



**TO:** Denver Planning Board  
**FROM:** Edson Ibañez, Senior City Planner  
**DATE:** March 12, 2025  
**RE:** Official Zoning Map Amendment Application #2024I-000170

### Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends **approval** for Application #2024I-00170.

### Request for Rezoning

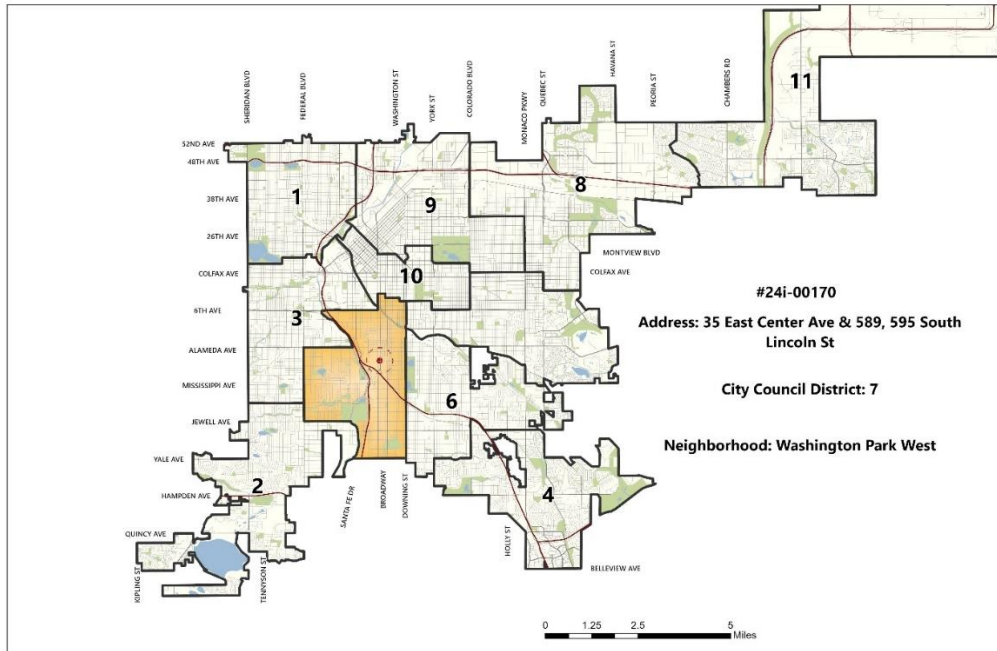
Address: 589 & 595 South Lincoln Street and 35 E Center Avenue  
Neighborhood/Council District and CM: Washington Park West neighborhood / CD 7, CM Alvidrez  
RNOs: Inter-Neighborhood Cooperation (INC), West Washington Park Neighborhood Association, Baker Historic Neighborhood Association and Lincoln Broadway Corridor Registered Neighborhood Organization  
Area of Property: 9,380 square feet  
Current Zoning: U-TU-B2, UO-3  
Proposed Zoning: U-RH-3A  
Property Owner(s): Lincoln/Glenarm L.P. (Colorado Coalition for the Homeless)  
Owner Representative: Max Lubarsky, Colorado Coalition for the Homeless

### Summary of Rezoning Request

- The subject properties are in the Washington Park West statistical neighborhood on the southwest corner of Center Avenue and Lincoln Street.
- The sites are currently occupied by two single family residences. The property owner is proposing to rezone the property to allow for the development of an apartment building.
- The current zoning is U-TU-B2, UO-3. U-TU-B2 is a two-unit zone district that allows for Row Houses on corner lots in the Urban Context. The UO-3 is the Historic Structure Use Overlay which allows for certain commercial uses subject to additional standards and limitations. The properties have been reviewed by Landmark Preservation staff and been given a Certificate of Demolition Eligibility.
- Concurrent with the rezoning, the applicant has voluntarily proposed and signed an Affordable Housing Plan (AHP). The AHP includes a negotiated alternative to Mandatory Affordable Housing requirements for this site. The AHP states that the intent is to build a fully affordable Low Income Housing Tax Credit project at 60% area median income (AMI) or below. More information is included later in the staff report.
- The proposed U-RH-3A, **U**rbane, **R**ow **H**ouse, **3** stories, zone district allows the urban house, duplex, tandem house, and row house primary building forms as well as detached accessory dwelling units. Additionally, the Apartment Building Form is allowed on corner lots where at least one of the intersection streets has a functional street classification of Collector or Arterial.

