



June 15, 2017

Jane Hann, Manager
Environmental Programs Branch
Colorado Department of Transportation
4201 E. Arkansas Ave, Shumate Building
Denver, CO 80222

SUBJECT: Additional Information, Colorado Register Act Consultation, Two Basins Drainage, Platte to Park Hill Stormwater Systems Project, City Park Golf Course Redesign, City & County of Denver (CHS #70051).

Dear Ms. Hann,

We received your letter dated May 26, 2017 regarding the Platte to Park Hill project, and specifically the mitigation related to the adverse effect determination for the City Park Golf Course (5DV5310).

We agree that the mitigation items described in the letter were discussed in the meeting between CDOT, the City of Denver, the State Historic Preservation Office (SHPO) and our office on April 13, 2017. We can also confirm that we are comfortable with the mitigation proposed for the Brick-Lined Storm Sewer (5DV11280). However, we do not believe the letter captures the full scope or intent of the other mitigation discussed.

Specifically, we asked that you prepare Part I of a Cultural Landscape Report as soon as possible, and before the design build process gets underway, so that the report findings can help direct design decisions that uphold the historic integrity of the Golf Course. Part I of a CLR, according to the National Park Service publication "A Guide to Cultural Landscape Reports," includes a site history, documentation of existing conditions, as well as analysis and evaluation "to identify the significance of landscape characteristics and features in the context of the landscape as a whole." This is critically important analysis and identification that should inform design and management decisions. To that end, we also request that the information regarding the significant course attributes identified in the CLR Part I be explicitly included in the project design guidelines. Additionally, as was discussed in April, we ask that the description of this piece of mitigation be amended to include a specific timeline, with completion of the CLR Part I, and its incorporation into design guidelines conveyed to the contractor, taking place between now and September 2017.

We asked for this as mitigation because it is our goal to ensure that City Park Golf Course retains integrity and therefore, its designation on the National Register of Historic Places. The Platte to Park Hill team has repeatedly stated that the historic nature of the Golf Course will be an important part of the overall project, and preserving historic character is a goal repeated in the design guidelines, as discussed by the Redesign Working Group comprised of community stakeholders,

including Historic Denver. Avoiding or minimizing the impact to the historic resource is also the underlying purpose of the State Register Act, and Section 106 of the Historic Preservation Act, after which this process has been modeled. The Golf Course and Platte to Park Hill project cannot live up to this goal if there is not a thorough understanding and respect for the aspects of the Course that contribute to its significance and integrity.

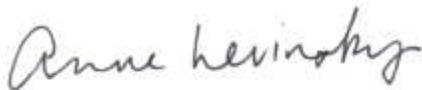
During the meeting on April 13 we also discussed the importance of public and stakeholder check-in points during the design-build process. Specifically, we ask that SHPO and Historic Denver be identified as consulting parties, with time for review and comment, for at least three check-in points:

- 1) Final Design Guidelines
- 2) Preliminary Designs
- 3) Final Designs
- 4) Major Revisions (if warranted due to unanticipated conditions)

We further ask that a timeline for these check-in points be included as part of any mitigation agreement or MOU. We are not comfortable signing or endorsing a mitigation agreement or MOU in the absence of these details.

We have participated in the stakeholder working groups and as a consulting party on the Platte to Park Hill project in order to seek solutions that honor the aspects of our historic city that have been recognized as significant. We have repeatedly asked for thorough analysis of the Course and its contributing elements given its status on the National Register of Historic Places and the unique challenges presented by a cultural landscape compared to a historic building. Without the additional detail discussed on April 13 and described in this letter the historic consultation hinges on vague notions of what may happen during the design/build process and therefore amplifies Historic Denver's concerns about the project. We would like to continue our good faith role as a consulting party, but can only do so if we believe that consultation will influence the outcome in a way that honors the Course and preserves its historic integrity.

Sincerely,



Annie Levinsky
Executive Director

CC: Jennifer Hillhouse, City of Denver
Lisa Schoch, CDOT
Barbara Stocklin-Steely, CDOT
Jennifer Bryant, State Historic Preservation Office
Kara Hahn, City of Denver, Community Planning & Development