

Mineral Station Area Framework

RESULTS OF PUBLIC OUTREACH

2018 COMMUNITY OUTREACH PROCESS

- 👤 February 15, 2018
Open House at the Carson Nature Center
- 👤 February 15 – March 2, 2018
Review and Comment on OpenLittleton.org
- 👤 39 Recorded Participants
- 👤 Responses from 9 Participants

Top Subjects of Discussion 2018	
TRAFFIC Congestion on Santa Fe and Mineral	PARKING Supply and Demand
UNIQUENESS of the Area and its Resources	Type and Character of New DEVELOPMENT
CHARACTER Preservation and Enhancement	NATURAL RESOURCE Preservation and Enhancement / Stewardship
NEIGHBORHOOD Preservation	Impacts on South Platte PARK
Areas Included in the STUDY AREA	Architectural and Urban DESIGN

2016 COMMUNITY OUTREACH PROCESS

- 👤 Issues identified during the 2016 community outreach process provided a foundation for the Framework
- 👤 2 open houses
- 👤 2 community meetings
- 👤 330+ recorded participants
- 👤 1000+ recorded comments

Top Subjects of Discussion 2016	
PARKING	TRAFFIC
DENSITY	MIXED-USE
APPROPRIATE USES	OPEN SPACE
PEDESTRIAN BRIDGE / AMENITIES	PRIVACY
ACCESS to Aspen Grove	PRESERVATION
Trails and CONNECTIVITY	DESIGN

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Please provide comments and suggestions on the introduction of this survey in the space below.

Answered: 4

Skipped: 5

RTD means use all events since leaves also show name staff totally
framework study area property community influence

It is with great concern that RTD has diminished the evening trains to and fro from here to the Convention stop. This means we cannot use light rail to go to the Symphony, plays, all cultural events since the last train South leaves before all events are let out. Since many attendees are over 65, this is particularly distressing. It also means the use of cars will increase.

The three choices outlined above are incomplete. The question asked is "Do you also want your response shown on this website?" My answer is no. But the only "No" option adds, "show it without my name to staff." There should be another that states, "show it with my name to staff," and I would have selected that. Also, it would be good to know who is "Peak Democracy"?

The name is totally inadequate and should be a framework study, guide, guidelines, or outcome. The present name "framework" leaves the intent dangling. The study area needs to be understood clearly that it is more than the 17 acres of property by RTD.

Previously the community engagement component was totally schewed by representatives of the community that were against any change of character for the area.

Study area should have included the subdivision to the north of Aspen Grove.

The plan doesn't discuss the influence or intended influence of the Ensor Property while there are many concerns for this area.

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Chapter 2:

Please provide comments and suggestions in the space below.

Answered: 5

Skipped: 4

see traffic situation been concern One Mineral through South
neighborhood actions so Chapter 1 How Use
Framework –

From p “The provide Planning future needs Santa Fe Drive US 85 C 470
” 2 guide decision making area expressed those statements appears draft’s
structure content 7 largely objective draft beyond itself e which they desired
character conditions ensure yet get what Day parking Additional 50 000 Littleton line

I am glad to see that the traffic situation has been identified as a major concern for this project. One more piece to add is that traffic headed west on Mineral cuts through the South Park neighborhood when the road becomes too congested at the light. This increased rate of traffic through a neighborhood is a significant concern to many of the residents. The actions the city has taken so far to mitigate the situation have had no effect.

This form has no space for Chapter 1 observation/suggestions, so I'm placing them here:

How to Use the Framework & Chapter 1
Introduction: INTENT AND ORGANIZATION

—From “How to Use the Framework” (p. 1)

“The Framework will provide a foundation for a Planning Environmental Linkage (PEL) study that will identify options to address a broad range of existing and future transportation needs along the stretch of South Santa Fe Drive (US 85) corridor between I-25 and C-470.”

—From “Chapter 1” (p. 2)

“The Mineral Station Framework is intended to provide direction for the city’s efforts to improve South Santa Fe Drive (US 85) and the South Santa Fe Drive and Mineral Avenue intersection, and will guide future planning and decision-making for this area of the city.”

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The ambition expressed by those two statements appears to overbalance the draft's structure and content:

- Because the draft's core is said to reside in Chapters 4-7, the Goal statements and accompanying lists of actions are largely focused on things to be done. Planning logic however suggests that actions should support an objective framework, not replace it.
- This is because, to serve as a genuine "frame" for "work" to follow, the draft would have to go beyond the work itself (i.e., the draft's actions) by providing a superstructure or scaffold on which they would be placed, conditioned to fit the design of the frame itself.
- It appears that such a framework, one that would indeed guide those actions (i.e., desired community, natural resources, and scenery character conditions) and ensure that the actions and the framework on which they should be structure (i.e., desired end-results to affected neighborhood communities, socio-cultural environments, and local economic stability) has not yet been written.
- Although "stewardship" itself isn't visible in the draft, at least some care-taking verbiage is. That's good to see, but those statements are yet largely subjective—lacking the objective content needed to a) get beyond generalized philosophy, explicitly state what those desired future character conditions are, and c) ensure responsiveness to expressed citizen concerns.
- Surely citizens should not be blamed for observing that the 2/15 draft is therefore not a real "foundation" able to actually "guide future planning and decision making." No?

Day use parking is critical and should be #1 in priority.
Additional parking needs to be constructed

On page 7 it discusses 50,000 vehicles a day through Littleton. I would get updated numbers from CDOT. I remember 10 years ago, the 50,000 cars were the same as 2007 as 2018. This can't consider growth of the area.

Since Sante Fe, south of C-470 and north of Evans is a full 3 lanes, how will the 'pinch' through Littleton be 'mitigated'?

How will the parking pressure of the Littleton and Mineral stations be addressed?

When will SW line be completed through to the SE line?

What will be impact of additional ROW be resolved?

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Chapter 3:

Please provide comments and suggestions in the space below.

Answered: 6

Skipped: 3

see uniqueness area been was residential park natural 880
acres platte what Check number p

I am happy to see that the uniqueness of the area has been recognized. I was concerned when the original plans were published with three or four options. All of them contained parking, residential, and retail structures, none of which are appropriate for the area due to its close proximity to the river, nature center, park, and trails. The uniqueness of this natural resource and gem would have been destroyed.

Challenges and opportunities- Mineral Station is ripe for improvement.

Pg. 11 - SPP is 880 acres new with s. platte residential.

MCGT - 1500/is average summer use. Busy day may see twice this - 500 user/hour during 4-5 peak hours.

It must be understood that as the area further develops & changes into whatever method that the natural environment will be significantly degraded. Having lived in Littleton for 25 years and frequented the area 10-12 times/year or more the natural area is nothing like what it was in the past.

Check the number of acres of the South Platte Park w/ the park it should be 880 acres

Check the number of users with the park

p.13 - Check the date of approval of the PD plan

p.14 - What is the level of service?

enhance bicycle traffic ways

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Chapter 4:

Please provide comments and suggestions in the space below.

