



Zone Map Amendment (Rezoning) for PUD - Application

PROPERTY OWNER INFORMATION*	
<input type="checkbox"/> CHECK IF POINT OF CONTACT FOR APPLICATION <input checked="" type="checkbox"/> CHECK IF POINT OF CONTACT FOR FEE PAYMENT	
Property Owner Name	United Airlines, Inc.
Address	233 S. Wacker Dr., WHQCT - 14th FL
City, State, Zip	Chicago, IL 60606
Telephone	
Email	
*Map amendment applications for a PUD district must be initiated by all (100%) of the owners, or authorized representatives, subject to the rezoning application (DZC Sec. 12.4.10.4.A.1)	

PROPERTY OWNER(S) REPRESENTATIVE**	
<input checked="" type="checkbox"/> CHECK IF POINT OF CONTACT FOR APPLICATION <input type="checkbox"/> CHECK IF POINT OF CONTACT FOR FEE PAYMENT	
Representative Name	Caitlin Quander
Address	675 15th Street, Suite 2900
City, State, Zip	Denver, CO 80202
Telephone	303-223-1233
Email	cquander@bhfs.com
**Property owner shall provide a written letter authorizing the representative to act on his/her behalf.	

SUBJECT PROPERTY INFORMATION	
Location (address(s) and/or boundary description):	17671 - 17675 East 64th Avenue; Denver, CO 80249
Assessor's Parcel Number(s):	00041-00-207-000 (Parcel A), 00041-00-231-000 (Parcel B)
Area in Acres or Square Feet:	113.9 acres
Current Zone District(s):	Parcel A: C-MU-30 WVRS, UO-1, AIO and C-MU-20 WVRS, AIO; Parcel B: GTWY AIO

PROPOSAL		
Proposed PUD Type (See DZC Section 9.6.1.3(A) to determine if General or Detailed):	<input checked="" type="checkbox"/> General PUD	<input type="checkbox"/> Detailed PUD
Proposing Subareas:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
List the zone district(s) on which the PUD will be based:	CMP-EI, S-MX-8	
Deviations from Standard Zone District: Provide a list of proposed deviations from the standard zone district and a detailed explanation of why the deviation is needed. Please use an attachment, if necessary.	Deviation	Why deviation is necessary
	See attached PUD draft	

PRE APPLICATION INFORMATION	
In addition to the required pre-application meeting with Planning Services, did you have a concept or a pre-application meeting with Development Services?	<input type="checkbox"/> Yes - State the contact name & meeting date _____ <input checked="" type="checkbox"/> No - Describe why not (in outreach attachment, see bottom of p. 3)
Did you contact the City Council District Office regarding this application?	<input checked="" type="checkbox"/> Yes - if yes, state date and method <u>Please reference outreach attachment.</u> <input type="checkbox"/> No - if no, describe why not (in outreach attachment, see bottom of p. 3)



REZONING REVIEW CRITERIA (ACKNOWLEDGE EACH SECTION)	
<p>General Review Criteria DZC Sec. 12.4.10.7.A</p> <p>Check box to affirm and include sections in the review criteria narrative attachment</p>	<p><input checked="" type="checkbox"/> Consistency with Adopted Plans: The proposed official map amendment is consistent with the City's adopted plans.</p> <p>Please provide a review criteria narrative attachment describing how the requested zone district is consistent with the policies and recommendations found in each of the adopted plans below. Each plan should have its own section.</p> <p>1. Denver Comprehensive Plan 2040</p> <p>In this section of the attachment, describe how the proposed map amendment is consistent with <i>Denver Comprehensive Plan 2040's</i> a) equity goals, b) climate goals, and c) any other applicable goals/strategies.</p> <p>2. Blueprint Denver</p> <p>In this section of the attachment, describe how the proposed map amendment is consistent with: a) the neighborhood context, b) the future place, c) the growth strategy, d) adjacent street types, e) plan policies and strategies, and f) equity concepts contained in <i>Blueprint Denver</i>.</p> <p>3. Neighborhood/ Small Area Plan and Other Plans (List all from pre-application meeting, if applicable):</p> <p>Far Northeast Area Plan. Please reference cover letter for discussion of consistency with adopted plans.</p>
<p>General Review Criteria DZC Sec. 12.4.10.7.A.1</p> <p>Only check this box if your application is not consistent with 12.4.10.7.A</p>	<p><input type="checkbox"/> Community Need Exception: The City Council may approve an official map amendment that does not comply with subsection 12.4.10.7.A if the proposed official map amendment is necessary to provide for an extraordinary community need that was not anticipated at the time of the adoption of the city's plans.</p> <p>Please provide a narrative attachment describing how the requested zone district is necessary to provide for an extraordinary community need that was not anticipated at the time of the adoption of the city's plans.</p>
<p>General Review Criteria: DZC Sec. 12.4.10.7. B & C</p> <p>Check boxes to the right to affirm and include a section in the review criteria for the public interest narrative attachment and for consistency with the neighborhood context and the stated purpose and intent of the proposed zone district.</p>	<p><input checked="" type="checkbox"/> Public Interest: The proposed official map amendment is in the Public Interest.</p> <p>In the review criteria narrative attachment, please provide an additional section describing how the requested rezoning is in the public interest of the city.</p> <p><input checked="" type="checkbox"/> The proposed official map amendment is consistent with the description of the applicable neighborhood context, and with the stated purpose and intent of the proposed Zone District.</p> <p>In the review criteria narrative attachment, please provide a separate section describing how the rezoning aligns with a) the proposed district neighborhood context description, b) the general purpose statement, and c) the specific intent statement found in the Denver Zoning Code.</p>



