



TO: Denver City Council Community Planning and Housing Committee
FROM: Tony Lechuga, Senior City Planner
DATE: May 7, 2026
RE: Official Zoning Map Amendment Application 2026-REZONE-0000015

Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommend approval for Application 2026-REZONE-0000015

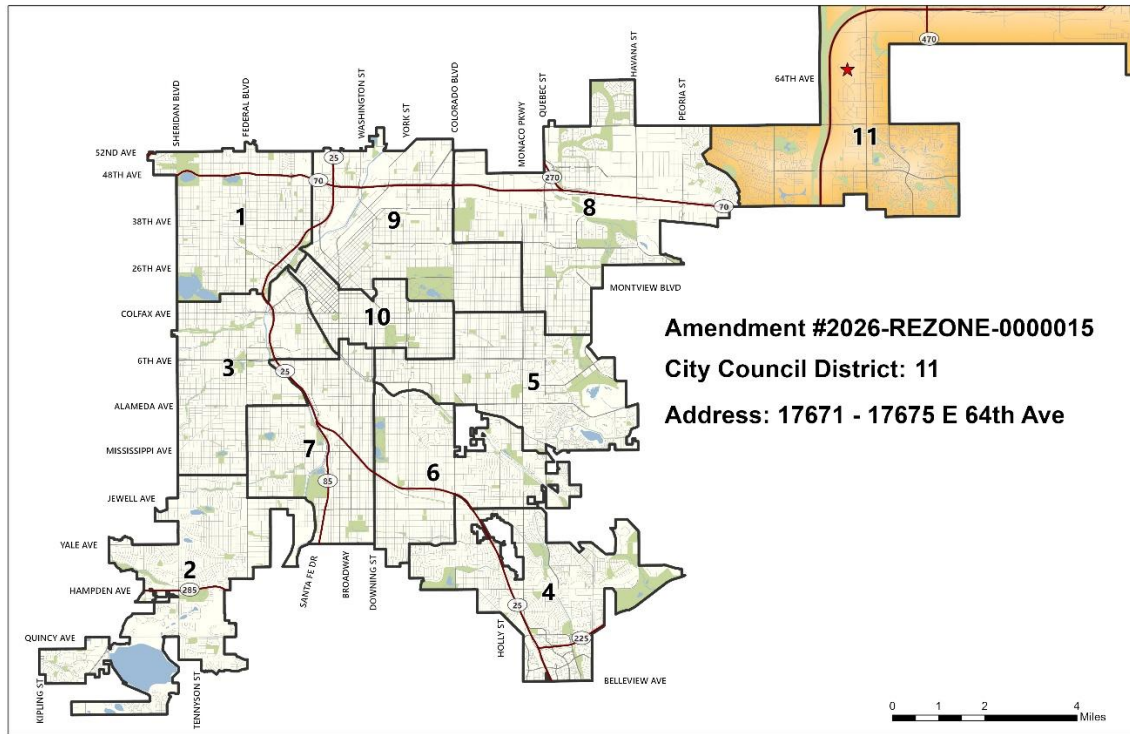
Request for Rezoning

Address: 17671-17675 East 64th Avenue
Neighborhood/Council District and CM: DIA / Council District 11, CM Gilmore
RNOs: Montbello 2020; Inter-Neighborhood Cooperation (INC)
Area of Property: ~114 acres
Current Zoning: C-MU-30 waivers, conditions, UO-1, AIO; C-MU-20 waivers, conditions, AIO; and Gateway, AIO
Proposed Zoning: PUD-G 40
Property Owner(s): United Airlines, Inc
Owner Representative: Caitlin Quander