Answered: 5

Skipped: 4

more traffic west Mineral through South neighborhood light
significant mitigate situation see area natural rail Station needs
environment zoning

I'll repeat what I wrote previously - One more piece to add is that traffic headed west on Mineral cuts through the South Park neighborhood when the road becomes too congested at the light. This increased rate of traffic through a neighborhood is a significant concern to many of the residents. The actions the city has taken so far to mitigate the situation have had no effect.

I am very happy to see the plans for multimodal transportation options that include ease of access for pedestrians and bicycles. This area should be a hub of outdoor activity due to its proximity to the natural resources close by.

See initial comments.

I agree with all of the goals. As a new community member who wants to use light rail, I have found the parking situation at Mineral Station to be a significant problem. The station itself needs updating, providing more shelter for rail passengers in a pleasant environment that builds upon the natural beauty of the area.

The city of Littleton needs to look closely at the zoning of the Ensor property. The original PD Zoning approved in 1983 is totally inadequate in today's environment 35 years later. Given that the south west corridor light rail line did not open until 2000.

Predictable travel times

Mitigate short cutting through neighborhoods

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Chapter 5:

Please provide comments and suggestions in the space below.

Answered: 4

Skipped: 5

open Mineral Space need build retail from center park Bowles

Please include the open property on the southwest corner of Mineral as a site for development as Open Space and/or recreational activities. Why do we need to build more retail and residential structures in this lovely area where we can still see deer grazing in the grass. There have been too many unsightly developments within Littleton that detract from its charm and unique qualities. One need look no further than the cracker box apartments on Rio Grande and the monstrosity that is being built across from the courthouse.

Use the land On Mineral and Santa Fe to build an outdoor space that will be used by many, many people.

Agree!

The City needs to work with the new owners of the Aspen Grove shopping center for entrance access to the light rail park and ride, and possibly encourage modifications to the southern section of the retail center.

Mineral impact to S. Platte Park.

Add park at SF and Bowles (overpass from Main to Bowles)

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Chapter 6:

Please provide comments and suggestions in the space below.

Answered: 5

Skipped: 4

all more density from small town **character** they existing neighborhoods
natural assets **Design Goal 1** established family study **area** its identity into
Littleton " make 2 enhance **other** city's how yet also **draft** could draft's
authors actions open was **Planning** address building citizens those above
concerns decision objective why What does appear multi use b content **neighborhood**
only beyond **residential** well both ½ Mile Radius **Development**
plan future including affected So park set **ACTION STEP** South Platte
River Corridor redevelopment resource **community** stewardship "South
Management Framework Santa Fe which focused protect Public needed within needs Drive
Mineral scenery aesthetics areas" **LAND** views

Yes! To all of these. No more high density, boring unsightly apartment buildings, condominiums, townhomes. These detract from our small town character; they place burdens on existing neighborhoods (traffic); and they eliminate our natural assets.

Chapter 6

Character and Design Goal 1: CHARACTER AND DESIGN

"Enhance the established small town, family-friendly character of the city and of the study area to ensure this area of the city retains its identity as a southern gateway into Littleton."

Webster's states that "Enhance" means, "1-to make better; 2-to make markedly greater in measure or degree; 3-to make more desirable." This goal to enhance is therefore in direct conflict with the its other half stating that enhancement is intended to retain the city's identity. This goal therefore makes no sense. For how would it be feasible to simultaneously "make better, more desirable, or greater by degree" and yet "ensure that this area of the city retains its identity"?

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Webster's also defines character as "attributes or features that make up and distinguish" and as "features used to separate distinguishable things into categories." If, as the draft states, this area of the city's "small town character" is "established" (IOW, already there—and indeed it is), how then could the draft's authors envision that enhancement actions would contribute to retention of the area's existing character?

This reviewer had a cordial conversation with the Mark Rudnicki at the 2/15 open house. That was insightful; thank you Mark. And our conversation also called to mind earlier Planning Commission dialogue I observed. It was to the effect that the Commission (or was it the city?) wasn't going to address things like building height in this draft. That position appears as an a priori conclusion (i.e., "relating to or derived by reasoning from self-evident propositions"—Webster's). But how are citizens to believe that is a self-evident perspective, when the reasons for it are nowhere present in the draft.

In fact, to the contrary, there is ample evidence we have all heard of citizen concern about potential changes to those character conditions noted above and corresponding concerns about the negative impacts of those changes to the human environment. How then are citizens to understand the city's decision not to incorporate objective character boundary markers (e.g., building height, scale, mass, etc.) without explaining why? What does appear self-evident is that in order to keep this portion of the city's established identity, as the draft states, the draft will need to:

(a) Identify what specific types of established character exist in the planning area (Note that single family, multi-family, and mixed use may help define uses, but not character), and

(b) Add the missing objective content. For example, explicitly note that 3-4 story structures and massive building scales do not fit surrounding suburban neighborhood character, and not even that of Aspen Grove. And neither do they fit the established adjoining natural, agricultural and countryside character at this gateway location.

These are significant omissions, yet they could be addressed. But only if the city wants a real "framework." That would require more definitive content beyond a simple list of actions to be done (Webster's defines "framework" as a "basic conceptional structure; a skeletal, open work or structural frame"). Otherwise, the draft's subjective wording and loose structure leaves it wide open to equally subjective interpretations as it is applied in practice.

Character and Design Goal 2: NEIGHBORHOODS

"Preserve and enhance the identity of the existing residential neighborhoods."

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The draft narrative turns the words use here upside down as well. Given what the words “preserve” and “enhance” mean, it is not logical to assert that both things can simultaneously be done—if the “identity of existing residential neighborhoods” is to be maintained. This verbiage further underscores the absence of any objective “frame” for this work in progress.

Both sections suggest that the draft is still searching for objective content, or at least should be if it is to keep the “framework” label.

Regarding the Draft’s ½-Mile Radius

The only feasible explanation for retention of the ½-mile planning radius is apparently that this is the old Transit Oriented Development (TOD) standard. “Old” because the draft seems to make plain that it is no longer a TOD plan. Moreover, the draft’s purpose—however loosely structured it may be, appears to be guiding future planning and decision-making, including at least some kinds of care taking and transportation planning.

Each of these three factors, coupled with the PEL’s scope, reveals that the ½-mile radius is insufficient for the task at hand. Several other affecting and affected entities beyond the ½-mile limit are intimately involved with the planning area. Important affecting actors and providers (including significant publics, citizens of other municipalities and other governments) lie well beyond that small radius. So also do a number of concerned publics (including other Littleton citizens, businesses and merchants (not just at Aspen Grove but nearby), commuters, park and greenway visitors, etc.). These will all be affected by what this document allows the city to set in motion.

About the Draft’s Actions

Under Chapter 6

♦ ♦ Character and Design Goal 1: CHARACTER AND DESIGN

ACTION STEP A:

“Apply the adopted design objectives (South Platte River Corridor Development Design Objectives) to all new development and redevelopment.”

