



**TO:** Land Use, Transportation, and Infrastructure Committee of the Denver City Council  
**FROM:** Scott Robinson, Senior City Planner  
**DATE:** July 16, 2020  
**RE:** Official Zoning Map Amendment Application #2019I-00159

### Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends approval for Application #2019I-00159.

### Request for Rezoning

Address: Platte Farm Open Space: 4855 Sherman St, 4824 Lincoln St, 4876 Sherman St, 4900 Sherman St, 4901 Grant St, 4978 Grant St, 5001 Logan St, 5000 Logan St, 5021 Logan St, 4877 Grant St, 4856 Sherman St

Neighborhood/Council District: Globeville Neighborhood / Council District 9

RNOs: Globeville First, Northeast Denver Friends and Neighbors (NEDFANS), Globeville Civic Partners, Inter-Neighborhood Cooperation (INC), UCAN, Elyria Swansea/Globeville Business Association

Area of Property: 5.76 acres

Current Zoning: E-SU-D, I-MX-3

Proposed Zoning: OS-A

Property Owner(s): City and County of Denver, Department of Parks and Recreation

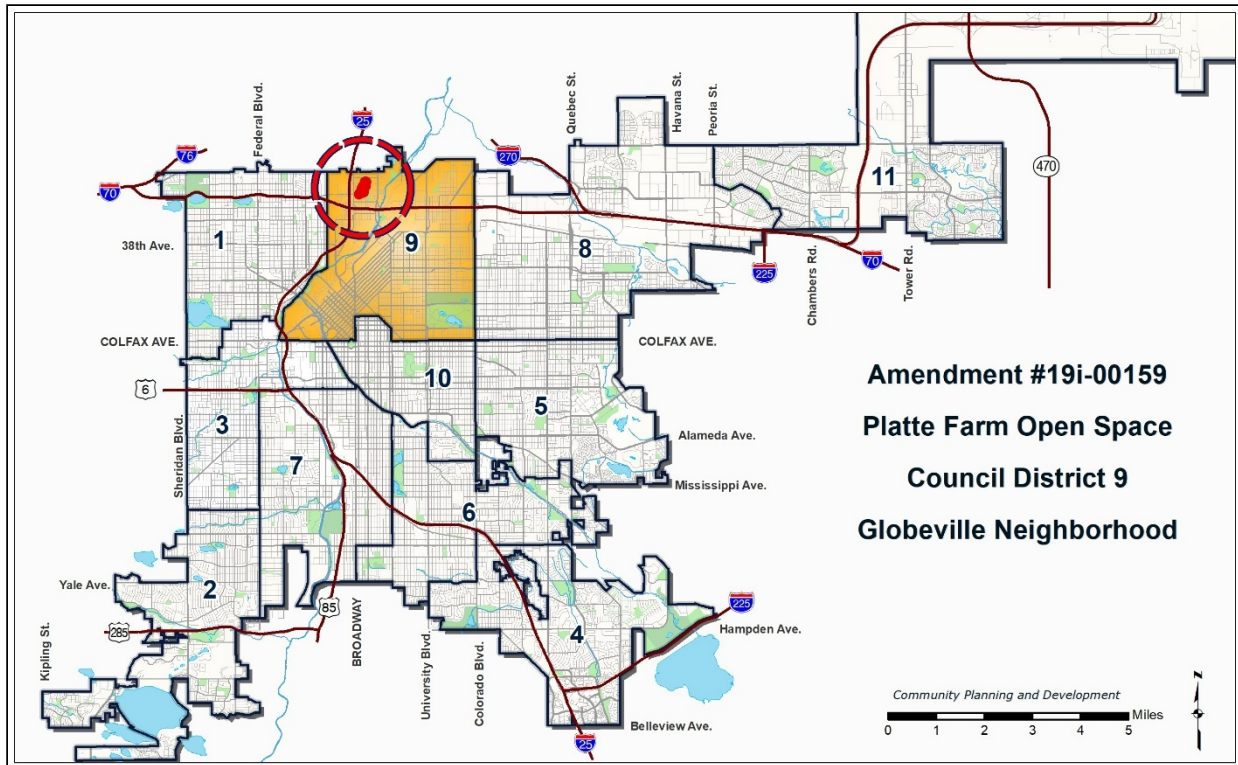
Owner Representative: Laura Aldrete, Community Planning and Development on behalf of Department of Parks and Recreation

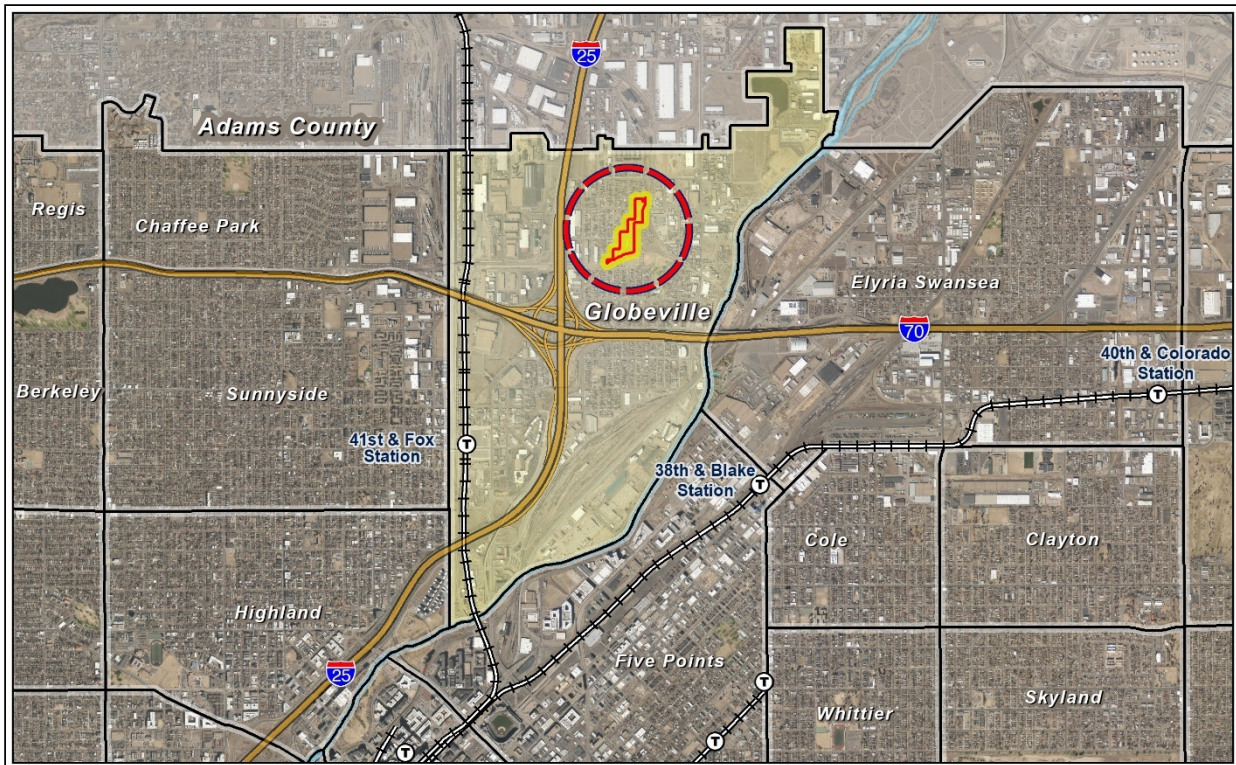
### Summary of Rezoning Request

- The parcels included in this proposed rezoning are in the Globeville neighborhood, north of Interstate 70 and east of Interstate 25. The parcels extend from the corner of Lincoln Street and 48<sup>th</sup> Avenue northeast to Logan Street north of 50<sup>th</sup> Avenue.
- Between 2014 and 2019, the City acquired the parcels included in the proposed rezoning, which are currently vacant, from Xcel. The purpose of the acquisition and this rezoning is to create a new park and trail space, as identified in the Globeville Neighborhood Plan (2014).
- While the current E-SU-D and I-MX-3 zone districts on the parcels allow for the planned open space and trail construction, Denver Parks and Recreation is requesting to rezone these parcels to OS-A to better reflect the planned use of the land and provide appropriate flexibility for park activities in the future.
- The Open Space Public Parks District (OS-A) is intended to protect and preserve public parks owned, operated or leased by the City and managed by the City's Department of Parks and Recreation (DPR) for park purposes. Further details of the requested zone district can be found

in the proposed zone district section of the staff report (below) and in Article 9 of the Denver Zoning Code (DZC).

