PLAN CONFORMANCE REPORT

SEPTEMBER 2020

DEVELOPMENT CODE UPDATE

City of
Greeley Colorado

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INTRODUCTION

The Plan Conformance Report is an analysis of the Greeley's development regulations – specifically Title 18 of the Municipal Code. It compares these regulations to the development and community design policies of the comprehensive plan – Imagine Greeley (adopted February 6, 2018). The purpose of this report is to evaluate how well the current regulations align with the plan, and identify a range of options to consider through the regulation update process.

This report is a preliminary step in the process to update Greeley's development codes. None of the commentary or analysis in this report represents an official direction of the project or a formal recommendation. It provides an objective and critical view of the regulations, and is intended to start a dialogue on a wide range of potential strategies and action steps. Subsequent steps in the project will evaluate which of these strategies and actions are best to implement Imagine Greeley.

REGULATIONS GENERALLY

There are many non-regulatory policies and public investments cities may pursue that have a more direct or immediate impact on implementing a comprehensive plan. In contrast, regulations influence change incrementally and cumulatively as cities receive and respond to future development proposals. However, the regulations will establish a crucial framework for many decisions (public and private), and the influence they have on the development patterns and physical design of the community will increase in significance over time. Greeley's development regulations will be considered specifically in light of the following relationships to long-range development policies and community building.

Subdivision Regulations
Subdivision regulations (Chapter 18.04 of Greeley's development code) are perhaps the most important tool for making connections to the comprehensive plan. They set in place development patterns through public and private infrastructure investments, and block, lot and ownership patterns that define the character and context of different places. These elements will not easily be changed in the future.

Conversely, when a plan prioritizes infill development as *Imagine Greeley* does, these standards need to be adaptable to redevelopment scenarios or situations where these patterns need to be integrated into existing contexts.

Essentially, subdivision regulations should address "big picture urban design" – coordinating the networks and systems that span across projects and even districts, and integrate development into the places and patterns identified in the *Imagine Greeley* Growth Framework. They need to reinforce planning and urban design components that create distinctions in the character and patterns of the Neighborhoods, Centers, Corridors and Areas that are the "building blocks" of the Growth Framework, and not simply serve as engineering and specifications manual. Therefore, the Greeley Subdivision standards should:

- Consider priorities with respect to future development in the **expected growth area**;
- Coordinate development through **systems** that extend across multiple projects (street networks, trail systems, open spaces and public facilities);

- Establish different criteria for **distinct contexts** identified for the various Neighborhoods, Centers, Corridors and Areas;
- Promote **good civic design** (streetscapes, open & civic spaces, gateways, frontages, and arrangements of blocks and lots).

Ultimately, subdivision regulations have the role of ensuring that each new plat results in efficient and effective development patterns, and adds value to the larger and greater whole of the community around it.

Zoning Regulations.

Zoning regulations focus more directly on the "private realm" – establishing standards for development on individual blocks and lots within the public realm framework established by the subdivision regulations. In light of Greeley's Comprehensive Plan, zoning regulations should accomplish the following:

- Establish different **districts** with distinct character – particularly the different types of neighborhoods, corridors, activity centers and job centers in the Growth Framework.
- Promote walkable, mixed-use **patterns** – particularly for downtown, legacy urban neighborhoods, and new walkable neighborhoods and neighborhood centers.
- Create **relationships** and better **transitions** between different but supporting zoning districts so that multiple projects can contribute to these distinct places – especially where the plan is prioritizing infill development.
- Be **flexible towards uses** to promote dynamic job centers and community destinations in the Corridors and Centers, and guard against any zoning district or project concentrating large-scale and single-use environments.

Design Standards.

Regulating design is about much more than aesthetics, materials or architectural style – or using buffers and landscape in the absence of expectations in that regard. In fact, regulating for good community design is often about none of these. When done in a comprehensive and systematic way, design-based approaches to development regulations instill a common understanding of *how we build and why*. This is often best accomplished by focusing on a few

simple and crucial patterns important at each scale of planning and development:

- How does the pattern of street networks and open spaces shape the **context of the community**?
- How does the design of blocks, streetscapes, civic spaces and building types shape the **character of neighborhoods and districts**?
- How does the coordination of frontages, facades and sites **relate to the street and surrounding properties**?

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The Greeley development code already addresses many of these topics – although often in a reactive or ad hoc manner. It is evident that as the City adapted to meet the communities goals for better design, some of these issues have been addressed in isolation, only in specific contexts, or through strategies that are sometimes competing with other standards. Organizing a consistent approach to design in the development code can allow the City to address these important questions in a simple and systematic way, but in a way that better responds to the unique places identified in *Imagine Greeley.*

COMPREHENSIVE PLAN: *IMAGINE GREELEY*

A comprehensive plan is a general guide to future growth and development. It is long-range and all encompassing, and does not necessarily predetermine anything specific to development proposals. However, it does establish a crucial policy framework with which to manage future change through development and to coordinate many different development projects over time

Imagine Greeley Comprehensive Plan   *The plan is organized around Core Values, 10 Plan Elements, and a Growth Framework concept organizing the city according to different context areas.*

and across areas of the City. (See sidebar on page 92 of the Growth Framework in *Imagine Greeley*). Rather than simply "codify" the plan, the regulations must provide the City with the tools to best manage change, enable different options, and react to many circumstances that cannot be fully anticipated. *Imaging Greeley* is organized around ten primary goals, with objectives identified for each goal area:

- Economic Health and Diversification
- Education, Health and Human Services
- Growth & City Form
- Historic & Cultural Resources
- Housing
- Infrastructure
- Natural Resources & Open Lands
- Parks & Recreation
- Public Safety
- Transportation & Mobility.

The Growth Framework chapter of *Imagine Greeley* also recognizes five distinct contexts as "building blocks" for the community – Neighborhoods, Centers, Corridors, Areas, and Open Space & Natural Areas. There are policies under each that identify how the goals and objectives of the plan may be met in different ways in different parts of the community, setting the stage for more context-based approaches to the development code.

These elements of the comprehensive plan also align closely with the City Council's 3-Year Priorities, adopted in April 2020. These priorities are the Council's strategy to implement Vision 2040. The priorities impact physical development and the development code in the following key areas:
- Neighborhood policies to strengthen unique identities of neighborhoods and implement the Strategic Housing Plan;
- Implementing a "village concept" for all new development;
- Improving mobility – particularly bikes and trails, and better alignment of streetscape design with the Transportation Master Plan update;
- Water conservation, particularly as it relates to landscape and open space design; and
- Economic development, particularly as it relates to "place making" principles in the plan, and how different places become more

dynamic, resilient and adaptable through the approach to zoning districts and land uses.

For the purposes of this report, the Growth Framework, and the goals and objectives of the plan have been summarized into the following key themes and topics that are most directly connected to and reliant on the development code for implementation.

Productive Places
- Revitalize Downtown
- Dynamic Job Centers
- Walkable Destinations

Unique Neighborhoods
- Active Living + Walkable Patterns
- Mix of Housing Types
- Prioritize Infill

Valuable Public Realm
- Connected Networks: Trails + Streets
- Contextual Streetscape Design
- Tree-lined Streets
- Imbedded Open & Civic Spaces

Environmental Performance
- Water Wise Landscapes
- Renewable Energy + Energy Efficiency
- Protect Sensitive Areas

Usability
- Clarity: Organization & Format
- Efficient Procedures

Some of these themes are more directly impacted by development regulations than others. A section-by-section analysis of the impact of the development regulations on these themes and topics was conducted to support the general commentary of this report. A comment log documenting this analysis will be used by the consultant and staff throughout the project to track standards that are currently working well and that support the values goals and objectives of *Imagine Greeley*; those that aren't working well or conflict with the values, goals and objectives; and new strategies that need to be added.

