August 25, 2026

Dear Mayor Johnston, City Council President Diana Romero Campbell, Denver City Council Members, Executive Director Buchanan, and Denver Water CEO/Manager Alan Salazar

We, the undersigned organizations, write to follow up on the previous letter we sent expressing our strong opposition to the proposed relocation of Denver Water facilities from Burnham Yard to Lot M at Empower Field at Mile High. We appreciate the City's timely response to this letter and subsequent opportunities several of our organizations have had to meet with representatives from the Mayor's office, City Council, Community Planning and Development, and Denver Water to learn more about Denver Water's needs and the process to date that led to the selection of Lot M as the proposed site.

Given the additional information we have learned, detailed in the attached fact sheet, we remain steadfastly resolved that Lot M is the wrong site for this use. Full stop. Denver Water's operational needs are legitimate and can – and should – be met elsewhere. Lot M should be taken off the table entirely, and the City and Denver Water should identify an alternative central-Denver location without further delay.

Based on the public record to date, the search for alternatives to Lot M appears to have been narrow and preliminary, with no evidence of a rigorous, city-wide site evaluation. This has the hallmarks of a path-of-least-resistance decision – a site that was fast, convenient, and already available – rather than the product of a genuine search for the right answer. That is not good enough given what is at stake, and it is not a reason to accept Lot M.

Lot M sits at the single most important redevelopment parcel in the Stadium District: at the doorstep of the Decatur-Federal RTD Station – one of the busiest stations in the RTD system – and the gateway to the West Colfax / Sun Valley neighborhoods. Nearly 20,000 residents live within a mile of the Colfax & Federal interchange that Lot M borders. Multiple City-adopted planning documents, developed with extensive community input, consistently call for this area to transition from surface parking and underutilized land to walkable, transit-oriented, mixed-use redevelopment, and for the Colfax & Federal cloverleaf to be redesigned into a safer, more connected urban interchange.

Denver Water's proposed use is inconsistent with current zoning aligned with this vision. Given the mismatch, it is reasonable to expect that this project would require a formal rezoning, use variance, or other affirmative zoning approval — a public process involving Planning Board and City Council review, and one that requires the City to affirmatively find the change consistent with adopted area plans. Given that the City's own planning documents for this very site call for exactly the opposite kind of use, that is a difficult finding for the City to make honestly, and a real point of legal exposure and delay if it tries.

Private developers – including Wood Partners, Mortenson, Urban Ventures, Trilogy Investments, and other institutional owners active in the district – have already invested hundreds of millions of dollars in multifamily and mixed-use development immediately surrounding Lot M, directly on the strength of the City's own adopted plans and long-stated vision for transit-oriented redevelopment around the Decatur-Federal Station. Denver Housing Authority has also invested well over $550 million in public and private capital transforming Sun Valley – including a $34 million HUD Choice Neighborhoods grant and roughly $65 million in revenue bonds backed by the City's affordable housing fund and $20M in Elevate and Vibrant Denver GO bonds for infrastructure – all delivered on the premise that this mixed-use and mixed-income neighborhood would be reconnected to the city's economic and transit fabric.

If the City is willing to abandon a decade of adopted, publicly vetted planning the moment a quick, convenient solution is needed for an unrelated priority, it sends an unmistakable signal to every private investor in Denver: adopted area plans cannot be relied upon, and long-term capital committed on the basis of those plans can be undermined at the City's convenience. That is a signal Denver cannot afford to send if it wants to continue attracting the private investment its growth depends on.

Furthermore, Sun Valley is one of Denver's most historically underserved neighborhoods, having already absorbed significant disruption from construction of the original Colfax & Federal cloverleaf, which displaced more than 240 families and businesses in the 1960s. If Lot M proceeds and community opposition escalates – through administrative appeals, litigation, or sustained public and media attention – the narrative risk is significant: a perception that the City is once again asking this same neighborhood to absorb a disproportionate burden, this time to accommodate the Broncos' stadium relocation, is likely to generate real reputational exposure for the City and its partners.

This is not a request for further study of Lot M, additional mitigation, or a compromise design. Our ask is direct:

- Take Lot M off the table entirely. It is not an appropriate location for a permanent Denver Water operations and storage facility, regardless of mitigation measures.
- Identify and commit to an alternative central-Denver site that meets Denver Water's legitimate operational needs without sacrificing this parcel.
- Conduct – and publicly document – a genuine, city-wide search for that alternative site, rather than defaulting back to Lot M because it is convenient.
- Preserve Lot M for the transit-oriented, mixed-use redevelopment envisioned by more than a decade of adopted City plans.
- Honor the reliance interest of private developers who have invested hundreds of millions of dollars in this district based on the City's own adopted vision – and protect Denver's credibility with the private capital its future growth depends on.
- Honor the City's own decade-long public investment in Sun Valley through DHA, rather than undermining it with an incompatible adjacent use.
- Ensure any Denver Water relocation decision is made with full public transparency and stakeholder engagement, consistent with the scale of its long-term impact on the district.

