Greater clarity in this section, both of the draft’s content and its intent, would be most helpful.

Chapter 3—Land Uses

Section 10-3-2: LAND USE TABLE

The table beginning on page 110 appears intended to make the relationship among land uses and zone districts kind-of clear. But the box in the upper left-hand corner of the table’s first page states, “LAND USE CATEGORIES ZONE DISTRICTS.” What does this mean—or did someone spill the alphabet soup?

And how do these land uses relate to the six “Development Areas” (mislabeled “Character Areas”) in Section 10-2-18? Which ones apply to which and how?

Chapter 4—Supplementary Standards

A lot of wonderful computer imagery in this section depicts buildings graced with substantial tree cover. If these conditions were actually realized, they would soften the harsh lines of modernistic rectilinear architecture. And, according to the imagery, might even recreate the tree canopies for which downtown Littleton was once known—and which thankfully still survive in at least a few areas. But here again there appears to be no reference in the draft to the specific community character conditions identified in the comprehensive plan.

This appears to be another omission. Or should the attractive greenery renditions be perceived by readers as nothing more than eyewash?

Conclusion

Citizens were promised that the zoning ordinance would implement the content of the comprehensive plan. When the comprehensive plan was being developed, in response to questions asked by citizens, planners assured us that community character conditions specified in the comprehensive plan would be traceable into the zoning ordinance. As the above observations and comments reveal, this has not happened.

Instead, it appears that this draft began somewhere else. Which leaves readers to ask whether the current draft is actually sufficiently anchored to the recently completed comprehensive plan. Apparently, not yet.

Don Bruns
District IV

July 31, 2020

Hi Kathleen,

1. I'm concerned that staff was not taking notes during each of the two Team meetings I participated in, Monday with Karl and Friday with Elizabeth. I filled out the survey but it didn't convey my thoughts. They both did a fine job with these two sessions.
2. I have watched every City Council meeting on this and think it is doing well. I am concerned that over and over the Council objects to buildings over 3 stories being added again and again after they have objected!! Please, like the Legend at the top left of the map says: **Maximum of three stories.**
3. I think the review/work the combined Planning Commission did last Monday and earlier have gone well.
4. Sorry, but I'm not going thru the 376 page document with comments. Thanks for putting up the PDF version.
5. Planning Commission Chair Mark Rudnicki's comments on building height are well spoken and should be adhered to. Building height should be spelled out specifically in feet. And many people here insist on three stories maximum.
6. My basic concern is that a set of zoning documents comes out of this exercise that allows the **Planning Commission to say no to some of the bad buildings that they've been forced to OK to the last few years because of our existing poor zoning regulations.**

Good Luck,



Paul Bingham

July 31, 2020

These are my comments for the ULUC which I was not able to submit online.

For the Public Record

Iftin Abshir

iftinabshir102@gmail.com

2594 W Dry Creek Ct.

Littleton, CO 80120

Density

We have a bad combination in this code update which will all be insure higher, denser development. This mixture is comprised of reduced parking requirements and increased height allowances. Add those two elements together and

every project in downtown will be the maximum height of four stories. Which because of the minimum floor-to-floor height allowances with now maximum building heights, these buildings could be 65 feet high where currently 40' is the maximum permitted. What has kept dense development in Downtown Littleton at bay are height limits, parking requirements, and the relatively small lot sizes. But loosening limitation on two of the three elements would have disastrous effects on the look and feel of Downtown Littleton.

Building Height Limits vs Floors

- Set backs and open space in the document are difficult to find.
- The Building Height Limits in the proposed new code are measured as minimum floor-to-floor heights with no limits and does not list any maximum building heights. This is extremely concerning and must be amended to measure maximum building heights. This is a disastrous oversight, and the minimum floor-to-floor measurement must be removed from any future code document. Additionally, step backs are not going to compensate enough for this increase in height limits, especially in the front view, of the building.
- Finally, building heights should be limited to three floors, with the option of extending to a fourth story ONLY allowed in certain circumstances. A fourth story, with a step back, could be allowed under the provision the building was making significant allowances for affordable housing (say 15-25% of units were working income attainable) or the building was being build with LEED standards or other sustainable building standards. Increases in building heights could be used as incentives for gains in city policies.