- Additional verbiage should be added to this action step that requires “conditioning design so that it achieves sustainable resource and community stewardship.” Otherwise this action gives the impression that development and redevelopment is all that matters. We’ve heard many citizens disagree.
- It is disconcerting is the fact that the draft fails to mention the existence of two other completed plans for the subject area. Both appear to a broader focus that the draft—they don’t just speak of development:

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- a) Arapahoe County's "South Platte River Corridor Vision" (2013) and
- b) The "Long Range Management Framework, South Platte River" (2000).

- Notice that Santa Fe is the eastern boundary marker for the 2013 final "South Platte River Corridor Vision", which makes both of these documents equally relevant.

- Management Philosophy articulated in the 2000 "Long Range Management Framework" is also not as narrowly focused on development. Significantly, here are a couple of its recommendations that the draft's authors appear to have missed:

- a) Recommended: That, in recognition of its special values for water quality and wildlife habitat as well as recreational and other uses, the entire 10.5 miles of the South Platte River Corridor in Denver be designated and managed as a City Natural Area.

- b) We want the South Platte River Corridor to be known and cherished by the citizens of the City and County of Denver. If we care for our River, protect its natural resources and help restore its beauty and quality, the South Platte will provide present and future generations unmatched opportunities for recreation, education and enjoyment.

- It is understood that the Community Development Department is by mission, narrowly focused on development and redevelopment. Planning Commission dialogue remains likewise focused on the development side of the equation—probably because its workload appears to be set largely set in turn by development application workloads of the Community Development. But those neglected documents reveal that South Platte River corridor is a one-of-a-kind Front Range resource, and that stewardship of its environment is enormously important—not just to Littleton's citizens but to the entire region. Public concerns about this whole planning process to date only underscore those findings. Those realities are not yet captured in the draft.

- These omissions, not simply the absence of reference to other apparently relevant plans, but the lack of content addressing community and resource stewardship also is very troubling. The impression thereby conveyed is that the city is insufficiently concerned and responsive to its responsibilities for stewardship of community and resource character.

- In staff's defense, skill sets beyond those needed to expedite development and redevelopment proposals are needed to exercise sustainable stewardship. That, of course is not likely to be resolved within time frames set for this draft. But the need stands out like a sore thumb. Addition of those skill sets would doubtless increase Littleton's awareness, sensitivity and responsiveness to expressed citizen concerns.

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ACTION STEP B:

"Future decision-making needs to enhance the livability and desirability of the properties in the study area."

Key words in this action step (e.g., "livability" and "desirability of the properties") appear to be written from a realtor or developer perspective. Again, this reveals a lopsidedly narrow development focus. Whether intended or not, it suggests a willful disregard for citizens' resource and community stewardships concerns.

On the other hand, maybe that is the city's actual intent. In that case, citizens should read Goal 1 under which this action step falls, to "Enhance the established small town, family-friendly character of the city and of the study area" as a commitment to change and not maintain the area's distinctive character qualities. Otherwise, why are such realty issues relevant? The draft should make clear the city's real intent.

ACTION STEP C:

"Future development and redevelopment needs to orient to the river and park."

If this framework is to address concerns expressed by citizens for stewardship of the river and of theirs and other affected communities, it is unclear why it would be desirable "orient" future development and redevelopment to the river. Unless, of course, the city's intent is to use this public resource to further private sector economic returns to realtors and developers.

Certainly, current state-of-the-art understanding of recreation and leisure behavior demonstrates that the encroachment of urban development right up to the greenway's edge does not benefit visitors recreationally, visually or aesthetically. However, the draft's authors may not know this. Suggest that this action be removed because it fails to respect public values of the park and park visitors.

♦♦ Character and Design Goal 2:

NEIGHBORHOODS ACTION STEP A:

"Follow the recommendations of the adopted South Neighborhood Plan, which covers that section of the study area east of South Santa Fe Drive. If necessary to better reflect current conditions, issues, and goals, update and expand that neighborhood plan."

- As mentioned in other observations above, the ½-mile radius is inadequate. It is difficult to comprehend how planners envisioned that it was (see why outlined above). But this means that other neighborhoods well beyond the "South Neighborhood" are both concerned about and will be

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impacted by what happens in this area. Especially, the “Heritage Neighborhood,” the southwest portion of which lies immediately adjacent to Mineral Station and Aspen Grove.

- The draft should also mention the “Heritage Neighborhood Plan.” Suggest amending draft text for faithfulness to the following provisions of the “Heritage Neighborhood Plan”. Please consider that Mineral Station’s off-site impacts require modification of the draft if Heritage Neighborhood Plan provisions are to be achieved. Because scenery and aesthetics is such a major factor for the planning area, multi-story development in the planning area would encroach on adjoining neighborhoods—especially those having “position superior” (i.e., a scenery management/stewardship term) visual exposure to the planning area.
- The draft’s authors must not imagine a physical barrier exists between neighborhoods adjoining the Mineral Station planning area because it does not.

From that Heritage Neighborhood Plan:

“NEIGHBORHOOD GOALS—Goal 1: Preserve existing character of the neighborhood, open space, semi-rural atmosphere, and general ‘quality of life’ aspects, especially the predominantly low-density single-family residential areas.”

“NEIGHBORHOOD GOALS—Goal 2: Prohibit new high-density residential uses from encroaching into existing low-density residential areas.”

“LAND USE—Policy 2: Any new development in the neighborhood should be designed and sited so as to protect views and maximize open space.”

“LAND USE—Policy4: Development proposals for commercial and multi-family residential developments should be carefully scrutinized to assure compatibility with existing adjacent residential development. A transitional area not less than 50 feet in width, landscaped and maintained by the owner of the non-residential/multi-family development shall be considered a minimum acceptable separation.”

Notice: In regard to “compatibility with existing adjacent residential development,” this is a “two-way street” (i.e., it has relevance to Mineral Station as well because the area has direct visual and aesthetic influence).

- Suggest amending draft text for faithfulness to the following provisions of the “South Neighborhood Plan”:

From that South Neighborhood Plan:

“LAND USE—Policy 1: That residential areas be protected from commercial and industrial development by utilizing a combination of setback “buffers”,

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screening, and other measures to reduce the visual and audible impacts created by the development.”

“LAND USE-Policy 4: “That residential development in the area provides a mix of housing types, in a manner that preserves or enhances character of existing residential areas.”

- The draft needs to reflect a more honest look at the wide-reaching affect this key area of the city has on other neighborhoods—both within the city of Littleton and beyond.
- Here again is another opportunity for the city to put into practice its stated desire to collaborate more closely with other affecting and affected entities.

ACTION STEP B:

Same as text quoted above for Action Step A, except this action step applies to the South Santa Fe Corridor Plan.

From that South Santa Fe Corridor Plan:

“URBAN DESIGN GOALS AND POLICIES—Policy 1: Preserve and protect the prominent and historic view corridors of the foothills/mountains and the South Platte River corridor including:

- Prince Street an South Santa Fe Drive intersection
- Bowles Avenue and South Santa Fe Drive intersection
- Mineral Avenue and South Santa Fe Drive intersection, and
- Main Street over the historic former Carnegie Library building.”

