

ULUC Zoning Comments

Next Generation Advisory Committee

Zoning Subcommittee

Subcommittee Members

Iftin Abshir, NCAG Vice Chair

Lauren Burgess

Alyssa Campbell

Joshua Hall

Charlee Ottersberg, NGAC Secretary

Larry Thompson Sr.

City Leadership and Staff

Pam Grove, City Council At Large

Ryan Thompson, Community Liaison & Mediation Coordinator

Table of Contents

Introduction	2
Zoning Boundaries	2
Comments on 10-14-8 (S) Additional Design Standards for All Character Areas	2
<i>Figure 1.1: View of Downtown Littleton Skyline form Bowles Ave Looking East</i>	3
<i>Figure 1.2: Entrance to Historic Downtown Littleton with Sign</i>	3
South Rapp Street	3
<i>Figure 2.1: Richard Little Historic Home</i>	4
<i>Figure 2.2: Character of 5767 S Rapp St and 5757 S Rapp St</i>	4
<i>Figure 2.3: 5797 S Rapp St with Historic Façade</i>	5
<i>Figure 2.4: 5807 S Rapp St</i>	5
W Alamo Ave	6
Littleton Post Office	6
Bowles Park	6
<i>Table 10-2-18(H)-1, Public Open Space Standards</i>	6
<i>Figure 3.1: Bowles Park South of Carnegie Library, at corner of Main Street and Santa Fe Drive</i>	7
<i>Figure 3.2: Bowles Park in relation to Carnegie Library</i>	7
Updated Downtown Zoning Character Area Map	7
<i>Figure 4.1: Proposed Updates to DT Character Map</i>	8
Height Capacity Limits	8
Section 10-4-18 (L3-L4) Downtown Building Types Draft – Mixed Use Building Types	8
<i>Opinion 1: Increasing Height Limits</i>	9
<i>Opinion 2: Moderate Height Allowances and a Focus on Policy</i>	9
<i>Final Thoughts</i>	9
Income Attainable Housing	9
Affordable Housing Incentives Ordinance	10
Controlled Price Units (CPUs)	10
Geneva Village	11
Integration of Live-Work	11
Further Questions	11
Section 10-4-18 (L3-L4)	12
Section 10-4-17.1-3	12
Section 10-2-18 (E)	12
Section 10-4-17.5	12

Introduction

The Zoning Subcommittee is a subcommittee of the Next Generation Advisory Committee (NGAC) that focuses on providing input to zoning and unified land use code issues with a mission of promoting income integrated housing and amplifying diverse and inclusive small businesses with a focus on historic and community preservation and diversity and inclusion. It is through this mission lens that the Zoning Subcommittee has decided to focus comments regarding the Unified land Use Code (ULUC) to the topics of the current zoning boundary lines, the height capacity limits, income attainable housing, the integration of live-work building spaces, and further questions the Zoning Subcommittee has regarding the ULUC document.

Zoning Boundaries

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

Where a key view corridor from the public way exists, the Zoning Subcommittee encourages the protection of key view corridors and urges the city to add the historic Columbine Mill to the list of Key Community Landmarks. As stated in the Consolidated Downtown District code a building should be designed “to frame the view to a key community landmark or natural feature. Examples of key community landmarks that engage the use of natural features include, but are not limited to:”

- i. Geneva Lodge;
- ii. Carnegie Library;
- iii. Littleton Courthouse;
- iv. The Mountains; and
- v. **Columbine Mill**
 - a. We strongly urge that the Columbine Mill 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.
 - b. Built in 1921, the Columbine Mill will be celebrating its 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 railroad and its importance in making Littleton a thriving city through the late 19th and early 20th centuries.
 - c. 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.

Figure 1.1: View of Downtown Littleton Skyline form Bowles Ave Looking East



Figure 1.2: Entrance to Historic Downtown Littleton with Sign



South Rapp Street

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, there are several 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 maximum of four stories (pg. 200) or Apartment or Live-Work building types could be a maximum of three stories (pgs. 190 & 194). Building heights such as those allowed under the DMU zoning would dwarf the historic property of the Richard Littleton Historic Home and significantly change the skyline of Downtown Littleton and limit the

view of the Columbine Mill. Additionally, buildings at 576, 5757, 5797 and 5807 South 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.