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- From the use tables it appears as if residential is not allowed in the Use Tables. However, there are apartments on Main Street currently. This should be reflected in the code.
- Since both Main Street and Alamo Ave a one-way streets, Alamo Ave should be considered a secondary main street area and therefore the Downtown Main Street (DMS) zoning designation should be applied to W Alamo Ave as well. Littleton would benefit both economically and culturally by promoting Alamo Ave as a secondary main street area. The street already promotes significant pedestrian traffic, many shops and could easily accommodate a few restaurants as well. Finally, by widening the DMS zoning distinction to the south to include Alamo Ave, we would be encouraging an even greater pedestrian focus in Downtown Littleton.

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- In addition to the need to protect sight lines to the Columbine Mill and the integrity of the Downtown skyline as you enter the downtown area from the west (heading East on W Bowles and W Alamo Ave). There are a number of historic buildings of interest on Rapp St, which should also be included in a Downtown Transition Area (DTA) Zoning. The first of these buildings is the Richard Little Historic Home, which was the home of Littleton's founder. Under the current proposed zoning, a Mixed Use building type could be a height of 150' (pg 200) or Apartment or Live-Work building types could be a height of 125' (pgs 190 & 194). Building heights such as those allowed under the DMU zoning would completely dwarf the historic property of the Richard Littleton Historic Home. Additionally, buildings at 576, 5757, 5797 and 5807 S Rapp Street have historical value and would be out of place in a DMU zoning and would be much more in line with the zoning standards for Downtown Transition Area.

DMU

- Similar to the comments on building heights, the city needs to more carefully refine the design standards and height allowances within the Downtown Mixed Use Area. This comment is not to say taller buildings not be allowed anywhere in Downtown Littleton, but that where they are allowed should be closely monitored. Teller buildings should be located in the Eastern part of the Downtown District and then height limits stepped down moving towards the West. This gradual decline in building heights would both protect views of the Mountains which are included in the list of character view corridors which should be protected and preserve current and future property owners' rights to receiving sunlight on their property. This east to west height allowance is in alignment with the physical geography of Downtown Littleton. For example, would the city consider allowing for taller buildings along S. Rio Grands Street but not along S Rapp Street?

Parking

- The less parking we get from developers means the more parking the city will have to provide. This is something we need to very closely monitor because this is essentially passing the burden to provide adequate

parking to future generations of Littleton Residents. Therefore, the square footage requirement per car needs to be increased.

- Mixed-Use should be required to provide the same standards of parking as the requirements for the Multi-Family zoning i.e. 1 space for 1 bedroom, 2 spaces for 2 bedrooms, etc... This should be a consistent standard for all types of residential buildings.

With regards to 10-2-18 (E), in addition to planning for stormwater run off, parking facilities in the Downtown District of Littleton could be reimagined as a green asset for the benefit of the whole Littleton Community. The parking industry has developed a number of suggestions to support sustainable solutions for parking that don't detract from the community's continued commitment to driving cars. Some ways to think about sustainable parking is communities can include:

- Prioritizing parking for carpools, fuel efficient vehicles, or vehicles that are low-emitting
- Pricing for parking that incentivizes alternative, more sustainable modes of transportation
- Creating shared-use parking for residential, office, entertainment, etc. to minimize need for lots with distinct parking usages.
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- Using native plantings and water-saving fixtures to minimize need for irrigation in green spaces adjacent or within parking facilities
- Using reflective coating on surface lots to reduce the effect of "heat islands"
- Planning for energy efficiency through the use of energy efficient lighting and mechanical systems in parking facilities
- Designating spaces for electric vehicle charging and installation of EV charging stations to incentivize use of emission-reducing vehicles
- Sensors to help patrons understand where available spots are in a parking facility can reduce emissions
- Using permeable paving materials for parking facilities enables more effective stormwater management and improvement of water quality
- The efforts of the city to encourage the use of public transportation by providing a reduction of parking requirements for businesses providing RTD passes to all employees and residents is commendable. However, we have a few questions that we believe should be more fully discussed within the code. For example, how long do these passes need to be provided? Additionally, how will this program be monitored to ensure compliance?
 - On parking structures and even in parking surface lots, incorporating renewable energy technology can or green roofing systems can generate energy and reduce urban heat island effect.