Lincoln Street is designated as an Arterial. The maximum height of the allowed primary building forms ranges from 30 to 38 feet for the front 65% of the zone lot and 17 to 38 feet in the rear 35% of the zone lot. The Detached Accessory Dwelling Unit form can be a maximum height of 24 feet. This district is intended for use in the Urban Neighborhood Context, which is characterized by single- and two-unit uses and allows for embedded multi-unit uses. Further details of the zone district can be found in the proposed zone district of this staff report (below) and in Article 5 of the Denver Zoning Code.

## City Location



### Neighborhood Location – Washington Park West



#### 1. Existing Context

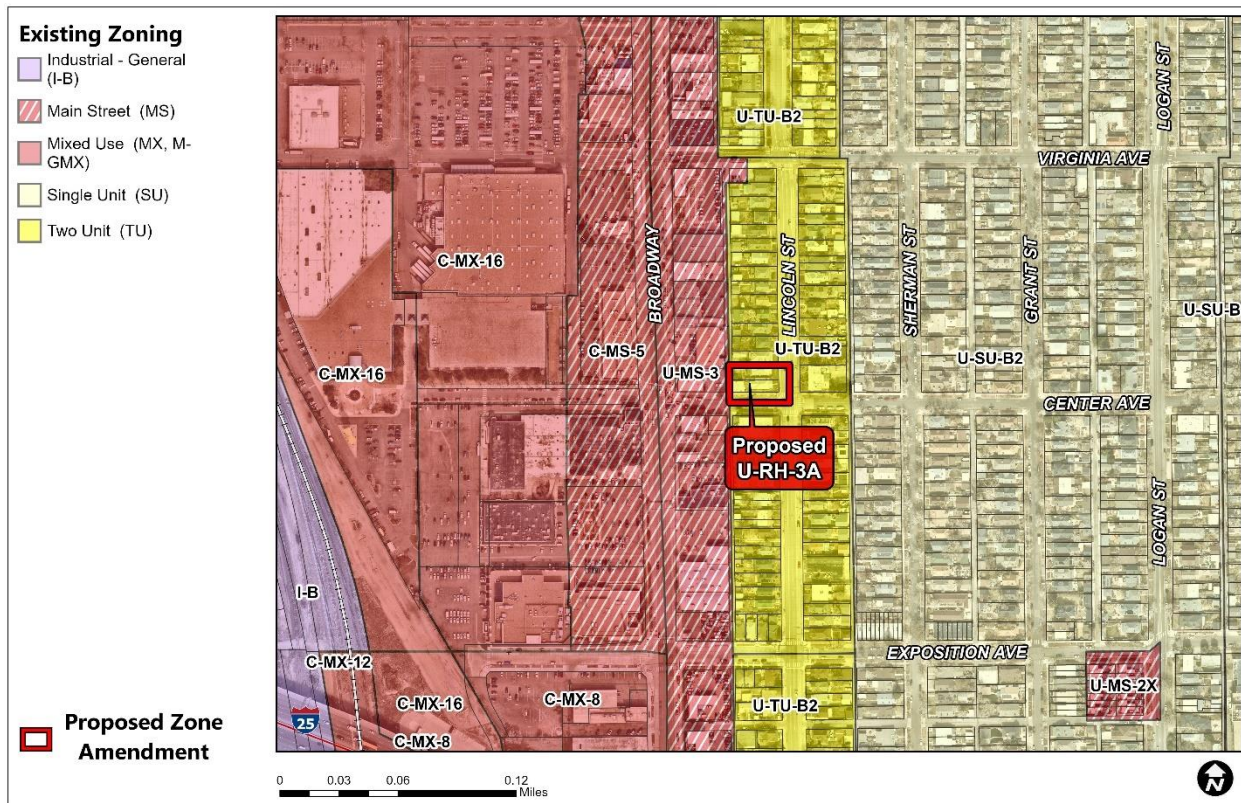


The subject properties are in the Washington Park West statistical neighborhood, and the immediate area consists of regular lot sizes without alleys. Washington Park is 0.7 miles east and the I-25 & Broadway Light Rail Station is a 12-minute (0.5 Mile) walk. One block to the south of the subject properties is the S Lincoln St & Exposition Ave bus stop, which is served by the RTD O/OL bus. The OL bus runs from Englewood Station to Union Station with 15-minute headways.