We look forward to continuing to work with you to pursue a path forward that repairs past damage, reconnects neighborhoods, and delivers on long-promised community goals.

Sincerely,

Jeanne Granville, President, Sun Valley Community Coalition

Adam Berger, Manager, Adam Berger Development LLC

Peter Piccolo, Executive Director, Bicycle Colorado

Avi Stopper, Founder, Bike Streets

Critter Thompson, Director, Catamount Studio

Renee Larrarte, Climate & Transportation Campaign Manager, Conservation Colorado

Rob Toftness, Co-Founder, Denver Bicycle Lobby

Jamie Anderson, Executive Director, Denver Food Rescue

Coleen Samuels, Executive Director, Denver Regional Mobility & Access Council (DRMAC)

Jill Locantore, Executive Director, Denver Streets Partnership

Marne Wills-Cuellar, Treasurer, Federal BID

Cody Bryan, Co-lead, Greater Denver Transit

Michael Guiietz, President, Jefferson Park United Neighbors (JPUN) Land Use Committee

Michael Dinerman, Member, JPUN

Nolan Hahn, President, La Alma Lincoln Park Neighborhood Association

Joseph Sak, Chair, Mayor's Bicycle Advisory Committee

Christopher Poirier, Co-Chair, Mayor's Pedestrian Advisory Committee

Brandon Vargas, Artist Liaison, Meow Wolf

Mark Anderson, Chairman, Millenium LLC

Alejandra X. Castañeda, Co-organizer, Denver metro area, Pedestrian Dignity

Frankie Toan, Co-Founder & Owner, Rainbow Dome

Adrianna Abarca, Part Owner, Ready Foods

Demetri Gantt, Community Manager, Revival on Platte Apartments

Rudolph Gonzales, President & CEO, Servicios de La Raza

Alvina Vasquez, Chairperson of the Board of Directors, Servicios Sigue

Debra Neeley, President, Sloan's Lake Citizens' Group

Tyler Winstead, Vice President, Strong Denver

Glenn Harper, Founder, Sun Valley Kitchen + Community Center

Kris Rollerson, Executive Director, Sun Valley Youth Center

Susan Powers, President, Urban Ventures

Evon Lopez, Member/Leader, Valverde Neighborhood Association

Win King, Managing Member, WALD, LLC

Heidi Newhart, Central Delegate Team, West Colfax Association of Neighbors (WeCAN)

Dan Shah, Executive Director, West Colfax BID

Shantelle Mulliniks, Co-Director, West Colfax Lampstand

Bill Hare, Vice President, Transportation Committee Chair, West Highlands Neighborhood Association

Michael Hughes, Executive Director, West Line Corridor Collaborative

Walter Armer, Partner, Wood Partners

Rob Greer, Steering committee member, YIMBY Denver

LOT M / DENVER WATER RELOCATION

Lot M Is the Wrong Site for Denver Water – Full Stop. The City Must Identify an Alternative.

The Proposal

As part of the broader plan to relocate the Denver Broncos to Burnham Yard, Denver Water must relocate certain facilities currently located on that site. Denver Water's primary relocation – a large operations campus – is planned for the Elyria-Swansea neighborhood (near 40th & Clayton). Separately, Denver Water has proposed a supplemental, close-in facility on Lot M, a 5.49-acre parking lot at Empower Field at Mile High, located south of the Colfax Avenue viaduct and immediately adjacent to CDOT's headquarters.

In December 2025, Denver Water submitted a concept plan to the City's Department of Community Planning and Development (CPD) for a two-story office and storage facility on Lot M, along with associated parking and exterior storage for fleet vehicles and materials.

Lot M is the wrong site for this use. Full stop. Denver Water's operational needs are legitimate and can – and should – be met elsewhere. Lot M should be taken off the table entirely, and the City and Denver Water should identify an alternative central-Denver location without further delay.

Why This Matters – The Bigger Picture

1. Lot M sits at the single most important redevelopment parcel in the district

Lot M sits at the doorstep of the Decatur-Federal RTD Station – one of the busiest stations in the RTD system – and at the gateway between the future Burnham Yard stadium district and the West Colfax / Sun Valley neighborhoods. Nearly 20,000 residents live within a mile of the Colfax & Federal interchange that Lot M borders.