City of Greeley Colorado
Greeley
DEVELOPMENT CODE UPDATE

BEST PRACTICES & EMERGING TRENDS

Cities rarely have the opportunity to take a step back, evaluate their long-term vision and explore the development code in a comprehensive manner. This is why so many codes have become complex, confusing, or even conflicting – a series of necessary and expedient amendments over time eventually end up compounding problems or creating codes that are very difficult to use. The last time the City of Greeley did a comprehensive update to the development code (1998), the planning profession had a different approach to regulations – one that emphasized land uses as the organizing element of codes. Codes typically were focused heavily on land uses, and mitigating perceived impacts between different uses and districts, and they lacked attention to urban design details, particularly relating to the "public realm" (streets and civic spaces). Updates to Greeley's code since this time reflect efforts to correct this and incorporate emerging practices of the profession into the code. Yet these amendments were placed within a code structure largely organized around practices and approaches with different philosophy.

This project provides that rare opportunity for a comprehensive and strategic look at the development code. It is a chance to restructure the code into a decision-making tool that reflects the City's values and priorities. It is important to strengthen the best elements of the current code, change things that are not working well, and incorporate new approaches to address Greeley's vision and goals. A number of best practices or emerging trends that were not prevalent in our community-building toolbox when Greeley's code was originally drafted or most recently updated should be considered. The topics in this section reflect new approaches that address many of the values, goals and objectives stated in Imagine Greeley.

COMPLETE STREETS

"Complete Streets" recognizes the essential role that street design plays in shaping the public spaces of our communities. Street design is not simply a transportation function and streetscapes are not merely aesthetic trappings on our streets – it sets the stage for how we engage and experience our entire community. Complete Street policies balance the critical planning, transportation, and urban design interests associated with street design, and *Imagine Greeley* recommends that complete street policies to be incorporated into the development code.

When incorporating complete street concepts into development codes, the following principles are helpful:
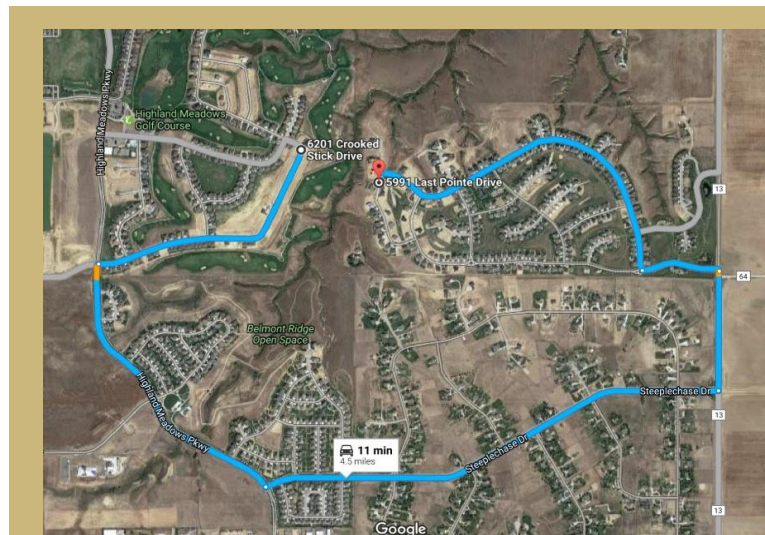
Connectivity: Windsor, CO *Lack of street connectivity can lead to inefficient patterns and make proximate things very distant.*

- **Start with systems, not streets**. Connectivity of the street network is essential to improve access and mobility, and it opens up the possibility for a far greater range of different street designs.
- **Prioritize different modes.** Multi-modal transportation means balancing different priorities in different areas. It does NOT mean simply put bike lanes or wider pedestrian facilities on every street. These token gestures to complete streets often result in streets that do not function well for any particular mode.
- **Design slow and shady streets**. Slow speed streets with abundant street tree canopies create the most value for the community. The majority of streets should be designed on this principle, particularly if you have a connected network.
- **Proximity is the first step in transportation planning.** The proximity of common trip origins and destinations, and connections provided by a network can result in fewer trips, shorter trips, and more alternative routes. These attributes of the transportation system result in slower traffic being accepted, and lead to safer streets with better options integrating different modes into street design. In a complete street system, very few street designs should prioritize traffic volumes and speeds above all other interests.
- **Speed and speed differential is the biggest factor in safety.** When considering pedestrian and bicycle transportation (rather than recreation), design speeds should guide what type of facility goes on what street. The greater the speed differential the greater the need for dedicated space and physical separation, and the lower the speed differential the more modes can be merged.
- **Different types for different contexts.** Street design should support the urban design principles and the uses of a particular place. Therefore, the street designs should transition along with changes in these characteristics - often on a block-by-block basis. So while "arterial," "collector," and "local" may describe the function of an entire street *within the system*, it should not answer all of the questions on the design of a street on a particular *block or segment*.
- **Resources and Guides.** The National Association of City Transportation Officials

Neighborhood Street: Longmont, CO - *Street trees and on-street parking are key features of slow, safe and comfortable neighborhood streets.*

Pedestrian Street: Westminster, CO – *Generous sidewalks, parking, tree-wells and storefronts shape inviting and walkable streets for commercial areas*

(NACTO) has the best guidance on all of these issues, and provides engineering, planning and urban design insights into "Complete Street" design. It is a more appropriate and more specific guide for city streets than the American Association of State Highway Transportation Officials (AASHTO) guide, which is often used by cities and cited in development codes.

The Greeley Development code includes "options" for street design within different zoning districts that begin to address many of these principles. However, a more explicit and systematic approach to street design needs to be integrated into the subdivision regulations.

MISSING MIDDLE HOUSING

"Missing Middle Housing" is a concept that focuses neighborhood planning and design on a wide range of housing types, including small-scale, multi-unit building, small lot detached houses (1.500 s.f. to 4,000 s.f.), and other small format housing. These types were once common and still are present in most communities, but have been forced out by conventional zoning. It exposes the fact that "density" is an abstract number that tells us very little about the scale, form or even intensity of a project, and therefore nothing to help us evaluate the compatibility of housing within its context. As a result, codes based on uses (single-family, two-family, and multi-family) and density (units per acre) have zoned out or made "missing" many of these valuable housing options. Regulating by building types – such as detached house, duplex, row house, multi-unit house, stacked flats, walk-up apartment, or cottage courts – replaces density as a measure of compatibility. The scale and format of these buildings – and perhaps variations within a type – are the focus of the standards as opposed the use or density. Although these housing types are very small scale, they can achieve densities above what may typically be allowed yet produce more predictable and compatible outcomes.

Imagine Greeley – like most cities with recent comprehensive a plans – identifies the communities need for more housing options. The Greeley development code is not heavily based on density (though there are some references to :"gross density" in intent statements and the plan), but it does rely on uses and broad lot, height, and open space standards to regulate single-family, two-family and multi-family uses. Many of these standards will preclude certain formats of small-scale and multi-unit housing and correspondingly push any multi-family buildings to larger-scale projects that are difficult to integrate into neighborhood settings.

The following benefits result from including a wide range of "missing middle" building types in the various residential zoning districts of the development code:

- ▪ ***More Housing Options.*** Fill the gap between suburban subdivision lots and duplexes, and between duplexes and large multi-family complexes.
- ▪ ***Targeted and Strategic Density.*** Put people in proximity to businesses, services

Row House Courtyard: Fort Collins, CO

Small Apartment: Longmont, CO

and amenities (walkable or short drive) and support the businesses, services and amenities with a critical mass of resources (customers, tax dollars and user fees).

- ▪ *Human Scale Patterns.* Small-scale buildings, smaller lots, and less car-oriented patterns can allow many different projects to improve neighborhood character and improve access to daily needs and activities.
- ▪ *Diversity Can Equal Affordability ... Eventually.* While new housing is never the best option for market-rate affordability, new housing can and should diversify the overall housing stock – in terms of type, format, location/context, size, and age/condition. A wide range of options under all of these categories will produce a more robust, and therefore more affordable housing stock.

A core value of *Imagine Greeley* is thriving, connected, and inclusive neighborhoods. The five neighborhood types in *Imagine Greeley* set the foundation for considering a broader range of housing / building types in all of these contexts.