The draft does not yet have the objective content needed to ensure that this goal and policy is met with regard to the third arrow above in particular. That’s because it does not yet outline a character framework within which to fit all of the draft’s actions and to which each would be held accountable. Instead, the draft is missing objective rationale for their inclusion. This could be provided by adding objective design parameters to a real framework (e.g., including building structure height, mass and scale, green space and biomass and paved over hardscape). These are needed for the draft to demonstrate responsiveness to the many concerns raised by citizens and other affected publics about this highly visible area of the city.

♦♦ Character and Design Goal 4: NATURAL ASSETS

“Preserve the natural assets in the study area, including the South Platte River, the Mary Carter Greenway, and the views to the river valley, park, and mountains.”

Steps that follow in the draft address: A-“trail connections”, B-“views of the river corridor”, and unspecified C-“high quality natural resources within the study area.”

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- While much of the draft is focused on actions addressing “development and redevelopment” (it is understood this is what Community Development does), the draft is conspicuously silent about stewardship of community and resource character as assets. These omissions stand out in bold relief because so much public concern has focused on the perceived imbalance. This is another “hole” in the draft that needs to be filled in.

ACTION STEP B:

“Future decision-making needs to protect views of the river corridor, the park, and mountains.”

The enormous significance of scenery and aesthetics in this area of the city, and to so many people, begs more attention in the draft than this simple action step. There are several scenery management frameworks from which the draft could have borrowed, and those for aesthetic character as well. As illustrated by the Venn diagram included in this observer’s first set of remarks, all other elements of this framework will affect scenery.

But it must also be noted that public concerns are not only limited to scenery but to aesthetics as well. Of special concern in this location is loudness of traffic sounds and related smells.

This action step is inappropriately limited to “views of” places beyond the planning area. A major omission is that the draft yet fails to address internal views and aesthetics, the appearance of what is happening within this area. Again, the draft includes no structural framework for addressing these parameters.

Agree. I hope the City of Littleton is looking at various projects in other parts of Denver (and other cities) for inspiration. "Established small-town, family-friendly character" needs to be balanced with forward-looking contemporary design and amenities to attract and retain future Littleton residents.

Goal for natural assets - recognize that trail connections & river facing development - while they celebrate the wildlife habitat & river, they also invite use & overuse.

SPP should have some limitations or barriers to prevent exponential growth of use.

Preserve/enhance 'neighbor hoods'

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Chapter 7:

Please provide comments and suggestions in the space below.

Answered: 6

Skipped: 3

residential needed **area** Preserve natural resources **park** areas river its Under
Chapter 6 see observations above ♦♦ **Land Use Goal** RECREATION
OPEN SPACE study amenities " met **framework** design
elements That's them development redevelopmentsignificant **South**
Platte other nearby yet character conditions within each affect socio
cultural environment observation **what** beenobserved **made does** however missing
draft occur effects also **ACTION** STEPS C all ensure 1 Step
Santa Fe Corridor Plan necessarygoals From historic including Street
Drive intersection Avenue over former building **objective** which could Thank Multi
Story parking garage into land p

No more retail or residential is needed in this area. Be bold! Take a risk.
Preserve the natural resources and develop an outdoor park area with room
for local concerts, play areas, access to the river and its trail.

Under Chapter 7

This chapter has similar cross-threaded verbiage as that in Chapter 6 (see observations above).

♦♦ Land Use Goal 2: RECREATION AND OPEN SPACE

"Preserve the study area's recreational amenities and open space/natural areas."

That goal cannot reasonably be expected to be met absent a genuine framework that explicitly specifies design attributes and elements (see detailed observations above under Chapter 6). That's because without them, development and redevelopment will surely encroach on the regionally significant greenway amenities of South Platte Park and other nearby open space. This is hugely significant.

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South Suburban has not yet adopted an integrative conceptual framework describing recreation setting character conditions within each of its zones, nor an accompanying framework for addressing the affect of urban development to individuals, households and communities, the socio-cultural environment, etc. That observation simply states what has been observed to be true; it is not made as a criticism of South Platte Park managers. It does however mean that if this goal is to be achieved, the framework elements observed to missing will need to be supplied.

For what this draft would allow to occur in the planning area will have significant effects to nearby park and open space resources that are not even mentioned in the draft. Those effects, positive and negative, are not limited to South Platte Park but also affect other publicly valued open space amenities nearby, the people who enjoy them, and consequent socio-cultural conditions of the human environment.

ACTION STEPS A, B & C

The subject of all three action steps is "Future decision making." The verb phrase following each of these subjects, similarly, is "needs to protect" or "provide." However, the draft yet includes no framework to ensure that will occur.

♦♦ Land Use Goal 3: DEVELOPMENT AND REDEVELOPMENT

"Ensure that development and redevelopment with the study area enhance the viability of the area." See also observations under "Chapter 6, Character and Design Goal 1, Action Step A" above.

ACTION STEP C:

"Follow the direction in the 20000 South Santa Fe Corridor Plan. If necessary to reflect current conditions, issues, and goals, update the corridor plan."

The same observation as is made under Chapter 6 applies here:

From that Santa Fe Corridor Plan:

"URBAN DESIGN GOALS AND POLICIES—Policy 1: Preserve and protect the prominent and historic view corridors of the foothills/mountains and the South Platte River corridor including:

- Prince Street and South Santa Fe Drive intersection
- Bowles Avenue and South Santa Fe Drive intersection
- Mineral Avenue and South Santa Fe Drive intersection, and
- Main Street over the historic former Carnegie Library building."

The draft does not yet have the objective content needed to ensure that this goal and policy is met with regard to the third arrow above in particular. That's because it does not yet outline a character framework within which to fit all of the draft's actions and to which each would be held accountable.

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Instead, the draft is missing objective rationale for their inclusion. This could be provided by adding objective design parameters to a real framework (e.g., including building structure height, mass and scale, green space and biomass and paved over hardscape). These are needed for the draft to demonstrate responsiveness to the many concerns raised by citizens and other affected publics about this highly visible area of the city.

These observations are made with the hopeful intent they will be found to useful in correcting and improving the draft. Thank you!

Don Bruns
District IV

Agree. Thank you for your work on this project.

Use the NE corner of Mineral and Santa Fe for a Multi Story parking garage built into the hillside and not protrude into the adjacemnt residential area. This land is former railroad right of way, so I am not sure as to ownership. If this is not possible construct a multi story garage in the existing area.

Change the land use designation from PD to one appropriate to light rail use. This should include the area within the 1/4 mile zone and could be used for additional parking or other RTD functions.

Action Step D p. 24 - what is/are value capture opportunities. See p. 34 for a definition.

p. 25 Action step C - is it realistic to reference 2000 Santa Fe Corridor plan when it hasn't adequately been followed? Will this be redone?

Minial, but necessary

Additional Citizen Comments below were received from Don Bruns, District IV

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Mineral Station Area Framework *Observations*

The 1/23/18 Council-Planning Commission study session dialogue was insightful. Members of both governing bodies appeared to struggle somewhat with portions of the draft.