## Existing Context





The subject site is directly north of Argo Park, separated from the existing park by a rail line. Another spur of the rail line extends north along the northeast corner of the subject site. The South Platte River and trail are approximately a half mile to the east. There is RTD bus service on Lincoln Street at the southwest corner of the property.

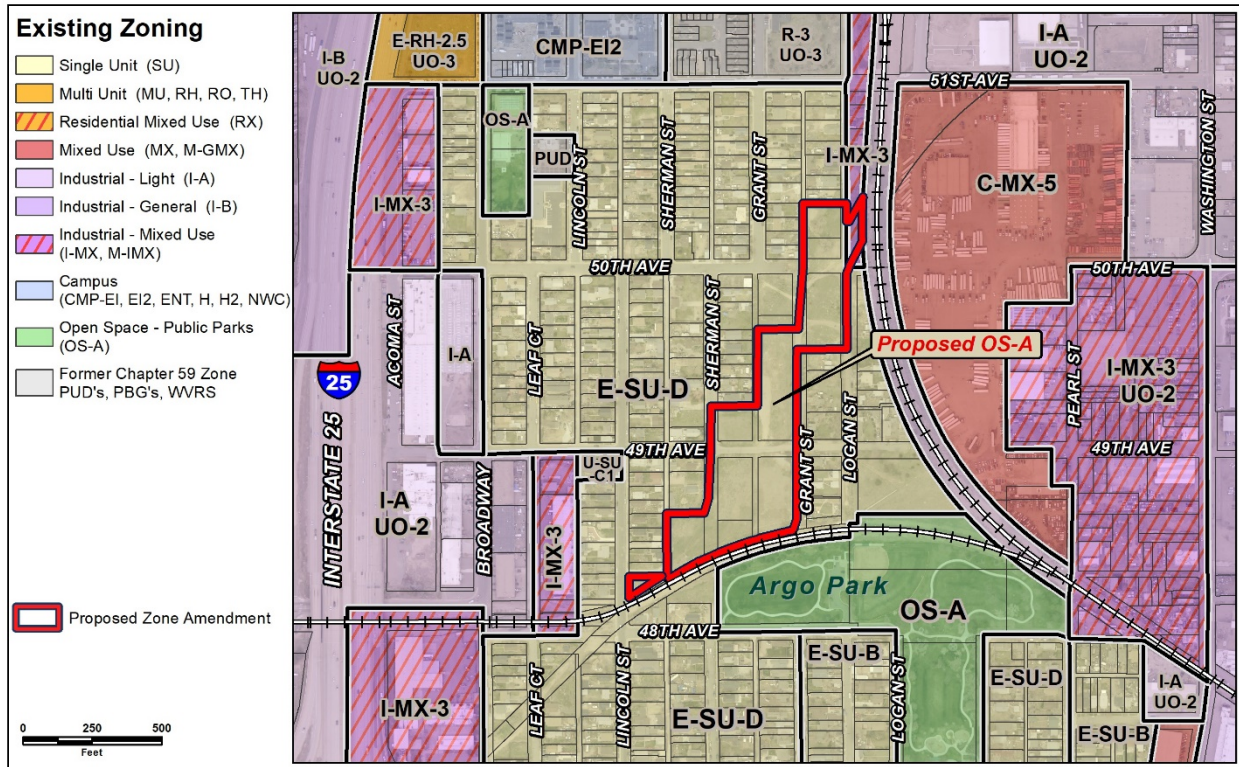
The following table summarizes the existing context proximate to the subject site:

	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
Site	E-SU-D, I-MX-3	Vacant	N/A	Generally a regular grid of streets interrupted by rail lines running east/west along the north side of Argo Park and running north/south east of Logan Street. Block sizes and shapes are consistent and rectangular. Vehicle parking to the side or rear of buildings (alley access). Some streets in the area are unimproved.
North	E-SU-D, I-MX-3	Single-unit residential, commercial/retail	1.5-story residential buildings with large setbacks	
South	E-SU-D, OS-A	Single-unit residential, park/open space	1.5-story residential buildings with large setbacks; open space	
East	E-SU-D, I-A UO-2	Single-unit residential, vacant, industrial	1.5-story residential buildings with large setbacks; 1-story industrial buildings with large surface parking lots and outdoor storage	
West	E-SU-D	Single-unit residential	1.5-story residential buildings with large setbacks	

### 1. Large Development Review (LDR)

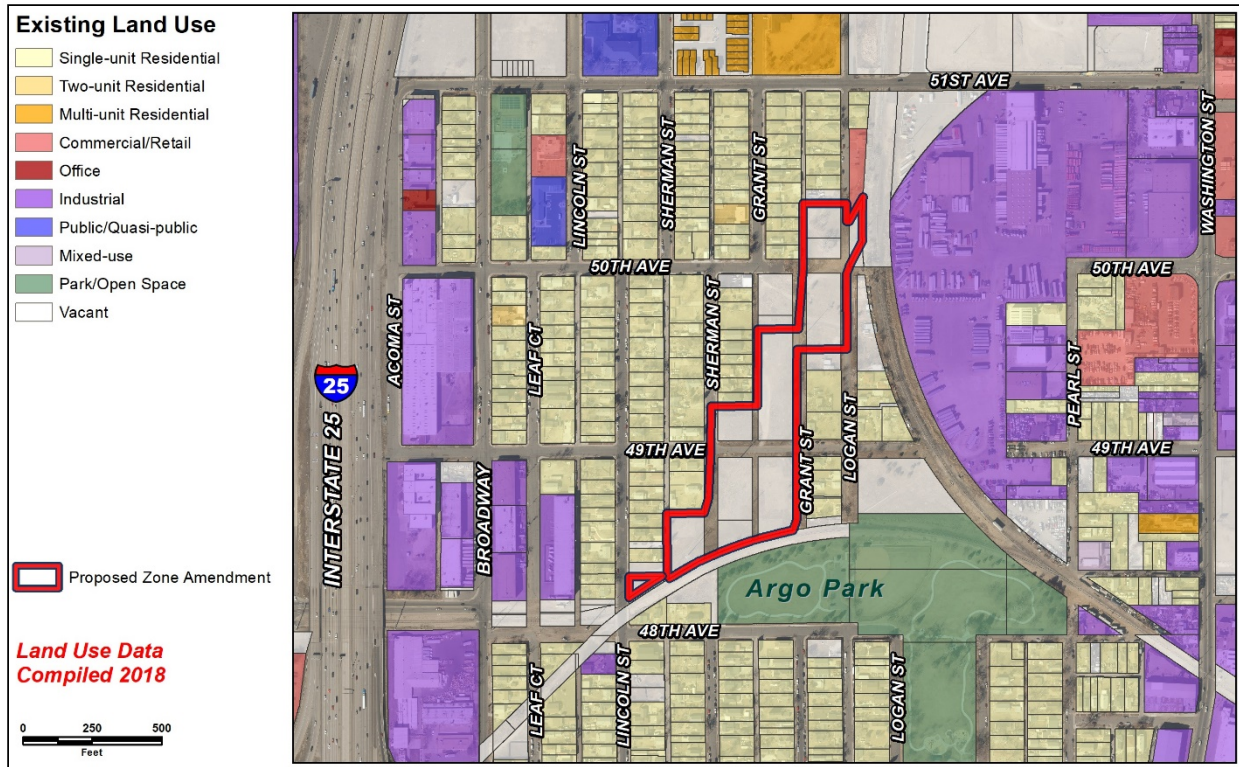
This rezoning application was reviewed by the Development Review Committee (DRC) to see if the proposal would be subject to the Large Development Plan (LDR) process outlined in Section 12.4.12 of the Denver Zoning Code (DZC) and require the creation of a Large Development Framework (LDF). The DRC determined that the project would not be subject to LDR review because the proposed use is consistent with adopted plans and there are no regional infrastructure needs or impacts to existing regional infrastructure. Additionally, any future project that results from this rezoning will be reviewed for compliance with all applicable DZC standards.