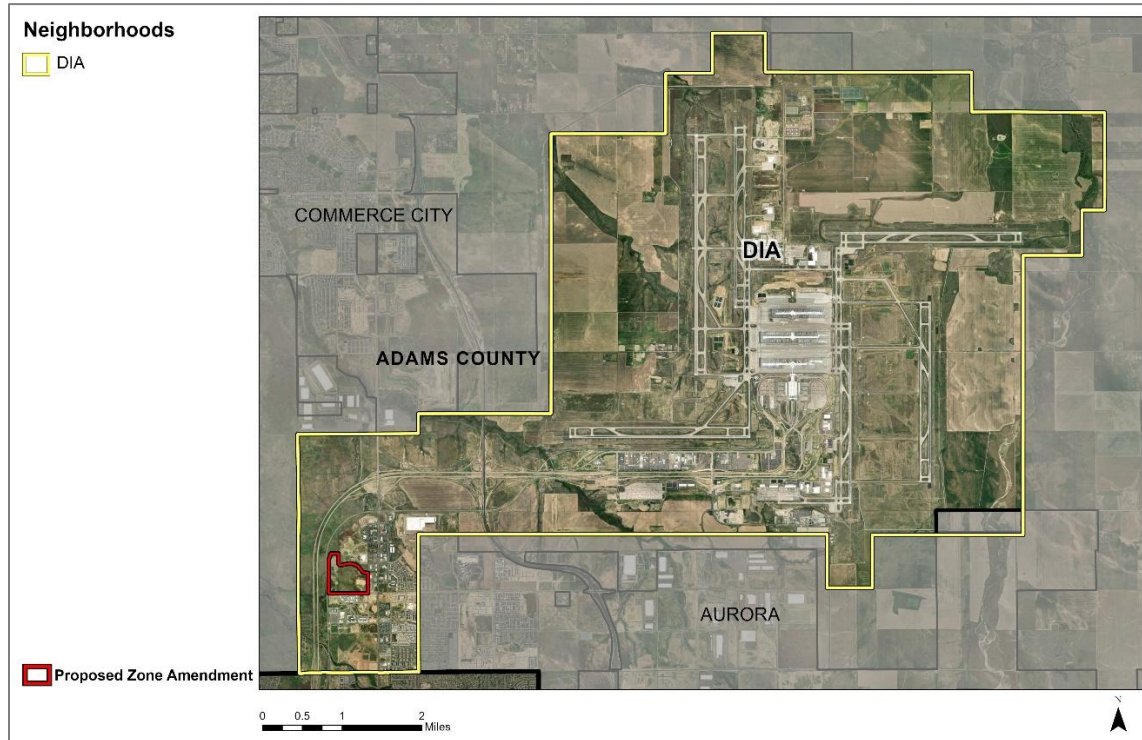
Summary of Rezoning Request

- The subject property is a greenfield site south of Dogwood Gulch, west of North Yampa Street, north of East 64th Avenue, and east of the RTD Commuter Rail A-Line train tracks and Peña Boulevard.
- The current existing zoning is largely C-MU-20, and C-MU-30 all with waivers and conditions and AIO, DIA Influence Area Overlay Zone. C-MU is a Former Chapter 59 commercial mixed-use zone district that allows commercial uses appropriate for high-visibility locations such as employment centers and the intersections of arterial streets. The western section of the site is currently in the Gateway District which is intended to encourage quality development of the gateway area and protect and enhance nearby Denver neighborhoods. The applicant is requesting this rezoning to remove the property from multiple Former Chapter 59 zone districts and rezone them into a Planned Unit Development (PUD) to allow development of the site as a corporate campus.
- The proposed zoning is **Planned Unit Development – General (PUD-G) 40**. This is customized zoning based on the **Campus Education/Institution (CMP-E/I)** zone district and adding in building form standards associated with **Suburban-Mixed Use-8 (S-MX-8)**. Further details of the requested zone district can be found in the proposed zone district section of the staff report (below).

City Location



Neighborhood Location



1. Existing Context



The subject property is located in the DIA statistical neighborhood generally northwest of the intersection of East 64th Avenue and North Yampa Street. In the general vicinity there are other commercial uses and undeveloped land. Denver International Airport is approximately 7 miles northeast; Peña Boulevard is accessed either by Tower Road to the north or East 56th Avenue to the south. The 61st & Peña Station on the RTD A Line is 0.5-1 miles southwest depending on location within the 114 acre site.

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

	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
Site	C-MU-30, waivers, conditions, UO-1, AIO; C-MU-20 waivers, conditions, AIO; and Gateway, AIO	Agriculture	Largely vacant; two small-scale farms on the western side	Block sizes and street connections vary. Sidewalks are generally present on developed parcels, and there are no existing alleys. Surface parking is common.
North	S-MX-8A, AIO	Vacant	Dogwood Gulch	
South	S-MX-12A, AIO, DO-6 and S-MX-8A, AIO, DO-6	Vacant and Multi-unit Residential	Multiple 2-story multi-unit residential buildings with interior circulation and surface parking	
East	C-MU-10, waivers, conditions, AIO and S-CC-5, AIO	Commercial/Retail; Vacant; and Industrial	4-story hotel and a 1-story auto-body shop	
West	DIA	Entertainment/Cultural	Open space	

3. Urban Design Standards & Guidelines

The Design Guidelines for Denver Gateway (UDSGs) were adopted in 1999 and updated in 2013 and apply to a large area between 40th Avenue and 72nd Avenue and between Chambers Road and Piccadilly Road, including the subject property. The UDSGs are intended to promote four notable attributes of the area: “magnificent views of the front range; the legacy of high plains agriculture; the contrasting riparian environment of First Creek and the West Fork of Second Creek; and the heritage of Denver’s park and parkway system.” The standards and guidelines are enforced by Community Planning and Development through the development review process. They will apply to this property regardless of whether this rezoning application is approved.

4. Gateway Subdivision Rules and Regulations

The Gateway Subdivision Rules and Regulations were adopted by the Planning Board in February of 2020 and apply to the subject property. The rules and regulations outline land dedication for parks, trails, open spaces, and schools.

5. Denver International Business Center General Development Plan

The General Development Plan (GDP) outlines conceptual plans for the future development of the area including proposed street locations, right-of-way, drainage, land use. The proposed rezoning is consistent with land uses in the GDP. Through the large development review process, it was recommended that GDP be repealed concurrent with the creation of an infrastructure master plan that will outline street connections currently shown in the GDP and adopted plans.