Comments on Sec. 10-4-17.5 - Parking Lot (Off-Site) AND Sec. 10-4-17.7 - Office - PAGE 160

Similar to with Sec. 10-2-18 (E) - Parking and Access, sustainability considerations should be made for off-site parking and office. Where possible, efficiency should be incentivized and encouraged among patrons of both parking lots and offices. Considerations should be made for building materials that enhance the sustainability of a facility. Recycling should be made available in all facilities to encourage recycling practices and reduce waste. Stormwater management and minimization of water use should be account for both in materials used for parking surfaces and adjacent green spaces. Where possible, renewable energy and green roof technology should be encouraged both to minimize energy use and combat the urban heat island effect. Where possible, mixed use should be maximized to ensure effective and sustainable use of limited space in our community.

Comments on Sec 10-2-18 (F) - Downtown Building Lighting - PAGE 70

Sustainability should be considered for downtown building lighting. Where possible, solar or other energy efficient options should be pursued. Efficient bulbs should be required for all light fixtures and types of approved bulbs (LED, especially) should be spelled out explicitly. Efforts to reduce artificial lighting at night (known as ALAN) can help protect the surrounding ecosystem and minimize impact on wildlife. Key methods for reduction of ALAN are 1) monitoring light intensity, 2) turning lights off when they are no longer needed, and 3) selecting light colors that minimize obstructive effects.

The city should also adopt past lighting standards that protect against issues of light pollution.

Comments on Sec. 10-2-18(G) - Downtown Rooftop Equipment Draft - PAGE 71

The inclusion of solar panels in this section is excellent. However, we also need to see the city advocate for the use of solar panels on all public, private, and commercial buildings.

Comments on Sec. 10-2-18 (H) - Downtown Greenspace and Tree Protection Requirements - Page 72

Subsection 1

In regard to the stated purpose and intent of this section I strongly supports the inclusion of items 1(c) and 1(d) which are critical for long term sustainability efforts.

Subsection 3(a)

More detailed language and clear standards around “xeric landscaping practices and techniques” should be included. As is done in other parts of the ULUC, the inclusion of an external reference standard (for example, from Colorado State University Extension: <https://extension.colostate.edu/topic-areas/yard-garden/xeriscaping-creative-landscaping-7-228/> or a comparable guideline) to ensure clearly stated sustainability standards are incorporated into the ULUC. Additional verbiage that encourages the selection of low volatile organic compound (VOC) producing trees is also encouraged.

Table 10-2-18(H)-1.

- Plazas: Allowing for the development of an open space in which the majority of the area will be covered with impermeable construction materials seems counterproductive to the stated purpose 1(c) since it will directly contribute to further urban heat island effects. If the plaza is felt to be an essential public open space standard, the inclusion of a shade tree requirement, either based on number/size of trees, or percent shade coverage, could help mitigate this effect.
- Common Green: An open space primarily composed of grass requires intensive water usage and is not an ideal option from a sustainability perspective. As with plazas, the inclusion of a shade tree requirement could help to further achieve purpose 1(c) and also reduce the space dedicated to grass.
 - Rooftop Garden: With the many benefits rooftop gardens have on both the urban heat island effect and energy consumption within the building, and this option should be incentivized over other open space options in the ULUC.
 - Parklet: There is some concern about the inclusion of parklet as an open space option. Parking is at a premium in downtown Littleton and the development of parklets would further exacerbate this issue. From a sustainability perspective, it would be unfortunate if this option were selected preferentially over other open space options as the parklet represents a minimal increase in green space. While this is likely not an ideal option for the downtown area, the parklet might have more utility in other areas within the city.

In addition to the six types of Public Open Spaces included in Table 10-2-18(H)-1, community gardens should be included in the zoning code. Community Gardens offer multiple physical and mental health benefits in addition to the creation of additional green space within the City of Littleton.

Foraging in public open spaces and urge the city to facilitated and encourage this activity.

Subsection 5(d)

The requirement for fences or walls as a requirement in buffers. The impermeable materials allowed in construction of these barriers are counterproductive to the stated purpose 1(c) as it will directly contribute to further urban heat island effects. If fences or walls are a necessary buffer component and can't be removed, there should be a focus on selection of sustainable materials.