## 2. Existing Zoning



The E-SU-D zone district is a single unit district in the Urban Edge neighborhood context allowing the urban house building form with a minimum zone lot area of 6,000 square feet. The I-MX-3 zone district is an industrial mixed-use district that applies to industrially-dominated areas served primarily by local or collector streets with a maximum building height of 3 stories.

### 3. Existing Land Use Map



### 4. Existing Building Form and Scale

All images are from Google street view.



Subject property viewed from Sherman Street north of 49<sup>th</sup> Avenue looking east



*Surrounding single-unit residential area viewed from Grant Street north of 50<sup>th</sup> Avenue*



*Surrounding single-unit residential area viewed from Sherman Street south of 49<sup>th</sup> Avenue*



*Aerial image looking north from above Argo Park showing residential areas, the adjacent park, and the single-story industrial buildings to the east*

## Proposed Zoning

The requested Open Space Public Parks District (OS-A) zone district is intended to protect and preserve public parks owned, operated or leased by the City and managed by the City’s Department of Parks and Recreation for park purposes. Building form standards, design, and development standards in the OS-A zone district are determined by either the City Council or by the Manager of Parks and Recreation. Permitted uses, number of uses, and applicable use limitations are determined by the Manager of Parks and Recreation.

The primary building forms allowed in the existing zone district and the proposed zone district are summarized below.

Design Standards	E-SU-D (Existing)	I-MX-3 (Existing)	OS-A (Proposed)
Primary Building Forms Allowed	Urban House	Townhouse, General, Industrial	N/A
Stories/Heights (max)	2.5/30'	3/38'-45'*	N/A
Primary Build-To Percentages (min)	N/A	50%-70%*	N/A
Primary Build-To Ranges	N/A	0'-15'*	N/A
Minimum Zone Lot Size/Width	6,000sf/50'	N/A	N/A
Primary Setbacks (min)	20'	0'-10'*	N/A
Building Coverages	37.5-50%	N/A	N/A

\*Standard varies between building forms



## 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 Response

**Asset Management:** Approved – No comments.

**Denver Public Schools:** Approved – No Response

**Department of Public Health and Environment:** Approved – See comments below:

- Notes. EQ concurs with the rezoning request but is aware that Platte Farm Open Space (PFOS) is within an area that has historically been used for industrial purposes and where the potential for soil contamination exists. If, during future soil disturbing activities, such soil is encountered, it should be handled according to the Materials Management Plan approved for the PFOS.
- General Notes: Most of Colorado is high risk for radon, a naturally occurring radioactive gas. Due to concern for potential radon gas intrusion into buildings, DDPHE suggests installation of a radon mitigation system in structures planned for human occupation or frequent use. It may be more cost effective to install a radon system during new construction rather than after construction is complete.
- If renovating or demolishing existing structures, there may be a concern of disturbing regulated materials that contain asbestos or lead-based paint. Materials containing asbestos or lead-based paint should be managed in accordance with applicable federal, state and local regulations.
- The Denver Air Pollution Control Ordinance (Chapter 4- Denver Revised Municipal Code) specifies that contractors shall take reasonable measures to prevent particulate matter from becoming airborne and to prevent the visible discharge of fugitive particulate emissions beyond the property on which the emissions originate. The measures taken must always be effective in the control of fugitive particulate emissions on the site, including periods of inactivity such as evenings, weekends, and holidays.
- Denver's Noise Ordinance (Chapter 36–Noise Control, Denver Revised Municipal Code) identifies allowable levels of noise. Properties undergoing Re-Zoning may change the acoustic environment but must maintain compliance with the Noise Ordinance. Compliance with the Noise Ordinance is based on the status of the receptor property (for example, adjacent Residential receptors), and not the status of the noise-generating property. Violations of the Noise Ordinance commonly result from, but are not limited to, the operation or improper placement of HV/AC units, generators, and loading docks. Construction noise is exempted from the Noise Ordinance during the following hours, 7am–9pm (Mon–Fri) and 8am–5pm (Sat & Sun). Variances for nighttime work are allowed, but the variance approval process requires 2 to 3 months. For variance requests or questions related to the Noise Ordinance, please contact Paul Riedesel, Denver Environmental Health (720-865-5410).
- Scope & Limitations: DDPHE performed a limited search for information known to DDPHE regarding environmental conditions at the subject site. This review was not intended to conform to ASTM standard practice for Phase I site assessments, nor was it designed to identify all potential environmental conditions. In addition, the review was not intended to assess

environmental conditions for any potential right-of-way or easement conveyance process. The City and County of Denver provides no representations or warranties regarding the accuracy, reliability, or completeness of the information provided.

**Denver Parks and Recreation:** Approved – No comments.

**Public Works – R.O.W. - City Surveyor:** Legal is approved.

**Development Services – Transportation:** Approved – No response.

**Development Services – Wastewater:** Approved – Will require additional information at Site Plan Review:

- DES Wastewater approves the subject zoning change. The applicant should note that redevelopment of this site may require additional engineering including preparation of drainage reports, construction documents, and erosion control plans. Redevelopment may require construction of water quality and detention basins, public and private sanitary and storm sewer mains, and other storm or sanitary sewer improvements. Redevelopment may also require other items such as conveyance of utility, construction, and maintenance easements. The extent of the required design, improvements and easements will be determined during the redevelopment process. Please note that no commitment for any new sewer service will be given prior to issuance of an approved SUDP from Development Services.

**Development Services – Project Coordination:** Approved – No response

**Development Services – Fire Prevention:** Approved – No comments

**Public Review Process**

	<b>Date</b>
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:	5/11/20
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, and property owners:	6/29/20
Planning Board unanimously recommended approval:	7/15/20
CPD written notice of the Land Use, Transportation and Infrastructure Committee	7/7/20

meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten working days before the meeting:	
Land Use, Transportation and Infrastructure Committee of the City Council moved the bill forward:	7/21/20
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 (tentative):	8/10/20
City Council Public Hearing (tentative):	8/31/20

- **Registered Neighborhood Organizations (RNOs)**
  - To date, no comment letters have been received from Registered Neighborhood Organizations.
- **Other Public Comment**
  - To date, no other public comment has been received.