WALKABILITY + ACTIVE LIVING

Plans and codes typically strive for improved walkability, and in general promote lifestyles that are not as tied to the automobile for living, working, leisure, and recreation – "active living." These general goals have received increasing attention and priority as communities realize there are both quality of life and economic benefits to improved walkability and active living. Compact, diverse, and walkable places are more resilient amidst shifts in our economy, more attractive to residents and investors, and are more productive considering our limited land and infrastructure capacity. They make good business sense, and they help diversify and make your community unique, as no two places need to be the same. In fact, the diversity, and the ability to transition and adapt to evolving needs only strengthen these types of places as economic generators for the community.

Despite this, our policies and codes – and even generally market trends amidst our framework of more recent development patterns – can make it more difficult to build walkable places. However, all walkable places share a few common and essential traits, and best practices integrate all

Walkability + Active Living: Denver, CO - *Slow, connected and comfortable streets promote biking and walking, particularly in development patterns with a variety of uses.*

of these into our development policies and codes:

- ▪ *Compact* – a clear destination, supported by many supporting uses within walking distance (typically ½ mile or less).
- ▪ *Connected* – short blocks and many ways to get there (typically 200 to 600 feet).
- ▪ *Diverse* – a wide range of smaller-scale uses creates many reasons to be there (typically 10 to 20 different things per block).
- ▪ *Active* – public and private gathering places designed to invite people to linger (at least 1 per each block face).
- ▪ *Human-scale* – streets, civic space, frontages, and buildings with details that are interesting at 2 mph – the walkable pace.

The Greeley Development code will need to emphasize and strengthen these traits in some targeted future development areas – the "centers" in the future growth framework – in order to meet the core values of proactive, progressive and balanced economic development; connected and inclusive neighborhoods; and sustainable growth and development patterns.

FRONTAGE DESIGN

Frontages are the interface of public and private spaces. The design of this space is one of the

Detached House – Terrace Frontage: Longmont, CO

Detached House – Neighborhood Frontage: Windsor, CO

Detached House – Suburban Frontage: Windsor, CO

most important factors for how people experience and perceive the community. Frontage design involves many nuances.

- It starts with the public streetscape, and whether that is an inviting or hostile space for people;
- It considers access at a variety of scales (district, block, shared or lot), and a variety of modes (in a car, on a bicycle or by foot);
- It addresses building placement, and how the mass shapes the public and/or private spaces between the building and street; and
- It includes the facade design and whether it activates these spaces or whether it creates dead space or blank walls.

Essentially careful design of all of these elements will determine how well projects transition from public space to private areas on a project basis, and how well the design of this space is calibrated to a particular context. Cumulatively across many lots, frontage design defines the character of each street, block or district of your community.

The appropriate frontage could be dependent on a particular building type, or it can be used to make a range of building types more compatible on a block; it can be based on the specific lot width, and whether a close building relationship or distant relationship is appropriate; or it can be based on a particular street, and whether it has pedestrian amenities or is a traffic-mover.

Under conventional codes this is generically defined as a minimum setback, it is typically set uniformly across an entire zoning district, and some basic landscape or buffer standards may be used to mitigate any negative consequences from this simple or undefined approach. However, a more careful study of the context of most communities can begin to reveal some common patterns or "typologies" of how buildings and sites relate to streets. Documenting these as "frontage types" can be an important tool for identifying more context-appropriate development standards.

The Greeley Development code already begins to do this through the options to available to the various base setback standards of the zoning district. This concept should be explored further, refined and simplified, and some specific frontage types should be developed for general

applicability throughout the city based on some context criteria. Improving the design of frontages, appropriate to the context will help Greeley achieve the core values of distinctive character, exceptional community benefits, and a safe and healthy community.

FORM V. USE

The *Imagine Greeley* Growth Framework reaffirms the community's on-going desire to see a greater mix of uses - within the community, within centers and corridors, and on specific blocks, sites, or even buildings. Greeley's development code and zoning districts are arranged primarily around land use as the distinguishing element between districts and projects. The use table includes a long list of sometimes very specific uses. This approach can lead to distinguishing between uses where there is no real difference and it also allow great differences in potential outcomes even when the use is the same

Development codes that become overly prescriptive towards allowed uses limit a city's ability to respond to markets, trends and consumer demand. It can also limit the ability to create dynamic, vital and social places. However, it is not as simple as saying we allow "mixed use" – there are too many variables that will get distorted and not meet the community's true goals.

Communities with historic downtowns, like Greeley, often find their development code does not reflect the traditional development patterns of their downtown. When it comes time for reinvestment, infill projects are difficult according to the code, or worse, projects that meet the code erode the existing building patterns and character and detract from what is typically the heart of the community. Additionally building new "nodes" of walkable centers to support neighborhoods is difficult as well.

As communities transition from conventional codes that are arranged primarily on land use, new strategies are needed to address the "compatibility" of development. Form-based codes – or codes that shift the emphasis of our regulations from "use" to "form" (building types, format, and scale) are an innovation that helps with this challenge. Form-based codes come in

Form v. Use: St. Paul, MN - This building type is a small commercial building with a storefront frontage, but the use type is Automotive Services, which is generally difficult to integrate into neighborhood centers. However, in this case the form dictates compatibility more than the use.

a variety of formats – from simple to sophisticated, but they typically are based on the following essential attributes:

- *Street Types.* Key different standards off the design of the "public realm" and primarily streets. (See Complete Streets section of Best Practices)
- *Frontage Types.* Focus on how a site and building relate to the block and street. (See Frontage Design section of Best Practices)).
- *Building Types.* Regulate the scale, footprint, and orientation of buildings rather than strictly land use or minimum setbacks.

These standards go a long way to assuring the compatibility of different projects, and can allow less emphasis on regulating uses. Many of the concerns about the impact or compatibility of different land uses, and the assumptions we must make about a use, can be viewed with a new perspective. Rather than predict impacts from a specific type or category of use, we instead can consider a more general approach to uses based on the following:

- **Scale**. The square footage of the use and/or footprint of a typical formats or buildings.
- **Form / Format**. How is the building situated and how does it relate to the lot and the surroundings?
- **Operations.** How does the use function with its surroundings, how do people access it, what are the hours of operations, how do other services support the use?
- **Performance**. What are the intensity, performance standards, or mitigating design elements on a site, which could be applicable to any use?

Many of these "form" elements are addressed in the Greeley development code in an indirect way, or as options and exceptions. Additionally, some standards are geared to the scale of the building, and the retail uses are particularly refined by scale. However, in general there are large ranges before different standards kick in and it is not clear how the scale of non-retail uses are affected. A coordinated approach to standards for different building types and form can allow the regulations on uses to be relaxed or generalized based on some of the above parameters. This will help with the core values of proactive, progressive and balanced economic development; distinctive character; and sustainable growth and development patterns.

RIGHT-SIZE PARKING

Parking reform is a common topic of development code updates, as communities grow more concerned with large areas of unproductive land dedicated to un-used surface parking. This has negative impacts on economic development, infrastructure efficiency, walkability, community Imagine, and the environment (storm water runoff and heat island impacts).

Part of the growing awareness of parking impacts is understanding that the public interest in regulating for parking is not to ensure that everyone always has enough access to free parking; rather it is to minimize the impacts parking and access may have on the streets and adjacent property. In this light – too much parking is as big or bigger problem than too little.

In "right sizing" parking standards to match our land use, transportation, and urban design policies, the following strategies should be considered:

- **Reduce minimum requirements** or have more exceptions, particularly for small uses, sites or buildings – or in some cases offer complete exemptions.
- **Consider maximum parking limits**, or maximums that require additional design mitigation.
- **Improve landscape and design** requirements to reduce aesthetic and environmental impacts.
- **Tier design and location** requirements to the scale of the parking area, so smaller, more dispersed and subtle parking areas can occur.
- **Give credits** for situations where alternative transportation, on-street parking, or adjacent overflow or contingency parking exists.