Some indicated the draft was fine but wondered how the 2/15 public meeting would go beyond what had already been done. Others appeared hesitant about whether the draft adequately addressed several issues already raised by citizens. Still others, wanting to make this document a useful guide for future development, shared their belief that the draft's strongest part were its goals and action steps.

The purpose of this paper is to outline some observations that staff and Planning Commission may find helpful in writing a true framework that is both responsive to citizens and has practical utility.

Looking for a Framework

Although the draft carries the title "Framework," its goals and actions nonetheless appear to focus on work to be done. But it is difficult to find a real frame for work outlined in the draft as actions.

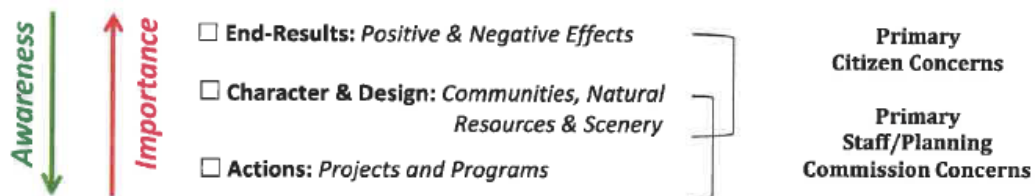
The draft's structure itself appears problematic. For example:

- The four Goal/Action Step sections are presented as discrete elements when in reality they are interrelated.
- Some Commission dialogue hinted that those interrelationships have not yet been defined—yet it seems certain they should be.
- Goals and actions function best when used to implement a framework, but the draft's actions are hardly can be conceived as a framework. Nevertheless, some draft category titles could be used to structure a genuine framework.
- Were actions conditioned by an authentic framework, they would not be viewed as ends unto themselves, but would instead serve as means for creating an objective framework design.
- Bottom line is that critically important components are yet missing from the draft.

What follows are a couple of ways to supply the missing pieces and restructure some already there—all to encourage preparation of a truly objective, functionally integrated and usable framework.

Potential Structural Framework Considerations

First, there is an Awareness-Importance Hierarchy of essential planning considerations. It was discovered and formulated by social science research. The green and red arrows below depict the differential awareness and importance of its three basic planning elements. People tend to be more aware of those having less importance and less aware of those having greater importance. Planners therefore find it easier to address actions rather than resulting effects to the human environment.



Green and red arrows signify differential human awareness of these three planning considerations. The green arrow signifies people's greater awareness of actions; which is why plans have such difficulty getting beyond projects and programs (3rd box, middle column). In sharp contrast, the red arrow signifies the greater importance of planning's positive and negative end-results (1st box), despite how difficult they are to grasp. Plans therefore often focus on elements of lesser importance because they more readily understood; but they tend to ignore elements both more important and more difficult to understand.

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- 1st: Comparing the draft's core chapters (i.e., IV-VII) with the foregoing graphic, one can see that Community Development structured those four sets of "Goals" and "Action Steps" around third tier "Actions" (see third box at the bottom of the middle column). That emphasis was also exhibited in how ensuing council and planning commission dialogue focused on that third tier.
- 2nd: Secondly, neither positive and negative effects, that is, "End-Results" in the first tier (see first box atop the middle column in the foregoing graphic) are yet addressed in the draft. These are effects to the human environment, about which citizens have expressed no small concern. Their omission from the draft suggests that its authors have chosen to ignore them.
- 3rd: Although "Character and Design" in the second tier (see second box, middle column) entitles one of the draft's chapters, the draft nonetheless has no definitively objective framework for this. Some commission dialogue appeared to recognize its value, but staff has not yet written it. Instead, the four goal statements in Section VI of the draft are only written in subjective terms.

A significant portion of the missing framework could be supplied by:

- a) Combining Chapters VI and VII, "Character and Design" and "Land Use":
 - o Adding objective content, thereby creating an actual framework for "Land Use Character and Design" which would also entail . . .
 - o Incorporating Goals 1 and 2 of Chapter VI (i.e., "Character and Design" and "Neighborhoods"). But of instead of simply listing actions, these sections would then describe an actual framework for finally achieving the objectively definable neighborhood character and design that affected citizens value and desire;
- b) Rewriting Goal 3 of Chapter VI to explain how that objective "Neighborhood Character and Design" would constrain and guide "Streetscape" design; and
- c) Rewriting Goal 4 of Chapter VI to explain how that objective "Neighborhood Character and Design" would also provide sustainable stewardship of affected "Natural Assets."

A Functionally Integrated Framework

The challenge for staff and the Planning Commission is how to restructure the draft's narrative so that it follows cause-and-effect planning logic. Not only would this help ensure the resulting framework echoes reality, it would also thereby be more responsive to citizen concerns that positive end-results are optimized and that negative, adverse impacts be minimized or eliminated altogether.

As this observer watched and listened to Planning Commission dialogue, it became clear that at least some members were searching for ways to sustain conditions that citizens have repeatedly said are important to them (e.g., greenway aesthetics, landscape visibility, human-scale architecture, etc.).

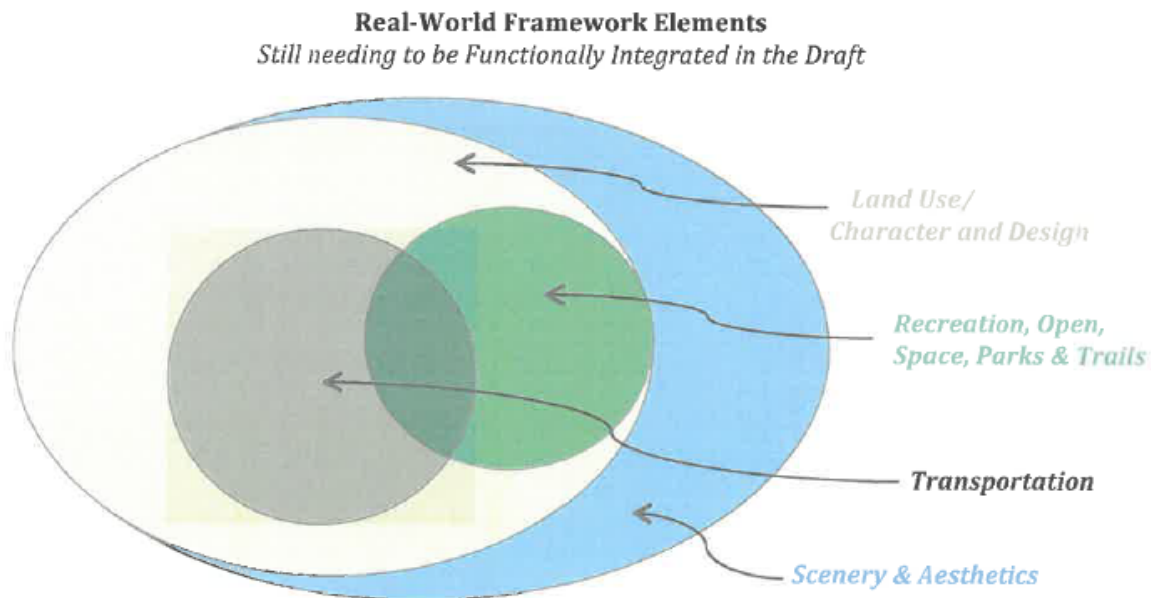
The following Venn diagram graphically portrays how the four components included in the draft—plus a fifth not yet included—are functionally integrated in the real world. It approximates functionally integrated interrelationships among those components. Conspicuous by its omission from the draft is Scenery and Aesthetics.

