

[EXTERNAL] Congress Park Neighbors, Inc. Request To Extend ECAP Public Comment Period

[Due to open meetings rules, I've dropped members of Council (except CM CdeBaca who has neighborhoods in ECAP) from this response.]

CPN Board,

Thanks for your invitation to attend your annual meeting. It's always great to hear perspectives from other elected officials (including Senator Court and DA McCann), and even more important, it's great to hear from residents.

After your annual meeting, I met with CPD members who oversee ECAP. I asked for additional context about the East Area Plan vs. East Central Area Plan and why the East Area Plan received a postcard while ECAP residents did not. We also discussed the public comment period.

After that meeting, I posted on social media (December 21st):

<https://www.facebook.com/DenverPerfect10/photos/a.102072091137424/159725455372087/>

East Central Area Plan (ECAP) update:

I have asked Denver's Community Planning and Development (CPD) for a 30 day extension to the public comment period for the ECAP draft. I recognize that the current draft period is through the holidays, and that makes it difficult for some to read, review, and comment on the plan. CPD and the District 10 office will take the extra 30 days as an opportunity to re-engage ECAP residents and ask for more participation in the plan.

In case you don't know what ECAP is, it's the guiding document that tells developers, neighbors, and government how we want the 6 neighborhoods in the plan to look like between now and 2040. Do you want additional bike lanes? Do you want fewer bike amenities? Are there enough trees in our neighborhoods now? Do you want additional pedestrian safety? Do you want more parks and recreation amenities? Are you concerned about traffic and speeding? This document captures all of YOUR desires and concerns, and every future zoning decision in these 6 neighborhoods refer back to this document to see if that re-zoning meets the details contained here.

I've made the request for an extension, but in exchange, I want your help. Now that we have additional time, I urge you to engage all of your friends, neighbors, and loved ones inside the ECAP boundaries to read, review, and comment as well. The more participation we have in this important guiding document, the better.

To Registered Neighborhood Organizations: you are how Denver communicates with the city's residents. RNOs have the power - and responsibility - to share this plan with those you represent. RNOs are important to the city and its residents, and Denverites felt RNOs important enough to ensure that your powers are protected by law. Please

let the District 10 office know how we can empower you to continue the ECAP discussions with those you represent, and because of Denver's laws, the District 10 office shouldn't interfere with your conversations directly with residents.

Finally, for anyone and everyone: if you feel the full ECAP document is too big, we have prepared a condensed guide for your reading pleasure. I'll include that in a post below.

Thank you for all you do for Denver and its future, and thank you for your input. It's critical we get your thoughts on this plan so we can make sure we're shaping Denver in a way that works for YOU, the people of Denver.

In addition to the post itself, here's additional context including parts of that meeting with CPD:

- While CPN asked for a 2-3 month extension, the compromise was to ask for an additional 30 days. Yes, the comment period was open during November and December, two months with major holidays. Usually the public comment period is open for 30 days, and CPD kept the comment period open for twice that time because of holidays. That said, 270 pages is a lot to get through, hence the extension. Also, this extension is just for this first draft comment period. There are still additional steps after the first draft comment, and if it continues to be clear that additional time is needed, we have additional opportunities to slow the process.
- While certain proponents have demonstrated that my predecessor sent numerous reminders about ECAP meetings (I've seen 6 newsletters from Wayne New which advertised ECAP meetings), I don't know what other outreach – if any – happened before my term began on July 15th. CPN and others have expressed concern about how the plan is getting rushed, so I don't want to assume the level of outreach that has occurred before I took office. I hear you – and others – who say the process should be slowed so you and others can communicate with your constituents.
- EAP and ECAP's demographics are different. Since the East Area Plan's residents are far more single-family-home dwellers, and since there were demographics underrepresented who lived in single family homes, it made sense to send out a postcard.
- ECAP's participants who live in single family homes are heavily over-represented in ECAP responses. That effectively means the southern half of Congress Park is over-represented in respondents with ECAP. That's the only area in the D10 neighborhoods participating in ECAP that has any concentration of single family homes. Uptown, Capitol Hill, and Cheesman are almost exclusively multi-family units.
- The north side of Congress Park is closer to the other D10 neighborhoods of ECAP – ie more multi-family buildings – and is more analogous to the other D10 neighborhoods in ECAP.
- Although it's not in CPN's boundaries, ECAP also includes Uptown, Capitol Hill, and Cheesman Park, and all of them are under-represented relative to Congress Park's participation (congrats to you for getting the word out!). They're very heavily skewed towards renters, not owners. 86% of Uptown residents are renters. Capitol Hill isn't far behind at 79% renters. Cheesman's at 64%.
- We're going to make an additional push to contact renters by engaging property management companies that focus on neighborhoods in ECAP. Per ECAP data, more than 50% of ECAP residents are younger than 35. More than 60% of

Capitol Hill residents are millennials. The analysis is that younger residents including millennials respond less to postcards (as in some never check their mail) and more to electronic communication, particularly if it's from a trusted source like a property management company.