Figure 2.1: Richard Little Historic Home



Figure 2.2: Character of 5767 S Rapp St and 5757 S Rapp St



Figure 2.3: 5797 S Rapp St with Historic Façade



Figure 2.4: 5807 S Rapp St



W Alamo Ave

Since both Main Street and Alamo Ave., are one-way streets, we feel that 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 with 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.

Littleton Post Office

As a historic government building we are wondering why the Littleton Post Office is located in the Downtown Mixed Use (DMU) zoning currently proposed in stead of being zoned as Public/Institutional (PI)? Additionally, the Chase bank to the North across Prince St is included in the Downtown Main Street (DMS) zoning, but the Littleton Post Office, which embodies even more of the historic character associated with the DMS zone and was designated a Historic Landmark in 2019, is not. If not able to be zoned as Governmental, as an alternative we propose the DMS zoning be extended to Alamo Ave to include the Littleton Post Office.

Bowles Park

This little area at the end of Main Street and to the South of the Carnegie Library is designed as a park, with 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 a green space area 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.

Table 10-2-18(H)-1, Public Open Space Standards


Table 10-2-18(H)-1, Public Open Space Standards	
Image	Standard
<p>Pocket Park</p> 	<p>General Character</p> <ul style="list-style-type: none"> • Small urban open space responding to specific user groups and space available • Range of character can be for intense use or aesthetic enjoyment • Low maintenance is essential <p>Location and Size</p> <ul style="list-style-type: none"> • Minimum area 5,000 square feet • Maximum area: 2 acres • Minimum pervious cover:75%; remainder shall consist of amenities, crushed stone, or pavers • Within a ¼ mile of residences • Permitted character areas: All

Figure 3.1: Bowles Park South of Carnegie Library, at corner of Main Street and Santa Fe Drive



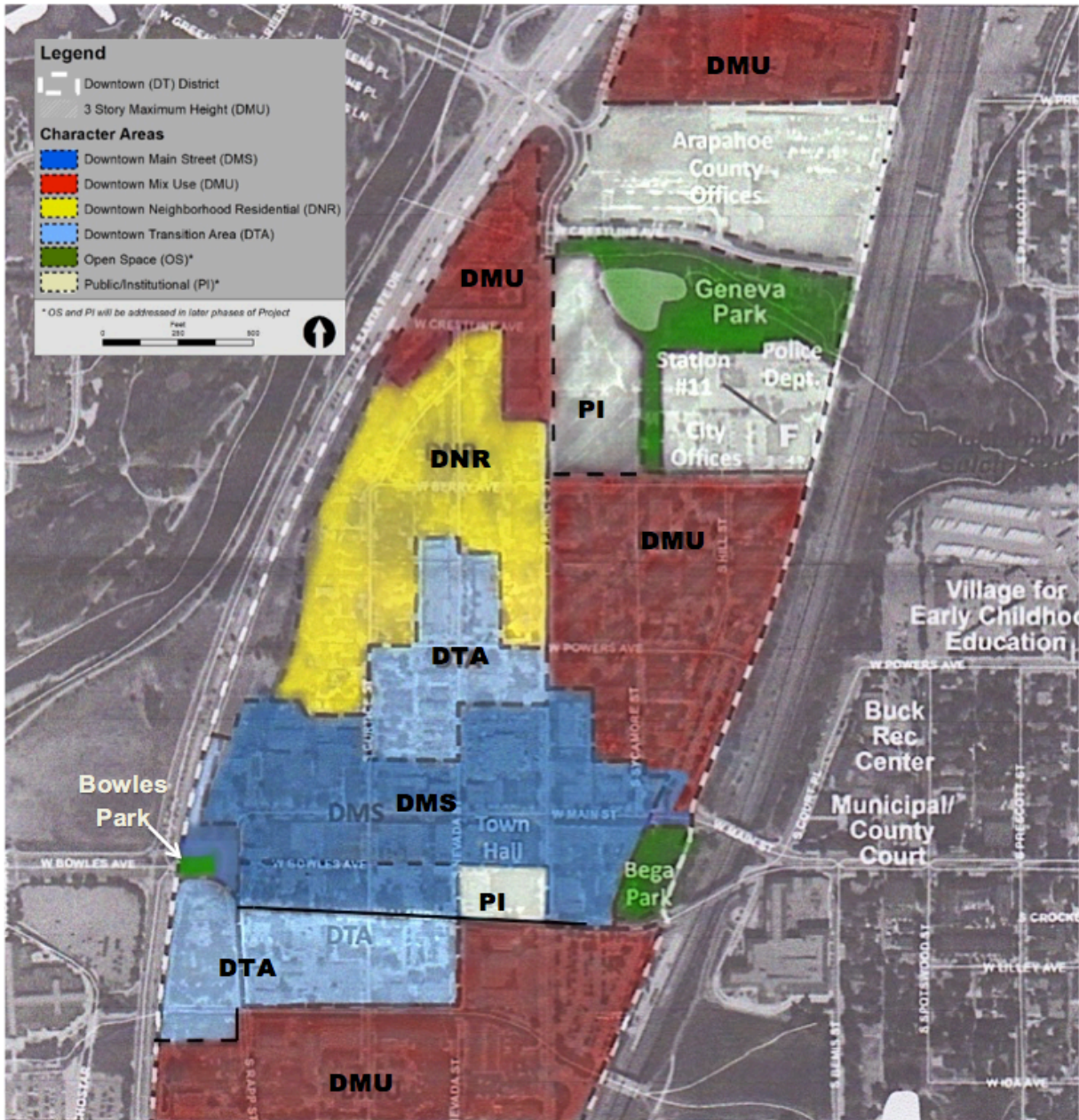
Figure 3.2: Bowles Park in relation to Carnegie Library



