



TO: Planning Board
FROM: Edson Ibanez, Senior City Planner
DATE: April 29th, 2026
RE: Official Zoning Map Amendment Application 2026-REZONE-00000032

Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends **approval** of Application 2026-REZONE-00000032.

Request for Rezoning

Address: Loretto Heights, 3001 S Federal Blvd + 3058 S May Stanton Way
Approx.

Neighborhood/Council District: Harvey Park South / Council District 2

RNOs: College View Neighborhood Association; Harvey Park Community Organization; South Mar Lee/Brentwood/Sharon Park Neighbors; and Inter-Neighborhood Cooperation (INC)

Area of Property: 2,548,715 square feet or approximately 58.51 acres

Current Zoning: PUD-G #24 & PUD-G #25

Proposed Zoning: PUD-G #41 & PUD-G #42

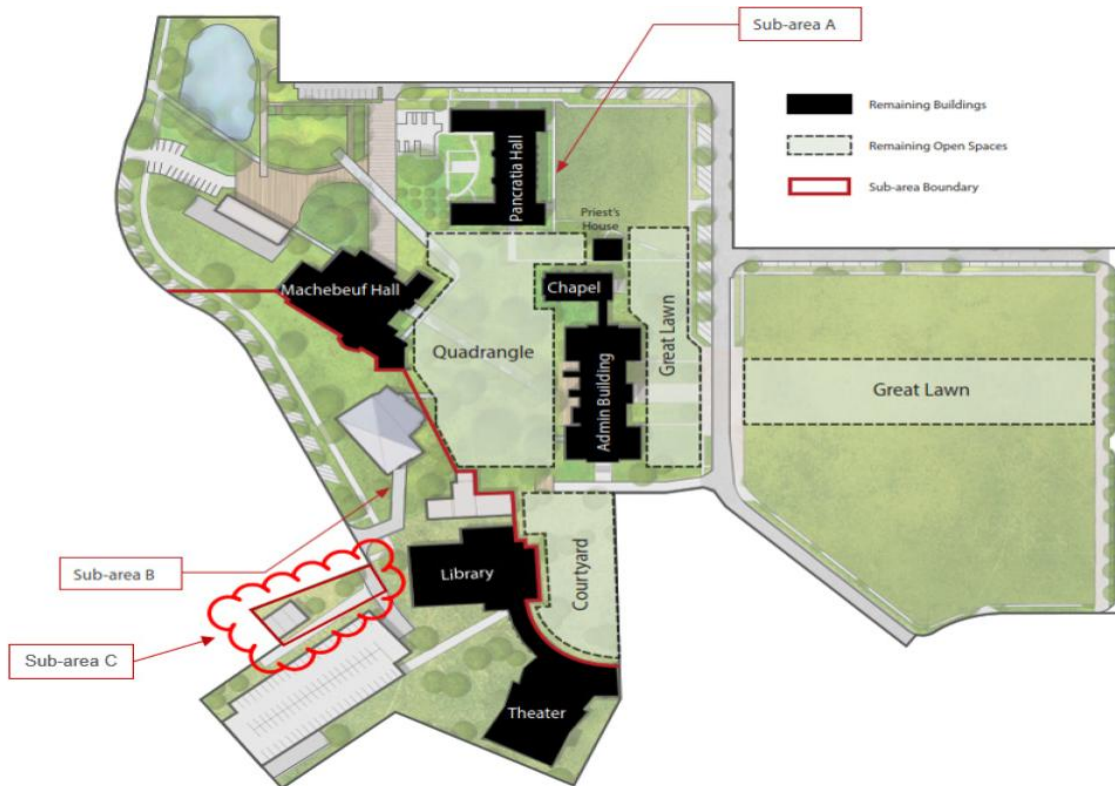
Property Owner(s): City and County of Denver + various property owners

Owner Representative: Matt Young, Denver Arts and Venue

Summary of Rezoning Request

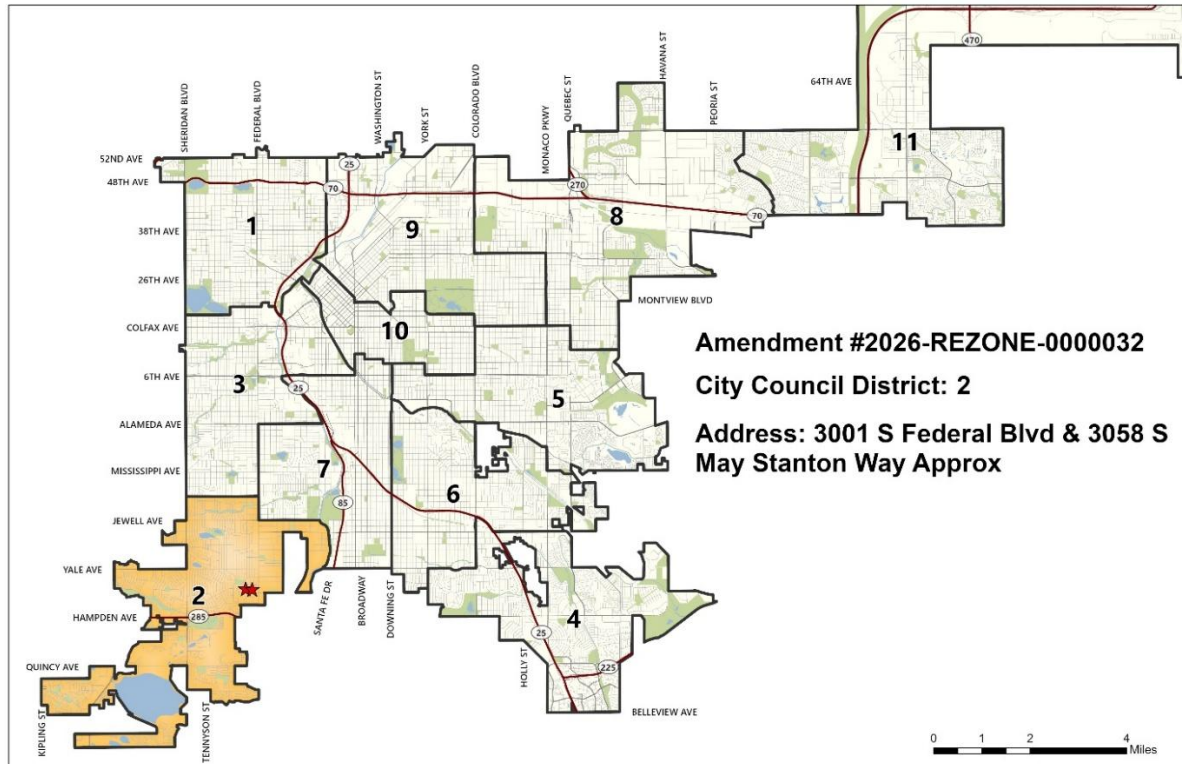
- The subject site is in the Harvey Park South statistical neighborhood on the northwest corner of South Federal Boulevard and West Dartmouth Avenue, in southwest Denver.
- This rezoning would move 3058 South May Station Way (approximately 14,000 square feet) from PUD-G #25 to PUD-G #24 to allow for a parking garage serving the nearby theater and library uses, resulting in two new PUDs (PUD-G #41 and PUD-G #42). Denver Arts & Venues is serving as the applicant representative.
- The two PUDs cover a 58-acre site, the Loretto Heights Campus Core PUD contains several iconic and historic buildings commissioned by the Sisters of Loretto over a period of more than 100 years to serve the educational needs of the former Loretto Heights Academy and College. The Loretto Heights Residential PUD focuses on new low scale residential uses.
- As part of the application, the applicant is requesting two Planned Unit Developments (PUD):
 - The Loretto Heights Campus Core PUD is **proposed to be rezoned from PUD-G #24 to PUD-G #41 and introduces a new subarea C**. The proposed PUD-G #41 addresses the historic core of the former Loretto Heights campus with the preservation and adaptive reuse of the historic buildings and new residential and commercial development in a campus setting based on the Denver Zoning Code CMP-EI2 zone district. Further details of PUD-G #24 and the CMP-EI2 zone district can be found in the “Existing Zoning” Section of this staff report and Article 9 of the Denver Zoning Code. The following changes to PUD-G #24 are proposed.