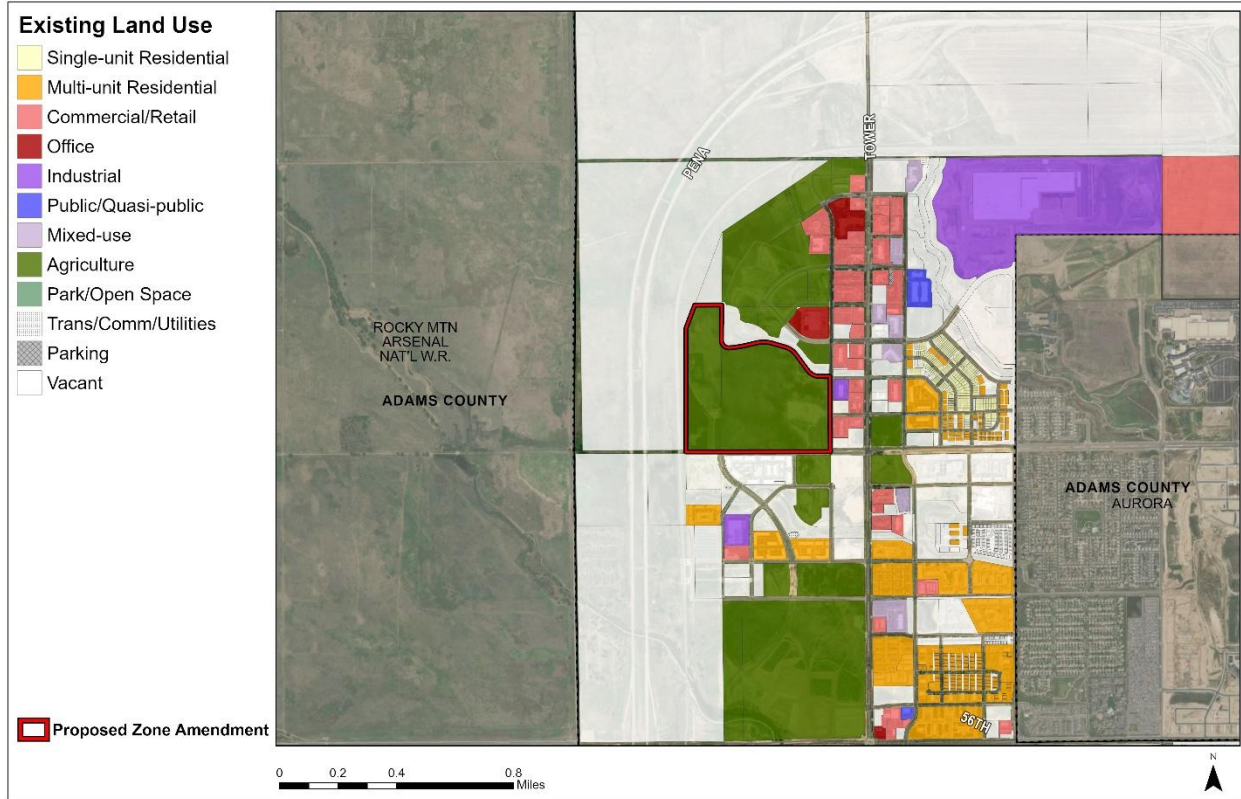
6. Large Development Review

The Development Review Committee reviewed this rezoning application to determine if the proposal would be subject to the Large Development Plan process outlined in Section 12.4.12 of the Denver Zoning Code. After review, it was determined the project would require a Large Development Framework (LDF) for the following reasons:

- Adopted plan recommendation in the *Far Northeast Area Plan* for the use of the LDR process.
- The proposed development application is larger than five acres.
- The development, open space, and infrastructure issues cannot be adequately resolved through other regulatory processes, such as site development plan review.
- The area is part of the DIBC General Development Plan No. 1; however, the plan lacks specificity.

The attached LDF outlines specific regulatory steps required for implementation of development on this site, including rezoning approval, a development agreement as necessary, and Infrastructure Master Plan (IMP), repeal of the General Development Plan (GDP) concurrently with the IMP which will implement the proposed infrastructure of the GDP and the *Far Northeast Area Plan* as the plan guidance incorporated the street grid from the GDP, a subdivision plat, and Site Development Plans (SDP).

7. Existing Land Use Map



8. Existing Building Form and Scale (Source: Google Maps)



View of the property looking north.

Proposed Zoning

The applicant has requested this rezoning to PUD-G 40 per Denver Zoning Code Section 9.6.1. The purpose of the Planning Unit Development (PUD) district is to provide an alternative to conventional land use regulations, combining use, density, site plan and building form considerations. A PUD district is intended to respond to unique and extraordinary circumstances, where more restrictive or flexible zoning than what is achievable through a standard zone district is desirable and multiple variances, waivers and conditions can be avoided.

Consistent with this purpose, the proposed zoning, if adopted, in conjunction with the UDSG, would allow for development of a corporate campus including the underlying uses of the CMP-EI district. The PUD includes customized zoning allowances within two subareas. For Subarea A the development must comply with building form standards of the CMP-EI zone district with the exception that maximum building heights have been lowered to 110-feet. For Subarea B, located at the southeast corner of the site, the building form standards that apply will match those of the S-MX-8 zone district. In both subareas some uses allowed in the S-MX districts have been added to the allowable uses for the entire site. Consistent with the AIO, residential uses are prohibited throughout the site, as is surface parking as a primary use.



The proposed PUD's customized provisions allow for a broader mix of uses on this proposed corporate campus, while ensuring compatible heights to surrounding zoning, encouraging activation of higher-pedestrian edges, high quality design, and appropriately scaled development.

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 Comments

Denver Public Schools: Approved – No Comments

Department of Public Health and Environment: Approved – No Comments

Denver Parks and Recreation: Approved – No Comments

Department of Transportation and Infrastructure: Approved – No Comments

Department of Transportation and Infrastructure – R.O.W.- City Surveyor: Approved – No Comments

Development Services – Project Coordination: Approved – No Comments

Development Services - Fire Protection: Approved – No Comments

Development Services – Transportation: Approved – No Comments

Development Services- Wastewater: Approved – See Comments

- The rezoning to PUD is conditionally approved. The development will need to reanalyze downstream sewer capacity to ensure that the average flows from Parcel A do not exceed the allocated flows established in the Aviation Station Master Sanitary Sewer Study. The study assumes approximately 150 acres of office development contributing to the lift station at 61st Avenue and Telluride Street (0.63 cfs average flow and 2.52 cfs peak flow).

Public Review Process

	Date
Property legally posted for a period of 15 days within 10 days of the submission of a complete application and CPD informational notice of the rezoning application to all affected members of City Council, registered neighborhood organizations, property owners, and tenants:	3/4/2026
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, property owners, and tenants:	4/21/26
Planning Board Public Hearing:	5/6/26 (tentative)
CPD written notice of City Council committee meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten (10) working days before the meeting:	5/19/26 (tentative)
City Council committee moved the bill forward:	6/2/26 (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:	6/22/26 (tentative)
City Council Public Hearing:	7/13/26 (tentative)

- **Public Outreach and Input**

- **Registered Neighborhood Organizations (RNOs)**

To date, staff have not received any letters from RNOs.

- **General Public Comments**

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, 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

1. 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;
2. The PUD District and the PUD District Plan comply with all applicable standards and criteria stated in Division 9.6;
3. 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;
4. The PUD District and the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property; and
5. 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.

1. Consistency with Adopted Plans

The following adopted plans apply to this property:

- *Denver Comprehensive Plan 2040* (2019)
- *Blueprint Denver* (2019)
- *Far Northeast 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 map amendment would require construction of around 11 acres of contiguous open space accessible to the public, including multiple trails connecting to the regional trails system, consistent with the following strategies:

- 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)

- Healthy and Active, Goal 2, Strategy A – Ensure equitable access to parks and recreation amenities for all residents (p. 58).

The proposed map amendment would require appropriate heights within the surrounding context and thoughtful design to the most visible elements of the property from the south and east, consistent with the following strategy within the Strong and Authentic Neighborhoods vision element:

- Goal 2, Strategy C – Create people-oriented places that embrace community character with thoughtful transitions, aspirational design, and an engaging public realm (p. 34).