Updated Downtown Zoning Character Area Map

This map represents the updates to the Downtown Zoning Character Map which were discussed during the July 23rd Zoning Subcommittee meeting and which represents the changes discussed above. The zoning of Downtown Littleton is complicated and involves strong emotions and opinions regarding the best outcome for the DT District. In light of this it is understandable that members of the group did not agree on the proposed density of Downtown Littleton, which will be discussed in further detail in the next section. This updated map represents one possible outcome to the DT zoning changes.

Figure 4.1: Proposed Updates to DT Character Map



Height Capacity Limits

Section 10-4-18 (L3-L4) Downtown Building Types Draft – Mixed Use Building Types

As a city appointed committee comprised of residents, business owners, and social justice advocates, members of the subcommittee are concerned with the proposed regulations outlined in section 10-4-18 (L3-L4). In understanding current historical trends and demographic growth projections, the need for quality, diverse, and affordable housing has never been greater. It is at this point, however, the subcommittee members experienced a difference of opinion as to how best to address this need for

affordable housing. While some members advocate for increasing height limits within the Downtown Mixed Use area, others suggest a more modest approach to height limits and instead promote a focus on policy to promote affordability within Littleton. In an effort to equally represent to diverse views of the subcommittee, both opinions will be represented within this document.

Opinion 1: Increasing Height Limits

Select members of the subcommittee encourage council to reconsider and increase the height allowance to allow for greater density in and around downtown Littleton. Recent studies¹² and surveys indicate that without an increase in height allowances, Littleton will remain stagnant and unable to attain the inclusive future outlined by the city's Comprehensive Plan and for which the Next Generation Advisory Committee stands. Thank you for taking the time to consider our perspective and our future as we work in collaboration to bring the city's Comprehensive Plan to life.

Opinion 2: Moderate Height Allowances and a Focus on Policy

Other members of the subcommittee think building heights should be limited to three floors throughout the Downtown Mixed Use area, with the option of extending to a fourth story ONLY allowed in certain circumstances. A fourth story, with an appropriate 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 constructed in accordance to LEED or other sustainable building standards. Increases in building heights could be used as incentives for gains in city policies in these areas. More about this this proposal will be said in the next section.

We would also like to building height limits to be regulated in coordination with the topography of Downtown, with the tallest buildings in the East and reducing heights for buildings toward the West side of town. This will both protect mountain views and access to sunlight for current and future landowners (for example to allow for the instillation and efficiency of solar panels at a future date). In accordance with this we would even suggest allowing the height allowance/incentive to be extended to along S Rio Grande Street on the far Eastern edge of the Downtown District.