- No changes proposed to Subarea A
- No changes proposed to Subarea B
- Add a new Subarea C. Subarea C would apply to the property moving from PUD-G #25 to PUD-G #24 located at 3058 S May Stanton Way Approx.
 - Maximum height is limited to 4 stories or 55 feet to ensure a transition to the lower scale residential uses to the north and west.
 - A front setback is proposed to ensure consistent setbacks with the adjacent residential zone district.
- The Loretto Heights Residential PUD **is proposed to be rezoned from PUD-G #25 to PUD-G #42**. The only change proposed is to remove 14,000 square foot property at 3058 S May Stanton Way Approx. from the PUD. The PUD will not otherwise be updated. **PUD-G #42** will continue to allow for low-scale residential redevelopment oriented to a network of streets and open spaces to the north and west of the historic campus core, based on the Denver Zoning Code Single Unit (SU), Row House (RH) and Residential Mixed Use (RX) districts. Further details of PUD-G #25 and the CMP-EI2 zone district can be found in the “Existing Zoning” Section of this staff report and Article 3 of the Denver Zoning Code.



Remaining Buildings and Remaining Open Spaces within PUD-G 41. Illustrative only.

Existing Context



The following table summarizes the existing context proximate to the subject property:

	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
Site	PUD-G #24 and PUD-G #25	Office, Vacant, Parking and Multi-Unit Residential	Multiple institutional buildings with varying building heights and open areas, large setbacks, with parking lots and vacant parcels	Generally regular grid of streets interrupted by the former Loretto Heights Campus
North	S-SU-D	Single-unit residential	Single-unit residential buildings, 1-2 stories with moderate setbacks with curb cuts and vehicle access from the front	Block sizes and shapes are consistent and rectangular to the north and east, becoming irregular to the south and west. Vehicle parking generally to the side or front of buildings (no alley access).
South	R-2-A, B-2	Multi-unit residential	Multi-unit residential buildings, three stories with large setbacks with curb cuts and vehicle access from the front and sides	
East	U-MX-3 and S-MX-3	Multi-unit residential, commercial	Multi-unit residential and commercial buildings, 1-3 stories tall, with large setback from South Federal Blvd. with parking lots in front of building	
West	S-SU-F	Single-unit residential	Single-unit residential buildings, 1-2 stories with moderate setbacks with curb cuts and vehicle access from the front	

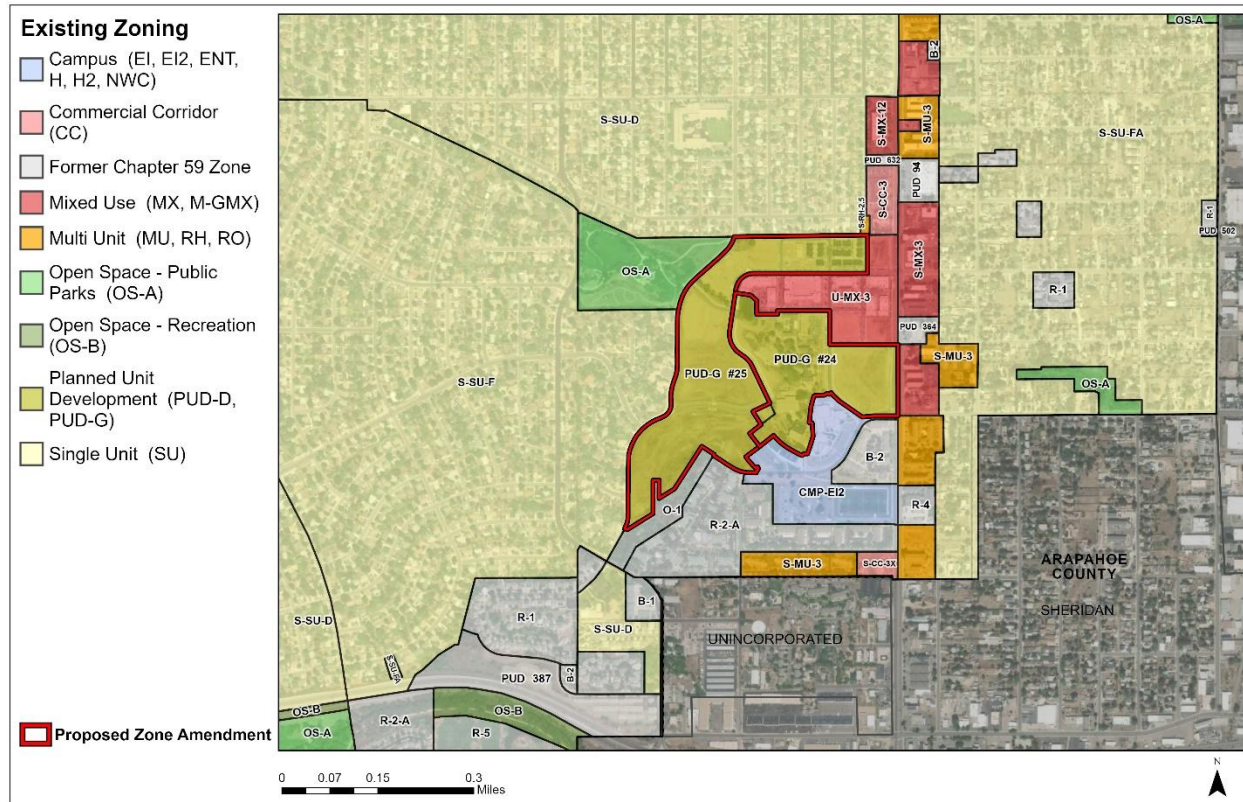
1. Historic District or Structures

The Loretto Heights campus is endowed with historic buildings commissioned by the Sisters of Loretto over a period of more than 100 years to serve the educational needs of the Loretto Heights Academy and College. They represent a variety of architectural styles designed by several prominent local architects and intentionally placed on a hilltop with commanding views of the Rocky Mountains and downtown Denver. Honoring the history of the campus and preserving and re-using the historic resources that define it as an integral piece of the community’s vision (refer to Figure 1, in page 2, “Remaining Buildings and Remaining Open Spaces within PUD-G 41”).

2. Large Development Review (LDR)

The Loretto Heights LDR Framework (LDF) is in place and continues to guide the buildout of the site in a manner consistent with the adopted plan. It outlines the key regulatory steps necessary for implementation, including completion of an Infrastructure Master Plan, Mobility Study, rezoning, subdivision, and standard construction and building permitting. The LDF also identifies potential topics for a future development agreement, such as affordable housing, off-site street improvements, historic preservation requirements outside of the PUD, and open space maintenance and tracking.

3. Existing Zoning



The site is currently zoned with two PUDs (Planned Unit Development), PUD-G #24 and PUD-G #25.

The Loretto Heights Campus Core PUD (**PUD-G #24**) addresses the historic core of the former Loretto Heights campus with the preservation and adaptive reuse of the historic buildings, and new residential and commercial development in a campus setting based on the Denver Zoning Code CMP-EI2 zone district. Further details of the CMP-EI2 zone district can be found in the “Existing Zoning” Section of this staff report and Article 9 of the Denver Zoning Code.

The Loretto Heights Residential PUD (**PUD-G #25**) allows for low-scale residential redevelopment oriented to a network of new streets and open spaces to the north and west of the historic campus core, based on the Denver Zoning Code Single Unit (SU), Row House (RH) and Residential Mixed Use (RX) districts. For further details on these zone districts can be found in Article 3 and Article 5 of the Denver Zoning Code.