- ☐ The buff colored interior is *Land Use*, its framework expressed by *Character and Design*. This is foundational. If staff and the Planning Commission can articulate an objective framework, it will help determine everything else.
- ☐ That framework needs to be responsive to citizens' desired character conditions for *Transportation and Parks & Open Space* in particular—because Land Use Character and Design directly influences these elements. In other words, Land Use Character and Design envelop both Transportation and Parks & Open Space.
- ☐ All four of these structural components have a direct bearing on *Scenery and Aesthetics*. In view of the huge concern citizens have expressed for this element, its omission from the draft is a significant oversight.

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These are not discrete elements as presented in the draft. The final draft needs to articulate how these overlapping framework elements, integrated in the real world, are to be functionally integrated in what the draft presents. To be truly responsive and therefore usable, it would seem that the draft needs to explain not only how these elements are functionally integrated but also how they will condition and constrain ensuing actions.



One is left with the impression that “Land Use Character and Design,” as a true framework, would establish objective parameters for community character, design, and allowable changes thereto. “Sideboards” set by that framework would, of course, also apply to “Transportation” and to “Parks and Open Space,” because it appears that both are land use subsets. Also citizens and other affected publics place a very high premium on scenery, (especially in this location, which, as the diagram illustrates, extends well beyond city boundaries). It would therefore be most appropriate to consider whether the framework sets adequate safeguards for aesthetics within the subject area and for views beyond as well (e.g., citizens have expressed no small concerns about both).

I hope, if the draft’s authors choose to articulate a genuinely objective framework, how it would guide and limit allowable uses or actions. Otherwise it would likely be unresponsive to citizens’ stewardship concerns. Especially for taking care of the two subsets identified in the draft (i.e., transportation and parks & open space) and the third not yet there, of which all draft chapters are a subset (i.e., scenery and aesthetics). If it does not do this, it would be difficult to imagine it as an authentic framework.

Although the draft does not address end-results, if a real “frame” is actually added to the final draft, types and degrees of change it would allow would also invariably end up generating positive and negative effects to the human environment (i.e., socio-culturally, environmentally, economically, etc.). It is these end-results that are the focus of concern voiced by affected parties in the public comment chain.

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District IV

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Mineral Station Framework Observations, Part 2

February 15, 2018 Mary Carter Greenway Open House Draft

The following observations supplement those submitted to staff at Mary Carter center on 2/15.

How to Use the Framework & Chapter 1

Introduction: INTENT AND ORGANIZATION

—From “How to Use the Framework” (p. 1)

“The Framework will provide a foundation for a Planning Environmental Linkage (PEL) study that will identify options to address a broad range of existing and future transportation needs along the stretch of South Santa Fe Drive (US 85) corridor between I-25 and C-470.”

—From “Chapter 1” (p. 2)

“The Mineral Station Framework is intended to provide direction for the city’s efforts to improve South Santa Fe Drive (US 85) and the South Santa Fe Drive and Mineral Avenue intersection, and will guide future planning and decision-making for this area of the city.”

The ambition expressed by those two statements appears to overbalance the draft’s structure and content:

- Because the draft’s core is said to reside in Chapters 4-7, the Goal statements and accompanying lists of actions are largely focused on things to be done. Planning logic however suggests that actions should support an objective framework, not replace it.
- This is because, to serve as a genuine “frame” for “work” to follow, the draft would have to go beyond the work itself (i.e., the draft’s actions) by providing a superstructure or scaffold on which they would be placed, conditioned to fit the design of the frame itself.
- It appears that such a framework, one that would indeed guide those actions (i.e., desired community, natural resources, and scenery character conditions) and ensure that the actions and the framework on which they should be structure (i.e., desired end-results to affected neighborhood communities, socio-cultural environments, and local economic stability) has not yet been written.
- Although “stewardship” itself isn’t visible in the draft, at least some care-taking verbiage is. That’s good to see, but those statements are yet largely subjective—lacking the objective content needed to a) get beyond generalized philosophy, explicitly state what those desired future character conditions are, and c) ensure responsiveness to expressed citizen concerns.
- Surely citizens should not be blamed for observing that the 2/15 draft is therefore not a real “foundation” able to actually “guide future planning and decision making.” No?

Chapter 6

Character and Design Goal 1: CHARACTER AND DESIGN

“Enhance the established small town, family-friendly character of the city and of the study area to ensure this area of the city retains its identity as a southern gateway into Littleton.”

- Webster’s states that “Enhance” means, “1-to make better; 2-to make markedly greater in measure or degree; 3-to make more desirable.” This goal to enhance is therefore in direct conflict with the its other half stating that enhancement is intended to retain the city’s identity. This goal therefore

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makes no sense. For how would it be feasible to simultaneously “make better, more desirable, or greater by degree” and yet “ensure that this area of the city retains its identity”?

Webster’s also defines character as “attributes or features that make up and distinguish” and as “features used to separate distinguishable things into categories.” If, as the draft states, this area of the city’s “small town character” is “established” (IOW, already there—and indeed it is), how then could the draft’s authors envision that enhancement actions would contribute to retention of the area’s existing character?

This reviewer had a cordial conversation with the Mark Rudnicki at the 2/15 open house. That was insightful; thank you Mark. And our conversation also called to mind earlier Planning Commission dialogue I observed. It was to the effect that the Commission (or was it the city?) wasn’t going to address things like building height in this draft. That position appears as an *a priori* conclusion (i.e., “relating to or derived by reasoning from self-evident propositions”—Webster’s). But how are citizens to believe that is a self-evident perspective, when the reasons for it are nowhere present in the draft.

In fact, to the contrary, there is ample evidence we have all heard of citizen concern about potential changes to those character conditions noted above and corresponding concerns about the negative impacts of those changes to the human environment. How then are citizens to understand the city’s decision not to incorporate objective character boundary markers (e.g., building height, scale, mass, etc.) without explaining why? What does appear self-evident is that in order to keep this portion of the city’s established identity, as the draft states, the draft will need to:

- (a) Identify what specific types of established character exist in the planning area (*Note that single family, multi-family, and mixed use may help define uses, but not character*), and
- (b) Add the missing objective content. For example, explicitly note that 3-4 story structures and massive building scales do not fit surrounding suburban neighborhood character, and not even that of Aspen Grove. And neither do they fit the established adjoining natural, agricultural and countryside character at this gateway location.