The proposed map amendment would allow for the envisioned construction of a corporate campus that would allow for large-scale growth of United Airlines presence within Denver, including hiring thousands of new employees across a diversity of departments, with a variety of educational requirements and pay-ranges, consistent with the following strategies within the Economically Diverse and Vibrant vision element:

- Goal 1, Strategy A – Improve economic mobility through workforce training, career development, quality education, and wealth creation (p. 46).
- Goal 4, Strategy C – Encourage businesses to work with local workforce training and education organizations to better prepare residents for job and career opportunities (p. 47).
- Goal 5 – Strengthen Denver as a global city that will be competitive in the economy of today and tomorrow (p. 47).

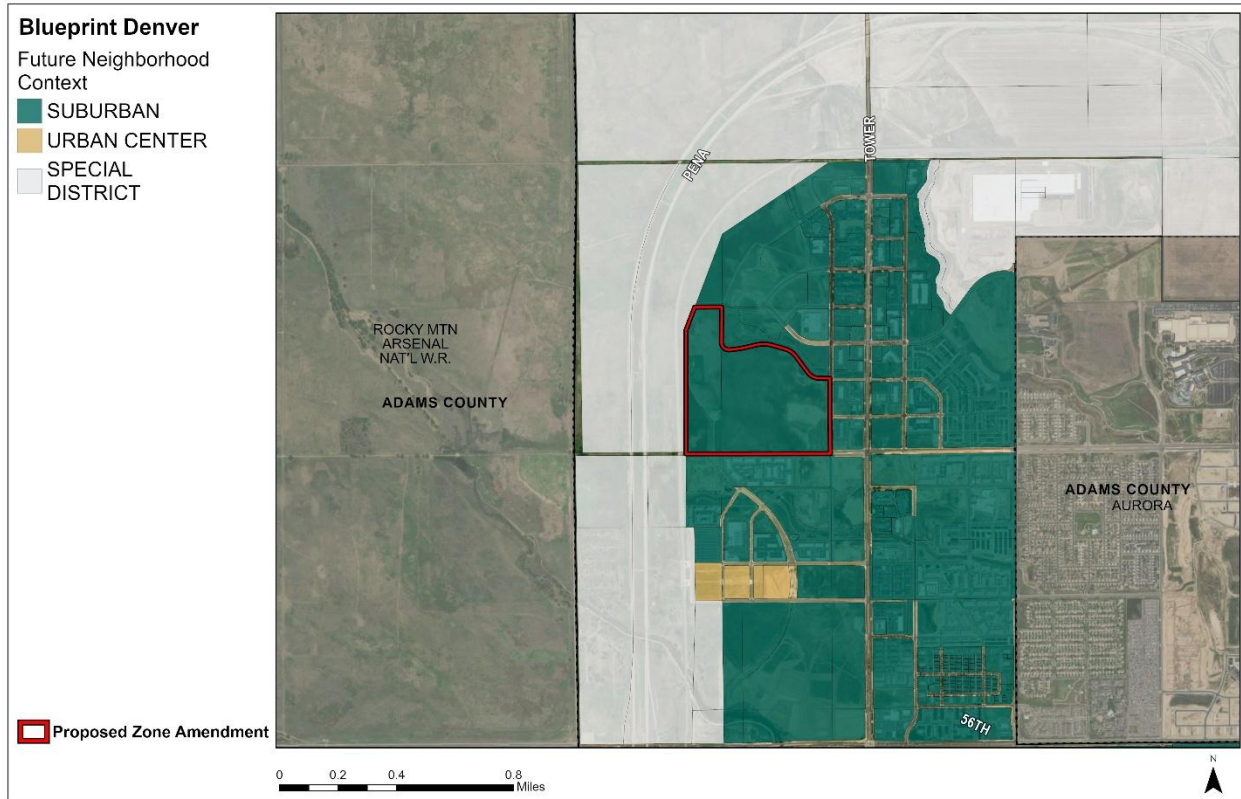
The proposed map amendment would allow for the planned growth of the area to support the operations of Denver International Airport, consistent with the following strategies within the Denver and the Region vision element:

- Goal 2 – Embrace Denver’s role as the center of regional growth (p. 64).
- Goal 4 – Capitalize on Denver’s role as a transportation hub and enhance connections to the region and beyond (p. 65).

Blueprint Denver

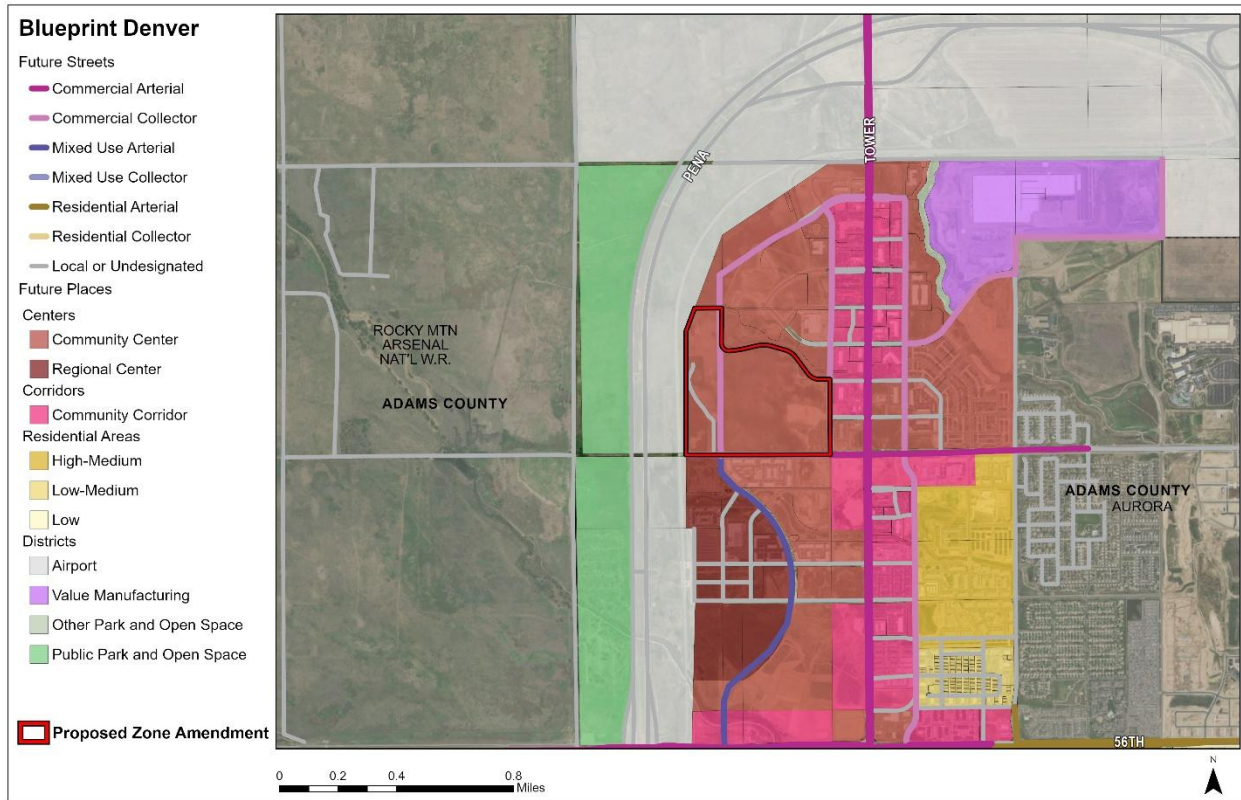
Blueprint Denver was adopted in 2019 as a supplement to *Comprehensive Plan 2040* and establishes an integrated framework for the city’s land use and transportation decisions. *Blueprint Denver* identifies the subject property as part of a Community Center place within the Suburban Neighborhood Context and provides guidance from the future growth strategy for the city.