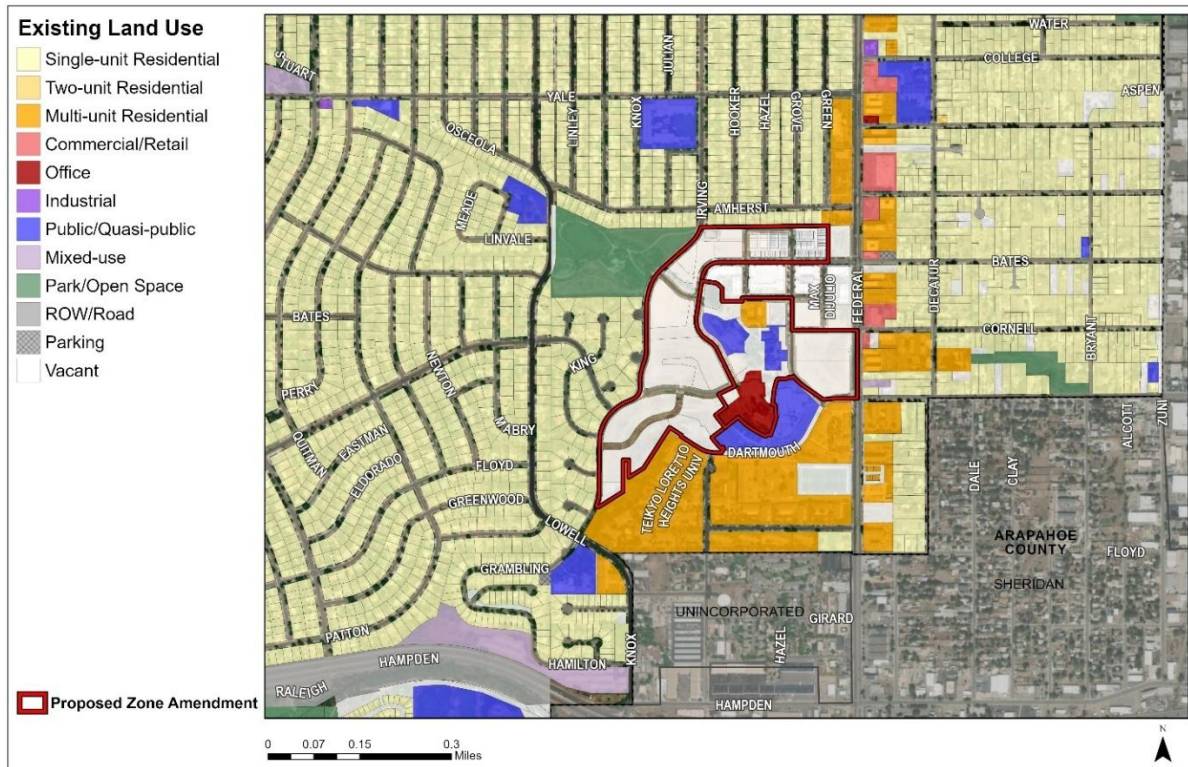
4. View Planes

The *Ruby Hill Park View Plane* is applicable to most of the site included in the rezoning. The intent of this view plane is to preserve the view of the Rocky Mountains (west of the subject site) from Ruby Hill Park (northeast of the applicable sites) and “no part of any structure within the view plane may exceed an elevation of 5,354 feet above mean sea level plus on and seven-tenths feet for each 100 feet that said part of structure is horizontally distant from the reference point” (DRMC Sec. 10-60.b).

Therefore, the portion of the subject property within this view plane is subject to maximum height restrictions ranging from 55 feet to 204 feet.

The proposed zone districts within the view plane are PUD-G #41 (maximum height of 45 feet), and PUD-G #42 (maximum height of 110 feet). As a result, the height restrictions in the *Ruby Hill Park View Plane* could impact potential development.

5. Existing Land Use Map



6. Existing Building Form and Scale



Subject site, facing west from former Loretto Heights Campus (Administration Building)



Subject site, facing west from former Loretto Heights Campus (Pancratia Hall)



Subject site, facing southwest from former Loretto Heights Campus (Library and Theater)



Subject site, facing southeast from former Loretto Heights Campus (Quadrangle)



North of subject site, facing south from West Amherst Avenue



East of subject property, facing west from South Federal Boulevard



East of subject site, facing east from South Federal Boulevard



South of subject site, facing west from West Dartmouth Avenue (DSST Campus)



South of subject site, facing east from South Irving Street



West of subject site, facing west from South Irving Street

Proposed Zoning

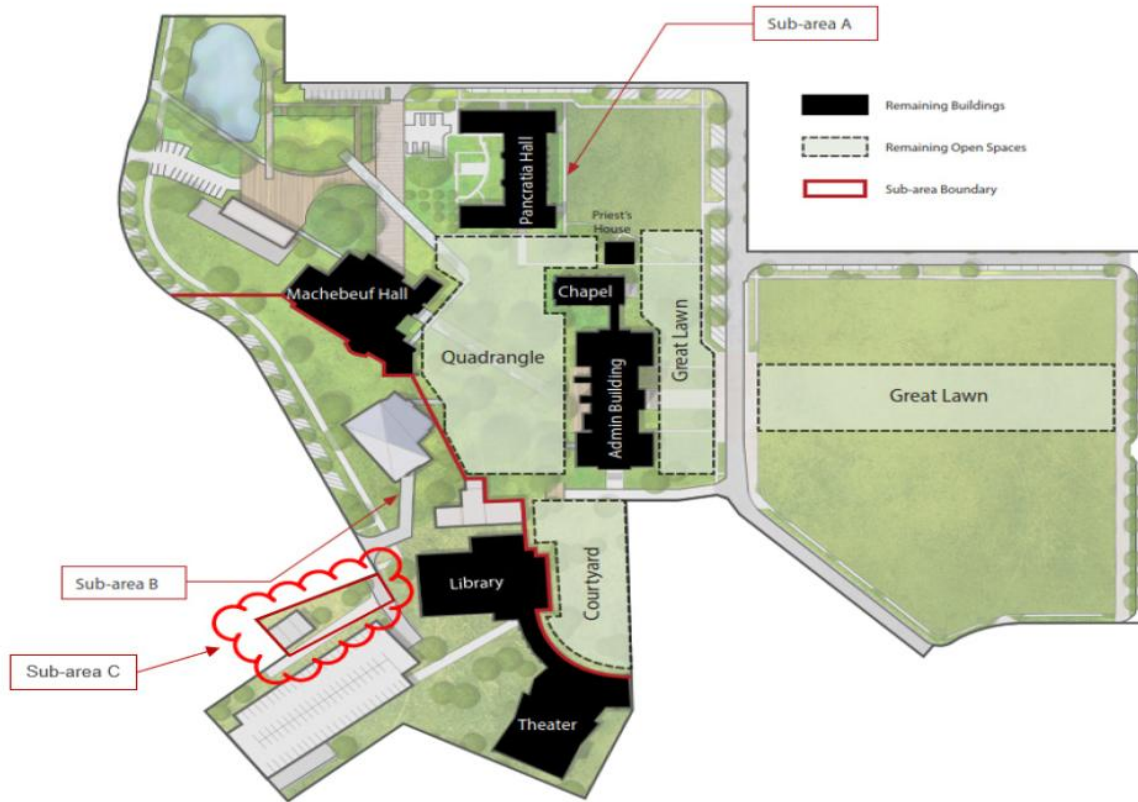
The proposed rezoning will result in a change to the boundaries of existing PUD-G #24 (campus core PUD) and PUD-G #25 (residential PUD) to rezone a parcel, 3058 South May Stanton Way Approx., from the residential PUD into the historic campus core PUD. The new boundary will be reflected in PUD-G #41 and #42. There are no other proposed changes to PUD-G #42.

The purpose of a Planned Unit Development (PUD) district is to provide an alternative to conventional land use regulations, combining use, density, site plan, and building form considerations into a single process, and substituting procedural protections for the more prescriptive requirements in the Denver Zoning Code. The PUD District is intended to respond to unique and extraordinary circumstances, providing more flexible zoning than what is achievable through a standard zone district and avoiding multiple variances, waivers, and conditions. The Denver Zoning Code notes that a PUD should provide significant public benefit, not achievable through application of a standard zone district. In exchange for the flexibility in site design with respect to the arrangement, heights, and setbacks of buildings, densities, open space and circulation elements in PUD-G #41 and PUD-G #42.

PUD-G #41 – Inclusion of new Subarea C

The proposed PUD-G #41 would apply to the historic core of the Loretto Heights campus. It is based on the Denver Zoning Code zone district CMP-EI2 (Campus - Education Institution 2) and addresses the preservation and adaptive reuse of the historic buildings and open spaces, along with new residential and commercial development in a topographically-varied campus setting. In responding to the unique attributes of the subject property, PUD-G #41 contains several special provisions that address:

- Subarea A – No Change
- Subarea B – No Change
- Subarea C – New
 - Applies Side Interior Lot Line Bulk Plane Standard
 - Allows a maximum building height of 4 stories or 55 feet
 - Requires a primary Street Setback of 20 feet



Further details of this proposed PUD can be found within the PUD-G #41 attachment to this staff report.