### 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. Uniformity of District Regulations and Restrictions
3. Public Health, Safety and General Welfare

#### DZC Section 12.4.10.8

1. Justifying Circumstances
2. Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements

### 1. Consistency with Adopted Plans

The following adopted plans currently apply to this property:

- *Denver Comprehensive Plan 2040*
- *Blueprint Denver (2019)*
- *Game Plan for a Healthy City (2019)*
- *Globeville Neighborhood Plan (2014)*

### ***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 requested map amendment will enable a new park in a largely residential neighborhood with limited quality of life amenities, which is consistent with the following strategy from the Equitable and Inclusive vision element:

- Equitable 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).*

Rezoning the subject site to OS-A from E-SU-D and I-MX-3 will provide appropriate flexibility to design and build a park as envisioned by the community, which is consistent with the following strategy from the Strong and Authentic vision element:

- Strong and Authentic Goal 5, Strategy B- *Design public spaces to facilitate social connections and enhance cultural identity (p.35).*

The requested rezoning will enable a new park, which is consistent with the following strategies from the Environmentally Resilient vision element:

- Environmentally Resilient Goal 6, Strategy A- *Recognize parks, public space, trees and plants as vital elements of green infrastructure and ensure that the provision of these elements keeps pace with Denver's growth (p.54).*
- Environmentally Resilient Goal 6, Strategy D- *Preserve and enhance the city's system of parkland and adapt park landscapes to be more climate and heat resistant (p.54).*

Similarly, the requested rezoning will enable flexibility to design and build a park as envisioned by the community within walking distance of the subject site, which is consistent with the following strategies from the Healthy and Active vision element:

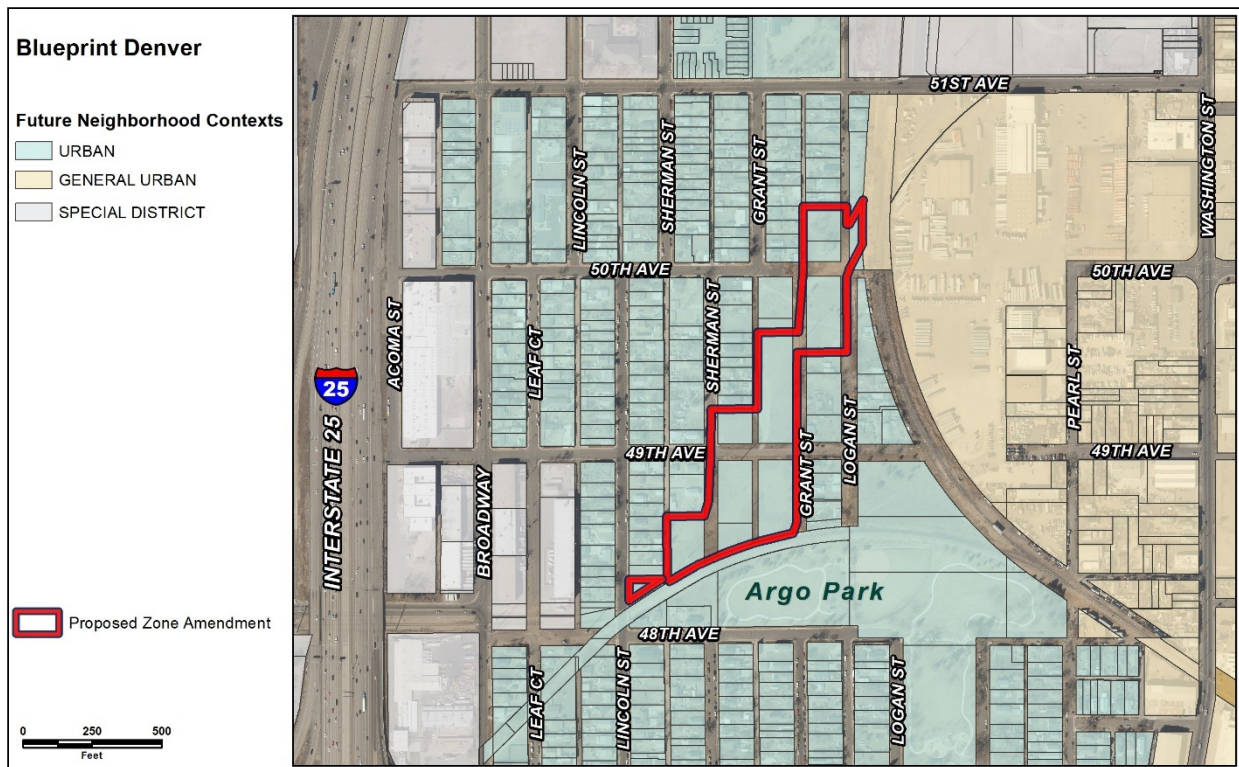
- Healthy and Active Goal 1, Strategy A- *Recognize parks, public space, trees and plants as vital elements of green infrastructure and ensure that the provision of these elements keeps pace with Denver's growth (p.58).*
- Healthy and Active Goal 1, Strategy C- *Design safe public spaces and recreational areas to serve people of all ages and backgrounds (p.58).*
- Healthy and Active Goal 2, Strategy A- *Ensure equitable access to parks and recreation amenities for all residents (p.58).*
- Healthy and Active Goal 1, Strategy B- *Make Denver's healthy outdoor lifestyle accessible to residents of all ages and backgrounds (p.58).*
- Healthy and Active Goal 1, Strategy C- *Expand the supply of parks, recreational facilities and programs relative to Denver's population growth (p.58).*

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

### ***Blueprint Denver***

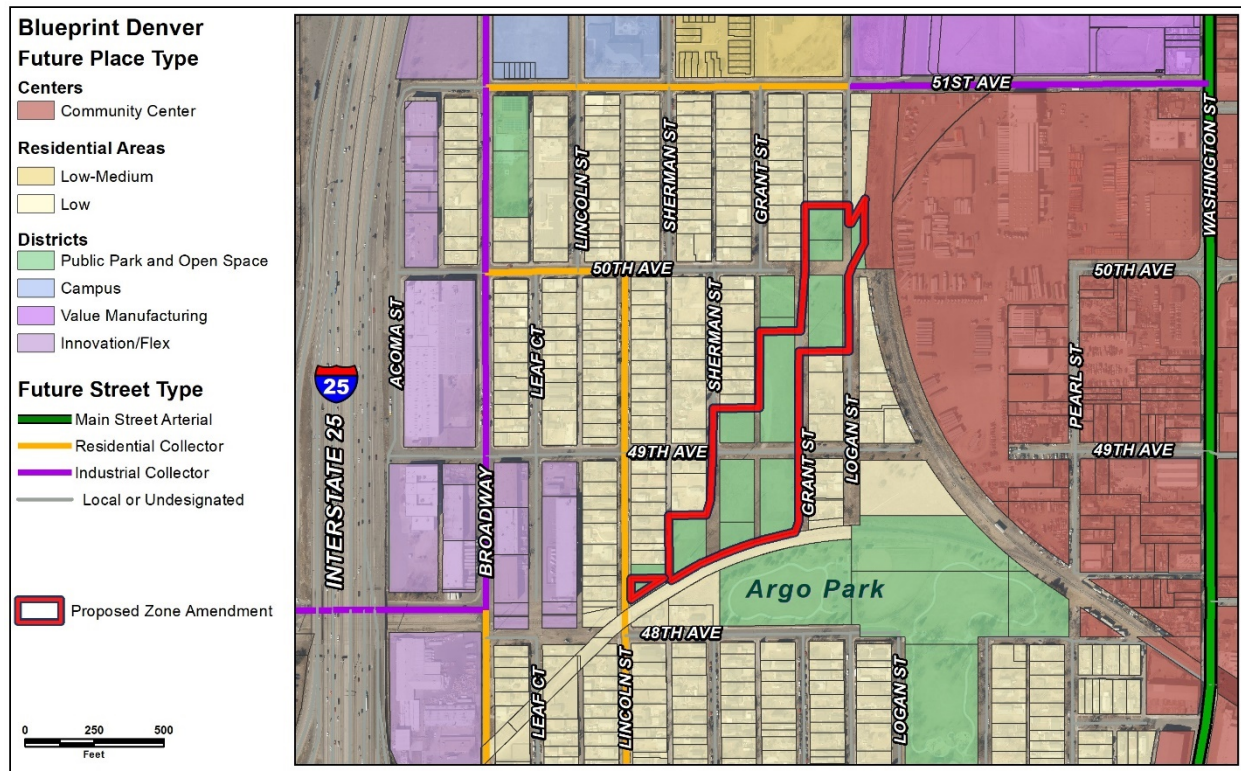
*Blueprint Denver* identifies the subject property as part of Public Park and Open Space place within the Urban Neighborhood Context and provides guidance from the future growth strategy for the city.