Blueprint Denver Future Neighborhood Context



In *Blueprint Denver*, future neighborhood contexts are used to help understand differences between land use, built form, and mobility at a high scale, between neighborhoods. The subject site is shown on the context map as the Suburban neighborhood context, the description of which is used to guide appropriate zone districts (p. 66). The Suburban neighborhood context is described as a “range of uses from single-unit and multi-unit residential to commercial corridors and centers” with irregular block patterns with curvilinear streets (p. 136). Suburban areas are also “walkable and bikeable with access to transit but still mostly reliant on cars” (p. 136). Notably, campuses are embedded within most neighborhood contexts. The proposed PUD attempts to blend the campus regulations with Suburban context. The proposed PUD, along with the associated LDF and Infrastructure Master Plan (IMP) would require the creation of new streets, allowance for a mix of uses, and appropriate suburban street activation, all of which is consistent with the Suburban context.

Blueprint Denver Future Places

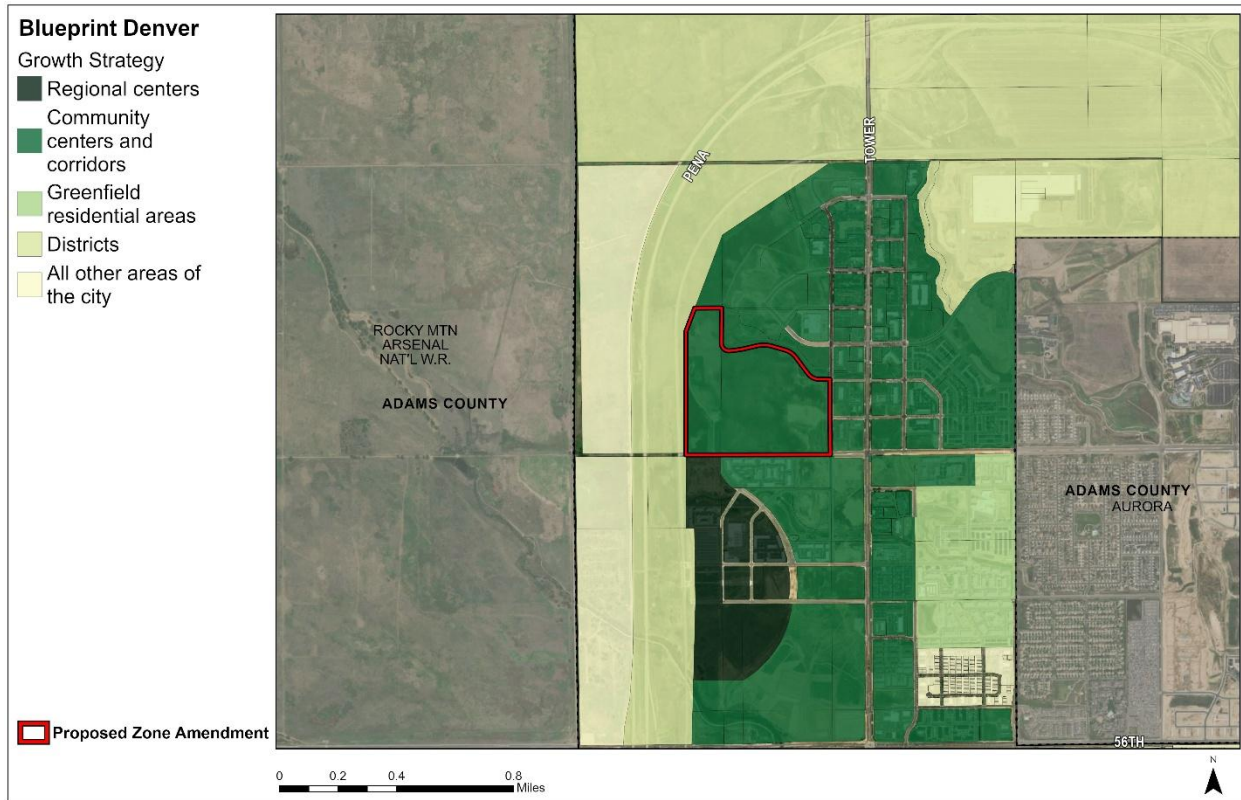


The Future Places map provides nuance to the aspirations of the individual places shown on the map. The subject site is designated within a Community Center future place type on the *Blueprint Denver* Future Places map. This place type “typically provides some medium mix of office, commercial and residential uses” with a wide customer draw and heights up to 5 stories (p. 194). The proposed PUD allows for office and commercial uses consistent with the future place type.