Subsections 7(c)(iii) and (d)

The city should be encouraging a modification of the shade tree requirement to focus on percent area shaded at tree maturity (see figure), rather than a tree spacing requirement as currently outlined, since ensuring a high percentage of shade coverage is the ultimate goal of these requirements. According to the EPA, tree shade can keep parked cars cooler, which lowers evaporative emissions of volatile organic compounds (VOCs), a critical precursor pollutant in the formation of ground-level ozone. As an example, one analysis predicted that light-duty vehicle evaporative VOC emission rates throughout Sacramento County could be reduced by 2 percent per day if the community increased the tree canopy over parking lots from 8 to 50 percent.

Figure 1: Parking Lot Shade Guidelines

Subsection 7(e)(j)(II)

The masonry wall option should be removed within the parking area screening section. As mentioned above, this type of construction material contributes to the urban heat island and is in conflict with purpose 1(c).

Subsection 11(c)

The inclusion of these native mature tree protection standards within the ULUC is excellent and should be greatly expanded.

Pocket Park at West End of Main Street

(I sent an email to Public Works Director, Keith Reister, asking for some more information about this little Park. So I will update this section as soon as I have a little more information)

This little area at the end of Main Street and to the South of the Carnegie Library was very clearly designed as a park. There is a small fountain and landscaping with grass and trees. In the proposed zoning changes, this area is designated as Downtown Mixed Use (DMU). This seems like an unusual zoning choice for an area which is clearly a park and we would urge the city to not remove a park and much needed green space from the Western side of Downtown Littleton. Additionally, allowing for a building to be built in such close proximity to the Carnegie Library would detract from the distinctive focal point of Main Street.

According to Table 10-2-18(H)-1, Public Open Space Standards on pages 75-76, this area appears to fall into the guidelines for a Pocket Park which is one of the approved types of Public Open Space allowed by the code guidelines.

Comments on Section 10-4-18 (N3-N4) AND (O3-O4)- Office (PAGE 208) & Institutional (PAGE 214)

The Carnegie Library, Littleton Post Office and Geneva Village should all be included in the Governmental & Institutional zoning. We cannot monetize the land use of these historic and important buildings. Additionally, as Littleton becomes more densely developed we are seeing the effects of the creation of an Urban Heat Island, especially in the Downtown District. An Urban Heat Island is the effect created as open space is converted to buildings, roads, and other paved and impermeable surfaces. These changes cause urban areas to become warmer than their surrounding areas. An Urban Heat Island effect occurs both on the surface as well as in the air and can lead to additional environmental impacts such as temperature inversions and increased air conditioning usage. We urge the City to keep these factors in mind as they consider the zoning changes in the Downtown Littleton District. Especially the proposed change to the City of Littleton Owned property at the corner of W Berry Ave and S Prince St from Governmental/Instructional land use to Downtown Mixed Use. The current land use is an example of Borrowed Green Space that should be encouraged and maintained whenever and wherever possible to reduce the impact of the previously discussed.

Comments on Downtown Building Types Draft - Parking Structure Building Type - Section 10-4-18 (P3 - P4) - PAGE 220

- Consider adding stipulations to parking structures that require they be convertible. This makes parking garages more sustainable as the structure could have multiple uses in the future, if the need to park cars diminishes. Also, the city needs to increase Electric Vehicle Charging Stations in parking garages. Finally, the square footage required for each parking space should be increased, and therefore the total number of parking spaces would be decreased.
- The less parking we get from developers means the more parking the city will have to provide. This is something we need to very closely monitor because this is essentially passing the burden to provide adequate parking to future generations of Littleton Residents. Therefore, the square footage requirement per car needs to be increased.
- Mixed-Use should be required to provide the same standards of parking as the requirements for the Multi-Family zoning i.e. 1 space for 1 bedroom, 2 spaces for 2 bedrooms, etc... This should be a consistent standard for all types of residential buildings.

Comments on 10- 4-18 (Q) Urban Design Techniques - PAGE 227 and Comments on 10-4-18 (R) Additional Standards for Building Materials - PAGE 235

Regarding urban design techniques and additional standards for building materials we should consider the implementation of more sustainable materials for walls and other building elements. The code revisions refer to the use of “high quality, natural, and durable materials” to be used in the Downtown Building Types section. The City of Littleton needs to see sustainable and environmentally friendly materials also be included, highlighted and, most importantly encouraged in any new and redevelopment within the City of Littleton. A sustainable building material is one that generates less waste, uses renewable raw materials, and is more durable than traditional building materials.