PUD-G #42 - No change other than removing parcel addressed 3058 S May Stanton Way Approx

The proposed PUD-G #42 will continue to allow for low-scale residential redevelopment oriented to a network of streets and open spaces to the north and west of the historic campus core. In responding to the unique attributes of the subject property, PUD-G #42 contains several special provisions including:

- Addressing buildings that front open spaces and public streets
- Implementing land use recommendations that do not match an existing zone district (e.g. three-story maximum height for row house districts in the Suburban neighborhood context and side street standards for South Irving and South Julian Streets)
- Addressing height within the unique topography, including a height incentive which rewards development meeting Denver's green building objectives.

PUD-G #42 has four subareas based on Single Unit, Row House and Residential Mixed-Use zone districts, including S-SU-A (Subarea A), S-RH-2.5 (Subarea B and C), and U-RX-3 (Subarea D).

Further details of this proposed PUD can be found within the PUD-G #42 attachment to this staff report.

Summary of City Agency Referral Comments

As part of the DZC review process, the rezoning application is referred to potentially affected city agencies and departments for comment. A summary of agency referral responses follows:

Assessor: Approved – No Comments

Asset Management: Approved – No Response

Denver Public Schools: Approved – No Response

Department of Housing and Stability: Approved – No Comments.

Department of Public Health and Environment: Approved – No Comments.

Denver Parks and Recreation: Approved – No Response

DOTI – R.O.W.- City Surveyor: Approved – No Response

Development Services – Project Coordination: Approved – See Comments Below

Development Review is currently in progress re: 2024PM0000364 / 2025-SDP-00000138. The SDP will need to demonstrate compliance with the underlying PUD and Zone District prior to approval of the SDP.

Development Services - Fire Protection: Approved – No Response

Development Services – Transportation: Approved – No Response

Development Services- Wastewater: Approved – No Comments.

Public Review Process

	Date
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, tenants and property owners; property legally posted:	1/27/2026
Property legally posted for a period of 15 days and CPD written notice of the Planning Board public hearing sent to all affected members of City Council, registered neighborhood organizations, tenants and property owners:	4/21/2026
Planning Board	5/6/2026
CPD written notice of Community Planning and Housing Committee meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten working days before the meeting:	5/11/26 (tentative)
Community Planning and Housing Committee of the City Council:	5/19/26 (tentative)
Property legally posted for a period of 21 days and CPD notice of the City Council public hearing sent to all affected members of City Council and registered neighborhood organizations:	6/8/26 (tentative)
City Council Public Hearing:	6/29/26 (tentative)

Public Outreach and Input

As described in the applicant’s narrative, the applicant conducted outreach with Registered Neighborhood Organizations and nearby community members.

Registered Neighborhood Organizations (RNOs)

As of the date of this staff report, staff have not received any comments from Registered Neighborhood Organizations.

Other Public Comment (all comments are attached to the staff report)

To date, staff have not received any comments from the public.

Criteria for Review / Staff Evaluation

The criteria for review of this rezoning application are found in DZC, Sections 12.4.10.7 and 12.4.10.8 and as follows:

DZC Section 12.4.10.7

1. Consistency with Adopted Plans
2. Public Interest
3. Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements

DZC Section 12.4.10.8 – Criteria for PUD rezonings

4. The PUD District is consistent with the intent and purpose of such districts stated in Article 9, Division 9.6 (Planned Unit Development) of this Code.
5. The PUD District and the PUD District Plan comply with all applicable standards and criteria stated in Division 9.6.
6. The development proposed on the subject property is not feasible under any other zone districts and would require an unreasonable number of variances or waivers and conditions.
7. The PUD District and the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property; and
8. The PUD District and the PUD District Plan establish permitted building forms that are compatible with the adjacent building forms, or which are made compatible through appropriate transitions at the boundaries of the PUD District Plan (e.g., through decreases in building height; through significant distance or separation by rights-of-way, landscaping or similar features; or through innovative building design.

7. Consistency with Adopted Plans

The following adopted plans apply to this property:

- *Denver Comprehensive Plan 2040*
- *Blueprint Denver (2019)*
- *Loretto Heights Area Plan (2019)*

Denver Comprehensive Plan 2040

The proposed rezoning is consistent with many of the adopted *Denver Comprehensive Plan 2040* strategies, which are organized by vision element.

The proposed rezoning to change the boundaries of the PUDs is consistent with the following strategies in the Equitable, Affordable, and Inclusive vision element:

- Equitable, Affordable and Inclusive Goal 1, Strategy A – Increase development of housing units close to transit and mixed-use developments (p. 28).
- Equitable, Affordable and Inclusive Goal 1, Strategy C – Improve equitable access to resources that improve quality of life, including cultural and natural amenities, health care, education, parks, recreation, nutritious food and the arts. (p. 28).
- Equitable, Affordable and Inclusive Goal 2, Strategy A - Create a greater mix of housing options in every neighborhood for all individuals and families (p. 28).

- Equitable, Affordable and Inclusive Goal 3, Strategy B – Use land use regulations to enable and encourage the private development of affordable, missing middle and mixed-income housing, especially where close to transit (p. 29).

The proposed rezoning will continue to enable mixed-use development, including varying housing options, retail services, and open space areas. Building forms will consist of an intensity consistent with the vision for a walkable, mixed-use neighborhood adjacent to public transit and is consistent with the following strategies in the Strong and Authentic Neighborhoods vision element:

- Strong and Authentic Neighborhoods Goal 1, Strategy A – Build a network of well connected, vibrant mixed-use centers and corridors (p. 34).
- Strong and Authentic Neighborhoods Goal 1, Strategy D – Encourage quality infill development that is consistent with the surrounding neighborhoods and offers opportunities for increased amenities (p. 34).
- Strong and Authentic Neighborhoods Goal 3, Strategy E – Support the stewardship and reuse of existing buildings, including city properties (p. 34).
- Strong and Authentic Neighborhoods Goal 4, Strategy A – Grow and support neighborhood-serving businesses (p. 34).

Finally, the proposed rezoning would continue to support the efforts to reuse existing buildings, and is consistent with the following strategies in the Environmentally Resilient vision elements:

- Environmentally Resilient Goal 8, Strategy B – Encourage mixed-use communities where residents can live, work and play in their own neighborhoods (p. 54).
- Environmentally Resilient Goal 8, Strategy C – Focus growth by transit stations and along high and medium-capacity transit corridors (p. 54).

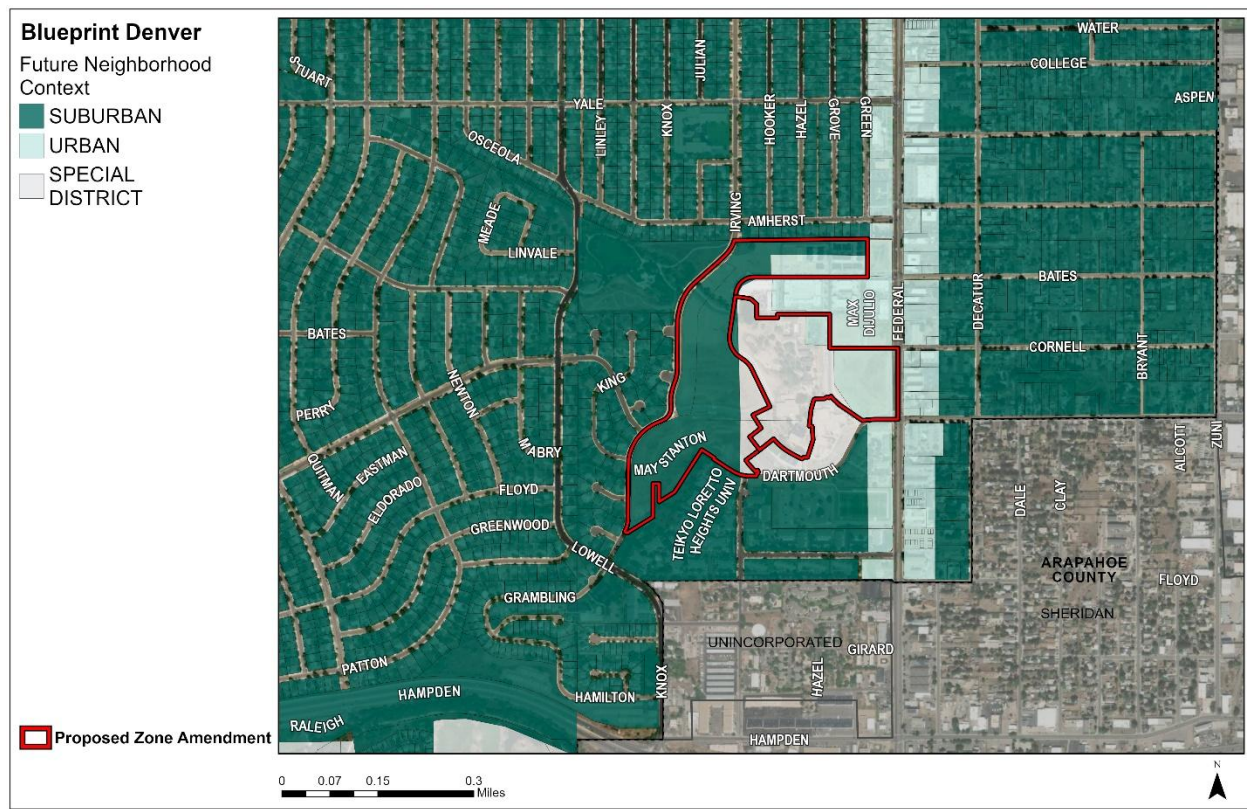
Therefore, the rezoning is consistent with *Denver Comprehensive Plan 2040* recommendations and strategies.

