



September 12, 2019

Kristin Kenyon
Federal Transit Administration, Region 8
1961 Stout Street, Suite 13301
Denver, CO 80294

Dear Kristin,

The 16th Street Mall is among the most iconic places in Denver, recognized for its high quality design, enduring materials, and value as a civic space. Officially recognized as eligible for the National Register of Historic Places due to the exceptional caliber of its design and designers, including I.M. Pei, Henry Cobb and Laurie Olin, the ULI called it “public art of the highest international quality.”

Given this high merit, Historic Denver, Inc., has taken very seriously its role as a consulting party in the Section 106 process, seeking to identify all opportunities to honor the Mall’s design integrity while repairing and improving its infrastructure. We’ve consistently noted that the most important features include:

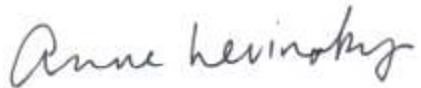
- 1) The granite pavers in their intricate pattern, which support a spatial arrangement that is human-scaled and a designed diagonal orientation that encourages free pedestrian flow
- 2) The unique, now replicated globe lights with several light functions
- 3) The 200+ trees, which are interspersed with the lights in an intentional linear pattern along the length of the original Mall
- 4) The subtle shift in alignment between symmetrically designed blocks and asymmetrically designed blocks that ensures the Mall is a truly shared street, rather than a conventional street.

The Locally Preferred Alternative detailed in the Programmatic Agreement is a significant departure from the original design, and cannot be considered a preservation approach. The strongest nod to the historic design is the retention of the granite pavers, their spatial layout, color and pattern. The reuse of the replicated lights is also key to the design, as is the use of trees to create *allees* that emphasize the Mall’s unique and linear nature. Executing these design concepts as has been discussed and detailed as design-based mitigation in the Section 106 process is critical.

Therefore, while Historic Denver does not concur that the LPA represents the best option for the Mall's rehabilitation, and we are deeply concerned that the Mall will no longer be considered a Pei design, nor eligible for the National Register, we will sign the Programmatic Agreement as a concurring party in order to continue participating in the design review processes described in Section II.

Thank you for the continued opportunity to engage in the future of one of our city's treasures.

Sincerely,



Annie Levinsky
Executive Director



John Olson
Deputy Director

CC: Brian Pinkerton, Denver Public Works
Tami Door, Downtown Denver Partnership
Joe Saldibar, History Colorado
Tracey MacDonald, FTA Region 8
Kristin Kenyon, FTA Region 8
Kara Hahn, Community Planning & Development
Kim Grant, Colorado Preservation, Inc.
Betsy Merritt, National Trust for Historic Preservation
Sarah Stokely, Advisory Council on Historic Preservation