Final Thoughts

However, regardless of the approach to the number of building floors, in relation the specific language of the zoning regulations we would strongly urge the city to reevaluate the use of minimum floor-to-floor heights to regulate building height limits instead of listing maximum building heights or maximum floor heights. As the code also does not list maximum floor heights, measuring building heights according to minimum floor-to-floor height the buildings could be much taller than previous code allowances. Members of this subcommittee believe this to be a concerning oversight, and the minimum floor-to-floor measurement must be removed from any future code document as step backs are not going to compensate enough for this increase in height limits, especially in the front elevation of the buildings.

Income Attainable Housing

It is the mission of this subcommittee to advocate on behalf of affordable and equitable housing within the City of Littleton. We recognize that most of our comments relating to this topic will be viewed

¹ *Littleton Housing Study, Final Report*. 1 July 2017. Prepared for the City of Littleton by BBC Research & Consulting.

² *Littleton Housing Study Phase 2: Recommendations*. 26 July 2018. Prepared for the City of Littleton by BBC Research & Consulting.

as related to policy rather than code, but we feel that any code update should keep a policy of affordable housing in mind as these changes are made. Diverse housing options provide opportunity to a wide spectrum of potential residents. By maintaining the affordability of housing within the City of Littleton, the city will remain a welcoming and inclusive community that flourishes under diversity.

In understanding current historical trends and demographic growth projections, the need for quality, diverse, and affordable housing has never been greater. To increase the availability of affordable and attainable housing within the City of Littleton, allowances must be made to accommodate greater residential density, which could be accomplished by an increase in height limits or permitting the zoning of Accessory Dwelling Units just to name a few options. However, simply allowing for an increase in density does not inherently mean there will be an increase in affordable housing. In a market driven environment, rents and home prices will be dictated by market trends thus pricing out many of Littleton's more vulnerable populations. We therefore urge the City of Littleton to consider adopting policy that allows for more equitable and affordable housing options within the city along with thoughtfully increasing the housing stock where appropriate.

Affordable Housing Incentives Ordinance

We suggest the City of Littleton adopt an Affordable Housing Incentives Ordinance to stimulate the creation of affordable housing units throughout the city. An Ordinance such as this would provide a Height Allowance Incentive for any new residential or commercial development within the City of Littleton if the new build was designed to provide high quality, diverse, affordable housing options. As mentioned above in the discussion of building height limits, building heights should be limited to three floors throughout the Downtown Mixed Use area, with the option of extending to a fourth story ONLY allowed in certain circumstances. A fourth story, with an appropriate step back, could be allowed under the Affordable Housing Height Allowance Incentive providing the building was making significant gains for affordable housing. The City and county of Denver adopted an Affordable Housing Incentives Ordinance in December 2019, which could be used as a model for Littleton.³

Controlled Price Units (CPUs)

Controlled Price Units are an effective way to ensure that a portion of all new housing stock is attainably priced by requiring a certain percentage of all new residential developments set aside a percentage of the units as high quality, affordable price units.

- In Playa Vista, California, where this practice was first implemented, approximately 1 out of 10 units in the development were designated as a CPU.
- To allow for affordability, CPUs are priced about 25-30% below market rate for similar properties in the area.
- Resale price is restricted from the time it was originally sold for the next 15 years. The resale prices are set at a below market, fixed price based on a formula tied to the consumer price index. After the 15-year period, there is no restriction on CPU resale and they can be sold for full market rate, making them an excellent investment, especially for first time buyers.
- Stipulations can be set to determine who is able to qualify for the purchase of a CPU, but some preference could be given for applicants who:
 - Are considered low income within the region
 - Are a first-time home buyer

³ *Affordable Housing Incentives Ordinance*. City & County of Denver. Article VI, Chapter 27 (Housing) of the Denver Revised Municipal Code (D.R.M.C). Adopted 18 Dec. 2019. <https://www.denvergov.org/content/dam/denvergov/Portals/696/documents/Other_forms_and_guides/Incentive-Height-Rules-and-Regulations.pdf>.