For example, the City of Littleton could start LEED (Leadership in Energy and Environmental Design) certification for new buildings from the U.S. Green Building Council. Buildings that use green materials have many positive effects like fewer air pollutants because ecofriendly building materials reduce VOC (volatile organic compound) emissions, there is increased productivity for staff, and green buildings use 25% less energy and 11% less water than traditionally constructed buildings. Some ecofriendly building materials that should be considered are products that have an environmental product declaration, which is an independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products. By looking at the life cycle for the materials we use for our buildings we can insure they are more sustainable.

Other ecofriendly materials that could be considered for buildings are Forest Stewardship Council Approved Wood, the Forest Stewardship Council focuses on sustainable forest management and other sustainable practices. Other examples of sustainable building materials are recycled content drywall, recycled glass, grasscloth wallpaper, ferrock, hempcrete, bamboo, AshCrete, Timbercrete, low VOC or zero VOC paint, non-toxic stains and sealers, slate tile, clay tile, fiber cement shingles, FSC wood shakes, recycled metal roofing panels made out of aluminum, steel, copper or alloys that contain different metals and a green roof which incorporates plant life and helps with insulation for the building. Overall if we increase our specifications in terms of what materials we use for our buildings and make sure that they are sustainable we can help decrease our impacts on the environment, save money through using more effective water and energy conservation techniques and improve our air quality in our buildings by preventing the use of products with high volatile organic compound concentrations. The city MUST encourage the use of renewable building materials within the zoning code as much as possible.

Comments on 10-14-8 (S) Additional Design Standards for All Character Areas

Where a key view corridor from the public way exists, design a building to frame the view to a key community landmark or natural feature. Examples of key community landmarks and natural features include, but are not limited to:

- i. Geneva Lodge;
- ii. Carnegie Library;
- iii. Littleton Courthouse;
- iv. The Mountains; and
- v. **Columbine Mill**

The Columbine Mill should be included in this list of key community landmarks as it is as much of Littleton’s skyline as is the Littleton Courthouse, and views of the Columbine Mill should be protected. Built in 1921, the Columbine Mill will be celebrating it’s 100th anniversary next year. Because of their extreme flammability, wooden grain elevators from the time period are rare along the Front Range and Eastern Plains. Designated a Historic Landmark in 1994, the Columbine Mill is a reminder of early Littleton’s deep connection to the rail road and it’s importance in making Littleton a thriving city through the late 19th and early 20th centuries.

While traveling East on Bowles Ave. into Historic Downtown Littleton, views of the Columbine Mill dominate the downtown skyline and this image of Littleton’s historic past should be protected.

July 31, 2020

Mohamed Mohamed & Val Fetters
ima333@centurylink.net
2594 W Dry Creek Ct.
Littleton, CO 80120

ULUC Comments
Density

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Building Height Limits vs Floors

- Set backs and open space in the document are difficult to find.
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Comments on Sec. 10-4-17.5 - Parking Lot (Off-Site) AND Sec. 10-4-17.7 - Office - PAGE 160

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Comments on Sec 10-2-18 (F) - Downtown Building Lighting - PAGE 70

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The requirement for fences or walls as a requirement in buffers. The impermeable materials allowed in construction of these barriers are counterproductive to the stated purpose 1(c) as it will directly contribute to further urban heat island effects. If fences or walls are a necessary buffer component and can't be removed, there should be a focus on selection of sustainable materials.

Subsections 7(c)(iii) and (d)

The city should be encouraging a modification of the shade tree requirement to focus on percent area shaded at tree maturity (see figure), rather than a tree spacing requirement as currently outlined, since ensuring a high percentage of shade coverage is the ultimate goal of these requirements. According to the EPA, tree shade can keep parked cars cooler, which lowers evaporative emissions of volatile organic compounds (VOCs), a critical precursor pollutant in the formation of ground-level ozone. As an example, one analysis predicted that light-duty vehicle evaporative VOC

emission rates throughout Sacramento County could be reduced by 2 percent per day if the community increased the tree canopy over parking lots from 8 to 50 percent.

Figure 1: Parking Lot Shade Guidelines

Subsection 7(e)(i)(II)

The masonry wall option should be removed within the parking area screening section. As mentioned above, this type of construction material contributes to the urban heat island and is in conflict with purpose 1(c).