Blueprint Denver

Blueprint Denver was adopted in 2019 as a supplement to *Comprehensive Plan 2040* and establishes an integrated framework for the city's land use and transportation decisions. *Blueprint Denver* identifies the subject properties as Suburban, Urban, and Campus within the Special District neighborhood context, and provides guidance from the future growth strategy for the city.

Blueprint Denver Future Neighborhood Context

Blueprint Denver identifies three future neighborhood contexts for the subject property, Suburban, Special District, and Urban. The western portion of the subject property, proposed to be rezoned to PUD-G #42, is predominantly within the Suburban neighborhood context. *Blueprint Denver* describes these areas as having a "range of uses from single-unit to multi-unit residential to commercial corridors and centers" (p. 136). Block patterns in this context are typically irregular with curving streets. While the Suburban context is generally more auto oriented than other contexts, "Denver's suburban areas are still more urban in nature and suburban places should reflect that" (p. 189). The central portion of the subject property, proposed to be rezoned to PUD-G #41, is identified as the Special Districts context. These areas "serve a specific purpose, usually highly specific based on uses, such as education, industry or healthcare" (p. 137).



PUD-G #41

The proposed PUD-G #41 will continue to be based on the CMP-EI2 zone district and the respective subarea boundaries, even the inclusion of subarea C, are mapped consistent with the neighborhood context map above. The campus zone districts allow for flexible placement of buildings and tend to have transitional areas that taper off in intensity towards adjacent residential neighborhood contexts while also incorporating more intense development (DZC 9.2.1). The proposed PUD-G #41 with new boundaries is appropriate and consistent with the Special District context plan direction as it will allow for the preservation and adaptive reuse of historic buildings and new residential and commercial development in a campus setting. Existing and proposed building forms will vary in height and intensity and respond to the surrounding community.

PUD-G #42

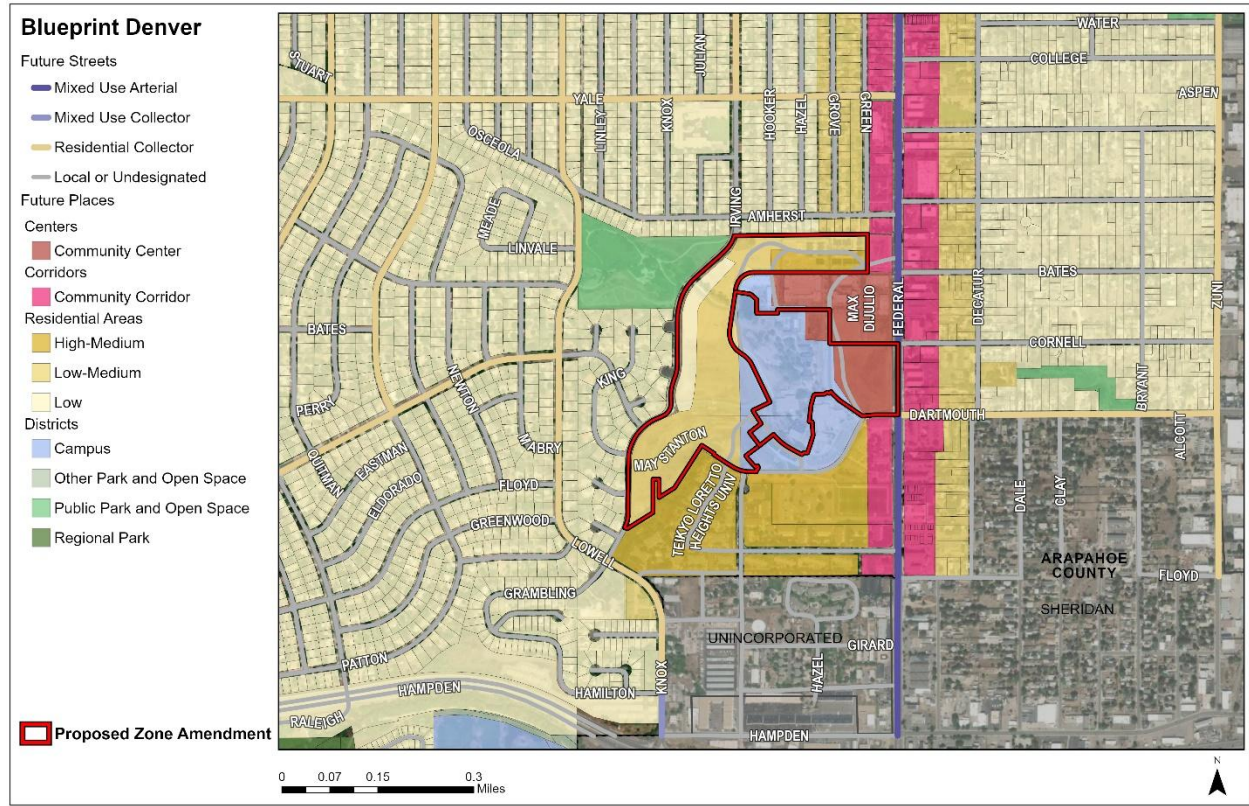
As stated previously in the staff report, the only change proposed to the residential PUD (proposed to be rezoned from PUD-G #25 to PUD-G #42) is to remove the property at 3058 S May Stanton Way Approx. No other changes are proposed. The proposed PUD-G 42 is based on the S-SU, S-RH and U-RX zone districts and the respective subarea boundaries are mapped consistent with the neighborhood context map above. The suburban zone districts are characterized by single-unit and multi-unit residential, as well as commercial strips and centers (DZC 6.1.1). Additionally, the general character of the urban neighborhood context is characterized by small-scale multi-unit residential uses and commercial areas which are typically embedded in residential areas (DZC 5.1.1). The proposed PUD-G #42 would allow compatible low-scale residential uses, and some residential mixed-use, in an appropriate building form embedded in the neighborhood, consistent with the *Blueprint Denver* description of the Suburban and Urban neighborhood contexts. The aspirational vision of these contexts is that the proposed districts are more urban in nature, and the design standards found in PUD-G #42 support a vibrant, walkable area along curvilinear streets and publicly accessible open space.

Blueprint Denver Future Places

The Future Places map identifies several place types for the subject sites. The northern and western area is identified as High-Medium Residential, Low-Medium Residential, and Low Residential. *Blueprint Denver* describes the High-Medium Residential place type as “a mix of mid-scale multi-unit residential options. Some neighborhood-serving mixed-use may be appropriate, especially along arterial streets or at non-local intersections. Buildings are generally up to 5 stories in height” (p. 233). Most of the western portion of the subject property is identified as Low-Medium Residential. These areas include “a mix of low- to mid-scale multi-unit residential options. Small-scale multi-unit buildings are interspersed between single- and two-unit residential. Limited mixed-use along some arterial and collector streets may be appropriate locations to introduce additional residential intensity. A variety of lower scale residential forms including row houses and small multi-unit buildings are found. Buildings are generally 3 stories or less in height” (p. 200). *Blueprint Denver* identifies the Low Residential place type along South Irving Street. These areas are “generally characterized by single-unit uses on larger lots. Accessory dwelling units and compatible two-unit uses are appropriate and can be thoughtfully integrated” (p. 198). Buildings in this place type are typically 2.5 stories in height.

