

September 24, 2025

Ryan Tefertiller, Planning Manager
Land Use Review Division
City Administration Building
30 S. Nevada Avenue, Suite 705
Colorado Springs, CO 80903

RE: Public Comments - LUPL-25-0012, ZONE-25-0026, SUBD-25-Palmer High School Rezone, Land Use Plan and Subdivision Plat to Vacate a Portion of E Boulder Street

Dear Mr. Tefertiller:

Thank you for forwarding the public comments received during the initial review of Palmer High School Rezone, Land Use Plan and Subdivision Plat to vacate a portion of E Boulder Street. We have considered these comments and would like to supply more details to address some of the concerns and misconceptions about the proposed project. We would be grateful if you could send this letter to the individuals who commented on the application.

In a letter dated August 28, 2025, the applicant indicated that additional study of traffic was being conducted to account for the temporary closure of E. Boulder Street, and that responses related to this topic would be addressed in a follow-up letter. This letter addresses these comments as well as new comments received to date.

The applicant would like to thank the Colorado Springs Downtown Partnership for their continued support of this project, including the rezone to FBZ-T2A, vacation and permanent closure of E. Boulder Street as a public right of way to allow consolidation of the campus, and the Development Plan for a world-class, 21st century educational environment.

The following topics of concern have been raised by the public as a result of application notifications:

VACATION OF E BOULDER STREET

Disruption of Traffic Flow

Some commenters expressed concerns that E Boulder St is a main entrance to downtown and that vacating the subject block of this street will disrupt the flow of all modes of transportation, including emergency responders, which is a concern for some as there is a hospital on E Boulder St. One commenter indicated they were of the understanding that emergency responders do not support the vacation request.

In March of 2025, City of Colorado Springs Staff leadership from multiple departments including CSPD, EMS, CSFD and Traffic Engineering Division, prepared a memorandum regarding the potential closure of a portion of E Boulder Street to facilitate the Palmer High School campus renovation. This memorandum is a culmination of information and statistics gathered and analyzed by the Departments. The memorandum evaluates traffic and public safety in the area of the Palmer High School, and assesses the potential impacts associated with closure of E Boulder Street between the blocks occupied by the school.

Include in the memorandum is information related to:

- *Existing emergency response times in the area*
- *Anticipated emergency response times with a closure of Boulder Street*
- *Crash data at intersections adjacent to, and near, Palmer High School*
- *Pedestrian and bicycle crash data in the area*
- *An assessment of traffic safety conditions at intersections*
- *The impact on traffic safety with a closure of Boulder Street*
- *Utility considerations, as provided by Colorado Springs Utilities*

The conclusions of the study are as follows:

- *Response time would increase by 20 seconds; therefore, the closure would not have a major impact on response times, and any other routes originating from the north or south of E. Boulder would use the alternate routes regardless of the blocked access of that segment.*
- *Crash data analysis concluded that between 2019 and 2024, there were 284 crashes in the area of the school, with 265 involving vehicles, 14 involving pedestrians, and 5 involving bikes. A review of these crashes does not indicate if the victims were students at Palmer High School; however, three bicycle crashes and three pedestrian crashes from involved juveniles.*
- *The intersection safety assessment concluded that closure of E Boulder street as proposed would result in improved safety as follows:*
 - *The daily volume of students leaving campus to walk to and from Palmer High School buildings located across from the main building would be reduced;*
 - *Elimination of the broadside crash pattern at the Boulder/Nevada intersection;*
 - *Reduction of crashes at the Boulder/Weber intersection; and*
 - *Reduction in conflicts between vehicles and pedestrian and bicycle users thus improving pedestrian and bike safety at these intersections.*

CSPD and CSFD are provided with an opportunity to comment on all applications related to the Palmer High School campus consolidation and renovation. Neither agency has expressed a lack of support for any of the applications submitted in conjunction with this property.

E Platte Avenue

Some commenters expressed concern about additional traffic congestion. One commenter was of the opinion that traffic is not a major issue therefore the vacation and closure of E Boulder Street is not

necessary to accommodate the school's plans; and suggested that a 20-MPH zone and continued use of the tunnel under E. Boulder Street would sufficiently manage safety issues, and that options for the E. Platte Avenue/N. Nevada Avenue intersection, including a round-about should be carefully considered.

A Traffic Impact Report (TIS) was submitted with the initial applications related to the project. The traffic study conducted for the Palmer High School renovation project evaluates the potential impacts of closing E. Boulder Street between N NEVADA Avenue and Weber Street to improve campus cohesion and pedestrian safety. This section of E. Boulder currently bisects the school campus, requiring students and staff to frequently cross the street. The study assessed existing traffic conditions, forecasted 2030 traffic volumes, and modeled scenarios with and without the E. Boulder Street closure. Eight surrounding intersections were analyzed during AM and PM peak hours.

Findings show that while the closure would redistribute traffic to adjacent routes, primarily E St. Vrain Street and Platte Avenue, all signalized intersections in the area would continue to operate at acceptable levels of service (LOS C or better). The only movement expected to fall below LOS D is the eastbound and westbound left turns from E St Vrain Street onto N NEVADA Avenue, which are projected to operate at LOS E/F. However, these movements are not anticipated to cause significant queuing or exceed intersection capacity.