Subsection 11(c)

The inclusion of these native mature tree protection standards within the ULUC is excellent and should be greatly expanded.

Pocket Park at West End of Main Street

(I sent an email to Public Works Director, Keith Reister, asking for some more information about this little Park. So I will update this section as soon as I have a little more information)

This little area at the end of Main Street and to the South of the Carnegie Library was very clearly designed as a park. There is a small fountain and landscaping with grass and trees. In the proposed zoning changes, this area is designated as Downtown Mixed Use (DMU). This seems like an unusual zoning choice for an area which is clearly a park and we would urge the city to not remove a park and much needed green space from the Western side of Downtown Littleton. Additionally, allowing for a building to be built in such close proximity to the Carnegie Library would detract from the distinctive focal point of Main Street.

According to Table 10-2-18(H)-1, Public Open Space Standards on pages 75-76, this area appears to fall into the guidelines for a Pocket Park which is one of the approved types of Public Open Space allowed by the code guidelines.

Comments on Section 10-4-18 (N3-N4) AND (O3-O4)- Office (PAGE 208) & Institutional (PAGE 214)

The Carnegie Library, Littleton Post Office and Geneva Village should all be included in the Governmental & Institutional zoning. We cannot monetize the land use of these historic and important buildings. Additionally, as Littleton becomes more densely developed we are seeing the effects of the creation of an Urban Heat Island, especially in the Downtown District. An Urban Heat Island is the effect created as open space is converted to buildings, roads, and other paved and impermeable surfaces. These changes cause urban areas to become warmer than their surrounding areas. An Urban Heat Island effect occurs both on the surface as well as in the air and can lead to additional environmental impacts such as temperature inversions and increased air conditioning usage. We urge the City to keep these factors in mind as they consider the zoning changes in the Downtown Littleton District. Especially the proposed change to the City of Littleton Owned property at the corner of W Berry Ave and S Prince St from Governmental/Instructional land use to Downtown Mixed Use. The current land use is an example of Borrowed Green Space that should be encouraged and maintained whenever and wherever possible to reduce the impact of the previously discussed.

Comments on Downtown Building Types Draft - Parking Structure Building Type - Section 10-4-18 (P3 - P4) - PAGE 220

- Consider adding stipulations to parking structures that require they be convertible. This makes parking garages more sustainable as the structure could have multiple uses in the future, if the need to park cars diminishes. Also, the city needs to increase Electric Vehicle Charging Stations in parking garages. Finally, the square footage required for each parking space should be increased, and therefore the total number of parking spaces would be decreased.
- The less parking we get from developers means the more parking the city will have to provide. This is something we need to very closely monitor because this is essentially passing the burden to provide adequate parking to future generations of Littleton Residents. Therefore, the square footage requirement per car needs to be increased.
- Mixed-Use should be required to provide the same standards of parking as the requirements for the Multi-Family zoning i.e. 1 space for 1 bedroom, 2 spaces for 2 bedrooms, etc... This should be a consistent standard for all types of residential buildings.

Comments on 10- 4-18 (Q) Urban Design Techniques - PAGE 227 and Comments on 10-4-18 (R) Additional Standards for Building Materials - PAGE 235

Regarding urban design techniques and additional standards for building materials we should consider the implementation of more sustainable materials for walls and other building elements. The code revisions refer to the use of “high quality, natural, and durable materials” to be used in the Downtown Building Types section. The City of Littleton needs to see sustainable and environmentally friendly materials also be included, highlighted and, most importantly encouraged in any new and redevelopment within the City of Littleton. A sustainable building material is one that generates less waste, uses renewable raw materials, and is more durable than traditional building materials.

For example, the City of Littleton could start LEED (Leadership in Energy and Environmental Design) certification for new buildings from the U.S. Green Building Council. Buildings that use green materials have many positive effects like fewer air pollutants because ecofriendly building materials reduce VOC (volatile organic compound) emissions, there is increased productivity for staff, and green buildings use 25% less energy and 11% less water than traditionally constructed buildings. Some ecofriendly building materials that should be considered are products that have an environmental product declaration, which is an independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products. By looking at the life cycle for the materials we use for our buildings we can insure they are more sustainable.