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	U-TU-B2 UO-3	Single Family Residence	One Story Single Family Residences with access off Center and Alley.	Generally regular grid of streets. Block sizes and shapes are consistent and rectangular with consistent sidewalks and amenity zones. Generally, vehicle parking is located to the rear or side of buildings in the neighborhood. Bus stops are located a block away along Lincoln Street.
North	U-TU-B2 UO-3	Single Family Residence	One Story Single Family Residences with access off the Alley.	
South	U-TU-B2 UO-3	Multi-Unit Residence	Three-story apartment building with access off Lincoln Street.	
West	U-MS-3 UO-1 UO-2	Industrial	One Story Tire Shop with access off the alley.	
East	U-TU-B2 UO-3	Multi-Unit Residence	Two-story structure with access off the alley.	

## 2. Existing Zoning



The existing zoning on the subject property is U-TU-B2, UO-3, which is a two-unit district allowing urban houses, duplexes, tandem homes, and detached accessory dwelling units with a minimum zone lot area of 4,500 square feet. Setbacks and lot coverage standards accommodate front and side yards. Allowed uses in U-TU-B2 are limited to single-unit, multi-unit dwellings and limited nonresidential uses found in Row House zone districts. The Row House Building Form is allowed on corner lots where at least one of the intersection streets has a functional street classification of Collector or Arterial. South Lincoln Street is designated as a Arterial Street. For additional details of the zone district, see DZC Section 5.2.2. The UO-3 is the Historic Structure Use Overlay District, which allows for certain commercial uses to encourage preservation, protection, adaptive use, and enhancement of Historic Structures.

### **3. View Planes**

The subject property is within the Washington Park view plane which limits height on the subject property to around 128 feet. The proposed zoning has allowed heights lower than the view plane limitations.