<p>Additional Review Criteria for Rezoning to PUD District: The proposal must comply with all of the additional review criteria</p> <p>DZC Sec. 12.4.10.9</p> <p>Check boxes to the right to affirm and include a section in the review criteria narrative for each.</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> The PUD District (and the PUD District Plan) is consistent and complies with the intent, purpose, all applicable standards and criteria stated in Article 9, Division 9.6 (Planned Unit Development). <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The PUD District, the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property. <input checked="" type="checkbox"/> The PUD District, 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).
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REQUIRED ATTACHMENTS

Please check boxes below to affirm the following **required** attachments are submitted with this rezoning application:

- Legal Description of subject property(s).** Submit as a **separate Microsoft Word document**. View guidelines at: <https://www.denvergov.org/content/denvergov/en/transportation-infrastructure/programs-services/right-of-way-survey/guidelines-for-land-descriptions.html>
- Proof of ownership document** for each property owner signing the application, such as (a) Assessor’s Record, (b) Warranty deed, or (c) Title policy or commitment dated no earlier than 60 days prior to application date. If the owner is a corporate entity, proof of authorization for an individual to sign on behalf of the organization is required. This can include board resolutions authorizing the signer, bylaws, a Statement of Authority, or other legal documents as approved by the City Attorney’s Office.
- Review Criteria Narratives.** See page 2 for details.
- Outreach documentation.** Pre-application outreach is required. The minimum requirement is outreach to the City Council District Office, Registered Neighborhood Organizations, and adjacent neighbors. Please describe all community outreach and engagement to these and any other community members or organizations. The outreach documentation must include the type of outreach, who was contacted or met with, the date of the outreach or engagement, and a description of feedback received, if any. If outreach was via email, please include a copy of the email chain. The outreach documentation attachment should be sent as a PDF or Word Doc, separate from other required attachments.

ADDITIONAL ATTACHMENTS (IF APPLICABLE)

Additional information may be needed and/or required. Please check boxes below identifying additional attachments provided with this application.


- Written narrative explaining reason for the request** (optional)
- Letters of Support.** If surrounding neighbors or community members have provided letters in support of the rezoning request, please include them with the application as an attachment (optional)
- Written Authorization to Represent Property Owner(s)** (if applicable)
- Individual Authorization to Sign on Behalf of a Corporate Entity** (e.g. if the deed of the subject property lists a corporate entity such as an LLC as the owner, this is document is required.) (if applicable)
- Affordable Housing Review Team Acceptance Letter** (if applicable)

Last updated: December 3, 2024 **Return completed form and attachments to rezoning@denvergov.org**



PROPERTY OWNER OR PROPERTY OWNER(S) REPRESENTATIVE CERTIFICATION

We, the undersigned represent that we are the owner(s) of the property described opposite our names, or have the authorization to sign on behalf of the owner as evidenced by a Power of Attorney or other authorization attached, and that we do hereby request initiation of this application. I hereby certify that, to the best of my knowledge and belief, all information supplied with this application is true and accurate. I understand that without such owner consent, the requested official map amendment action cannot lawfully be accomplished.

Property Owner Name(s) <small>(please type or print legibly)</small>	Property Address City, State, Zip Phone Email	Property Owner Interest % of the Area of the Zone Lots to Be Rezoned	Please sign below as an indication of your consent to the above certification statement	Date	Indicate the type of ownership documentation provided: (A) Assessor's record, (B) warranty deed, (C) title policy or commitment, or (D) other as approved	Has the owner authorized a representative in writing? (YES/NO)
EXAMPLE John Alan Smith and Josie Q. Smith	123 Sesame Street Denver, CO 80202 (303) 555-5555 sample@sample.gov	100%	<i>John Alan Smith</i> <i>Josie Q. Smith</i>	01/12/20	(A)	YES
United Airlines, Inc.	233 S. Wacker Dr., WHQCT - 14th FL Chicago, IL 60606 (872) 825-1942 Brandon.Fair@United.com	100%	Signed by:  07F91643E77F4B5...	02/6/26	(B)	YES NO n/a
						YES NO
						YES NO
						YES NO

Rezoning Application Narrative

February 6, 2026

Caitlin S. Quander
Attorney at Law
303.223.1233 direct
cquander@bhfs.com

City and County of Denver
Community Planning and Development
Attn: Tony Lechuga
201 W. Colfax Ave., Dept. 205
Denver, CO 80202

RE: Cover Letter to 17671 - 17675 East 64th Avenue Rezoning Application to PUD, AIO (the "Rezoning")

Dear Mr. Lechuga:

We represent United Airlines, Inc. ("United") with respect to the enclosed application to rezone the approximately 113.9-acre property located at 17671 - 17675 East 64th Avenue (the "Property") owned by United and located in the DIA (Denver International Airport) Neighborhood ("DIA Neighborhood") located in the northeast area of the City and County of Denver, Colorado (the "City") to Planned Unit Development ("PUD"), using a base zoning of Campus – Education Institution ("CMP-EI"), and AIO ("DIA Influence Area Overlay Zone").