Parking: Brighton, CO – *Oversized parking result in inefficient land uses, have negative impacts on streetscapes, and can have environmental consequences such as heat island effects, increased runoff and poor water quality.*

▪ ***Promote sharing*** between multiple sites – both location sharing (cumulative amounts) and peak time sharing (reduced amounts).

Right-sizing parking standards is necessary to implement the different patterns of the "building blocks" identified in the Growth Framework. Many of these strategies are in the existing development code such as additional mitigation for over-sized parking, exemptions in downtown, and some credits.   These strategies will need to be clarified and emphasized as the code is reorganized. Ultimately, this will help achieve the core values of proactive, progressive and balanced economic development; distinctive character; and sustainable growth and development patterns.

SUMMARY OF BEST PRACTICE STRATEGIES

The following strategies summarize how these best practices can apply to the Greeley development code.

- Use the design of streets and open spaces to shape and establish the character of different places.
- Consider multi-modal transportation policies, rather than prioritize vehicle movement and access over all other interests.
- Reduce the use of abstract standards such as density, open space percentages, or minimum setbacks, in exchange for more defined typologies of many different components of city- and neighborhood-building.
- Simplify the approach to uses, and reorganize the use table based on scale, format, and intensity, so that more uses can mix within certain districts.
- Allow a wider range of housing types to integrate into neighborhoods, provided they follow similar neighborhood patterns and compatible building formats.
- Use site design, lot and building frontages, and streetscapes to bring projects together, rather than assuming all projects benefit by separation or isolation.
- Establish context-appropriate standards for things like landscape, parking, access, buffers and screening to emphasize distinct places within the City.
- Simplify the code standards, but improve intent statements and decision criteria to allow better application and administration of standards.
- Provide a user-friendly format, where text is converted to tables and graphics wherever possible.
- Promote flexibility, but only through specific process and criteria, and based on clear and defined outcomes and objectives.

IMAGINE GREELEY POLICIES & PRIORITIES

The update to Greeley's development codes seeks to better implement the recent comprehensive plan – Imagine Greeley (adopted February 6, 2018). A thorough analysis of the plan and some of the goals, objectives and policies related to the plan was conducted. They are summarized into the following key themes discussed in this section – Usability; Productive Places; Unique Neighborhoods; Valuable Public Realm; and Environmental Performance. These themes and some specific topics for each theme, were used for a section-by-section evaluation of how well the current development code is aligned with the plan. This section provides some of the details from that review.

USABILITY

One of the primary objectives of most code updates is to make the development code easier to understand and administer, and it is the first goal listed in the City's RFP for the code update. There are two key aspects to a user-friendly development code: clarity in the way standards are organized and presented; and improving expectations in the application process.

Clarity: Organization & Format

Development codes are legal documents that must be implemented, enforced, and occasionally defended in court. Therefore, it is important that they are legally and technically correct. It is common for development codes to be filled with legalese and highly technical jargon giving it an air of authority. However, unlike other generally applicable laws, the development codes are the City's laws that are most likely to be encountered by a wide variety of citizens and stakeholders every day – neighbors, property owners, developers, designers, consultants, various city departments, and commissions all use the development code more often than any other city code. It is important that the code be as clear and user-friendly as possible. Ultimately, this also makes the code easier to implement, enforce, and defend in court if necessary.

Some key organization and format strategies to integrate into the Greeley Development to make it clearer include:

- Use a **"plain language"** drafting style, avoiding legalese, planning jargon, and unnecessary words.
- Use **graphics and tables** to support or replace text.
- Use **purpose and intent statements** providing clear ties to the comprehensive plan and improving the administration and interpretation of regulations.
- Build in **flexibility**, but only through clear, consistent and accurate guidance and **criteria**.
- Develop a **logical framework and structure** for all regulations. This avoids repeating the same or similar standards throughout the code, a practice that adds length, confusion, and ultimately introduces conflicts in the code. It also makes it easier for future amendments and updates to be integrated and ensures the regulations maintain a long shelf life.

Our independent review consistently gave the Greeley Development Code low marks in the Clarity category, which is typical of codes that have not had a comprehensive update for a long time. Greeley Development Code exhibits some disorganization, redundancy, and potential the conflicts or interpretation issues due to cumulative and disjointed amendments over the years.

Efficient Procedures

A "user-friendly" development code establishes expectations for anyone who may be involved in the development process. This is true even if

the standards are high and exacting in some cases, and even if the procedures are thorough and intensive in some cases. Clear expectations can make a complex or comprehensive code "user friendly." Similarly, minimal standards and quick procedures, but with low expectations is not necessarily "user friendly," and will end up being equally problematic.

Organizing procedures in the development code around the following essential components for each type of application can raise expectations:

- **Intent.** What is the application used for and what is the objective of a review process?
- **Applicability.** What development activities trigger an application process?
- **Submittals.** What is required and at what point in the process is it required?
- **Public Engagement.** What is the role of the public in this process and how should their involvement affect the decision? (And it is different for different types of applications.)
- **Process and Timeline.** What are key benchmarks, meetings, required notice, and who will review the application and when?
- **Decision Criteria**. How will reviewers who are recommending or deciding on the application evaluate it; what specific objectives should an application emphasize?
- **Effect of Decision**. How does an applicant proceed after a decision – if approved, is there a next step or can the application proceed to permits; if denied, is there an appeal process or chance to amend or correct an application?

All of these questions should be answered in a simple and well-organized procedures section. Organizing the procedures section around the elements that are common to all procedures and then the elements that are specific to a particular application can simplify the code and avoid repeating long and technical sections.

The Greeley Code has procedures located in several sections of the code, often paired with the particular standards they administer. While this may seem convenient, it adds lengthen to the code and disrupts the flow of substantive content. It also presents the opportunity for conflict and interpretation issues. A well-organized procedure section is crucial to raising

expectations for potential applicants and decision makers, and it is informative to others who are invited to engage in the process.

Options to Consider
Specific options to consider to improve the usability of the code include:

- Arrange the table of contents in sequential order – a first step in the development process to the last, and from large scale / community wide patterns to small-scale / site specific standards.
- Establish a common structure to chapters, sections, and subsections, and determine where topics require new chapters, sections, or subsections are needed to maintain this structures. Currently some sub-sections are very long and in-depth, where in other instances chapters or sections may be very brief, showing an inconsistency in structure.
- Group similar topics together – there are many instances of the same or similar standards being addressed in multiple sections of the regulations.
- Consolidate all definitions in a single section. Remove "regulations" from the definitions, and do not define words that have a "plain and ordinary meaning." Locate the definitions near the back of the code to avoid disruption flow of substantive content.
- Establish a hierarchy of guiding language – "Purposes" are broad goals related to the City's authority; "Intent Statements" are specific goals or general outcomes for a particular section or district; and "Design Objectives" are intended results or performance of specific standards. Each should be drafted with clarity.
- Many very long sections of text can be converted to simple tables that clearly identify the operative standards, and some existing tables can be simplified.
- Organize all procedures into one section, and consolidate duplicative procedures in a single section applicable to all regulations.
- Remove long sections of highly detailed submittal requirements. Instead, delegate to the Director the authority to create submittal forms, and a process to administratively update and adjust forms.

- Update the procedures table and present in a more legible format with pertinent summary information.

- Clarify which applications require a "public hearing," where the public has a right to speak which becomes part of the record on which a the decisions is to be made, as opposed to "public meetings" where the public may speak at the chairs option, but it is generally not part of the record or decision-making criteria.

- Emphasize distinct decision-making criteria for each type of application.

- Specify the "effect of decision" for each type of application, and coordinate with the Colorado Vested Property Rights law.

- Improve options for alternative compliance and administrative exceptions to the standards; tie these to specific intent statement, design objectives, or decision criteria.

- In association with improved design standards, determine which applications and decisions are routine and should be administered by staff as opposed to those that may involve more interpretation or discretion and should be elevated to Planning Commission.

PRODUCTIVE PLACES

Two core values of *Imagine Greeley* are "proactive, progressive, and balanced economic development" and "sustainable patterns of growth and development." Communities achieve this by strengthening the attraction and productivity of existing places, and ensuring that there is a diversity in the types of places so they can accommodate and adapt to new and emerging opportunities. The Greeley development code was reviewed for three key aspects of these core values – Revitalize Downtown, Dynamic Job Centers, and Walkable Destinations.