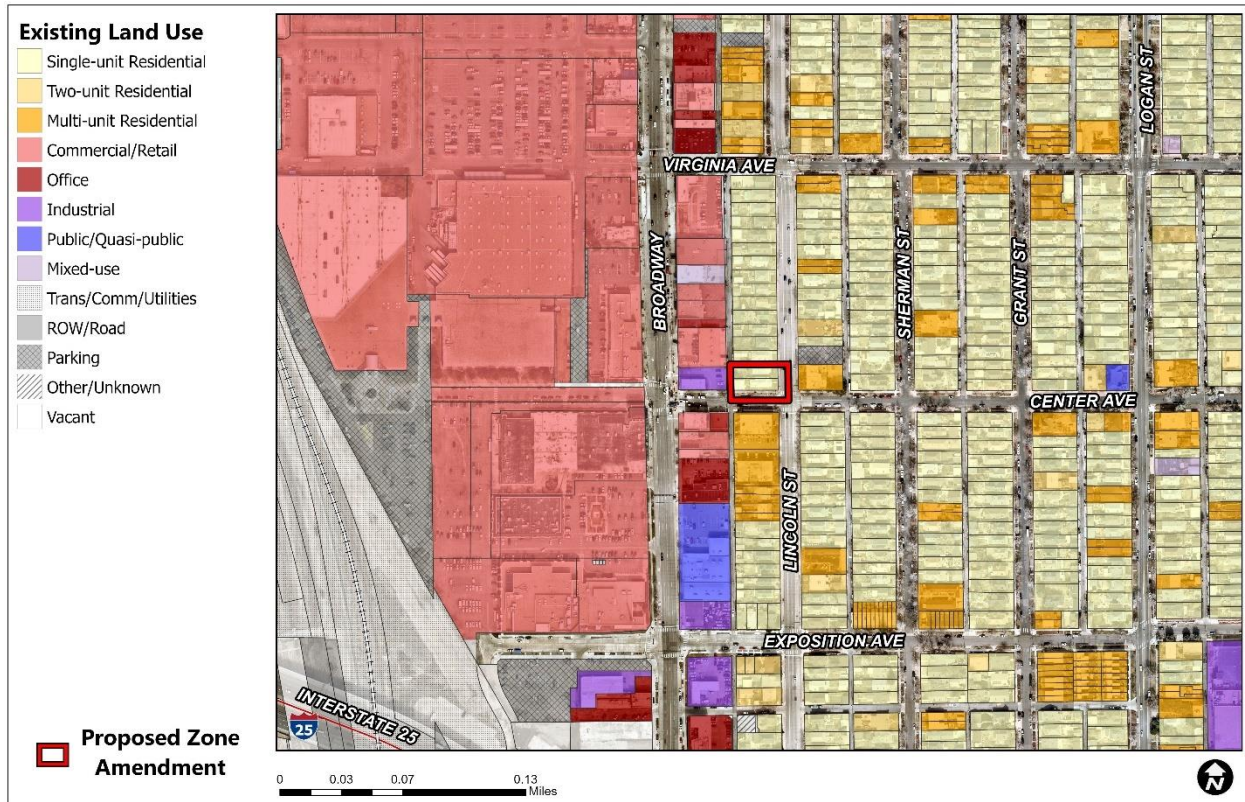
### **4. Affordable Housing Plan**

Concurrent with the rezoning, the applicant has voluntarily proposed and signed an Affordable Housing Plan (AHP). The AHP includes a negotiated alternative to Mandatory Affordable Housing requirements for this site. The AHP states that the intent is to build a fully-affordable Low Income Housing Tax Credit project at 60% area median income (AMI) or below. If the project is not realized, the AHP requires that any multi-family development provides a minimum of 20% of total dwelling units at 70% AMI. A fee-in-lieu instead on-site income-restricted units would not be allowed, and the units would be income-restricted for 99 years.

### **5. Historic Structures**

There are no historically designated structures or districts on the property. The applicants/owners submitted Certificate of Demolition Eligibility applications for both of the properties to Denver Landmark Preservation in Community Planning and Development. Landmark staff reviewed the applications for 35 E Center Ave. and 589 & 595 S Lincoln St. and found that neither property had potential to be an Individual Denver Landmark. With those determinations, Landmark staff issued Certificates of Demolition Eligibility for both properties, which are valid for five years. During that time period, the owners may pursue demolition permits without additional review of the properties by Denver Landmark.

## 6. Existing Land Use Map



The subject properties are classified as Single-Unit Residential use. Surrounding uses are primarily single-unit and multi-unit residential along Lincoln Street. Along Broadway, the uses range from Mixed Use, Commercial/Retail, Industrial, and Office.

## 7. Existing Building Form and Scale

*All images are from Google Street View.*



View of the subject properties, looking west.



View of the apartment buildings to the south of the subject properties, looking southwest.



View of the property to the east of the subject properties, looking east.



View of the Single-Unit Homes to the to the north of the subject properties, looking west.



## Proposed Zoning

### U-RH-3A Zone District

The applicant is requesting to rezone to U-RH-3A, which allows the Urban House, Duplex, Tandem House and Row House primary building forms up to two and a half stories in height. The Apartment Building Form is allowed on corner lots where at least one of the intersection streets has a functional street classification of Collector or Arterial. South Lincoln Street is designated as a Arterial. The intent of the district is to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context. These regulations allow for some multi-unit uses. The building form standards, design standards, and uses work together to provide a variety of low to medium residential housing types in a way that is compatible across the district.

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

Design Standards	U-TU-B2, UO-3 (Existing)	U-RH-3A (Proposed)
Primary Building Forms Allowed	Urban House, Duplex, Tandem House, Row House	Urban House, Duplex, Tandem House, Row House, Apartment
Height in Stories / Feet, Front 65% of Zone Lot,	<b>Urban House, Duplex, Tandem House, Row House:</b> 2.5 stories / 35’*	<b>Urban House, Duplex, Tandem House, Row House:</b> 2.5 stories / 35’** <b>Apartment:</b> 3 stories / 38’
Height in Stories / Feet, Rear 35% of Zone Lot,	<b>Urban House Duplex, Tandem House:</b> 1 story / 19’ <b>Row House:</b> 2.5 stories / 24’	<b>Urban House, Duplex, Tandem House, Row House:</b> 2.5 stories / 24’** <b>Apartment:</b> 3 stories / 38’
Height in Stories / Feet, Detached Accessory Dwelling Unit, (max.)	24 feet	1.5 stories / 24’
Zone Lot Size (min.)	4,500 sf 6,000 sf (for Row House) with a maximum of 9,375 sf	6,000 square feet with a maximum of 16,000 sf **
Zone Lot Width (min.)	<b>Urban House Duplex, Tandem House:</b> 35 feet <b>Row House:</b> 50 feet	50 feet**
Primary Street Block Sensitive Setback Required / If not	Yes / 20’	Yes / 20’
Side Street Setback (min.) *	<b>All Forms:</b> 5’	<b>Urban House, Duplex, Tandem House, Row House:</b> 5’** <b>Apartment:</b> 10’
Side Interior Setback (min.) *	<b>Urban House, Duplex, Tandem House:</b> 3’ <b>Row House:</b> 5’	<b>All forms:</b> 5’**
Rear Setback, Alley / No Alley	<b>All Forms:</b> 12’ / 20’	<b>All forms:</b> 12’ / 20’