These are significant omissions, yet they could be addressed. But only if the city wants a real “framework.” That would require more definitive content beyond a simple list of actions to be done (Webster’s defines “framework” as a “*basic conceptional structure; a skeletal, open work or structural frame*”). Otherwise, the draft’s subjective wording and loose structure leaves it wide open to equally subjective interpretations as it is applied in practice.

Character and Design Goal 2: NEIGHBORHOODS

“Preserve and enhance the identity of the existing residential neighborhoods.”

The draft narrative turns the words use here upside down as well. Given what the words “preserve” and “enhance” mean, it is not logical to assert that both things can simultaneously be done—if the “identity of existing residential neighborhoods” is to be maintained. This verbiage further underscores the absence of any objective “frame” for this work in progress.

Both sections suggest that the draft is still searching for objective content, or at least should be if it is to keep the “framework” label.

Regarding the Draft’s ½-Mile Radius

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The only feasible explanation for retention of the ½-mile planning radius is apparently that this is the old Transit Oriented Development (TOD) standard. “Old” because the draft seems to make plain that it is no longer a TOD plan. Moreover, the draft’s purpose—however loosely structured it may be, appears to be guiding future planning and decision-making, including at least some kinds of care taking and transportation planning.

Each of these three factors, coupled with the PEL’s scope, reveals that the ½-mile radius is insufficient for the task at hand. Several other affecting and affected entities beyond the ½-mile limit are intimately involved with the planning area. Important affecting actors and providers (including significant publics, citizens of other municipalities and other governments) lie well beyond that small radius. So also do a number of concerned publics (including other Littleton citizens, businesses and merchants (not just at Aspen Grove but nearby), commuters, park and greenway visitors, etc.). These will all be affected by what this document allows the city to set in motion.

About the Draft’s Actions

Under Chapter 6

☐ **Character and Design Goal 1: CHARACTER AND DESIGN**

ACTION STEP A:

“Apply the adopted design objectives (South Platte River Corridor Development Design Objectives) to all new development and redevelopment.”

- Additional verbiage should be added to this action step that requires “conditioning design so that it achieves sustainable resource and community stewardship.” Otherwise this action gives the impression that development and redevelopment is all that matters. We’ve heard many citizens disagree.
- It is disconcerting is the fact that the draft fails to mention the existence of two other completed plans for the subject area. Both appear to a broader focus than the draft—they don’t just speak of development:
 - a) Arapahoe County’s “South Platte River Corridor Vision” (2013) and
 - b) The “Long Range Management Framework, South Platte River” (2000).
- Notice that Santa Fe is the eastern boundary marker for the 2013 final “South Platte River Corridor Vision”, which makes both of these documents equally relevant.
- Management Philosophy articulated in the 2000 “Long Range Management Framework” is also not as narrowly focused on development. Significantly, here are a couple of its recommendations that the draft’s authors appear to have missed:
 - a) *Recommended: That, in recognition of its special values for water quality and wildlife habitat as well as recreational and other uses, the entire 10.5 miles of the South Platte River Corridor in Denver be designated and managed as a City Natural Area.*
 - b) *We want the South Platte River Corridor to be known and cherished by the citizens of the City and County of Denver. If we care for our River, protect its natural resources and help restore its beauty and quality, the South Platte will provide present and future generations unmatched opportunities for recreation, education and enjoyment.*
- It is understood that the Community Development Department is by mission, narrowly focused on development and redevelopment. Planning Commission dialogue remains likewise focused on the development side of the equation—probably because its workload appears to be set

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largely set in turn by development application workloads of the Community Development. But those neglected documents reveal that South Platte River corridor is a one-of-a-kind Front Range resource, and that stewardship of its environment is enormously important—not just to Littleton’s citizens but to the entire region. Public concerns about this whole planning process to date only underscore those findings. Those realities are not yet captured in the draft.

- These omissions, not simply the absence of reference to other apparently relevant plans, but the lack of content addressing community and resource stewardship also is very troubling. The impression thereby conveyed is that the city is insufficiently concerned and responsive to its responsibilities for stewardship of community and resource character.
- In staff’s defense, skill sets beyond those needed to expedite development and redevelopment proposals are needed to exercise sustainable stewardship. That, of course is not likely to be resolved within time frames set for this draft. But the need stands out like a sore thumb. Addition of those skill sets would doubtless increase Littleton’s awareness, sensitivity and responsiveness to expressed citizen concerns.

ACTION STEP B:

“Future decision-making needs to enhance the livability and desirability of the properties in the study area.”

Key words in this action step (e.g., “livability” and “desirability of the properties”) appear to be written from a realtor or developer perspective. Again, this reveals a lopsidedly narrow development focus. Whether intended or not, it suggests a willful disregard for citizens’ resource and community stewardships concerns.

On the other hand, maybe that is the city’s actual intent. In that case, citizens should read Goal 1 under which this action step falls, to “Enhance the established small town, family-friendly character of the city and of the study area” as a commitment to change and not maintain the area’s distinctive character qualities. Otherwise, why are such realty issues relevant? The draft should make clear the city’s real intent.

ACTION STEP C:

“Future development and redevelopment needs to orient to the river and park.”

If this framework is to address concerns expressed by citizens for stewardship of the river and of theirs and other affected communities, it is unclear why it would be desirable “orient” future development and redevelopment to the river. Unless, of course, the city’s intent is to use this public resource to further private sector economic returns to realtors and developers.

Certainly, current state-of-the-art understanding of recreation and leisure behavior demonstrates that the encroachment of urban development right up to the greenway’s edge does not benefit visitors recreationally, visually or aesthetically. However, the draft’s authors may not know this. Suggest that this action be removed because it fails to respect public values of the park and park visitors.

☐ **Character and Design Goal 2: NEIGHBORHOODS**

ACTION STEP A:

“Follow the recommendations of the adopted South Neighborhood Plan, which covers that section of the study area east of South Santa Fe Drive. If necessary to better reflect current conditions, issues, and goals, update and expand that neighborhood plan.”

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- As mentioned in other observations above, the ½-mile radius is inadequate. It is difficult to comprehend how planners envisioned that it was (see why outlined above). But this means that other neighborhoods well beyond the “South Neighborhood” are both concerned about and will be impacted by what happens in this area. Especially, the “Heritage Neighborhood,” the southwest portion of which lies immediately adjacent to Mineral Station and Aspen Grove.
- The draft should also mention the “Heritage Neighborhood Plan.” Suggest amending draft text for faithfulness to the following provisions of the “**Heritage Neighborhood Plan**”. Please consider that Mineral Station’s off-site impacts require modification of the draft if Heritage Neighborhood Plan provisions are to be achieved. Because scenery and aesthetics is such a major factor for the planning area, multi-story development in the planning area would encroach on adjoining neighborhoods—especially those having “position superior” (i.e., a scenery management/stewardship term) visual exposure to the planning area.
- The draft’s authors must not imagine a physical barrier exists between neighborhoods adjoining the Mineral Station planning area because it does not.