### **Blueprint Denver Future Neighborhood Context**



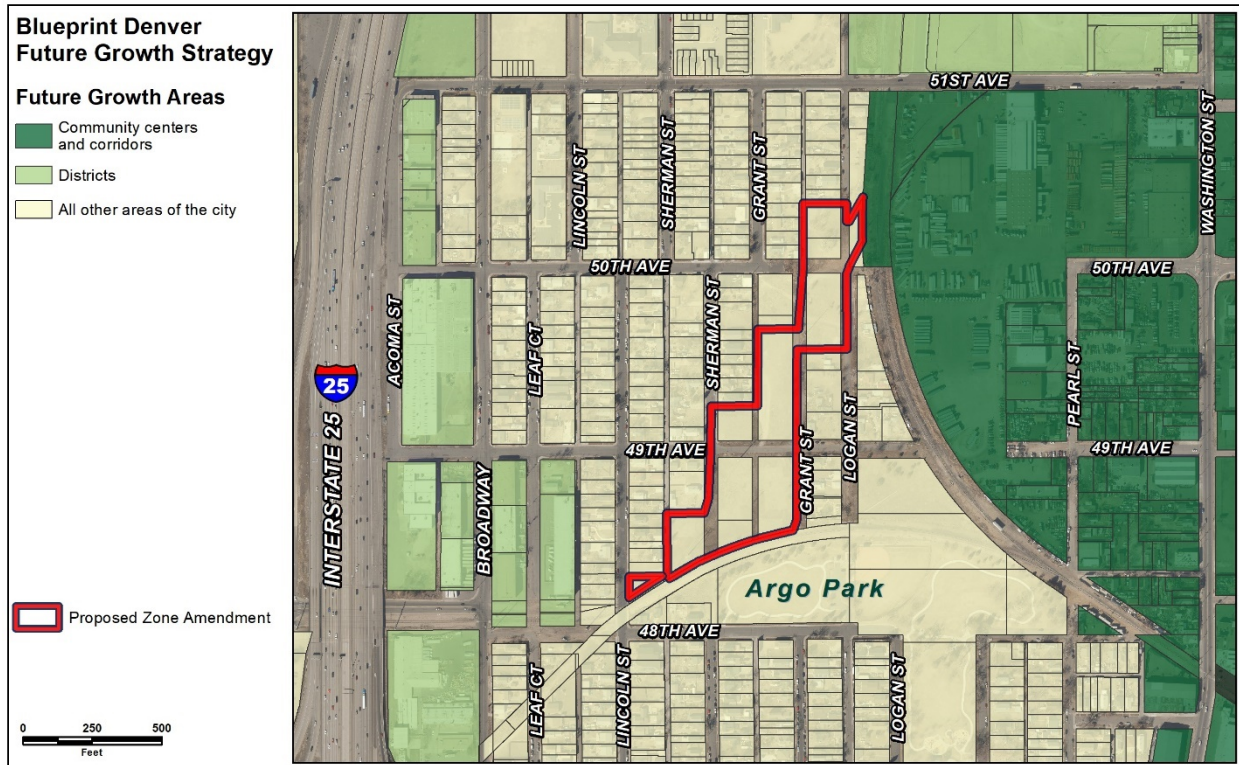
The subject property is shown on the context map as Urban neighborhood context. In the Urban neighborhood context, “development should be compatible with the existing neighborhood character and offer residents a mix of uses with good street activation and connectivity” (p. 222). The OS-A zone district is part of the Open Space context, which “accommodates sites ranging from very active to completely passive, and from those embedded in a neighborhood to sites that are large enough to stand alone” (DZC 9.3.1). Because Open Space districts are intended to be embedded in any neighborhood, and the proposed OS-A zone district would facilitate the development of a park, contributing to the mix of uses in the area, the proposed rezoning is consistent with the Urban neighborhood context plan direction.

**Blueprint Denver Future Places**



The Future Places Map shows the subject property as a Public Park and Open Space, which *Blueprint Denver* describes as areas that “represent vital quality-of-life infrastructure that is part of a place. There are many different examples, including parks and golf courses in residential areas, or a [sic] plazas/parks in centers and corridors” (p. 152). Because Open Space districts are intended to be parks that are embedded in any neighborhood, the proposed OS-A is consistent with the Public Park and Open Space place type plan direction.

## Growth Strategy



Because the subject property is designated as a Public Park and Open Space, it is categorized as “All other areas of the city” according to the future growth strategy. These areas are anticipated to see around 20% of new housing growth and 10% of new employment growth by 2040 (p. 51). The proposed map amendment to OS-A will not provide additional housing, but it will provide a critical quality of life amenity to the surrounding residential neighborhood, which is consistent with this plan direction.

### Street Types

In *Blueprint Denver*, street types are considered in the context of the future place to evaluate the appropriateness of the intensity of the adjacent development (p. 67). *Blueprint Denver* classifies the streets surrounding the subject site as undesignated local streets, except for Lincoln Street, which is a residential collector. The plan states “collector streets are in between a local street and an arterial street; they collect movement from local streets and convey it to arterial streets” (p.159). The use and built form characteristics of Residential streets is described as “primarily residential uses, but may also include schools, civic uses, parks, small retail nodes and other similar uses” (p.160). Local streets, which “provide the lowest degree of through travel but the highest degree of property access” (p.161), “can vary in their land uses and are found in all neighborhood contexts” (p.161). The proposed OS-A district is consistent with these descriptions as it is intended to be compatible when embedded in residential neighborhoods (DZC Section 9.3.1).