- As mentioned in the Facebook post, Denver relies on its RNO partners as the official communication vehicle between the city and its residents. RNOs are in ordinance and, by law, the way Denver is designed to communicate with residents about issues facing neighborhoods. The RNO system has been around since the 70s, and Congress Park Neighbors was one of the first RNOs formed in 1978. That said, based on the statistics provided below, it sounds like we need to do better at reaching residents. Perhaps the current RNO process isn't as effective as it was when it was created. My colleagues on Council and I are looking at ways to further strengthen RNOs ability to communicate with the residents you represent, but those are just discussions right now.
- As you know, the District 10 office doesn't have any funds to proactively do its own outreach. My predecessor gave [all remaining D10 funds](#) to organizations including Congress Park Neighbors (\$15k) and Cheesman Park RNO (almost \$14k), two RNOs within the ECAP boundaries. Based on the annual meeting, it sounds like the CPN Board has designated where it would like those funds to go – which is certainly your right. If you feel strongly that a postcard campaign is important, do you have funds left from what the District 10 office gave you earlier this year? Unfortunately, due to decisions made before I took office, the D10 budget doesn't have the ability to assist with outreach using D10 office funds. Also unfortunate, the contents of that article only came to our attention after making decisions that affect 2020, and our office is taking furloughs to ensure District 10 has a balanced budget in 2020 as well.

I look forward to continuing to work with you, Congress Park Neighbors, the residents of Congress Park, and all of District 10 to make sure we're putting together a document that makes sense for developers, government, and, most importantly, residents.

Hope this isn't too long, and hope it makes sense. Our office is closed until the 2nd, otherwise, please let me know how else I can support CPN and the ECAP process.

Best,

Chris

From: Congress Park Neighbors Inc <cpnboard@congressparkneighbors.org>

Sent: Saturday, December 28, 2019 3:22 PM

To: Hinds, Chris - CC Member District 10 Denver City Council
<Chris.Hinds@denvergov.org>

Cc: District 9 <District9@denvergov.org>; Herndon, Christopher J. - CC Member District 8 Denver City Coun <Christopher.Herndon@denvergov.org>; kniechatlarge <kniechatlarge@denvergov.org>; Deborah Ortega - Councilwoman At Large <OrtegaAtLarge@Denvergov.org>; City Council District 5 <DenverCouncil5@denvergov.org>; Robinson, Scott D. - CPD City Planner Senior <Scott.Robinson@denvergov.org>; Upton, Curt C. - CPD City Planner Principal <Curt.Upton@denvergov.org>; Congress Park Neighbors Inc <cpnboard@congressparkneighbors.org>

Subject: [EXTERNAL] Congress Park Neighbors, Inc. Request To Extend ECAP Public Comment Period

Dear Councilman Chris Hinds,

Thank you for attending the last meeting of Congress Park Neighbors on December 18th.

Shortly before the meeting ended, there was a floor motion requesting that Congress Park Neighbors send a request that the ECAP comment period be extended beyond 60 days (currently concluding 1/5/20) until the end of March or April 2020. This motion was seconded and then passed without opposition.

There are many reasons why the public comment period needs to be extended.

- The Denver Planning Department did not publicly release the ECAP draft review until 11/7/19. This was weeks after it was promised and shortly before a public meeting. There has only been one general public meeting on this new draft to address concerns within the 6 neighborhoods encompassed by the ECAP.
- The Congress Park/Planners meeting on Land Use has been rescheduled to January 15 or 16 (pending location), by then the comment period will be closed. There is also more discussion needed regarding Safe Streets, the implications of the "character preservation program", and Building Heights.
- In addition the timing of the ECAP draft release has limited public involvement and participation. During this time there are multiple national and religious holidays that are celebrated during the comment period. Many of the resident's focus is on family, friends and other matters.

A recent communication from Denver Planning indicated that "Community members have already submitted 500 comments on the first draft of the East Central Area Plan." Given the number of households within the 6 neighborhoods contained within the ECAP and the fact that a respondent is allowed to make multiple comments, this is a trivial number. By comparison, the Congress Park Development Survey <https://www.congressparkneighbors.org/2019/07/13/results-of-survey/> released 7/13/19 had more than 300 different respondents. In addition to selecting a question response, many made multiple written comments.

The Denver Planning Department needs to do more to engage the ECAP community.

By comparison, outreach associated with the East Area Plan has been much more successful. A postcard mail campaign generated more community engagement. During the CPN RNO meeting it was suggested that a similar effort be made to reach ECAP residents.

Recently the Denver Planning admitted that the current 2010 Zoning Code can readily accommodate the anticipated population growth during the planning period. This fact was previously unknown and not disclosed until after the ECAP draft release. This fact has many ramifications that need be considered and incorporated into the ECAP since many plan recommendations which affect zoning.

Finally, in a recent letter, <http://ortega.denvercitygov.net/common/mailings/index.cfm?id=185>, Councilwoman Debbie Ortega called attention to current deficiencies in the 2010 Zoning Code which allow rezoning "without a hard look at the cumulative impacts adjacent neighborhoods ... and on our infrastructure (roads, drainage, sewer, & water)." She expressed the opinion that it is irresponsible to consider rezoning without addressing these concerns. The same considerations apply

to the ECAP planning process which fails to address these important matters.

The ECAP planning process needs to be slowed down so that we can all carefully consider the alternatives, address displacement of current residents and small businesses, and preserve the character and integrity of Congress Park and its adjacent neighbors.

Congress Park Neighbors requests your support in extending the public comment period for the ECAP, oppose limiting continued public discussion to RNO's and similar larger entities, actively encourage a postcard mailing campaign to residents affected by the ECAP and directly support the majority viewpoint expressed by Congress Park residents.

Respectfully,

Congress Park Neighbors Inc Board Of Directors

Rodney Allen, President