Building Coverage per Zone Lot including all accessory structures (max.), not including exceptions	45%	N/A
Detached Accessory Building Forms Allowed	Detached Accessory Dwelling Unit, Detached Garage, Other Detached Accessory Structures	Detached Accessory Dwelling Unit, Detached Garage, Other Detached Accessory Structures

\*Based on subject property width of 50 feet

\*\*Standard varies depending on building form

### 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 Response

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

**Department of Public Health and Environment:** Approved – No Comment.

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

**Public Works – R.O.W. - City Surveyor:** Approved – No Comments

**Development Services - Transportation:** Approved – No Response

**Development Services – Wastewater:** Approved – No Response

**Development Services – Project Coordination:** Approve Rezoning Only - Will require additional information at Site Plan Review.

A concept review meeting is recommended to ensure that rezoning the property to U-RH-3A will meet the needs of the applicant, as the property is relatively small. Additionally, after applying block-sensitive setbacks, the development of a multifamily project would be limited.

- 1) A Zone Lot Amendment will likely be needed to combine the subject properties into a single zone lot for the development of a multi-family project. The Zone Lot Amendment can be done concurrent with the SDP review process.
- 2) A Concept and Site Development Plan (SDP) will be needed for the proposed multi-family project. The SDP will need to be approved prior to the issuance of any building and zoning permits.
- 3) It is recommended to submit for an initial Concept Review simultaneous with the Rezoning in order to verify that the zone districts being sought will allow what the project seeks to develop.
- 4) The U-RH-3A zone district only allows the use of Row Home building forms to provide a multi-dwelling unit use. However, as Lincoln is designated as an Arterial by DOTI, the Apartment building form may also be used at this location. If Rowhomes are used, all units will need to

face the street and consist of Side-by-Side Dwelling Units. With the Row home building form, the number of units would be limited to 10. Both building forms require a minimum 6,000 s.f. zone lot in order to develop family uses.

5) The site is located within the Washington Park View Plane boundary.

**Development Services – Zoning:** Approved – No Response.

**Development Services – Fire Prevention:** Approve Rezoning Only - Will require additional information at Site Plan Review.

### Public Review Process

	Date
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:	<b>12/2/24</b>
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:	<b>3/4/25</b>
Planning Board Public Hearing:	<b>3/19/25</b>
CPD written notice of the Land Use, Transportation and Infrastructure Committee meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten (10) working days before the meeting:	<b>3/21/25 (Tentative)</b>
Land Use, Transportation and Infrastructure Committee of the City Council moved the bill forward:	<b>4/1/25 (Tentative)</b>
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:	<b>4/21/25 (Tentative)</b>
City Council Public Hearing:	<b>5/12/25 (Tentative)</b>

- **Public Outreach and Input**
  - **Registered Neighborhood Organizations (RNOs)**
    - To date, staff has received one letter of conditional support from the Lincoln/Broadway Corridor Registered Neighborhood Organization, West Washington Park Neighborhood Association and the Baker Historic Neighborhood Association. The conditional support is contingent on the acceptance of a Community Benefit Agreement (CBA) between the property

owner and the three RNOs. The letter highlights specific affordable housing commitments, property management details, demolition standards, architectural design requests, and communication details. The letter is attached to the Application.

- **General Public Comments**
  - To date, staff has received no public comment letters.

## **Criteria for Review / Staff Evaluation**

The criteria for review of this rezoning application are found in DZC, Sections 12.4.10.7 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

### **1. Consistency with Adopted Plans**

The following adopted plans apply to this property:

- *Denver Comprehensive Plan 2040 (2019)*
- *Blueprint Denver (2019)*
- *West Washington Park Neighborhood Plan (1991)*

### ***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 would allow for additional housing units within an established neighborhood, consistent with the following strategies in the Equitable, Affordable and Inclusive vision element:

- 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 (pg. 28).