### **Strategies**

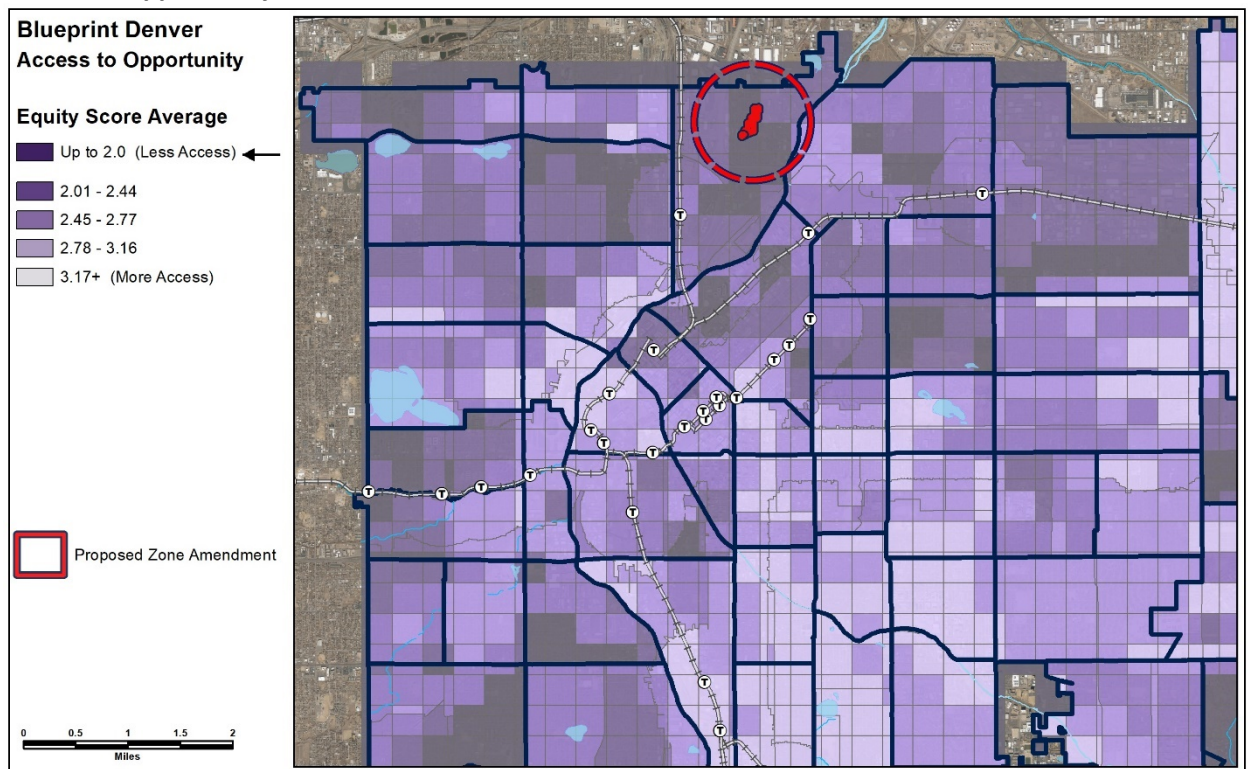
*Blueprint Denver* references *Game Plan for a Healthy City*, which is an adopted supplement to Comprehensive Plan 2040. It provides a roadmap for our public parks, recreation programs, urban forest and environment. It articulates “an implementation recommendation to increase the percentage of residents who can walk to a park in 10 minutes or less, prioritizing high-need neighborhoods for improvements. This recommendation is essential to *Blueprint Denver’s* vision for a city where every neighborhood is complete” (*Blueprint Denver* p.124).

The proposed rezoning to OS-A enables the construction of a park amenity that will be within a 10-minute walk to an existing residential community, and one that was identified as having a high-need for increasing access to opportunity, as detailed in the Equity Concepts, below. See *Game Plan for a Healthy City* section below for more detail on consistency with that plan.

### **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.

#### **Access to Opportunity**



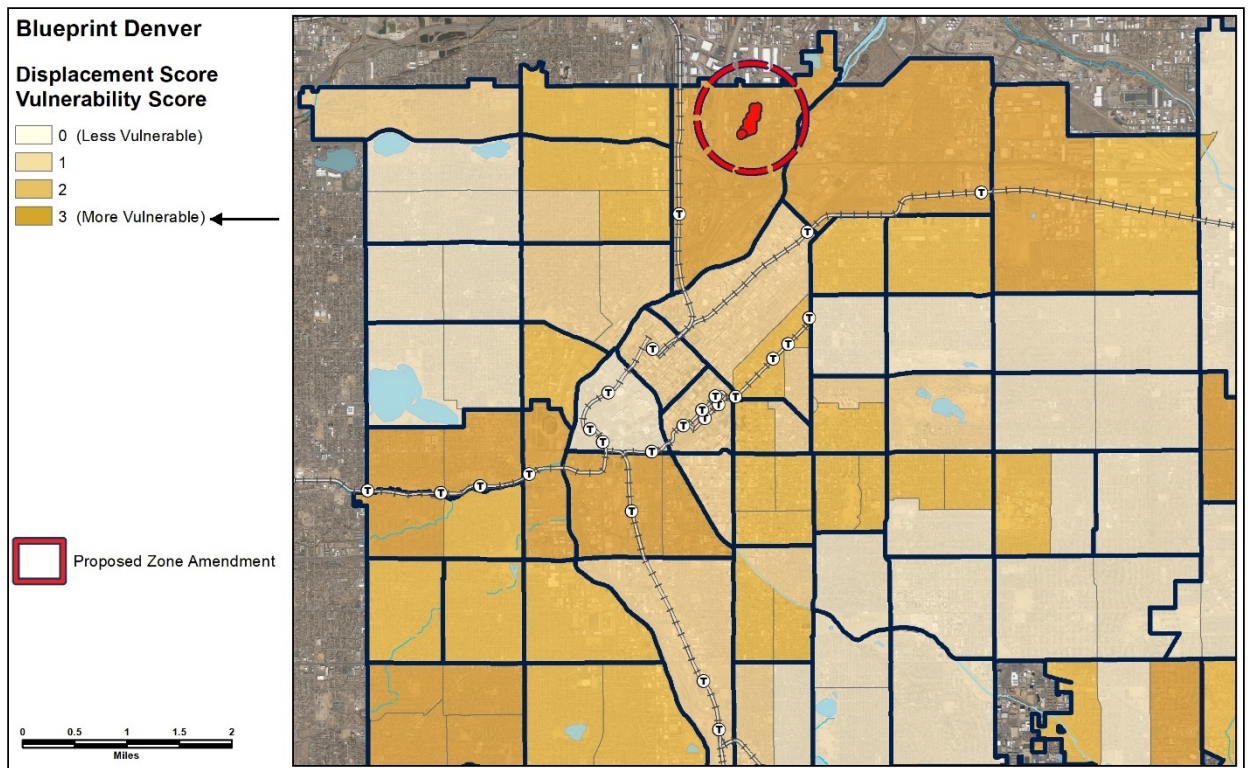
The subject property is in an area with low access to opportunity. Access to opportunity is a composite of the neighborhood equity index developed by Denver’s Department of Public Health and Environment, proximity to high-capacity and frequent transit, and access to centers



and corridors. This measure indicates whether a particular neighborhood is complete. One key driver of this measure is the percentage of households that live within a quarter mile of a park. In this neighborhood, approximately 31% of households meet this criterion. The proposed rezoning will facilitate the construction of a new park on currently vacant land in this neighborhood, thereby increasing the percent of households that will be able to walk to a park and improving the overall access to opportunity. The application estimates that this new park will serve 2,000 people.

Two other drivers of the access to opportunity measure are life expectancy and childhood obesity. As noted in the application, “adding green space to this neighborhood will help to increase positive physical and mental health outcomes and will contribute to improving quality-of-life infrastructure for both adult and child residents.” The remaining elements of the access to opportunity measure will not be impacted or exacerbated by the proposed rezoning.

### **Vulnerability to Involuntary Displacement**



The subject property is in an area that is vulnerable to involuntary displacement according to a measure developed by the Denver Economic Development and Opportunity office. This neighborhood is vulnerable according to all three drivers included in this measure:

- The median household income is lower in this neighborhood than the Denver average;
- The percent of residential units that are occupied by renters rather than owners is higher than the Denver average; and