From that Heritage Neighborhood Plan:

“NEIGHBORHOOD GOALS—**Goal 1**: Preserve existing character of the neighborhood, open space, semi-rural atmosphere, and general ‘quality of life’ aspects, especially the predominantly low-density single-family residential areas.”

“NEIGHBORHOOD GOALS—**Goal 2**: Prohibit new high-density residential uses from encroaching into existing low-density residential areas.”

“LAND USE—**Policy 2**: Any new development in the neighborhood should be designed and sited so as to protect views and maximize open space.”

“LAND USE—**Policy 4**: Development proposals for commercial and multi-family residential developments should be carefully scrutinized to assure compatibility with existing adjacent residential development. A transitional area not less than 50 feet in width, landscaped and maintained by the owner of the non-residential/multi-family development shall be considered a minimum acceptable separation.”

Notice: *In regard to “compatibility with existing adjacent residential development,” this is a “two-way street” (i.e., it has relevance to Mineral Station as well because the area has direct visual and aesthetic influence).*

- Suggest amending draft text for faithfulness to the following provisions of the “**South Neighborhood Plan**”:

From that South Neighborhood Plan:

“LAND USE—**Policy 1**: That residential areas be protected from commercial and industrial development by utilizing a combination of setback “buffers”, screening, and other measures to reduce the visual and audible impacts created by the development.”

“LAND USE—**Policy 4**: “That residential development in the area provides a mix of housing types, in a manner that preserves or enhances character of existing residential areas.”

- The draft needs to reflect a more honest look at the wide-reaching affect this key area of the city has on other neighborhoods—both within the city of Littleton and beyond.

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- Here again is another opportunity for the city to put into practice its stated desire to collaborate more closely with other affecting and affected entities.

ACTION STEP B:

Same as text quoted above for Action Step A, except this action step applies to the **South Santa Fe Corridor Plan**.

From that South Santa Fe Corridor Plan:

"URBAN DESIGN GOALS AND POLICIES—Policy 1: Preserve and protect the prominent and historic view corridors of the foothills/mountains and the South Platte River corridor including:

- Prince Street and South Santa Fe Drive intersection
- Bowles Avenue and South Santa Fe Drive intersection
- Mineral Avenue and South Santa Fe Drive intersection, and
- Main Street over the historic former Carnegie Library building."

The draft does not yet have the objective content needed to ensure that this goal and policy is met with regard to the third arrow above in particular. That's because it does not yet outline a character framework within which to fit all of the draft's actions and to which each would be held accountable. Instead, the draft is missing objective rationale for their inclusion. This could be provided by adding objective design parameters to a real framework (e.g., including building structure height, mass and scale, green space and biomass and paved over hardscape). These are needed for the draft to demonstrate responsiveness to the many concerns raised by citizens and other affected publics about this highly visible area of the city.

☐ **Character and Design Goal 4: NATURAL ASSETS**

"Preserve the natural assets in the study area, including the South Platte River, the Mary Carter Greenway, and the views to the river valley, park, and mountains."

Steps that follow in the draft address: A—"trail connections", B—"views of the river corridor", and unspecified C—"high quality natural resources within the study area."

- While much of the draft is focused on actions addressing "development and redevelopment" (it is understood this is what Community Development does), the draft is conspicuously silent about stewardship of community and resource character as assets. These omissions stand out in bold relief because so much public concern has focused on the perceived imbalance. This is another "hole" in the draft that needs to be filled in.

ACTION STEP B:

"Future decision-making needs to protect views of the river corridor, the park, and mountains."

The enormous significance of scenery and aesthetics in this area of the city, and to so many people, begs more attention in the draft than this simple action step. There are several scenery management frameworks from which the draft could have borrowed, and those for aesthetic character as well. As illustrated by the Venn diagram included in this observer's first set of remarks, all other elements of this framework will affect scenery.

But it must also be noted that public concerns are not only limited to scenery but to aesthetics as well. Of special concern in this location is loudness of traffic sounds and related smells.

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This action step is inappropriately limited to “views of” places beyond the planning area. A major omission is that the draft yet fails to address internal views and aesthetics, the appearance of what is happening within this area. Again, the draft includes no structural framework for addressing these parameters.

Under Chapter 7

This chapter has similar cross-threaded verbiage as that in Chapter 6 (see observations above).

☐ **Land Use Goal 2: RECREATION AND OPEN SPACE**

“Preserve the study area’s recreational amenities and open space/natural areas.”

That goal cannot reasonably be expected to be met absent a genuine framework that explicitly specifies design attributes and elements (see detailed observations above under Chapter 6). That’s because without them, development and redevelopment will surely encroach on the regionally significant greenway amenities of South Platte Park and other nearby open space. This is hugely significant.

South Suburban has not yet adopted an integrative conceptual framework describing recreation setting character conditions within each of its zones, nor an accompanying framework for addressing the affect of urban development to individuals, households and communities, the socio-cultural environment, etc. That observation simply states what has been observed to be true; it is not made as a criticism of South Platte Park managers. It does however mean that if this goal is to be achieved, the framework elements observed to missing will need to be supplied.

For what this draft would allow to occur in the planning area will have significant effects to nearby park and open space resources that are not even mentioned in the draft. Those effects, positive and negative, are not limited to South Platte Park but also affect other publicly valued open space amenities nearby, the people who enjoy them, and consequent socio-cultural conditions of the human environment.

ACTION STEPS A, B & C

The subject of all three action steps is “Future decision making.” The verb phrase following each of these subjects, similarly, is “needs to protect” or “provide.” However, the draft yet includes no framework to ensure that will occur.

☐ **Land Use Goal 3: DEVELOPMENT AND REDEVELOPMENT**

“Ensure that development and redevelopment with the study area enhance the viability of the area.” See also observations under “Chapter 6, Character and Design Goal 1, Action Step A” above.

ACTION STEP C:

“Follow the direction in the 20000 South Santa Fe Corridor Plan. If necessary to reflect current conditions, issues, and goals, update the corridor plan.”

The same observation as is made under Chapter 6 applies here:

From that Santa Fe Corridor Plan:

“URBAN DESIGN GOALS AND POLICIES–Policy 1: Preserve and protect the prominent and historic view corridors of the foothills/mountains and the South Platte River corridor including:

- Prince Street an South Santa Fe Drive intersection
- Bowles Avenue and South Santa Fe Drive intersection

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- Mineral Avenue and South Santa Fe Drive intersection, and
- Main Street over the historic former Carnegie Library building."

The draft does not yet have the objective content needed to ensure that this goal and policy is met with regard to the third arrow above in particular. That's because it does not yet outline a character framework within which to fit all of the draft's actions and to which each would be held accountable. Instead, the draft is missing objective rationale for their inclusion. This could be provided by adding objective design parameters to a real framework (e.g., including building structure height, mass and scale, green space and biomass and paved over hardscape). These are needed for the draft to demonstrate responsiveness to the many concerns raised by citizens and other affected publics about this highly visible area of the city.

These observations are made with the hopeful intent they will be found to useful in correcting and improving the draft. Thank you!

Don Bruns
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