

Adams County  
Department of Planning and Development  
12200 North Pecos Street, 3rd Floor  
Westminster, Colorado 80234  
re: Clear Creek Valley TOD Plan

1. I serve on the Advisory Board of The TOD Group and am a specialist in land use and transportation planning issues, especially TOD. I have been on a tour of US cities over the last 3 weeks with my book *Resilient Cities: Responding to Peak Oil and Climate Change* (Island Press). This tour included Denver where I spoke at DRCOG and at UC Boulder. I also enclose a paper I published recently on densities and TOD.
2. While the idea of a Clear Creek Valley TOD Plan is good I do not agree with the possibility of capping density on our site to only 10.2 units per acre (see Parcel A on the table on p. 63 of attached "TODPlan.pdf".) This density is not consistent with best practice in TOD as set out in my paper. The minimum residential density should be at least 35 units per acre but there should not be a cap on density, rather there should be guidelines only as I suggested in my talk in Denver. The best TODs are much higher density than you are proposing. By reducing density you will exponentially reduce the value to the transit system and to local residents who will be looking for local services to be provided in this center.
3. The current plan calls for only 86,400 s.f. of office and 43,200 s.f. of retail. This is a fraction of the office and retail space found in many of the best practice in TODs. The total 129,600 s.f. of commercial space will not create a vibrant, mixed use TOD.
4. Best practice TODs reduce parking requirements by unbundling. You really should have an unbundled approach to parking. The TOD Group want to promote car sharing, bike usage and sharing, and transit use as has been promoted in most of the FASTRAKS and strategic planning literature in Denver. You cannot achieve a good TOD without lowering parking and using the extra space for greater density.
5. The TOD Group envision Washington, DC-like development of 20 - 30 story mixed use towers at the station with 5 - 10 story development across the rest of the site. These are the kind of densities we are now achieving in TOD sites in Perth which is a smaller city than Denver. This density will generate the market for energy efficient design. We also believe that a better TOD plan for this site which is based on national best practice will attract more resources from the Federal Transit Administration's joint development pool of funds to assist Adams County with costs of infrastructure for this site area.
6. The station location as proposed in your plan does not maximize the area for a TOD. If you put a station next to a parking area you do not enable a TOD to work. The station should be on the west side next to the TOD so that walk-on can be optimized and hence capital will be attracted to the site for other developments as well as the one planned by the TOD Group

I urge you to reconsider this plan and enable the site to fulfill its promise as a TOD.

Sincerely

Peter Newman

Professor of Sustainability  
The Curtin University Sustainability Policy Institute  
Curtin University  
3 Pakenham Street  
Fremantle, 6160  
Western Australia  
0407935133