Revitalize Downtown

Downtown is noted as the historic, civic, and social heart of Greeley. and it reflects traditional development patterns that pre-date conventional zoning. Many of *Imagine Greeley's* policies and principles promote replicating these patterns and guarding against incompatible projects that

could erode this character. There are two primary threats through new development – car-oriented uses and site design, and large-scale projects that disrupt human scale and fine-grained diversity of uses that people experience at the street level.

Simple principles for sensitive infill and redevelopment for small downtowns can best be characterized by David Sucher' book, *City Comforts - How to Build and Urban Village*:

- ***Build to the Street***. Buildings shape important public spaces, and particularly create enclosure for streetscapes. When buildings do not frame the streets, alternatives such as social spaces, landscape or "street walls" serve this purpose.

- ***Create Permeable Facades***. Buildings are designed to promote activity, and create actual or perceived connections between uses and the public realm. Also, when done with many different uses and buildings along a block this creates fine-grained diversity and human scale.

- ***Hide / Minimize the Parking.*** Parking is primarily on-street; any site specific parking is behind buildings or located at remote locations. All of this is possible when parking requirements are reduced or eliminated.

Downtown Streetscape, Salida CO - A variety of small-scale uses create many reasons to be there, and are the key to productive and active downtowns and neighborhood centers.

Unusually, there is no specific zoning district in the Greeley development code for Downtown. Instead, it applies the most intense commercial district – C-H, but then applies the "General Improvement District" overlay and "Entertainment District" overlay to account for the unique scale, pattern and design of downtown. The C-H district base standards are generally inappropriate for this area, and will actually damage the character of Downtown. Therefore the GID attempts to reconcile this by eliminating required setbacks, parking, or other anti-urban standards that ordinarily apply to C-H. (The Entertainment District overlay merely relaxes rules for special events in public and civic space). The walkable, small-town character is not well represented in the GID overlay. While it may enable some of the traditional development patterns reflected in downtown, it does so by being less restrictive on the setbacks and buffers common to conventional zoning. Therefore, it allows development consistent with older patterns but it also does not ensure it, and the area is exposed to investment inconsistent with the vision for downtown. The Infill Area Design standards offer some oversight and control, but this introduces a potentially cumbersome process and is based on general and somewhat vague "compatibility" criteria. Essentially the two primary threats – car-oriented uses and site design, and large-scale projects, are allowed as equally as traditional, small-scale urban patterns.

Dynamic Job Centers
Imagine Greeley provides opportunities for job-creating uses in a wide variety of formats and contexts. The Growth Framework include: Corridors, Centers, the Mixed-use High Intensity Area, and Employment & Industrial Areas all offer opportunity for significant job growth, and all of them call for accommodating a wide range of compatible and supporting uses. Several of these are also aiming to achieve a walkable and bikable pattern and context, as most areas concentrated with employment options benefit from these attributes by being accessible and offering amenities that employers capitalize on; however, others are reserved for employment and industry that is difficult to integrate in with other patterns or supporting uses. Employment opportunities can be concentrated the following contexts:

- *Walkable, mixed-use formats* – Downtown and Neighborhood Centers
- *Larger-scale, but walkable or multi-modal formats* – Mixed-use areas and corridors, and Regional Centers.
- *High-intensity employment formats* - Employment and industrial areas

Most of the zoning districts appropriate for the above distinct patterns allow job-generating uses, as well as a mix of potentially supporting uses. The standards are weakest at creating distinctions between the development patterns, scale and format, and urban design attributes of these different contexts. The plan also notes that the nature of employment intensive uses – and particular industrial uses, has changed with the economy and technology. The Greeley code has three different industrial uses, based on scale and intensity, while only having two commercial districts. In addition to the development pattern and urban design qualities being upgraded, some overlap in the uses and development standards between these districts is likely necessary to create dynamic job centers called for in the plan.

Walkable Destinations
An important building block of the *Imagine Greeley* Growth framework is "centers," described as concentrated nodes of activity. The plan identifies two types of centers in addition to downtown – regional and neighborhoods. The neighborhood centers are far more prominent and dispersed throughout the community to provide good access for all residents to a neighborhood center.

Although the centers are different scale and intensity, all three call for:
- Developing or strengthening *walkable patterns*;
- Promoting a greater *mix of uses and activity*; and
- Incorporate *more housing* into and around the centers.

Therefore, the attributes of walkable places identified in the best practices – Compact, Connected, Diverse, Active, and Human-scale – will be important to implement more walkable places throughout Greeley.

The C-L district is the most likely district to implement the neighborhood center pattern, and the use table begins to refine several uses by the scale of use (particularly retail). In general, it is intended for the type of small scale and mixed use activity envisioned in the plan. As mentioned in other sections, the code needs to be strengthened in terms of street design, connectivity, and housing options that are crucial to creating the context for neighborhood centers. These attributes also need to be carried into the centers, and greater attention should be paid to the scale and format of uses, in addition to the mix of uses permitted. Other commercial districts lack important attributes of walkable places and attempt to implement them with options or overlay and infill exceptions.

Options to Consider

Specific options to consider that can implement more productive places through the code include:

- Consider converting the GID overlay to a form-based code, using street types, building types and civic space types as key standards to future development, and making more distinctions within sub-areas or on a block-by-block basis with default criteria or a regulating plan.
- Investigate a range of form-based strategies for all commercial districts (See Form v. Use best practice) and allow reduce the emphasis on particular uses, particularly for downtown, the centers and mixed-use areas.
- Expand the focus on the scale of uses in the use table and apply this strategy to many categories of uses (beyond just retail).
- Improve streetscapes and open spaces to promote walkability and social activity in the street.
- Review the approach to uses to ensure that a flexible approach can accommodate emerging fields – whether retail, service, office, institutional, or industrial.
- Consider using one of the three industrial districts to re-purpose to include more "placemaking attributes", while focusing on a broad range of employment and light-industrial uses.
- Promote a healthy concentration of a wide variety of job-generating uses in the centers and mixed-use areas to be more efficient

with infrastructure investments, and have spin-off economic development effects
- Create more refinement in industrial uses based on scale, intensity and format, so that more job-creating uses can be located in centers and mixed use areas.
- Create more explicit distinctions (possibly based on the building blocks / Growth Framework) between the development standards and patterns of all non-residential districts; the C-L, C-H, I-L, I-M, and I-H essentially have the same standards and the only significant differences are through the uses allowed.

UNIQUE NEIGHBORHOODS

A core value of *Imagine Greeley* is "thriving, connected, and inclusive neighborhoods in all the city." The Housing goals and objectives emphasize this with a more refined approach to different housing types and price points. The 2019 Strategic Housing Plan also outlines nine major strategies addressing mix of housing, affordability, and more specific plans and strategies to improve choices. In association with other goals in the plan and for the purposes of the code review these were summarized into the topics Active Living + Walkable Patterns; Housing Options; and Prioritize Infill.

Active Living + Walkable Patterns

Walkable neighborhoods that promote active living can occur in variety of contexts, at different intensities and with unique character. However, they all exhibit some essential traits.
- *Focal Point* – A destination within walking distance. This could be a commercial center, an institutional anchor, or civic and community gathering place – or ideally all three.
- *Connected* – Short blocks (typically 300 to 700), or in situations or contexts were less connectivity is appropriate, trails and passages providing human connections at these intervals.
- *Diversity* - A variety of housing types, sizes, and formats supports a compact format, but it also insures that the neighborhood remains active and vital, meeting the needs of many different people.
- *Slow, Shady Streets* – The majority of streets should be designed for slow speeds

Apartment Courtyard: Loveland, CO

Detached House – Courtyard: Fort Collins, CO

– under 20 mph, and provide comfort and interest though street trees.

▪ ***Civic Sites*** – A variety of public, common and private spaces throughout the neighborhood provide gathering points that offer people the option for short walks, and help propel people to destinations for longer walks.