The Future Places map shows the central portion of the subject property as part of a “Campus” area within the Districts context. *Blueprint Denver* describes these areas as having a “primary purpose such as education or medical services. These environments often provide retail, restaurants, offices, and residential uses to support the primary use and serve the surrounding neighborhoods” (p. 291). Campus buildings vary greatly in size and form, and multi-story, single-use and mixed-use buildings are typical. Finally, when adjacent to lower intensity development, campuses should transition gradually to respect the surrounding neighborhood.

The east of the subject property is identified as the Community Corridor future place type. *Blueprint Denver* describes these areas as “typically provid{ing} some mix of office, commercial and residential uses” (p. 228). These areas often have a linear orientation along the street and height are typically up to 5 stories. Most of the eastern portion of the proposed rezoning along Federal Boulevard is identified as the Community Center place type. These areas have a wide customer draw and provide “some mix of office, commercial and residential uses” (p. 226). They include continuous building frontages with heights up to 5 stories.



PUD-G #41

The PUD-G #24 boundary encompasses the Campus future place type described above. The proposed rezoning which adds parcel 3058 S May Stanton Way Approx will continue to address the historic core of the former Loretto Heights campus with the preservation and adaptive reuse of the historic buildings, and new residential and commercial development in a campus setting. The custom zone district will allow for a variety of sensitive infill development including retail, residential, and office uses which will serve the surrounding neighborhood consistent with the *Blueprint Denver* place type description. The proposed maximum allowable building heights and the mass and scale of buildings varies and is appropriate when considering the historic status of the site. Therefore, the proposed zone district continues to be consistent with the future place guidance mapped in this area.

PUD-G #42

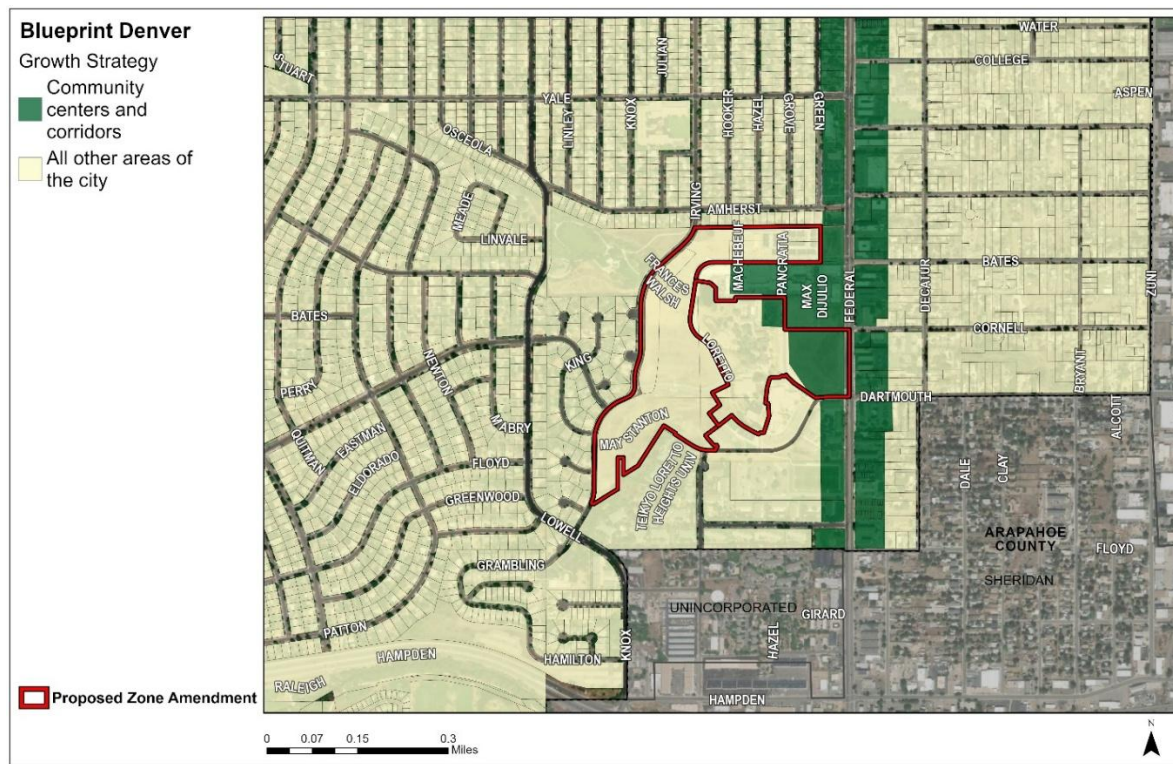
The PUD-G #42 with the new boundary will continue to encompass all the High-Medium Residential, Low-Medium Residential, and Low Residential described above. The proposed rezoning allows for low-scale residential development oriented to a network of new streets and open spaces. The carefully calibrated height guidance and allowable building forms built into the custom zone district is intended to respond to the existing single-unit structures to the west and north, and provide a variety of residential uses that compatibly transition to higher intensity uses the closer you get to the Campus Core. Therefore, the proposed zone district is still consistent with the future place guidance mapped in this area.

Street Types

Blueprint Denver street types work in concert with the future plan to evaluate the appropriateness of the intensity of the adjacent development (p. 67). The subject property is located between Irving Street and Federal Boulevard, north of Dartmouth Avenue. *Blueprint Denver* classifies Irving Street and Dartmouth Avenue as Local Streets. These streets are designed for the highest degree of property access and the lowest amount of through movement” (p. 154). Land uses along local streets vary, but they are most often characterized by residential uses (p. 161). Federal Boulevard is classified as a Mixed-Use Arterial, which “are designed for the highest amount of through movement and the lowest degree of property access” (p. 154). These streets include retail, office, residential, and restaurants with buildings that are pedestrian-oriented with shallow setbacks and high building coverage.

The proposed rezoning to PUD-G #41 and PUD-G #42 zone districts continue to be consistent with the Future Street Types designation for the area. PUD-G 42 allows for appropriate residential and some mixed uses that are served by proposed by local streets. The primary purpose of these public streets and private drives is property access and a low degree of through movement. PUD-G 41 allows for the preservation and adaptive reuse of historic buildings on the former Loretto Heights Campus. These mixed-use buildings will be served by new local streets allowing for access to residential uses and some commercial activity. Finally, these zone districts are consistent with this plan direction for this location and the uses that may result from this rezoning are appropriate along the existing Mixed-Use Arterial street.

Growth Strategy



Blueprint Denver's growth strategy map is a version of the future places map, showing the aspiration for distributing future growth in Denver (p. 51). The western portion of the subject property is located within the "all other areas of the city" growth area, where 10% employment growth and 20% housing growth is anticipated by 2040 (p. 51). *Blueprint Denver* identifies the eastern portion of the subject property, along Federal Boulevard, as the "Community Centers and Corridors" growth area. These areas are expected to see 20% of new employment growth and 25% of new housing growth by 2040 (p. 51).

The proposed map amendment to PUG-G #41 and PUD-G #42, is consistent with the growth strategy mapped for this area. The proposal allows for infill development that will support the adaptive reuse of existing buildings, as well as an appropriate level mixed-uses that will enable the growth of employment opportunities. Therefore, the requested zone districts are consistent with *Blueprint Denver's* growth strategy.

Other Applicable *Blueprint Denver* Policy Recommendations and Strategies

Historic Preservation

Blueprint Denver provides recommendations related to preserving historic structures. Land Use and Built Form: General Policy 2, Strategy E says, "in historic areas, balance efficiency with preservation through strategies that encourage the reuse of structures" (p. 72). In addition, Land Use and Built Form: Design Quality and Preservation Policy 2, Strategy A says "continue the city's commitment to existing historic districts and landmarks and use historic designation to preserve the character of an individual structure or district or where there is historic, architectural, cultural, and/or geographic significance" and Strategy I says "promote incentives to preserve the reuse of historic buildings and the unique historic features of Denver's neighborhoods" (p. 99).

The proposed PUD-G #41 will continue to support the efforts to preserve and adaptive reuse of the historic resources on the former Loretto Heights Campus and would facilitate its continued use, consistent with these recommendations from *Blueprint Denver*.

Custom Zoning

Blueprint Denver provides the following direction on how to limit the use of custom zoning including PUDs: "Limit the use of site-specific, customized zoning tools—such as Planned Unit Developments (PUDs) and waivers/conditions—to unique and extraordinary circumstances. The zoning code offers a wide variety of zone districts that cover the diverse contexts and places of Denver. Custom zoning tools are most effective when a standard zone district does not exist to implement the adopted plans for an area" (p. 73). More details on the challenges of custom zoning are provided on page 73 of *Blueprint Denver*.

