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Commerce City Council and Mayor Douglas
7887 E. 60th Avenue
Commerce City, CO 80022

Re: Comments on Land Development Code Section 21-4210 – Residential Building Standards

Dear Mayor Douglas and Members of the City Council,

First, I would like to thank City staff, Council, and the Planning Commission for the significant time and effort you have dedicated to the development of the new Land Development Code. It is clear a great deal of thought has gone into crafting a framework that will shape the city's growth for years to come. My comments below are intended in the spirit of collaboration to ensure the standards support high-quality, affordable, and sustainable residential development.

1. Motor Court Driveway Length Requirement

Subsection G.6.b requires individual driveways leading from the shared accessway to each dwelling to be 20 feet in length. This provision applies only to Motor Courts, not Green Courts. The result is that shared accessways become dominated by cars, functioning more like parking lots than multipurpose spaces where neighbors can gather. It also increases impervious surfaces, which adds stormwater and heat island impacts, while simultaneously reducing achievable density and increasing home prices.

2. Motor Court Shared Accessway Configurations

Figure 21-4210-4 distinguishes between dead-end and cul-de-sac Motor Court layouts. The dead-end option allows four buildings, while the cul-de-sac option is limited to three. The cul-de-sac design, however, often produces less paved area, more architectural variety, and better building massing. By limiting this configuration, the code unintentionally discourages its use, which may lead to repetitive and less interesting Motor Court neighborhoods.

3. Court Development Building Separation

Section F requires 60 feet between buildings facing each other in Court

Developments. This distance is significantly larger than the standards of other municipalities in the Denver Metro area. For example, Aurora studied Green Courts in depth and concluded that 30 feet was the appropriate distance. A 60-foot requirement reduces density by roughly two units per acre, increases landscaping and irrigation costs, and works against the affordability goals that Court-style housing is intended to support.

Note of Clarity

During prior code discussions, it was suggested that Motor Courts present greater utility concerns and that Green Courts are therefore preferred. Based on our experience designing both configurations for multiple builders, we can confirm that utilities function the same in each. Wet utilities typically run in the shared drive or alley, while dry utilities may be placed in the alley, in the Green Court, or in rear yards of Motor Courts. In either configuration, if a utility issue requires repair, the probability of impacting neighbors is essentially identical.

Summary

While the goals of these standards are understandable, the impacts of these specific requirements may result in less efficient land use, higher costs, and designs that are less community-oriented. I respectfully ask Council to reconsider these sections of the code to better align with the goals of affordability, sustainability, and livable neighborhoods.

Thank you again for the time and care you are investing into this process and for your consideration of these comments.

Sincerely,
Jeff Marck