As noted in other sections, the "pubic realm" standards need to be improved in terms of connectivity and street design. The options in the code for different street design are perhaps the strongest for neighborhood streets, with some of the options presenting good prototypes for the slow, shady streets. These should be

emphasized and codified as the default standard for most neighborhood streets. Options to promote a greater diversity of housing types and to create walkable destinations are discussed in other sections.

Housing Options

As noted in the Missing Middle best practice, housing options is a key goal of most cities. Not only because it is a quality of great, life-long neighborhoods, but demographic shifts are calling for new options. Diversifying housing will help all communities adapt to shifts in demographics over time. This is both for demographic reasons as people transition through different housing needs, and for affordability reasons as more options allows supply at different price points. Cities with a robust housing stock provide options:

▪ Different types of neighborhoods in different contexts.
▪ Different housing types within neighborhoods.
▪ Differences in size, format, amenity, age, condition and price points.

Some of these factors are not a function of the development code, but influenced most by the housing market, the development industry, and time – it takes consistent effort to build, nurture, and maintain a robust housing market. However the development code needs to present these options in a refined manner in order to help the market and industry respond to specific segments over time.

The Greeley development code has three primary districts for all housing options with basic use, lot, and setback standards. Housing options come either from the wide range of outcomes that could meet the standards, or from design options that are codified for different situations. The multi-family district is particularly non-descript as there are a wide range of housing formats that qualify as "multi-family", but only a single lot standard and density guide to implement these.

The code also has many provisions that suggest individual neighborhoods take ownership in their own unique design values and goals. This is a great strategy to promote uniqueness and diversity, but it can be difficult to administer over

time if that task is up to city staff. Additionally some neighborhoods may feel like they are starting from scratch when given the opportunity to act on this, and this can limit meaningful action.

Prioritize Infill

Infill development is a challenge. It is typically at a scale that is harder to finance and typically has more constraints than "greenfield" development. Yet promoting infill is crucial to many important city goals – it capitalizes on underutilized infrastructure, it strengthens tax bases, it contributes to housing options – and in particular is a crucial part of the options being older neighborhoods or older homes. Addressing the challenges to infill often requires finding subtle ways to generate new revenue to invest in existing property or buildings.

- Ensure there are as few barriers as possible to rehabilitation of existing homes.
- Identify and codify the patterns of blocks, lots, frontages, and housing types of existing neighborhoods.
- Consider ways to leverage new development with additional units, including multi-unit houses, accessory dwelling units, and courtyard patterns with multiple units on one or more lots.

The Greeley development code identifies infill and suggests some strategies that may promote infill. However all infill sites require design review, and what triggers this, the process and what standards apply is not clear. This can pose a procedural barrier and result in lower expectations for potential infill projects. Additionally, the infill options for the residential districts uses all of the same base district lot and development standards, and present no flexibility or incentives to deal with existing patterns or potential constraints. The infill area design standards are aimed specifically at compatibility criteria, and may to completely address other potential barriers to infill and rehabilitation.

Options to Consider

Specific options to consider that can promote and strengthen unique neighborhoods through the code include:

- Promote "public realm" design – the character of streets, trails, open space, and community/civic gathering places as a way to emphasize distinct neighborhoods.
- Simplify and clarify the options currently available to the three primary residential building types.
- Explore a "building type" approach where the standards focus more specifically on how the building, lot and frontage fit into the context, and less on the use or density.
- Expand options of types through "missing middle" housing – particularly for the multi-family code option and the higher end of missing middle housing.
- Remove the 4-unit limit on townhomes and allow buildings with up to 12 units; further create options for narrower-width row houses.
- Create new small lot options for detached 1 to 3 unit buildings that can use lower-cost strategies of the International Residential Code.
- Consider at least one district (or add a new one) for a greater mix of housing types, including single-family houses and small-scale, multi-unit buildings.
- Improve the infill standards – particularly looking for ways to get additional units on existing lots or buildings, leverage the lower end of "missing middle housing types," and create courtyard patterns out of 1 to 3 lots.
- Consider what distinctions are needed for the "legacy urban" and "downtown" neighborhoods compared to new walkable neighborhoods.
- Identify a few basic neighborhood design patterns and elements to codify for all neighborhoods to create consistency in approaches and content, but allow neighborhoods to vary details between them.
- Investigate ways to improve the MH (mobile home parks) district, promote more "small-format" housing, and better integrate these types of projects into the community.
- Clarify "alternative compliance" standards and take a more comprehensive approach to the infill area design standards with pre-

approved patterns and building types that address common infill situations.

VALUABLE PUBLIC REALM

The "public realm" is an urban design term often described as the spaces between buildings that people perceive and experience on a regular basis. It includes public, common, and private spaces. The majority of this space consists of streets, rights-of-way, and open spaces, and to a lesser extent extensions of these areas on private lots.

In conventional plans and development codes, this space often considered only from a functional perspective, and not an urban design perspective. The Transportation section *Imagine Greeley* exhibits this to some extent with goals and objectives for streets. However, in context with the core values of the plan, and other goals for housing, open spaces, community character, and mixed use centers, it is clear that designing a valuable public realm a fundamental principle of *Imagine Greeley.*

Connected Networks: Trails + Streets
The network of streets establishes the majority of the public realm. It is estimated in a typical community this reflects between 25% to 35% of the total land area of the city. Designing this space effectively means you effectively design nearly one-third of the city. When leveraged with Greeley's existing and planned trail system, a very substantial portion of city design will include the street and trail systems.

While not all of this system will be implemented or changed through the development code (and in infill areas very little of it), the development code is still a good place to present a unified and coordinated approach and standards for different components of the system.

Connectivity will determine two crucial things that are important throughout the *Imagine Greeley* – proximity and options. Connected networks mean that more things are proximate to other things; and connected networks mean there are more options – in terms of routes and modes of travel – to get to different places. Therefore, connectivity is not simply about

transportation. It impacts nearly every goal of the comprehensive plan.

Some rules of thumb on connectivity, which can be coordinated with the different contexts and

Rustic Trail: Cherry Hills Village, CO

Neighborhood Passage: Denver, CO

The design and context of open spaces can shape the character of an area.

building blocks in the Growth Framework of *Imagine Greeley* are:

- *Walkable Centers* – 200' to 500' blocks; 2 to 5 acres.
- *Walkable Neighborhoods* – 250' to 700' blocks; 4 to 7 acres
- *Accessible Edges / Exceptions* – 400' to 1000' blocks; 6 to 10 acres.
- *Remote / Disconnected areas* – 1000'+ blocks; 10+ acres.

Greeley's historic grid is based on an approximately 450' by 450' block (4.6 acres), with variations up and down based on the area, other intervening patterns, or different access and lot arrangements. This provides great access and a wide variety of street types throughout most of the community. However, the development code only addresses connectivity at a very broad scale – 1,320' blocks is the threshold, resulting in blocks over 10 acres or as large as 40 acres in the extreme. This reinforces a suburban pattern of the "arterial grid", and without further refinement, it will compromise most of *Imagine Greeley's* development, transportation, and community design goals. The regulations do a good job of integrating the trail system into this, however more refinement – largely based on the context goals of the growth framework is needed.

Contextual Streetscape Design

One of the more important Transportation goals of *Imagine Greeley* states: "[Streetscapes] should vary depending on the modes accommodated, the surrounding land uses, and character of the area or neighborhood through which it passes." [Objective TM 1.3: Streetscape Design, page 84]   This means that despite the functional classification of the street, the design of the street should transition to defined its context.   As noted in the Complete Streets best practice, functional class addresses the overall function of the street in the network; however good streetscape design requires that options of different "street types" need to apply to different segments within the network. The components of street design and cross sections include the following elements to be designed differently for different contexts.

- *Travel Lanes* – 9' to 11', depending on desired speeds, and "yield flow" lanes for

low volume / low speed streets; and 12' only for very high speed streets.
- *Bicycle Facilities –* including combined flow for slow speed / low volume, dedicated or protected lanes for higher speed / higher volume, or off-street / spirited facilitates on priority routes
- **Curb Zones / Edges** – including dedicated on-street parking, occasional on-street parking, no parking, or rural shoulders.