Due to the many unique attributes of the property, including the challenging topography and the variety of remaining historic resources located in the center of the site, there is no standard zone district that can address this site's unique and extraordinary circumstances. Additionally, the PUDs district will assist in implementing land use recommendations from the *Loretto Heights Small Area Plan* that do not match an existing zone district (e.g. three-story maximum height for row house districts in the Suburban

neighborhood context and side street standards for South Irving and South Julian Streets). Therefore, the use of PUDs is consistent with the recommendations of *Blueprint Denver*.

Equity

The proposed rezoning is also consistent with the following strategies from *Blueprint Denver*:

- Land Use & Built Form – General Goal 2: Allow increased density in exchange for desired outcomes, such as affordable housing (p. 72).
- Land Use & Built Form: Housing Policy 6: Increase the development of affordable housing and mixed-income housing, particularly in areas near transit, services and amenities (p. 85).

The rezoning will continue provide the potential for a more integrated mix of residential, commercial, and pedestrian-oriented uses. Future development is expected to bring needed services, activate the site, and improve overall walkability through updated building placement and circulation standards. Planned infrastructure upgrades—including enhanced bus stops and safer pedestrian crossings—will further strengthen transit access and connectivity.

Adaptive Reuse

Likewise, the proposed PUDs support the following policy regarding building preservation regardless of historic status:

- Land Use & Built Form: Design Quality and Preservation Policy 2: Promote incentives to preserve the reuse of historic buildings and the unique historic features of Denver’s neighborhoods (p.99).
- Land Use & Built Form: Design Quality and Preservation Policy 3: Identify important mixed-use historic structures and encourage their continued use or adaptive reuse (p.102).
- Land Use & Built Form: Design Quality and Preservation Policy 6: Incentivize the preservation of structures and features that contribute to the established character of an area, even if they are not designated as landmarks or historic districts (p.104).

This proposed rezoning is consistent with *Blueprint Denver* as the PUDs will continue facilitate the adaptive reuse of an existing buildings.

Climate

This existing PUDs support the city’s goals to reduce climate impacts by enabling additional housing near transit, facilitating the adaptive reuse of an existing buildings, and amenities. Because many transportation options are available and amenities are walkable, these areas are less auto dependent, which can reduce greenhouse gas emissions from transportation. Also, multi-unit buildings are more energy efficient than low density residential development types. This energy efficiency will advance Denver’s goals to reduce greenhouse gas emissions from buildings, which contribute to a warming climate.

Based on these policies, the proposed rezoning is consistent with *Blueprint Denver* as the PUDs will continue to support the proposed adaptive reuse of the existing building, and allow development consistent with the campus neighborhood context.

Loretto Heights Area Plan

General Framework

The *Loretto Heights Small Area Plan* contains a framework plan for the entire plan area and recommendations for smaller neighborhood areas. The overarching theme of the *Loretto Heights Small Area Plan* is to create a community destination that preserves the history of the former Loretto Heights campus, while also accommodating a wide variety of new uses and services in an environment that enhances the quality of life for future residents.

The proposed rezoning to move one parcel from PUD-G #25 to PUD-G #24 remains consistent with the Loretto Heights Small Area Plan and the established LDF. The adjustment does not alter the overarching vision for the site, but rather refines parcel boundaries to better align with infrastructure planning, land use organization, and implementation sequencing. The parcel will continue to contribute to the broader framework of mixed-use development, preservation of historic resources, and creation of a walkable, connected community. As such, the rezoning maintains consistency with plan guidance while supporting a more efficient and cohesive buildout of the site.

The proposed rezoning will continue to be consistent with the following Land Use and Built Form, Mobility and Quality of Life Recommendations:

1. Land Use and Built Form Recommendations
 - LU - 01 Promote a diverse mix of land uses (p. 51).
 - LU - 04 Encourage high-quality public realm design that contributes to the neighborhood character and sense of place (p. 52).
 - LU - 05 Promote a variety of building heights and intensities (p. 52).
 - LU - 07 Preserve and re-use historic structures and features on the Loretto Heights campus (p. 53).
2. Mobility Recommendations
 - MOB - 04 Increase access to multi-use trails, pathways and parks and open space (p. 66).
 - MOB - 05 Create a complete pedestrian network (p. 66).
 - MOB - 08 Increase the use of shared mobility options (p. 68).
 - MOB - 09 Improve resident access to transit (p. 68).
3. Quality of Life Recommendations
 - QOL - 03 Create new community gathering spaces to accommodate a variety of activities for residents and visitors (p. 79).
 - QOL - 04 Provide a variety of amenities that contribute to a sense of place and enhance active and passive uses (p. 79).

Loretto Heights Small Area Plan Maps

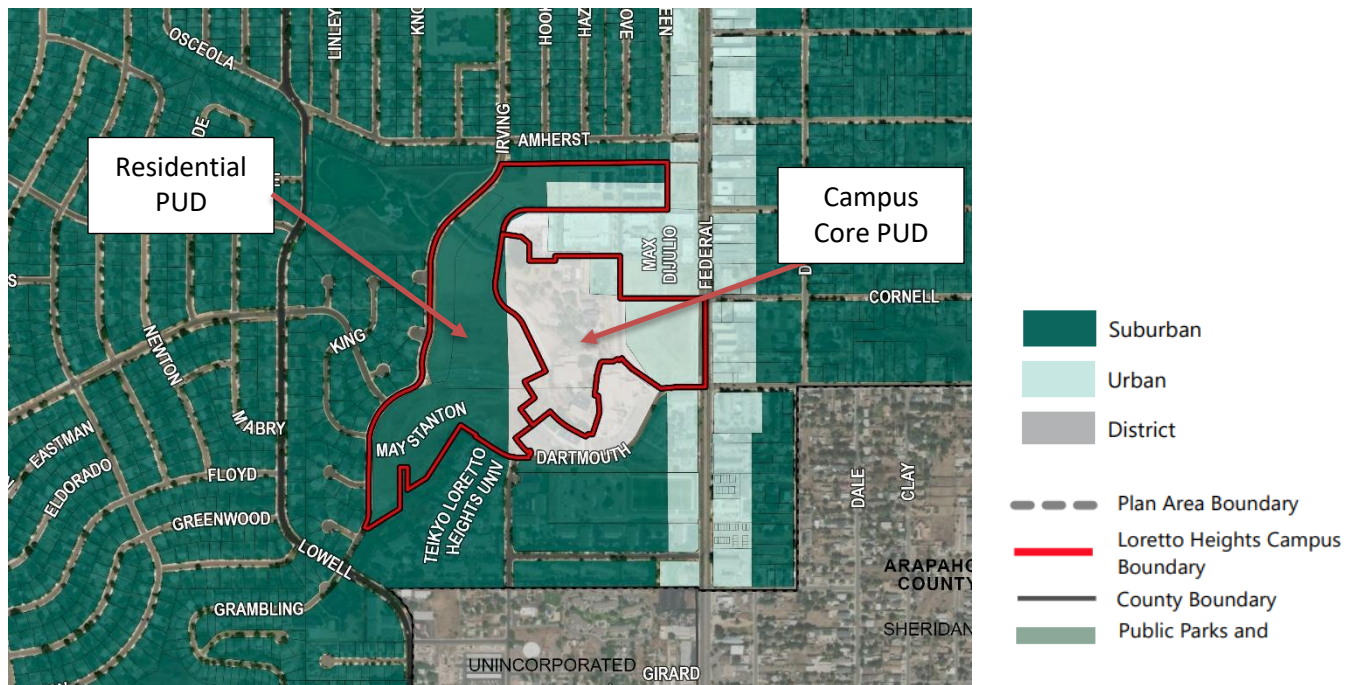
The *Loretto Heights Small Area Plan* was adopted as a supplement to *Blueprint Denver* in 2019 and is consistent with many citywide goals and policies. The Neighborhood Context and Future Place maps created in the *Loretto Heights Small Area Plan* provide detailed guidance for use in rezonings and other policy decisions. In 2019, these maps updated the same *Blueprint Denver* maps.