Other ecofriendly materials that could be considered for buildings are Forest Stewardship Council Approved Wood, the Forest Stewardship Council focuses on sustainable forest management and other sustainable practices. Other examples of sustainable building materials are recycled content drywall, recycled glass, grasscloth wallpaper, ferrock, hempcrete, bamboo, AshCrete, Timbercrete, low VOC or zero VOC paint, non-toxic stains and sealers, slate tile, clay tile, fiber cement shingles, FSC wood shakes, recycled metal roofing panels made out of aluminum, steel, copper or alloys that contain different metals and a green roof which incorporates plant life and helps with insulation for the building. Overall if we increase our specifications in terms of what materials we use for our buildings and make sure that they are sustainable we can help decrease our impacts on the environment, save money through using more effective water and energy conservation techniques and improve our air quality in our buildings by preventing the use of products with high volatile organic compound concentrations. The city MUST encourage the use of renewable building materials within the zoning code as much as possible.

Comments on 10-14-8 (S) Additional Design Standards for All Character Areas

Where a key view corridor from the public way exists, design a building to frame the view to a key community landmark or natural feature. Examples of key community landmarks and natural features include, but are not limited to:

- I. Geneva Lodge;
- II. Carnegie Library;
- III. Littleton Courthouse;
- IV. The Mountains; and
- V. **Columbine Mill**

The Columbine Mill should be included in this list of key community landmarks as it is as much of Littleton’s skyline as is the Littleton Courthouse, and views of the Columbine Mill should be protected. Built in 1921, the Columbine Mill will be celebrating it’s 100th anniversary next year. Because of their extreme flammability, wooden grain elevators from the time period are rare along the Front Range and Eastern Plains. Designated a Historic Landmark in 1994, the Columbine Mill is a reminder of early Littleton’s deep connection to the rail road and it’s importance in making Littleton a thriving city through the late 19th and early 20th centuries.

While traveling East on Bowles Ave. into Historic Downtown Littleton, views of the Columbine Mill dominate the downtown skyline and this image of Littleton’s historic past should be protected.

July 31, 2020

Kathleen, staff:

--> Please consider extending this process, for at least one more round, preferably two rounds, of integration of inputs, review and interactive discussion and responses.

- As Planning Commission and Historical Preservation Board noted Monday 7/27, the objectives and changes they wanted, which they defined last month, weren't even submitted to the consultants to incorporate.

- This product is apparently only the work of staff plus Texas consultants.

- As noted by staff and LPC and LHPB, there were also several very significant 'mistakes' in this document, different from the expressed direction to the consultant. At the least, these should be fixed so the next review allows people to look at a minimally compliant document and check for and correct any other errors.

This document is too consequential to pass with only one review!

- and the public, and most importantly almost all of us downtown residents and owners, have had no exposure to these changes, much less an opportunity to respond to them!!

I think anyone concerned with basic fairness and public service and their own accuracy, would agree that the process should include more review cycles. And you should/must add outreach to, and information and feedback sessions specifically for, us downtowners. Send postcards, let us meet by Zoom or use a socially distanced room in person. At least inform owners and residents and small business tenants!

The focus group was tiny and not representative. The proposed land use map includes many specific property Rezoning that normally would each require a Public Hearing. I am shocked by the current approach, which cuts out informing the individuals most immediately and greatly impacted.

- I tell you with confidence, that in professional project management, there is never just one cycle of review for critical documents. No one knows the changes other people are making. More cycles allow proposed changes to be discussed, and time to work to define and understand differences and to reconcile them and integrate them, to produce a stronger document with more consensus.

- there should really be 3 review cycles: draft, preliminary and final.

2. Extend this process for public information and explanation and rationale and feedback.

- previous City initiatives like Urban Renewal had interactive public sessions at ACC. The whole City has an interest in this huge changes.

- and there should be targeted downtown neighborhood group meetings.

- I know there's virus restrictions, so either postpone this product until meetings can be held; or hold virtual public meetings.

- this public engagement was promised many times during the Envision process, when there was nothing for people to review.

now that there is a lot (almost 400 pages and 164 acres!!!) to review, which impacts many people now and in future, it is imperative for the Envision process to live up to its promise of public engagement including information, rationale, interactive public discussion by the public (not the special-access unelected board members), and then **informed** input by the public.

3. Put this aside until you define and incorporate regulatory language on how to protect and provide:

- Historic preservation (our 'goose that lays the golden egg', which I believe this Code and land use change would kill within 20 years).