The concurrent affordable housing plan will ensure that income-restricted, affordable housing is provided on-site. The AHP furthers plan guidance regarding affordability.

The proposed rezoning would allow infill development appropriate for the surrounding neighborhood that broadens the range of housing types available, consistent with the following strategy in the Strong and Authentic Neighborhoods vision element:

- Strong and Authentic Neighborhoods Goal 1, Strategy B - Ensure neighborhoods offer a mix of housing types and services for a diverse population (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).

Similarly, the land use pattern detailed in the previous paragraph is also consistent with the following strategies in the Environmentally Resilient vision element:

- Environmentally Resilient Goal 8, Strategy A - Promote infill development where infrastructure and services are already in place (p. 54).

The requested map amendment will allow an additional residential density at an infill location where infrastructure is already in place. The requested zone district enables building forms and uses which can provide residents with a mixture of housing types. Therefore, the rezoning is consistent with *Denver Comprehensive Plan 2040* recommendations.

### ***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 part of a Low Residential place within the Urban Neighborhood Context and provides guidance from the future growth strategy for the city.

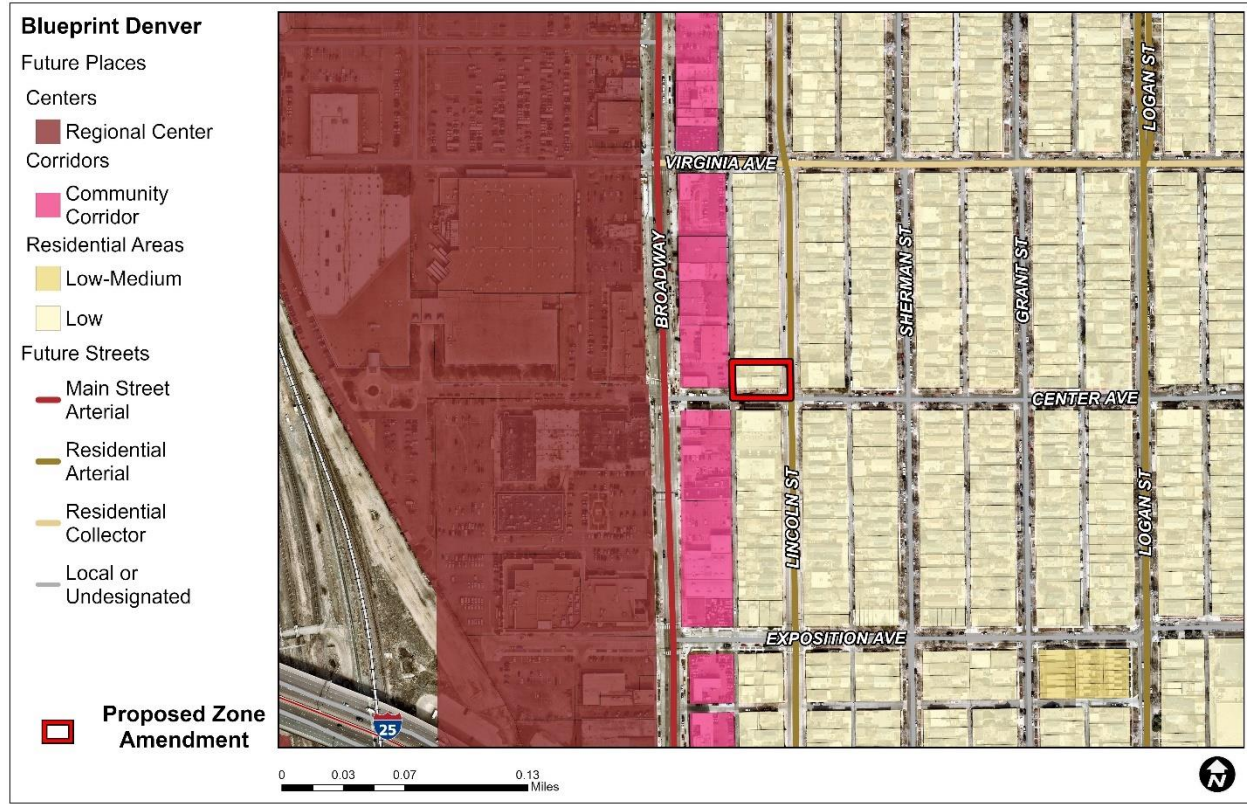
### ***Blueprint Denver Future Neighborhood Context***