Suburban, Urban and District Context

Consistent with the *Blueprint Denver* mapping and analysis above, there are three different future neighborhood contexts for the subject property, Suburban, Special District, and Urban. The proposed

PUD-G 42 will continue to allow compatible residential uses, and some residential mixed-use, in an appropriate building form embedded in the neighborhood, consistent with the *Loretto Heights Small Area Plan* description of the Suburban and Urban neighborhood contexts. Similarly, the proposed PUD-G #41 is appropriate and consistent with the Special District context plan direction as it will support the preservation and adaptive reuse of historic buildings and new residential and commercial development in a campus setting. The proposed rezoning to move on parcel from PUD-G #25 to PUD-G #24 is consistent with the *Loretto Height Small Area Plan's* Urban context guidance.

Future Neighborhood Contexts Map



Future Place and Building Height

Consistent with the *Blueprint Denver* mapping and analysis above, the Future Places map identifies several place types for the subject site. The northern and western areas are identified as High-Medium Residential, Low-Medium Residential, and Low Residential with maximum building heights of 2.5-3 stories. The Future Places map shows the central portion of the subject property as part of a “Campus” area within the Districts context with maximum building heights of 5-8 stories. The “Campus” description states “when adjacent to lower intensity development, the campus should transition gradually to respect the surrounding neighborhood” (p.40). While the small area plan allows up to 8 stories for Subarea C, PUD-G #41 has restrictive height of 4 stories to allow transition from the Campus Core into the lower intensity residential development to the north and west.

Building Height Map



PUD-G #41 addresses the historic core of the former Loretto Heights campus with the preservation and adaptive reuse of the historic buildings, and new residential and commercial development in a campus setting. The custom zone district will continue to allow for a variety of sensitive infill development including commercial, residential, and office uses which will serve the surrounding neighborhood consistent with the *Loretto Heights Small Area Plan* place type description. Subarea C of PUD-G #41 establishes reduced height limits intended to create a compatible transition from the Campus Core to adjacent lower-intensity residential development. The proposed maximum allowable building height of 5-8 stories, reduced height of Subarea C, and the mass and scale of buildings varies and is appropriate when considering the historic status of the site.

PUD-G #42 will continue to allow for low-scale residential development oriented to a network of new streets and open spaces. The carefully calibrated height guidance (maximum of 2.5 to 3 stories) and allowable building forms built into the custom zone district is intended to respond to the existing single-unit structures to the west and north, and provide a variety of residential uses that compatibly transition to higher intensity uses the closer you get to the campus core.

2. Public Interest

The proposed rezoning would further the public interest through implementation of the city's adopted land use plans, including the *Loretto Heights Small Area Plan*. The change in boundaries for the PUDs will continue to facilitate the preservation and reuses of some of the existing structures on the former campus, the application notes that the proposed zone districts contain enhanced design standards that reinforce the desired character of the area and encourage better built form outcomes fostering a more pedestrian-oriented environment.

3. Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements

PUD-G #41

PUD-G 41 is based on the CMP-EI2 zone district. This Campus context generally consists of midsize to large medical, institutional, educational or entertainment sites (DZC Section 9.2.1). The context allows flexible placement of buildings and a unified treatment of site elements like signage, landscaping, and open space. The context may have transitional areas that taper off in intensity towards adjacent residential neighborhoods, or they may be adjacent to more intense development. Buildings may be oriented either to a street, or to an internal courtyard, or to an open space area. Building massing varies with greater massing generally interior to the site. In this district the General primary building form is the only allowed building form.

PUD-G #42

Subareas A, B and C within PUD-G #42 are based on the Suburban neighborhood context which is characterized by single-unit residential and multi-unit residential, commercial strips and centers, and office parks. Single-unit residential consists typically of the Suburban House building form, and multi-unit building forms consist of Row House and occasional mid-and-high-rise Apartment building forms (DZC Section 3.1.1). Subarea D within PUD-G #42 is based on the urban neighborhood context and is primarily characterized by single-unit and two-unit residential uses where small-scale multi-unit residential uses and commercial areas are embedded in residential areas (DZC Section 5.1.1).

The proposed map amendment to PUD-G #42 would allow a variety of residential uses, including single unit and rowhouse building forms, consistent with the Suburban context description. Additionally, within Subarea D, PUD-G #42 will allow for small-scale multi-unit residential uses and commercial areas embedded in a primarily residential area, consistent with the Urban context description. For further analysis of consistency with PUD zone district purpose and intent, see section 6.A of this staff report.

The proposed map amendment to PUD-G #41 addresses the historic core of the former Loretto Heights campus with the preservation and adaptive reuse of the historic buildings, and new residential and commercial development in a campus setting. The varying height, building orientation, and publicly accessible open space standards in PUD-G #41 are consistent with the Campus district purpose.

4. Additional Review Criteria for Rezoning to a PUD District.

A. The PUD District is consistent with the intent and purpose of such districts stated in Article 9, Division 9.6 (Planned Unit Development) of the Zoning Code;

- The PUD District is consistent with the intent and purpose of such districts stated in Article 9, Division 9.6 (Planned Unit Development) of the Zoning Code to respond to “unique and extraordinary circumstances where more flexible zoning than what is achievable through a standard zone district is desirable and multiple variances, waivers, and conditions can be avoided.”
 - The proposed rezoning updates the PUD boundaries from PUD-G #24 and #25 to PUD-G #41 and #42 to reflect revised site conditions and planning priorities. This change enables a customized zoning approach necessary to address site topography, implement adopted plan recommendations, and preserve the historic character of the property while allowing for feasible redevelopment.
- Section 9.6.1.1.C states “A PUD District is not intended as either a vehicle to develop a site inconsistent with the applicable neighborhood context and character, or solely as a vehicle to enhance a proposed development’s economic feasibility.”
 - The proposed PUDs would allow development on the subject property that is consistent with the Suburban, Urban and Campus neighborhood contexts and that furthers the public health, safety, and general welfare of the city, as described above.
- According to Section 9.6.1.1.D., “in return for the flexibility in site design a PUD District should provide significant public benefit not achievable through application of a standard zone district, including but not limited to diversification in the use of land; innovation in development; more efficient use of land and energy; exemplary pedestrian connections, amenities, and considerations; and development patterns compatible in character and design with nearby areas and with the goals and objectives of the Comprehensive Plan.” The PUD District is compatible with the goals and objectives of the Comprehensive Plan while providing significant public benefit including:
 - Provision of a diverse range of much needed affordable housing options, including different price points, types, and a mix of rental and for-sale units.
 - Provision of publicly accessible open space and valuable connections to the adjacent Loretto Heights Park and regional trail network including the Platte River Trail.
 - Development patterns compatible in character and design with surrounding neighborhoods while preserving the historic structures and character of the former Loretto Heights campus.
 - The expanded allowed uses on the former campus while providing the historic structures more flexibility to adapt to new uses over time.
 - Investments in public infrastructure including both public and private drives which improve east-west vehicular and pedestrian connections throughout the subject site.

- B. *The PUD District and the PUD District Plan comply with all applicable standards and criteria stated in Division 9.6;*
- The proposed PUD District and PUD District Plan comply with the standards and criteria stated in Division 9.6, including those described above and the form and content standards in Section 9.6.1.3.
- C. *The development proposed on the subject property is not feasible under any other zone districts, and would require an unreasonable number of variances or waivers and conditions;*
- As described above, the site would require several variances or waivers to the standard S-SU, S-RH, U-RX and CMP-EI2 zone districts to accommodate the development, most notably the location, side street standards, height and scale of the allowed development in PUD-G #42, and the flexible building standards needed to preserve and maintain existing buildings in PUD-G #41. There is no other zone district which would accommodate the development without variances or waivers.
- D. *The PUD District establishes permitted uses that are compatible with existing land uses adjacent to the subject property;*
- The PUD District proposes uses consistent with those allowed in S-SU, S-RH, U-RX and CMP-EI2, with additions and modifications described above. These uses are appropriate to apply to a site currently used for public/quasi-public uses in a Suburban neighborhood that is surrounded by varying residential intensity and commercial areas.
- E. *The PUD District establishes permitted building forms that are compatible with adjacent existing building forms, or which are made compatible through appropriate transitions at the boundaries of the PUD District Plan.*
- The PUD Districts allow building heights and building forms that are compatible with the surrounding neighborhoods. The setback and building form restrictions ensure appropriate relationships to adjacent properties, the historic character of the campus core, and the surrounding neighborhood.

Attachments

1. PUD-G #41
2. PUD-G #42
3. Outreach