Blueprint Denver Street Types

In *Blueprint Denver*, street types work in concert with the future place to evaluate the appropriateness of the intensity of the adjacent development (p. 67). This site is served by an emerging network of streets in a range of street types. *Blueprint Denver* classifies East 64th Avenue and nearby Tower Road as Commercial Arterials. Arterials “are designed for the highest amount of through movement and the lowest degree of property access” (p. 154). North Yampa Street and a future North Telluride Way are described as Commercial Collectors. Collectors convey traffic to arterial streets (p. 154). As described above, the subject site is served by an emerging network of streets and the types of development allowed by the PUD are consistent with *Blueprint Denver’s* vision for those street types.

Blueprint Denver Growth Strategy

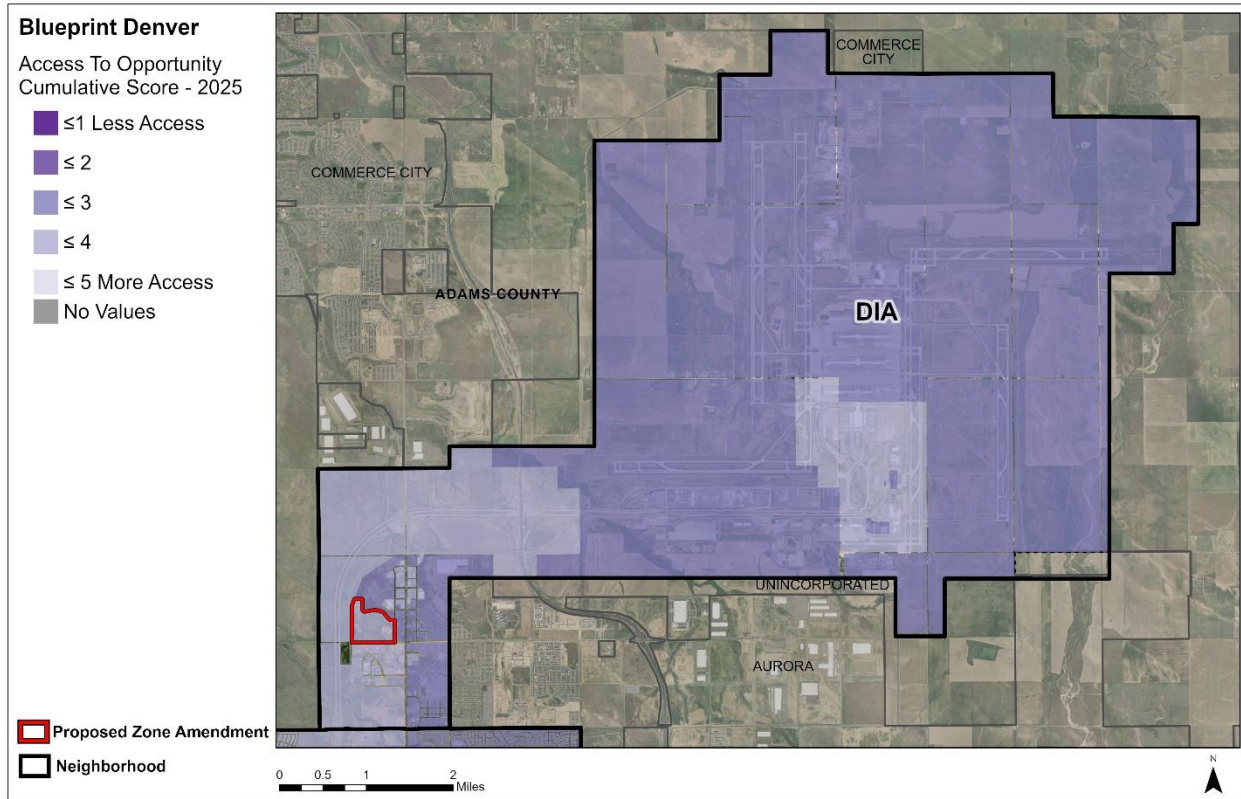


Blueprint Denver's growth strategy map is a version of the future places map, showing the aspiration for distributing future growth in Denver (p. 51). The subject property is part of the "Community Centers and Corridors" growth area. These areas anticipate experiencing around 25% of new housing growth and 20% of new employment growth by 2040 (p. 51). This growth area is "where underutilized infill redevelopment sites can be repurposed" (p. 49). The proposed map amendment will allow high density employment uses consistent with the growth strategy.

Blueprint Denver Equity Concepts

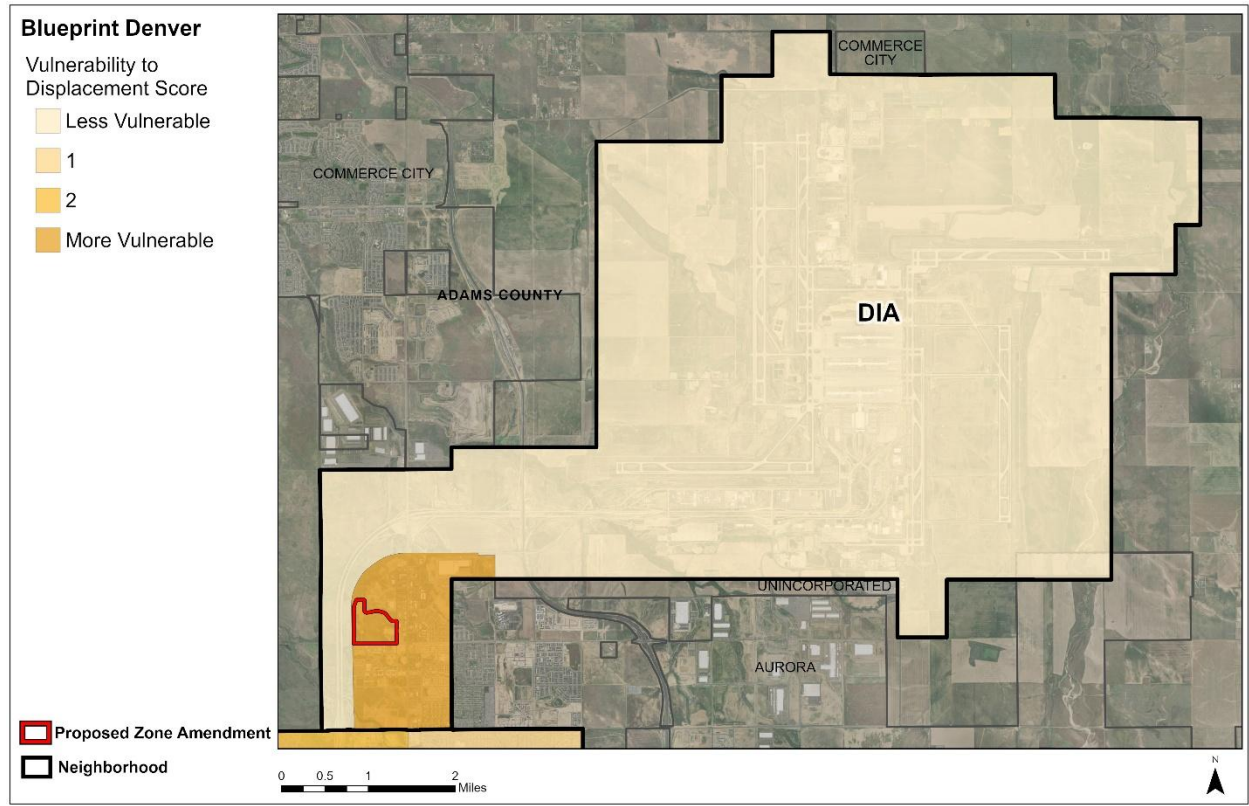
Blueprint Denver contains three equity concepts to help guide change to benefit everyone. Each equity concept has associated measurements that help inform implementation actions through large rezonings along with other implementation actions.