To mitigate impacts, the study recommends converting the E Boulder Street/N Nevada Avenue and E Boulder Street/N Weber Street intersections to three-leg intersections, adjusting signal timing and striping, and eliminating specific turning pockets no longer needed. It also notes that converting E. Boulder Street into a pedestrian plaza will improve safety and connectivity on campus.

Modifications to the nearby E Platte/N NEVADA intersection, including potential roundabout alternatives, should be carefully coordinated with broader city planning efforts to avoid introducing operational challenges.

Because E Boulder Street through the campus has been temporarily closed to accommodate demolition/construction activity additional data has been collected at three intersections along Platte Avenue. This new data has been analyzed with a focus on traffic volumes, intersection level of service (LOS), and vehicle queue lengths as compared to the data collected in February 2025 and the projected 2030 closure estimated traffic conditions.

The analysis indicates that the August 2025 observed conditions with Boulder Street closed were generally consistent with the projections from the April 2025 study (which used February 2025 data). Traffic volumes and LOS remained close to estimated conditions, with projections slightly more conservative overall. The most notable differences were higher than expected through volumes at Platte & Nevada and Platte & Wahsatch. Despite these variances, LOS remained acceptable, suggesting the network can continue to accommodate the closure impacts. Of particular note, recorded traffic conditions indicate that the potential need to increase available storage length for the southbound left turn movement at Platte & Nevada is less likely than previously projected.

Continued monitoring is recommended to confirm long-term impacts. The recommendations in the April 2025 report are conservative compared to what was observed in August 2025 following the Boulder Street closure, and there is no foreseen need to update the analysis in the report.

The full data analysis and discussion can be found in the Felsburg Holt & Ullevig Memorandum dated September 19, 2025, submitted with the September 24, 2025 application resubmittal.

Establishment and modification of the speed limit in the area of the school is a City of Colorado Springs responsibility and has not been suggested by City Traffic Engineering. Continued use of the tunnel does not meet the goals of a fully consolidated campus.

Negative Impact on Businesses and Neighborhood

Some commenters expressed concern that the closure of E Boulder Street through the campus is not convenient, negatively impacts area businesses, and isolates students and staff from the neighborhood. One commenter stated that students, families and staff did not ask for the closure of E Boulder Street. One commenter expressed concern that the pedestrian plaza proposed in the vacated and closed E Boulder Street does not accommodate public access and should be redesigned to have fencing and gates on the north and south sides of the plaza instead of at the east and west ends; and that there should be traffic prevention bollards on the east and west ends to prevent vehicular traffic.

The Vacation and use of E. Boulder Street for campus purposes is convenient for student, staff, and faculty of the school. While the closure will require others using the area to find an alternate route, there are plenty of options in the area, on streets that are classified and designed to accommodate alternate traffic routes for all modes of transportation. Use of the vacated E Boulder Street as a pedestrian plaza is intended until such time as a field is able to be constructed internal to the campus. Palmer High School students, faculty, and staff will continue to have access to the neighborhood, including area parks, restaurants, and other businesses in the area. Palmer High School is a public school, and the students and those who work at and for the school are members of the public, therefore, the applicant considers the pedestrian plaza to be public, even though for safety reasons, access is limited. The field is part of a later phase of campus consolidation and could be many years into the future. If a field is constructed in the future, the vacated right of way will be partially incorporated into the field, however, the remainder will continue to function for pedestrian access purposes.

The Colorado Springs Downtown Partnership continues to support this project, including the vacation of E Boulder Street, in pursuit of their goals and priorities which include:

- *Better investment in the region's education system*
- *Honoring history while embracing the needs of the future*

The Partnership considers the development plans for the Palmer High School to be a "once-in-a-generation opportunity to dramatically transform the only public high school facility in Downtown Colorado Springs." Further, with significant expansion of the downtown residential base, the expectation is that future

residential development and economic growth will be catalyzed by the investment into Palmer High School. The Partnership believes that not allowing E Boulder Street to be incorporated into the campus “would represent a significant hurdle to improving the quality of education and would impeded efforts to enhance students’ safety through a more integrated campus”.

REZONE/LAND USE PLAN/DEVELOPMENT PLAN

One commenter had concerns about granting a warrant to allow off-site parking, including on-street parking, to satisfy the parking requirements for the campus, because there is no clear parking plan for full build-out of the land use plan; displacement of neighbors; and destruction of historic homes.

There are numerous successful examples in the community where off-site, including on-street, parking to satisfy parking requirements for development. City Code allows for on-street parking to count towards required parking, and the FBZ parking standards do not specifically state that all parking must be on the same site as the use. Further, parking provided on the north portion of the campus will be considered on-site once E Boulder Street is vacated and the campus is replatted as one lot. Parking with each future phase of the campus Land Use Plan will need to be reviewed and approved through the Development Plan process, at which time a detailed plan for parking will be required.

The multi-family homes owned by the District, while historic, are not designated structures, or in a preservation district. Further, while the District intends to remove the structures from the properties, they are open to considering how those structures could be removed. Those occupying the structures are provided with adequate notice to vacate the premises and could stay in the neighborhood if they choose.

Please let me know if there is any additional information, we can provide to alleviate the neighbors’ concerns about this project. We are confident the rezoning and creation of an additional development lot will be compatible with the area have a positive impact on the community.

Regards,

A handwritten signature in black ink that reads "Kimberly Johnson". The signature is written in a cursive, flowing style.

Kimberly Johnson, AICP
Project Manager

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