The subject properties are shown on the context map as an Urban Neighborhood Context, the description of which is used to guide appropriate zone districts. “Small multi-unit residential and low-intensity mixed-use buildings are typically embedded in single-unit and two-unit residential areas. Block patterns are a regular grid with consistent alley access. Where they occur, multi-unit buildings are low scale. Mixed-use buildings are sited in a pedestrian-friendly manner near the street” (p. 222).

U-RH-3A is a zone district within the Urban Neighborhood Context and is intended “to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context” and “the building form standards, design standards and uses work together to promote desirable residential areas” (DZC Section 5.2.2.1). U-RH-3A is consistent with *Blueprint Denver’s* future neighborhood context of Urban because it will promote the residential character of the neighborhood by allowing a low-medium-scale multi-unit residential building that will be compatible with the existing residential area.

### **Blueprint Denver Future Places**



Within the Urban Neighborhood Context, the subject property is categorized as a Low Residential future place with a land use and built form defined by *Blueprint Denver* as “predominately single and two-unit uses on smaller lots... and limited mixed-use can occur along arterial and collector streets, as well as where commercial uses have been already established,” and “building heights are generally up to 2.5 stories in height” (p. 230). The proposed U-RH-3A zone district allows multiple building forms up to 2.5 stories in height and the Apartment building form up to 3 stories in height on certain corner lots at arterials and collectors like this one.

In regard to height, *Blueprint Denver* explains “The building heights identified in this plan provide a general sense of scale and are not intended to set exact minimums or maximums. Factors to consider when applying *Blueprint Denver* building height guidance may include: *guidance from a current small area plan; surrounding context, including existing and planned building height; transitions, including transitions from higher intensity to lower intensity areas; adjacency to transit, especially mobility hubs; achieving plan goals for community benefits; and furthering urban design goals*” (p. 66). The small area plan does not include height guidance, but it was zoned for higher density multi-unit housing at the time. There are apartment complexes directly to the south and east of the subject properties. To the west, Broadway is zoned U-MS-3 with heights allowed up to 45 feet (3 stories). The maximum height for apartments in the U-RH-3A zone district is 38 feet. The current zoning of U-TU-B2 allows for a maximum height of 35 feet. The additional height in U-RH-3A will allow a moderate increase in height to accommodate additional housing forms on the site. This will ensure future development is in context with the surrounding area, while also facilitating the development of affordable housing as

recommended by adopted plans. Consistent with this height guidance, the proposed U-RH-3A zone district provides for an appropriate transition to the adjacent areas. Additionally, the applicant is achieving plan goals by providing a community benefit through an Affordable Housing Plan as described earlier in this report.

### **Street Types**

In *Blueprint Denver*, future street types work in concert with the future places to evaluate the appropriate intensity of adjacent development (p. 67). *Blueprint Denver* classifies Lincoln Street as Residential Arterial Future Street Type, these streets are described as *designed for the highest amount of through movement and the lowest degree of property access* (p.154). *Blueprint Denver* classifies Center Avenue as Local or Undesignated Future Street Type. The proposed U-RH-3A district is consistent with this street type because it allows for residential uses at a scale with an intersection where one street is a Residential Arterial Future Street Type.

### **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 "All other areas of the city" growth area. These areas anticipate experiencing around 20 percent of new housing growth and 10 percent of new employment growth by 2040" (p. 51). This growth area contains "mostly residential areas with embedded local centers and corridors (that) take a smaller amount of growth intended to strengthen the existing character of our neighborhoods" (p. 49). The proposed U-RH-3A zone district is appropriate in this growth area as it will contribute to growth in the neighborhood while maintaining the area's residential character. Therefore, the proposed rezoning is consistent with the *Blueprint Denver* growth strategy.



### *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 Goal 2: Diversify housing options by exploring opportunities to integrate missing middle housing into low and low-medium residential areas (p. 82).
- Land Use & Built Form – Housing Goal 2: Integrate missing middle housing into low and low-medium residential areas, especially those that score low in housing diversity. This allowance should advance goals for affordability, such as including a requirement to provide affordability in exchange for increased density (p. 82).