I. Access to Opportunity



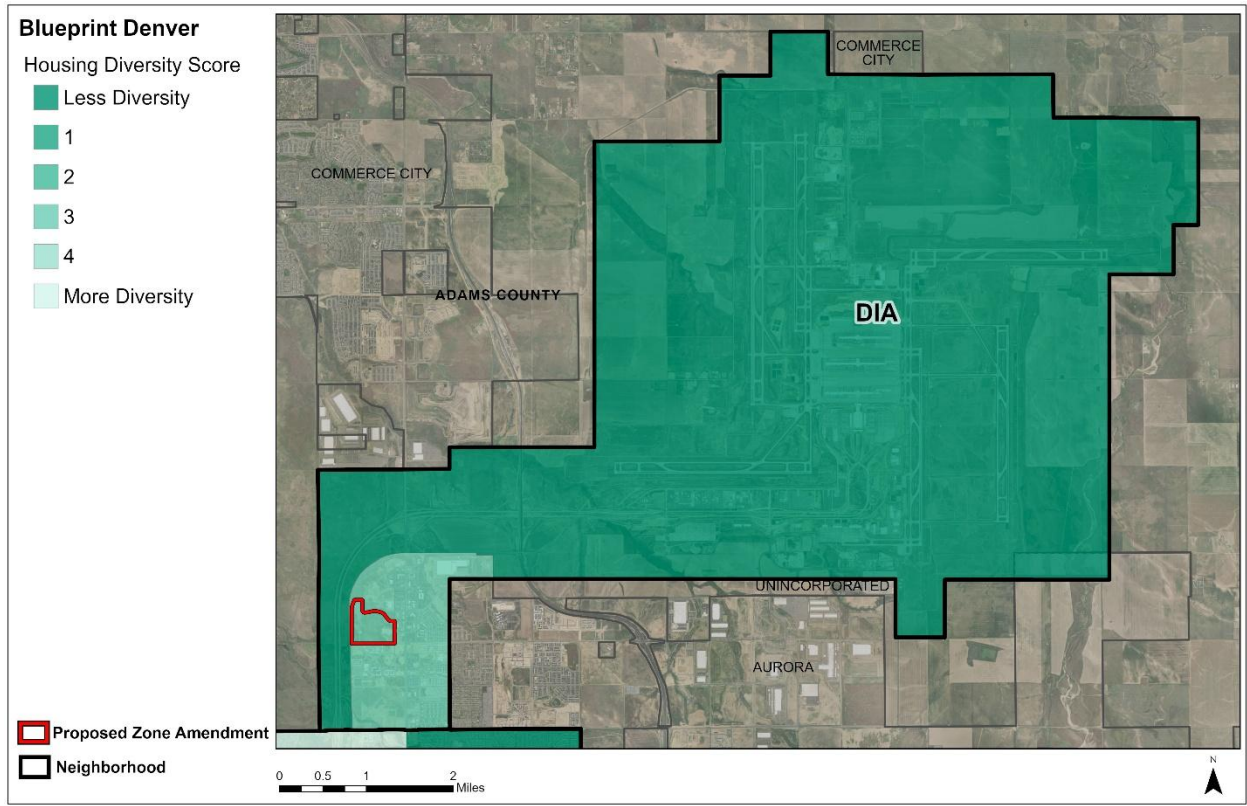
The subject property is in an area with high access to opportunity. The basis for measuring access to opportunity is a composite of the neighborhood equity index developed by Denver’s Department of Public Health and Environment, proximity to high-capacity and frequent transit, and access to centers and corridors. Access to opportunity helps us to consider if we are making progress towards achieving the vision for complete neighborhoods across the city. In areas with higher access to opportunity, it is important to increase the range of affordable housing options so that residents of all income levels can live in these neighborhoods. The proposed map amendment would facilitate appropriate growth in the area that provides a variety of jobs accessible to various education levels and at different pay ranges.

II. Vulnerability to Involuntary Displacement



The subject property scored as vulnerable on all three metrics of vulnerability to displacement. This metric is influenced by a low residential population in the area since residential isn't allowed north of East 64th Avenue and there is a low residential population within the broader analysis area. The proposed zone district would allow for mixed commercial development which can provide a diversity of jobs, thus lowering pressure on those vulnerable to displacement.

III. Expanding Housing Diversity



The subject property has moderate housing diversity. The housing diversity map combines census tract-level data measuring the percentage of middle-density housing (housing with 2-19 units), home size diversity, ownership vs. rental, housing costs and the number of income-restricted units. In areas with a moderate level of housing diversity, increase the number of affordable housing units. As noted earlier in the staff report, housing is not allowed north of East 64th Avenue, and so the proposed map amendment will have no effect on expanding housing diversity in the area.