Collector Street – Pedestrian: Arvada, CO

Collector Street – Standard: Arvada, CO

The design of streets can differ along segments to better support the development patterns, urban design character and uses for a specific area.

- **Amenity Areas** – 6' minimum for large street trees; 8' preferred; and 10' to 20'+ where social spaces are desired.
- **Sidewalks** – 5' minimum, 6' to 10' for important pedestrian routes, 12' to 20' where economic activity from pedestrians is desired, and 20' + (including amenity zone) where social spaces are desired); alternative options for very low intensity development patterns.

The Greeley development code includes street design standards in several different places, and the most specific standards are based primarily on the functional class of the street, and not the context in which it applies. Several of the zoning districts allow options that begin to address complete street policies, but they are not emphasized in the code and since they apply through zoning districts, it misses the chance to emphasize this as part of a system that spans across different projects and zoning districts.

Tree-Lined Streets

Imagine Greeley calls to reinforce Greeley's image as a Tree City, and recognizes that travel corridors are the primary means to do this. The building blocks in the Growth Framework also identify street trees as a key feature of distinct places. This is because street trees provide so many cumulative and reinforcing benefits:

- **Value** – Studies show the property with street trees sell and appraise higher than comparable property without trees.
- **Environment** – Street trees filter and infiltrate stormwater, clean the air, and reduce heat islands.
- **Comfort** – Street trees make walkable, human scale streets because they slow cars, provide shade, and create interest and enclosure.
- **Character** - Streets with trees are simply more attractive; they improve the community image and are one of the easiest things to add to transform development patterns and character.

Due to these benefits, street trees need to be treated as an essential part of infrastructure, not an amenity that is nice to get if you can. The development code has many street standards that prohibit street trees, or which do not allow them in the proper location to deliver the above
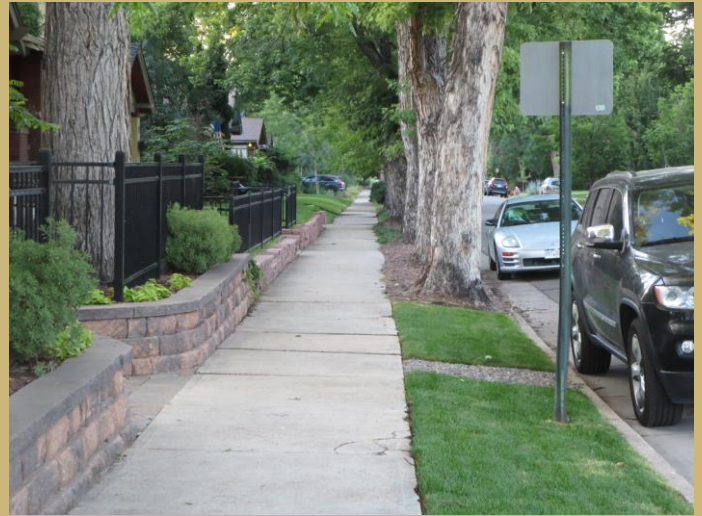
Street Trees, Denver CO

benefits. There are some sections that will allow them through options or alternatives, but these streets need to be codified as types. There are some site and landscape standards that require street trees at good intervals, however these need to be coordinated with street designs and street types to ensure they are located appropriately in the street cross section.

Embedded Open & Civic Spaces

Civic and recreational amenities are another important open space component of the public realm. One of the core values of Imagine Greely is "distinctive character and outstanding recreational and cultural amenities." Unlike natural areas – which do serve a secondary recreational function – these spaces are specifically designed and integrated into development to serve people. In this manner, it is not simply the amount of space that is important, but the design, function and where it is applied that has the biggest impact.

To accomplish this, development codes should include:

- **Variety of Types –** Create standards for a hierarchy of open spaces to best suit different contexts and functions – from spacious and open informal spaces such as a park or a trail to compact and designed formal spaces such as a plaza or courtyard.

- **Systems and Sites.** Integrate these standards into both the subdivision regulations (for the larger spaces associated with platting) and zoning and site design standards (for the smaller spaces incorporated into blocks and lots of specific projects).
- **Value Design.** A robust open space system should give credit for all of these spaces in the right context, regardless of the amount of space.
- **Focal Points.** Link spaces and locate them in prominent places, as part of a complete system and as an extension of the street network. This will , improve the accessibility of all lots and buildings to some component of the civic space system.

The Greeley code addresses open spaces in a number of ways – ecological areas for protection, spaces to serve recreation needs, buffers and landscape for aesthetic purposes. However, many of these topics are merged – which may be appropriate as open spaces can serve all of these multiple needs, even in the same space. However, the standards do not have a clear link to these sometimes disparate objectives, and are often boiled down to simply the percentage of a lot or a project. The site and building design standards present a robust range of "neighborhood identity features" that could be the basis of a more complete range of open space typologies. These should be integrated into the subdivision standards, and more directly influence the required open space percentages for sites, blocks, and projects.

Options to Consider

Specific options to consider to design a valuable public realm through the code include:

- Improve street network connectivity standards. These may differ for different contexts of the community.
- Create exceptions to the connectivity standards, and be clear on when and why they may apply. Require alternative connections in these situations.
- Implement street design types that go beyond simple functional classification standards, and provide design standards for different contexts, development patterns and land uses. Many of the design options

within the zoning districts begin to do this, however these should be codified as specific types to be applied across the entire street network.

- Integrate the planning and urban design standards for streets into the development code, but defer to the Street Design Criteria and Construction Specifications manual for engineering and construction.
- Use street types to provide cues for what level of development standards should be expected from the private sector based on the character and quality of the streetscape. (See Frontage Design best practice discussion.) In this manner, street networks and streetscapes are the coordinating elements that tie places and projects together.
- Consider ways that the historic 450' x 450' block could be re-subdivided to meet housing goals, particularly the idea of alley or "mews" loaded small lot housing.
- Require street trees as an essential part of each street section. Determine appropriate location and intervals for each cross-section, and determine acceptable alternative locations for rare situations or constrained right-of-way.
- Strengthen design standards for open space in the subdivision regulations. Currently these standards are largely procedural (not emphasizing open space design) and highly reliant on the amount of space rather than how these spaces shape the context.

ENVIRONMENTAL PERFORMANCE

Two core values of *Imagine Greeley* are "responsible stewardship of natural resources and the environment" and "world class water resources and management." Many of the other core values, goals and objectives of the plan support these principles, foremost by calling for a more compact, walkable community – through both infill and growth. This quality alone is one of the most environmentally responsible things a city can do – maximize its return on existing land and infrastructure investments, and do so in a way that promotes a quality of life without excessive driving. In addition, Greeley's context along the Front Range presents greater opportunities for better environmental

performance through development – one that incorporates water wise landscapes, renewable energy and energy efficiency, and protects sensitive areas.

Water Wise Landscapes

Water wise landscapes incorporate three related goals crucial to the Front Range – protect water resources from runoff and pollutants; reuse runoff for productive secondary uses; and plant low-water landscapes that are attractive and adaptive to the arid high-plains climate. These issues have gained greater prominence and importance as the Front Range experienced rapid growth. Many regional resources and best practices are now available, that were not as well understood the last time there was a comprehensive update to the Greeley development code.

Xeric Landscape: Centennial, CO

Some key principles of water wise landscapes include:

- **Filter and Infiltrate**. Treat rain as close to where it falls as possible, maximize small-scale site infiltration.
- **Integrate Systems.** Manage stormwater at the largest scale possible, rather than inefficient site-by-site storage. Design streets and open space systems to integrate large-scale solutions, so that other benefits form more compact development patterns are possible.
- **Right Plant / Right Place** . Use regionally appropriate plants, strategic plant locations to serve specific functions, and xeric design and management for maximum water efficiency.