- **affordable housing quotas;**

- **energy efficiency requirements** for new construction or remodels, including the right to solar access and solar power;

(even if you personally think this is unimportant to 'people' now, in 20 years this will affect marketability and desirability, and the whole City will be impacted. You have an obligation to future Council and staff and residents and business owners to require that buildings built now, to remain marketable and desirable in the future.)

- **greenspace and wildlife goals**, related to our rare proximity to the river, and our quality of life.

Typically, you'd do this by setting heights low, setbacks large, open space generous, parking adequate; then only make the concessions you are giving to everyone in this version, only give them to applicants who provide specified deliverables of the above City assets.

for example, a 3 story limit unless 25% of the housing is affordable/cost-accessible; and there is 15% landscaped greenspace with trees and wildlife habitat.

4. Remove Land Use map with new character areas.

- not ready for prime time.

- too many entitlements would be transferred from City-benefitting uses and character, to much more massive uses, changing the character fatally and forever.

- you are not "charging" enough, for the entitlements you are giving.

- do not rezone for the common, mass market developers in the current building mode! Cities should never rezone for the current market!

- Littleton is special, therefore we need to invite and attract special development partners. So far, Littleton has done everything to alienate any innovative, progressive developers and designers.

- the proposed map simply has too many changes from the Future Land Use map, and especially too many changes from the current 8 character areas in the current Downtown Design Standards

example geneva village: in downtown design standards is gov/institutional; but in the proposed new map, it's changed to Mixed Use. Mixed Use automatically monetizes the property, changing its fundamental value. But Geneva Village is historic, it provides 'borrowed' and open greenspace in an area you've defined to densify all around, it provides unique housing for a fragile group.

example: Change the Carnegie Library and the Post Office to government/institutional, for similar reasons.

don't surround the Transitional and Neighborhood areas with intrusive "arms" of Mixed Use! makes no sense at all.

- somebody only 6 weeks ago said we need 4 stories on the west side of downtown. There's been no rationale, no justification, no pros and cons, and this is way too big a change and way too sudden, to just try to slide in.

NO to 4-story Mixed Use on the west side!

first: there were few residences next to Santa Fe, because it's undesirable to live next to the noise of a 55-mile/hr highway, and it's dangerous to your pets and children. These will not hold value.

second: put the 4 stories on the east side of downtown, where there is already a natural height drop. Then drop heights down to 2 stories on the west, so that the maximum number of properties get views of the mountains.

- we've not been provided any alternatives!

my proposal: mark Little's Creek and Slaughterhouse Gulch as waterways to improve and develop.

5. Adopt some baseline assumptions:

Littleton is unique and more desirable than other suburbs around Denver.

Therefore, we can attract better-than-average, small, creative, innovative, passionate, motivated development partners.

Littleton does not have to attract the average Denver metro developer! It is against our best interests to do so!

Let's build Code that gives incentives to the 'good guys' who will embrace the challenge of providing affordable accessible energy-efficient housing in historic districts.

Pam Chadbourne
downtown resident and homeowner

Robert J. Schwinn

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To Whom It May Concern,

Following are comments on the Envision Document dated July, 2020.

I am extremely disappointed with this document. I went to nearly all the Envision meetings. I loved the visions proposed. Keats did a splendid job of laying out different building types and shapes, and people got excited. But, none of that can happen with this document. The original code - all the rules laid out in the 70's - remain in place along with the new design standards. It appears that nothing has changed except that more rules have been added. It doesn't work .

First are the zone districts and their overlay designations. This is extremely confusing. I speak "planner" and have been following this process for years now. In the downtown area the old designations of B-2, CA (now DT), and R-5 should be eliminated, and the rules should be incorporated in the new designations of DNR, DMU, DTA, and DMS. If I were new to the city and were trying to access development opportunities, I wouldn't know where to start.

Then, there are the specifics that will effectively disallow much development. The hard and fast height caps of the existing code don't allow the buildings Keats has "Envisioned" for us. The setbacks in R-5 won't allow conventional duplexes. The 30' height limit with a pitched roof eliminates 3 story buildings. The "no garage doors facing the street" eliminates any developments on the 5400 block of Nevada or Curtice because there are no alleys.

Then there is the PDO that remains. I was at the meeting where downtown PDOs were eliminated.

Are they quietly coming back? And if so, with what parameters or constraints?

 7-31-20