Other Blueprint Denver Strategies

- General Policy 3, Strategy A – Rezone properties from the Former Chapter 59 zoning code so that the entire city is covered by the DZC, including continuing to incentivize owners to come out of the old code (p. 73).
- Economics, Policy 7 – Protect and promote Denver International Airport as the primary economic engine for the State of Colorado
 - Strategy B – Encourage further commercial development near the airport and protects DEN’s ability to grow and thrive for generations to come (p. 93).

Climate

This rezoning supports the city’s goals to reduce climate impacts by enabling dense corporate development near transit and within proximity to Denver International Airport, thus reducing individual vehicle miles travelled between DIA and the proposed United Airlines corporate campus. Because many transportation options are available, this campus will be less single-occupancy-vehicle auto-dependent, which can reduce greenhouse gas emissions from transportation. The energy efficiency standards proposed by United Airlines in the LDF and IMP will advance Denver’s goals to reduce greenhouse gas emissions from buildings, which contribute to a warming climate.

Far Northeast Area Plan (2019)

The *Far Northeast Area Plan* (FNE) contains a framework plan for the entire plan area and recommendations for smaller neighborhood areas. Within the *Far Northeast Area Plan* the subject property is within the Suburban Neighborhood Context, is in a Community Center future place, and is recommended for a maximum building height of 8 stories.

The proposed PUD, along with the associated LDF and IMP which provide defined growth for a United Airlines corporate campus, aligns with the descriptive language of the DIA Neighborhood Opportunity Framework Transformative Projects (TP), specifically TP 2, Employment Center North of 64th Avenue, which states, “The vast greenfield sites north of 64th Avenue provide an opportunity for Denver to retain employment centers that require large footprints for operational needs and amply additional space for expansion” (p. 200). This proposal is also consistent with the following explanation for the importance of this area to the DIA neighborhood: “The greenfield sites of the DIA neighborhood coupled with the restriction on housing development create an opportunity to support employment centers in this area. Maintaining those jobs in Denver is of top priority and the FNE has the competitive advantage of supporting industrial uses by capitalizing on its proximity to DEN, Interstate 70, Pena Boulevard, and E-470. The ability to retain those jobs in the DIA neighborhood also creates prospects for employment for Montbello and GVR residents.

The proposed PUD would also align with the following goals:

- Land Use, 18 – Rezone Former Chapter 59 properties into the Denver Zoning Code.
 - Land Use, 18.4 – Support rezoning efforts that will result in development of significant job opportunities and expansion of employment sectors (p. 59).
- Land Use, 19 – Support employment growth in Far Northeast (p. 64).
- Quality-of-Life, 7 – Grow parks and recreation access and diversify services and programs (p. 115).

2. Public Interest

The proposed official map amendment furthers Public Interest through implementation of the city’s adopted land use plans, encouraging use of greenfield sites near DIA as high-density airport-supportive commercial sites, and building out the connectivity of the DIA neighborhoods road, rail, and open space networks.

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

The proposed PUD-G 40 is based on a Campus neighborhood context which is embedded throughout the city where medical, institutional, educational, or entertainment sites are found. Campus contexts can be incorporated into more intense development. The design standards of the proposed PUD have been tailored to allow for lower heights and a mix of uses appropriate to a corporate campus and consistent with both the Campus neighborhood context and the adjacent Suburban neighborhood context.

For analysis on consistency of this rezoning with the PUD zone district purpose and intent statements, see below.

4. Additional Review Criteria for Rezoning to a PUD District (12.4.10.8)

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 this Code

- Denver Zoning Code Section 9.6.1.1 states that the general purpose of a 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. A PUD is intended 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.

PUD-G 40 is consistent with the intent and purpose of a PUD district because the subject site has special characteristics related to the scale of the development project and demands a more customized zoning approach to achieve a successful phased development aligned with adopted plan guidance. While the adopted plans anticipate mixed-use development on this site, the underlying CMP-EI zone district was created with the anticipation that buildings would be placed on larger zone lots surrounded by vast open space or parking associated with unified campuses with a single owner or user. The adjacent Suburban-Mixed Use zone districts do not accommodate some of the unique security requirements associated with the proposed United Airlines flight training facility and corporate campus.

- To address these unique circumstances, the proposed PUD-G 40 district uses the CMP-EI zone district with customized provisions that align closely with S-MX zone districts including lowering the allowable height and building form standards closer to residential and commercial development to the south and east.
- DZC Section 9.6.1.1.C states that 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.

PUD-G 40 is consistent with the Suburban neighborhood context and character as noted above. The PUD is intended as a mechanism to ensure that development is consistent with adopted plans, not as a vehicle to enhance the proposed development's economic feasibility.

- According to DZC 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.

PUD-G 40 provides significant public benefit not achievable through application of a standard zone district, including 1) diversification of land use while maintaining defining characteristics of the surrounding neighborhood context, 2) exemplary pedestrian amenities through the building form standards specified in the PUD, 3) development patterns consistent with the character and design of nearby areas, and 4) advancement of numerous city goals.

b. The PUD District and the PUD District Plan comply with all applicable standards and criteria stated in Division 9.6

The PUD District complies with all standards and criteria stated in Division 9.6.

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

The PUD District is necessary because there is no standard zone district available that applies appropriate standards to this unique location and development. An unreasonable number of variances or waivers and conditions would be required to achieve the tailored approach in the PUD.

d. The PUD District and the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property

The PUD District's allowed uses are compatible with the commercial corridor surrounding the site and are appropriate in close proximity to transit options.

e. The PUD District and the PUD District Plan establish 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 (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.)

PUD-G 40 provides tailored building form standards to directly address appropriate transitions to neighboring properties and areas, including:

- Maximum height is compatible with the nearby S-MX-8 districts.
- Building form standards compatible with the S-MX districts.
- Tailored use allowances to create a successful campus in support of the unique operations of United Airlines and DEN.

Therefore, PUD-G 40 establishes permitted building forms that are compatible with adjacent existing building forms through appropriate design standards.

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Attachments

1. Application, including PUD-G 40
2. Public Comments
3. Public Engagement Outline