This rezoning to a U-RH-3A zone district allows for additional missing middle housing-built forms in this Low Residential Future Place and is consistent with *Blueprint Denver* recommendations. Additionally, rezoning and the concurrent affordable housing plan will facilitate affordable housing options with new development on this site. This rezoning furthers equity by facilitating affordable housing development and additional housing option in this neighborhood.

### *Climate*

This rezoning supports the city's goals to reduce climate impacts by enabling additional housing near transit 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.

### ***West Washington Park Neighborhood Plan (1991)***

This neighborhood plan was adopted in 1991 and is applicable to the subject properties. The plan is, "intended to promote patterns of land use, urban design, circulation and services that contribute to the economic, social, and physical health, safety and welfare of the people who live and work in the neighborhood" (p. 4). The proposed U-RH-3A zone district would allow for a diversity of land uses that contribute to quality-of-life and livability within the neighborhood. At the time of the plan the subject property was zoned R-3, a High-density apartment district. The plan is largely silent on the R-3 district in its Residential Land Use Recommendations beginning on page 17.

Section V, "Housing", the stated goal of the housing recommendations are, "to plan for a mix of people (individuals, families, ages, renters and homeowners, and lifestyles); to permit a mix of housing types; to encourage new housing that is compatible with the existing housing stock in character, design, and scale" (p. 54). The specific recommendations largely focus on code enforcement, housing rehabilitation, and streetscape improvements. The proposed U-RH-3A zone district and concurrent affordable housing plan will help meet the state goal of the housing section of the plan by allowing for an increase in density, a diversity of housing types in the allowable building forms, and the stated mix of housing needs.

## **2. Public Interest**

The proposed official map amendment furthers the public interest through implementation of the city's adopted land use plans. The proposed rezoning would also facilitate increased housing density near services and amenities and promote a walkable, urban neighborhood within walking distance to public transit. The concurrent affordable housing plan will ensure the site provides on-site income restricted units.

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

The proposed U-RH-3A zone district is within the Urban Neighborhood Context. The neighborhood context generally consists of primarily single-unit and two-unit residential uses, and small-scale multi-unit residential uses and commercial areas are typically embedded in residential areas. The Urban Neighborhood Context consists of a regular pattern of block shapes surrounded by an orthogonal street grid, providing a pattern of pedestrian and vehicular connections and a consistent presence of alleys. Block sizes and shapes are consistent and include detached sidewalks, tree lawns, street and surface parking, and landscaping in the front setback. Residential buildings typically have consistent, moderate front setbacks, shallow side setbacks and consistent orientation. The Urban Neighborhood Context is characterized by low-scale buildings except for some mid-rise commercial and mixed-use structures, particularly at nodes or along arterial streets. There is a balance of pedestrian, bicycle and vehicle reliance with greater access to the multi-modal transportation system (DZC, Division 5.1). It is appropriate to apply zoning within the Urban Neighborhood Context at this location due to the adopted plan vision described earlier as well as the existing context. The proposed rezoning to U-RH-3A will enable development that is consistent with the neighborhood context description.

According to DZC 5.2.2.1.A, the general purpose of the Residential zone districts is to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context. The building form standards, design standards, and uses work together to promote desirable residential areas. Lot sizes are consistent within an area, and lot coverage is typically medium to high accommodating a consistent front and side yard. The standards of the two unit and row house districts promote existing and future patterns of lower scale multi-unit building forms that address the street in the same manner as an urban house building form. The regulations provide certainty to property owners, developers, and neighborhoods about the limits of what is allowed in a residentially zoned area. These regulations are also intended to reinforce desired development patterns in existing neighborhoods while accommodating reinvestment. The rezoning to U-RH-3A is consistent with the zone district general purpose and recognizes the existing residential context.

Specifically, U-RH-3A is a multi-unit district that allows up to a two and a half story rowhouse building form. Apartments are allowed up to three stories, on certain corner lots. It also allows the urban house, detached accessory dwelling unit, duplex, and tandem house building forms. The proposed zone district recognizes the subject site's existing condition, surrounding context, and plan guidance, fulfilling this Specific Intent statement.

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### **Attachments**

1. Application
2. Public Engagement + RNOs Comment Letter