2. It conflicts with more than a decade of adopted City plans

Multiple City-adopted planning documents, developed with extensive community input, consistently call for this area to transition from surface parking and underutilized land to walkable, transit-oriented, mixed-use redevelopment, and for the Colfax & Federal cloverleaf to be redesigned into a safer, more connected urban interchange:

- Decatur-Federal Station Area Plan (2013)
- Blueprint Denver (2019)
- Stadium District Master Plan (2019)
- Colfax & Federal Interchange Transformation Study (2021)
- West Area Plan (2023)
- Denver Moves Everyone (2023)

A permanent Denver Water storage and operations facility on Lot M would preempt that redevelopment vision and foreclose one of the few remaining large parcels capable of delivering on it.

3. Denver Water's need for a central site is real – which is exactly why Lot M shouldn't be the solution

Denver Water's stated need to keep certain operations, trades, and fleet crews close to the urban core, to preserve rapid emergency response times to water main breaks and other incidents across central Denver, is legitimate and should be taken seriously. This central-site requirement is genuinely critical to Denver Water's overall relocation program; it is not a manufactured or secondary consideration.

But that legitimate need is precisely why the City and Denver Water owe it to the public to find the right central site – not simply the first one that became available. Nothing about Lot M is operationally unique. Many other centrally located parcels across Denver could satisfy the same criteria without sacrificing one of the most consequential redevelopment sites in the city: proximity to arterials and highways, adequate acreage, and reasonable access to the urban core. Based on the public record to date, the search for alternatives to Lot M appears to have been narrow and preliminary, with no evidence of a rigorous, city-wide site evaluation. This has the hallmarks of a path-of-least-resistance decision – a site that was fast, convenient, and already available – rather than the product of a genuine search for the right answer. That is not good enough given what is at stake, and it is not a reason to accept Lot M.

4. The proposed use appears inconsistent with the site's zoning

Lot M is zoned C-MU-30 (Commercial Mixed-Use – 30), a zone district carried over from Former Chapter 59 of the Denver Revised Municipal Code that was never rezoned into the current Denver Zoning Code adopted in 2010. By the City's own definition, C-MU-30 and the other mixed-use districts in that family exist to “provide for and encourage a compatible mix of uses, rather than a separation of uses,” with C-MU districts specifically described as “predominantly commercial” and intended to create “a balanced mix of uses in a pedestrian-friendly environment.” A permanent, fenced utility storage and operations yard is not what this zone district was designed for and is difficult to reconcile with a predominantly commercial, pedestrian-oriented mixed-use classification.

The parcel also carries a UO-1 overlay, which is Denver's Adult Use Overlay District – a legacy protection unrelated to industrial or storage uses and with no bearing on whether Denver Water's proposed facility is permitted. It does not change the underlying analysis: the applicable base zoning is C-MU-30, and that district's stated purpose points toward mixed-use, pedestrian-oriented development, not industrial storage.

Given the mismatch between C-MU-30's commercial/mixed-use purpose and Denver Water's proposed industrial storage and operations use, it is reasonable to expect that this project would require a formal rezoning, use variance, or other affirmative zoning approval — a public process involving Planning Board and City Council review, and one that requires the City to affirmatively find the change consistent with adopted area plans. Given that the City's own planning documents for this very site call for exactly the opposite kind of use, that is a difficult finding for the City to make honestly, and a real point of legal exposure and delay if it tries. A formal Zone Use Verification from CPD would confirm this definitively.

5. The City's own review flagged the conflict

Of the 22 City departments and agencies that reviewed Denver Water's Lot M concept plan, 21 marked it “OK to proceed.” The lone dissent came from City's manager for transit-oriented development, who warned that approving the Lot M plan would “substantially compromise” the City's and CDOT's ability to redesign the Colfax & Federal cloverleaf into a more pedestrian-friendly interchange.

6. It cuts off the pedestrian gateway from the light rail station

Today, riders exiting Decatur-Federal Station and future residents of the surrounding district should be walking toward housing, retail, and public space – not a fenced utility yard. Locating a fleet and materials storage operation directly along this gateway severs the pedestrian connection between transit, the stadium district, and the surrounding neighborhoods at precisely the location where that connection matters most.