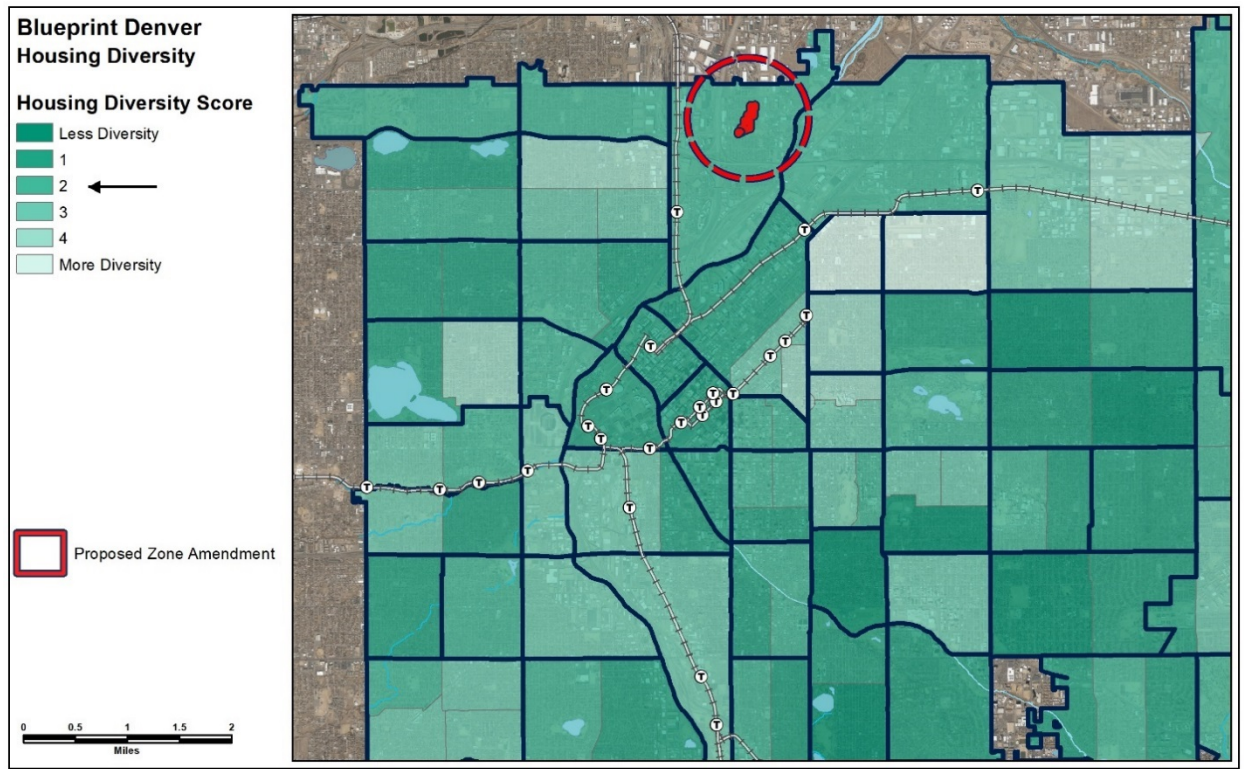
- The percent of population with less than a Bachelor’s degree lower than the Denver average.

While this park project is a community-driven initiative, the City is aware of the possibility for public investment to accelerate displacement. The application notes that a “cross-sectoral strategy with parks and housing is a demonstrated tactic to help combat potential ‘green gentrification.’”<sup>1</sup> DPR held a series of discussions in March and April of 2020 with other departments, including the Department of Public Health and Environment (DDPHE), the Department of Transportation and Infrastructure (DOTI), the Department of Housing Stability (HOST), and the Department of Economic Development and Opportunity’s Neighborhood Equity and Stabilization (NEST) team. These discussions identified several programs that this community can leverage to prevent displacement, including Denver Urban Renewal Authority (DURA) Emergency Home Repair and Access Modification Programs, Denver Human Services’ Property Tax Relief Program, Energy Outreach Colorado’s CARE Program, and Globeville Elyria Swansea Displacement Database and Resource Navigation. An additional program currently in development within HOST includes a preference policy that would give residents who have been displaced or are at risk of displacement preference for a portion of city-funded affordable housing units. These and other city programs, combined with new income-restricted housing being developed in the area, will help ensure the proposed rezoning does not increase vulnerability to involuntary displacement in the neighborhood.

---

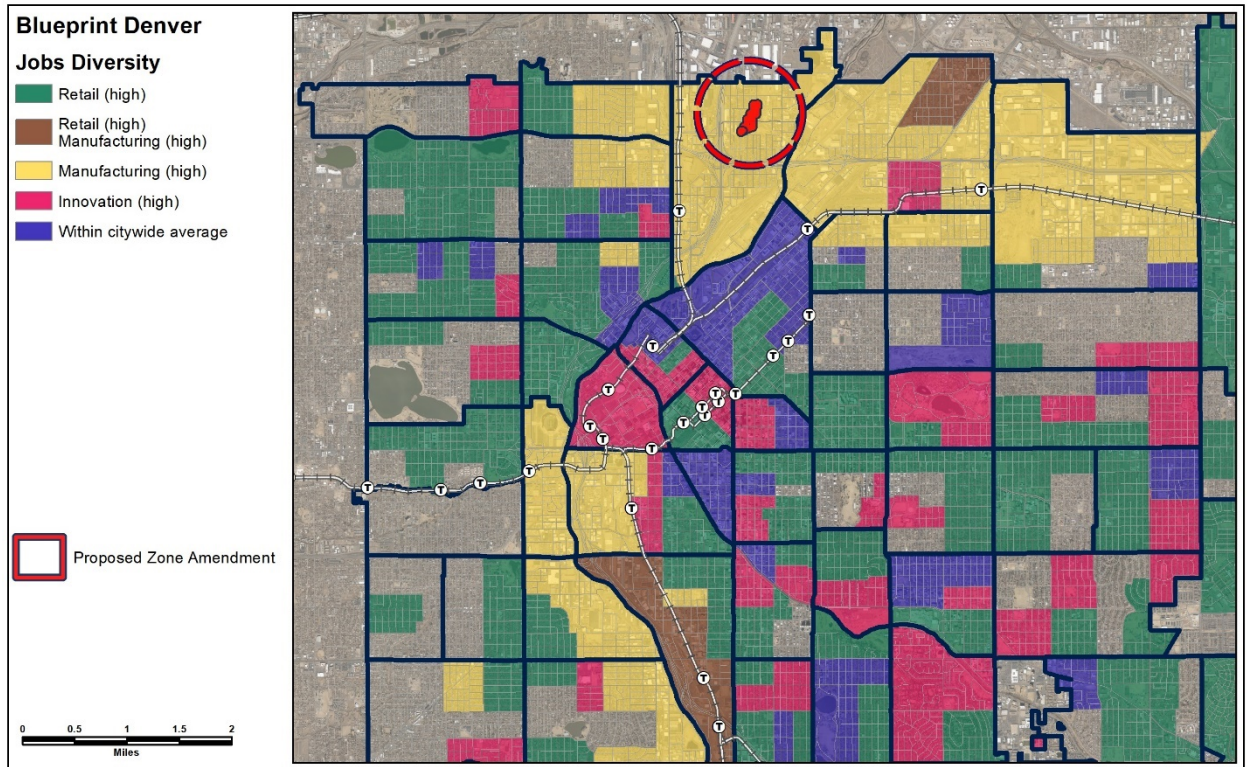
<sup>1</sup> The application references the following source: Rigolon & Nemeth, “We’re not in the business of housing: Environmental gentrification and the nonprofitization of green infrastructure projects,” 2018.

### Expanding Housing Diversity



The subject property is in an area that has moderate housing diversity. There are five drivers in this measure of housing diversity. This area is diverse compared to the city average in terms of the number of bedrooms per household and the percentage of households that rent versus own their houses. This area is less diverse than the city average in terms of the type of housing (housing with two to 19 units compared to single-unit or buildings with 20 or more units), housing cost, and the number of affordable housing units. The proposed rezoning will not provide additional housing and therefore does not impact or exacerbate the current housing diversity.

### Expanding Jobs Diversity



The color on this map indicates whether the mix of jobs across sectors is similar to that of the city or whether a particular sector is more dominant in a particular area than it is citywide. The subject property is within an area that has more manufacturing jobs than the citywide average. Specifically, 53% of jobs are manufacturing jobs in this area, compared to 10% citywide. There are 3.37 jobs per acre, with 42% in retail and 5% in innovation. The proposed rezoning to OS-A is not expected to impact jobs diversity.