- Work in the health care, first responder, or educational fields
- Place of work is within five miles of the residence

Geneva Village

As stated in the mission statement for the Zoning Subcommittee of the Next Generation Advisory Committee, we are dedicated to the promotion of income integrated housing throughout the City of Littleton. As discussed in the July 23rd subcommittee meeting, members believe that in order to promote this mission, it is important that Geneva Village affordable senior housing be preserved. Affordability in Downtown Littleton has very quickly decreased to a point that the DT district is no longer affordable to a large portion of Littleton’s population, and in particular seniors with a fixed income would no longer be able to afford to live in the area. In order to have a thriving community, it is important that our most venerable seniors can afford to age in place and an important part of that is remaining within the community where they have lived for years. By providing affordable senior housing, the City of Littleton through Geneva Village is promoting income integrated housing in one of the most expensive areas of the city and must be praised for this and we urge the city to keep the zoning of the city owned property as Public/Institutional in order to ensure that this affordable housing is maintained for generations to come.

Integration of Live-Work

In response to section 10-4-18 (K3-K4) Downtown Building Types Draft – Live- Work we praise the committee for allowing the zoning of such buildings in our downtown area. By allowing such buildings we are helping to promote the growth of small businesses. We want to ensure a few considerations are kept in mind:

1. Live-Work spaces often have a history of transforming neighborhoods “The neighborhood becomes a go-to hot spot of creativity and vitality. Restaurants, bars and coffee shops move in next door to feed and water the artists and the visitors, art collectors and other creatives who explore the area. Property values begin to rise. Eventually, the artists are priced out of the community they helped create. So, they find another run-down building in an iffy neighborhood and start again. The story even has a name: The SoHo Effect.”⁴ However, in light of this, we would like to encourage the City of Littleton to adopt policies that will help maintain the affordability of the neighborhood. Creating a thriving Downtown District is important, but we also believe it is important to maintain affordability and diversity within Littleton.
2. In the definition of Live-Work, it has been defined as light commercial work such as art studios, small offices, and technology support services. A question the NGAC has is how were these industries defined? Is there an opportunity to broaden this list to be sure to as to not exclude certain demographics?

Further Questions

In reviewing the ULUC Zoning Regulations, we are concerned with the vague verbiage used to dictate Littleton’s zoning regulations and would like Council to provide clarification and consideration to the below:

⁴ LeFevre, C. (2015). “Is Affordable Artist Live/Work Housing the New Normal?” 31 July 2020. <helinemediamedia.com/features/artisthousingnewnormal12152015.aspx>.

Section 10-4-18 (L3-L4)

1. Define the type of housing and consider including apartments and income integrated housing options.
2. Define “pedestrian friendly façade” and include impacts on residents with mobility barriers.
3. Clarify “easily identified entrance to building.”

Section 10-4-17.1-3

1. Clarify what is required for a group home to register with the city.
2. Clarify the reasoning behind the one kitchen rule and consider the implications this may have on the residents who may require more than one cooking site due to dietary or mobility restrictions.
3. Clarify the reasoning behind why it’s stipulated that a childcare center should only be located in an existing single-family detached building type.

Section 10-2-18 (E)

1. Define how adequate off-site vehicular and bike parking will be provided.
2. Clarify how indirect impacts on neighborhoods adjacent to the mixed use and non-residential areas of downtown be minimized.
3. Clarify how flexibility and creativity will be promoted in the approval process.
4. Consider the impact on small businesses to meet the parking requirements, therefore we suggest considering adjusting parking requirements from being held to gross square footage to operating square footage
5. Increasing the parking requirements for new construction, this will reduce the city’s need to provide parking, which in the future could become a financial barrier to the city.
6. Consider removing bicycle parking as a requirement to be provided by the business and provide bicycle parking as a city. Other members believe both in order to promote more sustainable transportation options both the city and businesses should provide bicycle parking.
7. Consider adding a statement regarding the Americans with Disabilities Act that ADA supersedes all of the above.

Section 10-4-17.5

1. Consider removing the requirement to obtain a conditional use permit and/or make this process far more accessible for inclusive and diverse businesses coming to Littleton