Why This Matters – Specific Neighborhood & Site Concerns

- Incompatible adjacent use: Lot M sits immediately next to existing multifamily housing (including Alta Mile High) and future planned residential and mixed-use development. A fenced storage/operations yard with fleet vehicles and exterior materials storage is fundamentally inconsistent with a walkable residential district.
- Undermines investments made in reliance on adopted plans: Hundreds of millions of dollars in multifamily and mixed-use investment in the district have been made based on the City's own adopted vision for transit-oriented redevelopment around Decatur-Federal Station. A permanent industrial/utility use adjacent to that investment directly conflicts with the vision the City itself promoted.
- Forecloses future redevelopment options: Once built, a facility of this kind is unlikely to be relocated again for decades – permanently limiting redevelopment potential on one of the last large sites in the district.

- Limited public process to date: Denver Water's concept plan advanced through internal City review with comparatively little public engagement or transparency, despite the significant long-term implications for the surrounding community.
- Undercuts more than a decade of public investment in the immediately adjacent Sun Valley neighborhood: Denver Housing Authority (DHA), in partnership with the City, State, HUD, and numerous other partners, has invested well over $550 million in public and private capital transforming Sun Valley – including a $34 million HUD Choice Neighborhoods grant and roughly $65 million in revenue bonds backed by the City’s affordable housing fund and $20M in Elevate and Vibrant Denver GO bonds for infrastructure – all delivered on the premise that this mixed-use and mixed-income neighborhood would be reconnected to the city's economic and transit fabric. Converting the adjacent Lot M gateway parcel to industrial use directly undermines the goals that public investments were designed to achieve.

Private Investment Was Made on the Strength of the City's Word – Lot M Breaks It

This is not a hypothetical concern. Private developers – including Wood Partners, Mortenson, Urban Ventures, Trilogy Investments, and other institutional owners active in the district – have already invested hundreds of millions of dollars in multifamily and mixed-use development immediately surrounding Lot M, directly on the strength of the City's own adopted plans and long-stated vision for transit-oriented redevelopment around Decatur-Federal Station.

That capital was not deployed speculatively. It was deployed because the City, through more than a decade of public planning processes, told the market clearly and consistently what this area would become: a walkable, transit-connected, mixed-use district anchored by one of RTD's busiest stations. Developers underwrote acquisition prices, capital structures, and long-term hold strategies based on that stated vision – including the assumption that parcels like Lot M, sitting at the literal pedestrian gateway between the station and the district, would ultimately be redeveloped consistent with that plan, not converted to permanent industrial use.

This is not just a private-sector concern. Denver Housing Authority has made an even larger and longer-standing commitment to the same premise, investing well over $500 million in public and private capital — including HUD and City funding — to redevelop Sun Valley into a mixed-income, transit-connected neighborhood. That public investment relied on exactly the same assumption as the private capital surrounding it: that adjacent parcels like Lot M would evolve consistent with the area's adopted plans, not revert to industrial use.

Placing a Denver Water storage and operations yard at that gateway does not just compromise one parcel. It materially diminishes the development potential, walkability, and market perception of the entire surrounding district – undercutting the very investments, both public and private, that the City's own planning encouraged in the first place.

The stakes here extend well beyond this single site or even the Stadium District. If the City is willing to abandon a decade of adopted, publicly vetted planning the moment a quick, convenient solution is needed for an unrelated priority, it sends an unmistakable signal to every private investor in Denver: adopted area plans cannot be relied upon, and long-term capital committed on the basis of those plans can be undermined at the City's convenience. That is a signal Denver cannot afford to send if it wants to continue attracting the private investment its growth depends on.

A Risk Worth Flagging: Single-Site Exposure and Schedule Risk

Beyond the land use and neighborhood concerns described above, there is a practical program risk that may not yet be fully visible from the City's vantage point – and one worth raising early, before it becomes difficult to unwind.

Sun Valley is one of Denver's most historically underserved neighborhoods, having already absorbed significant disruption from construction of the original Colfax & Federal cloverleaf, which displaced more than 240 families and businesses in the 1960s. If Lot M proceeds and community opposition escalates – through administrative appeals, litigation, or sustained public and media attention – the narrative risk is significant: a perception that the City is once again asking this same neighborhood to absorb a disproportionate burden, this time to accommodate the Broncos' stadium relocation, is likely to generate real reputational exposure for the City and its partners.

More importantly from a program standpoint, Lot M currently appears to be the only identified central-Denver option for this portion of Denver Water's relocation. That means the City has effectively concentrated all of its schedule risk in a single, contested site. If Lot M proceeds, a protracted dispute – through administrative appeals, litigation, or sustained public opposition – is a realistic and foreseeable outcome, not a remote one. Denver Water's ability to vacate Burnham Yard on the current timeline would be placed at real risk, which would in turn delay the start of construction on the new stadium at precisely the moment when schedule certainty matters most.