The landscape standards in the Greeley development code reference best management practices for protection and conservation of water resources, administered by the water department. There is also a low water plant list in the appendix of the code, but use of these is only encouraged not required. Overall, the landscape standards rely on a fairly complicated point system so some of the priorities of these other policies tend to get lost in the content. Assuming these outside resources prioritize key principles of water wise landscapes, the standards can be administered to fulfill these goals and policies. Additionally, there are stormwater performance standards that emphasize integration into landscapes so these

areas perform multiple design purposes, rather than concentrated facilities strictly for stormwater. However, the xeric principles, use of non-potable water for irrigation, and integrated and context-based stormwater practices could have a stronger emphasis in the code provisions.

Renewable Energy + Energy Efficiency

Imagine Greeley recognizes the climate challenges that are increasingly facing municipalities. The plan notes that the City can lead by example through its own practices of being more efficient with energy use and what types of energy it consumes. Regardless of what the uncertain future presents with regard to energy use and the impacts of energy use, conservation and efficiency are prudent practices – particularly due to this uncertainty. In addition to the City's own practices, cities can impact these issues for the general population through development regulations in the following ways:

- Preparing for a range of **renewable energy options**, including at a site- or household-scale and at a district-scale, and as an accessory use or as a principle use.
- Enabling **low-energy development patterns**, primarily though a more walkable and bikeable community.
- Promoting **energy efficient building and landscape design**, either through

Renewable Energy - Centennial, CO

these areas, and allowing greater development in less-sensitive areas.

- **District / Neighborhood Block Scale**. Integrate extensions of these area into development by merging natural areas and open space systems with the pattern of streets, blocks and lots. This needs to first occur at the first stage of development – when large areas are subdivided of platted, but also be included opportunistically as smaller areas are platted or redeveloped..
- **Street / Site Scale.** Leverage each of the above scales with better options for context-appropriate site development, landscape and open space standards for new and infill development.

Each of these scales should emphasize how natural systems and environmental features can provide aesthetic, recreation, and ecological benefits that serve development.

A chapter of the Greeley development code is dedicated to protecting areas of ecological significance, based on a map that is coordinated with the Colorado Division of Wildlife. Provided this map is updated annually and administered efficiently as stated in the code, this section can fulfill the goals and objectives. The substantive standards are somewhat vague, and this section could be better coordinated with subdivision design standards and with standards for open spaces at a variety of scales. Overall this chapter seems like more of a negotiated process, so more clear standards and

requirements or ensuring that development standards do not inadvertently limit emerging practices.

The low-energy development patterns are more thoroughly discussed in the Unique Neighborhoods and Productive Places policy section. Beyond this, there is very little in the Greeley development code addressing renewable energy or energy efficiency. Some of the site and landscape standards imply locating plants for the greatest ecological benefit, but things like passive heating and cooling, reducing heat islands and other benefits from property site design are not strongly emphasized. Additionally provisions for renewable energy uses are lacking, unless these facilities are interpreted under other accessory, temporary, or principle uses.

Protect Sensitive Areas

The environmental goals and objectives of *Imagine Greeley* are closely related to the parks and recreation goals and objectives. (See Imbedded Open and Civic Spaces section of this report). Ensuring that these areas maintain their crucial ecological functions, but are also protected in a way that serves development requires a multi-layered strategy.

- **Regional / City-wide Scale.** Preserve and link sensitive areas and habitats and protect, edges by directing development away from

Conservation Area Windsor CO

indications on conserving or dedicating these areas can serve development or meet multiple design and development standards could improve implementation.

Options to Consider

Specific options to consider that can improve environmental performance through the code include:

- Coordinate the development code better with the City's Landscape Policy for Water Efficiency.

- Give a higher profile to requirements for xeric standards, limited irrigated turf areas, and use on non-potable sources for irrigation.

- Require street trees on all streets

- Promote environmental benefits from landscape design, including reduction of heat island, reductions of energy use for buildings, and other benefits that can result from the proper allocation of required landscape materials.

- Coordinate large-scale and small-scale stormwater management standards or performance criteria, so that site specific stormwater does not compromise other goals for more sustainable growth and development patterns.

- Coordinate stormwater management strategies and performance criterial with context, and provide a range of urban, suburban, and rural/open land strategies.

- Ensure that oil and gas regulations are adequately protecting water resources and air quality.

- Better coordinate open space standards with the regulations to protect sensitive areas. Integrate these regulations into the patterns and design standards in the subdivision regulations, and create a hierarchy of open space types that build off of these systems.

- Emphasize site- and household-scale renewable energy facilities as an accessory use, or confirm there are not any impediments in the general accessory use standards or design provisions.

- Consider standards for neighborhood- or district-scale renewable energy facilities.

DEVELOPMENT CODE UPDATE

SUMMARY

Key recommendations for further discussion and updates to the development in this report and the comment log include:

Usability

- Restructure the code to group similar topics together and arrange in a sequential order (considering timing and scale of issues).

- Improve hierarchy of articles, chapters, sections and sub-sections

- Coordinate all definitions in a single section

- Organize all procedures into one section, and consolidate duplicative procedures in a single section applicable to all applications.

- Remove submittal requirements from code and delegate to the Director the authority to administer and update submittal forms

- Improve options for alternative compliance and administrative exceptions to the standards; tie these to specific intent statements, design objectives, or decision criteria.

Productive Places

- Incorporate more scale, form, and urban design standards into commercial districts (particularly the GID and areas for regional and neighborhood centers).

- Expand focus of use table on the scale of uses, rather than just the type; consider being more general with permitted uses with increased emphasis on scale and form.

- Improve design standards for streetscapes and opens spaces to promote walkability, social activity in the street, and creating distinctions between different contexts and places.

- Consider using one of the three industrial districts to re-purpose to included more "placemaking attributes," while focusing on a broad range of employment and light-industrial uses.

- Create more explicit distinctions (possibly based on the building blocks / Growth Framework) between the development standards and pattern of all non-residential districts.

Unique Neighborhoods

- Promote "public realm" design – the character of streets, trails, open space and community / civic gathering places, as a way to emphasize distinct neighborhoods.

- Expand options of housing types through "missing middle" housing – particularly the multi-family code option and the higher-end of missing middle housing.

- Create new small lot options for detached 1 to 3 unit buildings that can use lower-cost strategies of the International Residential Code, including expanding options for the R-HH district for small format housing.

- Consider at least one district (or add a new one) for a greater mix of housing types, including single-family houses and small-scale, multi-unit buildings.

- Identify a few basic neighborhood design patterns and elements to codify for all neighborhoods to create consistency in approaches and content, but allow neighborhoods to vary details between them.

Valuable Public Realm

- Improve street network connectivity standards and vary requirements by context of "building blocks" of the Growth Framework.

- Implement street design types that go beyond simple functional classification, and make some of the design options in the current code a permissible, preferred, or required type.

- Consider ways that the historic 450' x 450' block could be re-subdivided to meet housing goals, particularly the idea of alley or "mews" loaded small lot housing.

- Require street trees as an essential part of each street section.

- Strengthen design standards for open space in the subdivision regulations; consider codifying the specific standards for different types of open space to be used in different contexts.

Environmental Performance

- Coordinate the development code better with the City's Landscape Policy for Water Efficiency, and give a higher profile to or require xeric standards.

- Coordinate large-scale and small-scale stormwater management standards or performance criteria, and strengthen connections to street and open space standards.

- Better coordinate open space standards with the regulations to protect sensitive areas.

- Emphasize site- and household-scale renewable energy facilities as an accessory use, or confirm that there are no other barriers or issues for site specific facilities.

NEXT STEPS

This report is an independent and objective analysis of *Imagine Greeley* compared to the Greeley development code. It is a starting point for more in depth analysis, broad policy discussions, and strategic engagement in the "Discussion" phase of the project. Part of this will be to determine which issues most crucial to this update, and may require more specific focus on options and opportunities. This will include issue papers or case studies that go more in depth on policy, planning and design considerations and a range of regulatory strategies for these key topics. While these topics will not be the entire extent of the updates, it will focus engagement efforts on areas where more discussion may be needed or where potential code changes may be more significant.