The proposed map amendment will increase access to opportunity and have minimal impact on vulnerability to involuntary displacement and housing and jobs diversity. The rezoning to OS-A is consistent with the context, place, growth strategy, street type, and strategy recommendations of *Blueprint Denver*.

### **Game Plan for a Healthy City (2019)**

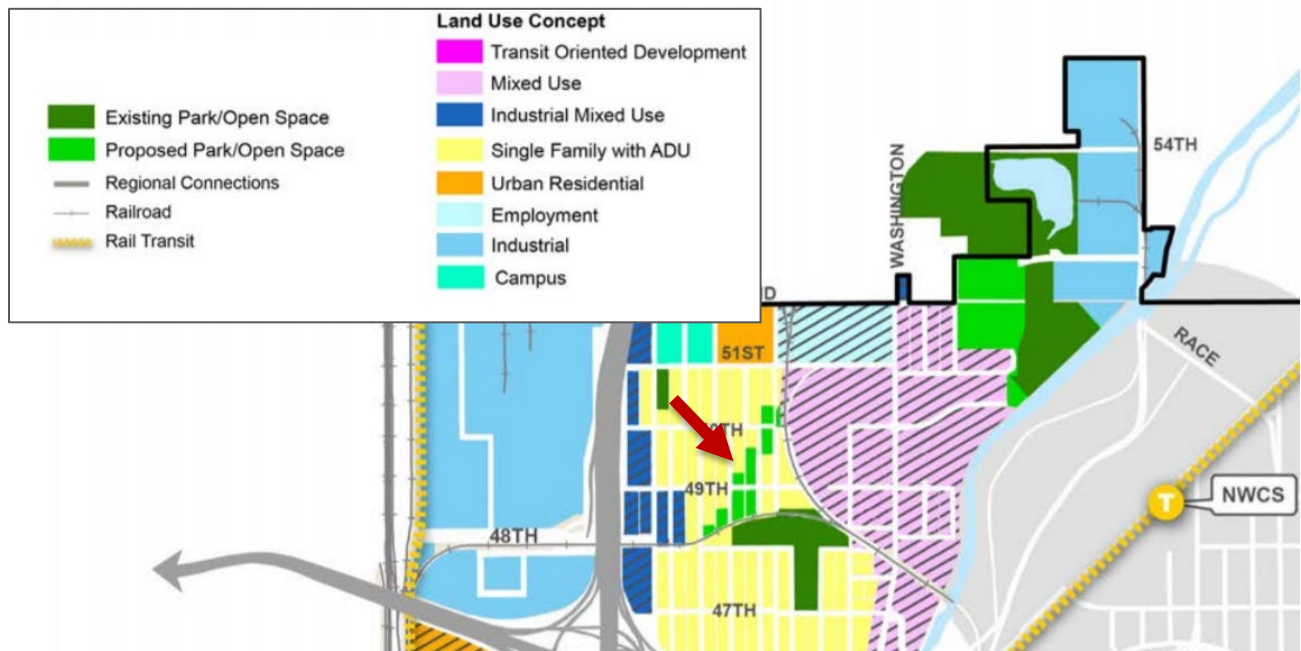
*Game Plan for a Healthy City* provides both a vision and a strategic roadmap for the future of Denver's parks, hundreds of facilities, and recreation programs, and 20,000 acres of park landscapes. This plan defines Globeville as a "High Need Neighborhood with significant areas lacking walkable access to park access" (p.124). The document prioritizes "addressing unmet needs in high-need neighborhoods" (p.137), and Strategy 4.2 under the Reinvest pillar is to identify and focus park and

programmatic resources in underserved neighborhoods. The proposed rezoning to OS-A enables DPR to design and build a park in this neighborhood, consistent with the plan recommendations.

### Globeville Neighborhood Plan (2014)

The Globeville Neighborhood Plan identifies the subject property as a Proposed Park/Open Space in the Concept Land Use map. There is a recommendation to “Create new parks, open spaces, and recreational facilities” (p.42), with a specific strategy for Platte Farm Open Space. According to the plan, “Platte Farm Open Space is a community-created vision to transform 5.5 acres of neglected land into an open space where all ages and abilities can recreate, exercise and connect with nature. Currently, the space is undeveloped, apart from high-voltage power lines that traverse the space. The site is prone to flooding and illegal dumping is commonplace. A public planning process led by Groundwork Denver and the Platte Farm Open Space Resident Steering Committee has resulted in a conceptual open space vision for the site. Implementing Platte Farm Open Space would transform a large area that is currently perceived as blighted into an amenity” (p.42). The proposed rezoning to OS-A is consistent with the Globeville Neighborhood Plan by enabling the development of this future park identified in the plan.

## CONCEPT LAND USE AND AREAS OF CHANGE



## 2. Uniformity of District Regulations and Restrictions

The proposed rezoning to OS-A will result in the uniform application of zone district building form, use and design regulations.

### **3. Public Health, Safety and General Welfare**

The proposed official map amendment furthers the public health, safety, and general welfare of the City through implementation of the city's adopted plans. Additionally, the proposed rezoning will enable approximately five additional acres of publicly-accessible green space and a trail system. There is a large body of evidence connecting additional green space to improved mental and physical health outcomes.<sup>2</sup> As stated in the application, "Parks have been associated with overwhelmingly positive outcomes including: increased physical activity, general mood improvement, stress reduction, and increased social capital."<sup>3</sup>

### **4. Justifying Circumstance**

The application identifies a changed or changing condition as the Justifying Circumstance under DZC Section 12.4.10.8.A.4, "Since the date of the approval of the existing Zone District, there has been a change to such a degree that the proposed rezoning is in the public interest. Such a change may include: ... a City adopted plan."

As discussed above, the Globeville Neighborhood Plan, adopted in 2014, identified this area as a future park. This land use policy was reinforced with the adoption of Blueprint Denver in 2019. In addition, the City acquired the property between 2014 and 2019 which makes it eligible for the OS-A zone district, which applies to city-owned parks. These changes, which have occurred since the current zoning was established in 2010, justify rezoning the subject site to OS-A to allow DPR to create a park on this site.

### **5. Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements**

The requested OS-A zone district is within the Open Space context, which "consists of all forms of public and private parks and open spaces. The context accommodates sites ranging from very active to completely passive, and from those embedded in a neighborhood to sites that are large enough to stand alone. Active sites may include high use areas such as ball fields, while passive areas focus on resource protection, trails, walking and biking... Buildings in the Open Space Context are typically placed where access is highest, and are often located away from view of the general public... Buildings are typically low in scale, although some open space areas with active recreational uses support large-scale facilities." (DZC, Section 9.3.1). The Open Space Context is intended to apply in a variety of contexts, including the surrounding urban context of this neighborhood. This context is appropriate for this low-scale residential neighborhood with plan direction for a future park.

Open Space Public Parks District (OS-A) "is intended to protect and preserve public parks owned, operated or leased by the City and managed by the City's Department of Parks and Recreation ("DPR") for park purposes" (DZC, 9.3.2.1.A). Direct oversight of building form, design, and development by DPR and City Council will result in development that is appropriate for this location. The proposed OS-A zone district will be consistent with the purpose and intent.

---

<sup>2</sup> [http://cloud.tpl.org/pubs/benefits\\_HealthBenefitsReport.pdf](http://cloud.tpl.org/pubs/benefits_HealthBenefitsReport.pdf)

<sup>3</sup> <https://www.nrpa.org/parksrecreation-magazine/2017/april/the-health-benefits-of-small-parks-and-green-spaces/>

## **Attachments**

1. Application