This is exactly why Lot M needs to come off the table now, rather than after a dispute has already taken hold. The City does not need to gamble its own top priority – an on-schedule Broncos relocation – on a site that is contested, legally vulnerable, and inconsistent with its own adopted plans. An alternative site should be identified and committed to before, not after, this becomes a fight.

Key Facts at a Glance

Topic	Detail
Site	Lot M, Empower Field at Mile High – 5.49 acres, south of the Colfax Ave. viaduct, adjacent to CDOT HQ and Alta Mile High
Proposed use	Two-story office/storage facility, associated parking, exterior storage for fleet vehicles and materials
Zoning	C-MU-30 (Commercial Mixed-Use, Former Chapter 59) with a UO-1 overlay (Adult Use Overlay – unrelated to this issue). C-MU districts are defined by the City as “predominantly commercial” and intended for a “balanced mix of uses in a pedestrian-friendly environment” – not industrial storage.
Is a central site important to Denver Water?	Yes – Denver Water has a legitimate, program-critical need to keep certain operations, trades, and fleet crews close to the urban core to preserve emergency response times. That need is real and does not require Lot M specifically – a number of other centrally located Denver sites could meet the same criteria.
Was a rigorous site search conducted?	No – the public record to date shows only a narrow, preliminary search focused on already-available or City-controlled land, not a genuine, city-wide evaluation of alternative central sites.
City review outcome	21 of 22 reviewing City departments/agencies said “OK to proceed”; the sole dissent came from the City's own TOD manager, citing conflict with cloverleaf redesign plans
Adjacent transit	Decatur-Federal Station – among the busiest in the RTD system; nearly 20,000 residents live within one mile of the interchange
Funding source	Broncos ownership group has agreed to fund Denver Water's relocation costs, including new property acquisition, site prep, and construction
Backup site identified?	None identified to date – Lot M currently appears to be the only central-Denver option under consideration, concentrating schedule risk in a single, contested site

Program risk if Lot M proceeds	A protracted dispute (appeals, litigation, sustained opposition) is a realistic outcome and would delay Denver Water's move out of Burnham Yard – and with it, the start of stadium construction
Private investment at risk	Hundreds of millions of dollars in multifamily/mixed-use investment by institutional developers (including Wood Partners, Mortenson, and others) has been made in the immediate area based on adopted plans for this district
Public (DHA) investment at risk	DHA and the City/HUD have invested well over $550 million transforming adjacent Sun Valley, including a $34M HUD Choice Neighborhoods grant and $75+M in City funding through the Affordable Housing Fund and Elevate and Vibrant Denver GO bonds, on the premise the area would be reconnected to the city's transit and economic fabric
Bottom line	**Lot M is the wrong site, full stop. Denver Water's needs can and should be met elsewhere.**
Conflicting adopted plans	Decatur-Federal Station Area Plan (2013); Blueprint Denver (2019); Stadium District Master Plan (2019); Colfax & Federal Interchange Transformation Study (2021); West Area Plan (2023); Denver Moves Everyone (2023)

The Ask

This is not a request for further study of Lot M, additional mitigation, or a compromise design. The ask is direct:

- Take Lot M off the table entirely. It is not an appropriate location for a permanent Denver Water operations and storage facility, regardless of mitigation measures.
- Identify and commit to an alternative central-Denver site that meets Denver Water's legitimate operational needs without sacrificing this parcel.
- Conduct – and publicly document – a genuine, city-wide search for that alternative site, rather than defaulting back to Lot M because it is convenient.
- Preserve Lot M for the transit-oriented, mixed-use redevelopment envisioned by more than a decade of adopted City plans.
- Honor the reliance interest of private developers who have invested hundreds of millions of dollars in this district based on the City's own adopted vision – and protect Denver's credibility with the private capital its future growth depends on.
- Honor the City's own decade-long public investment in Sun Valley alongside DHA and State and Federal partners, , rather than undermining it with an incompatible adjacent use.
- Ensure any Denver Water relocation decision is made with full public transparency and stakeholder engagement, consistent with the scale of its long-term impact on the district.

Sources: The Denver Post; Denver7; Denver Sports; Muller Engineering Colfax & Federal Interchange Transformation Study; City of Denver adopted planning documents and Stadium District Master Plan implementation materials; Denver Revised Municipal Code, Former Chapter 59 (Division 15, Mixed-Use Districts); Denver Housing Authority / HUD Choice Neighborhoods public records; Denver Water and Denver Broncos public statements.