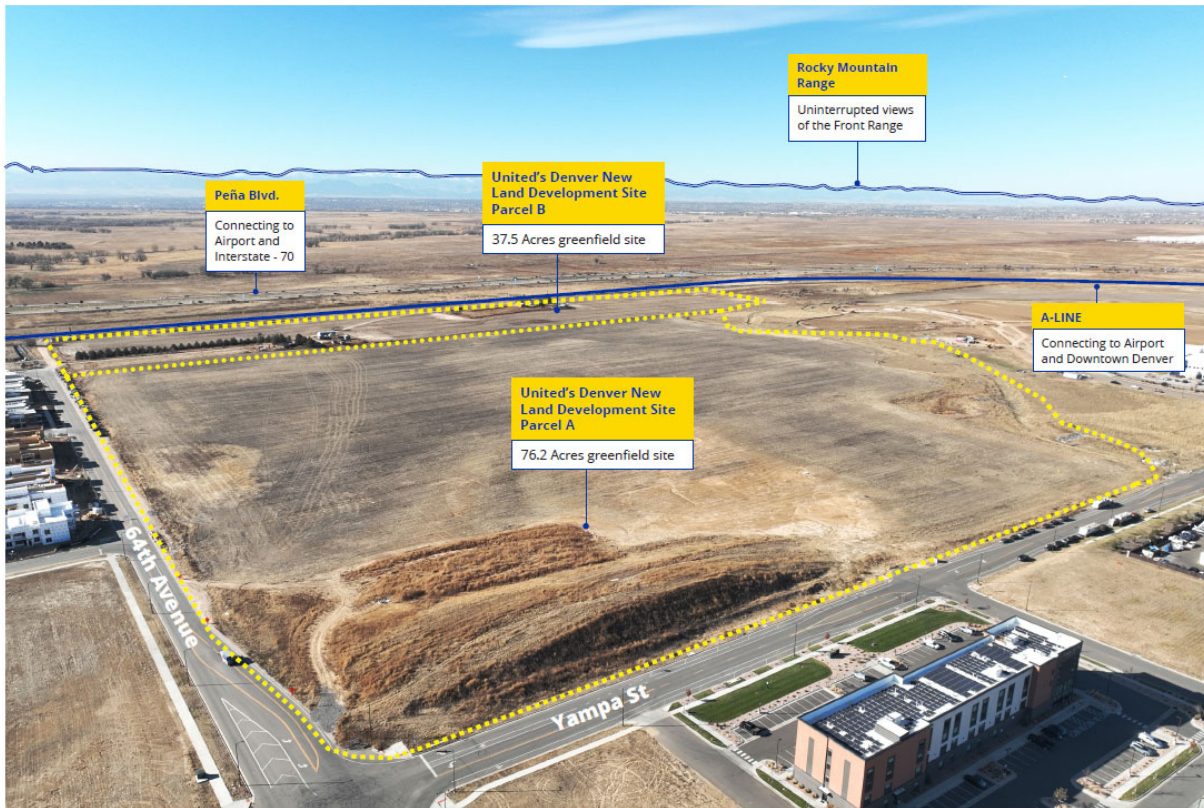
This letter is provided as part of the application for the Rezoning and to provide the City with additional information that may aid City staff and City Council in reviewing and approving the application.

BACKGROUND

The Property is generally located in northeast Denver adjacent to Peña Boulevard, and is bounded by Yampa Street to the east, 64th Avenue to the south, RTD's A-Line transit to the west, and Dogwood Gulch to the north. The Property was annexed by the City along with other portions of the DIA Neighborhood in the 1980s during the development of the airport. The purpose of the annexation was to address the City's expansion needs and mitigate conflicts arising from urban encroachment and airport noise. Like the Property, most property within the DIA Neighborhood is privately owned. The current use of the Property is agricultural and undeveloped vacant land (the "Current Use").

In the last seven years, the DIA Neighborhood has seen significant growth. To the north of the Property, a commercial development commonly known as Peña Station North was recently approved and constructed. To the south of the Property across 64th Avenue, a new multi-family residential development is underway, and further south, a mixed-use development commonly known as Peña Station Next is under construction.

The Property is currently composed of two parcels: 17671 East 64th Avenue, which is approximately 76.21 acres ("**Parcel A**") and 17675 East 64th Avenue, which is approximately 37.49 acres ("**Parcel B**"). Parcel A and Parcel B are depicted in the aerial image below.



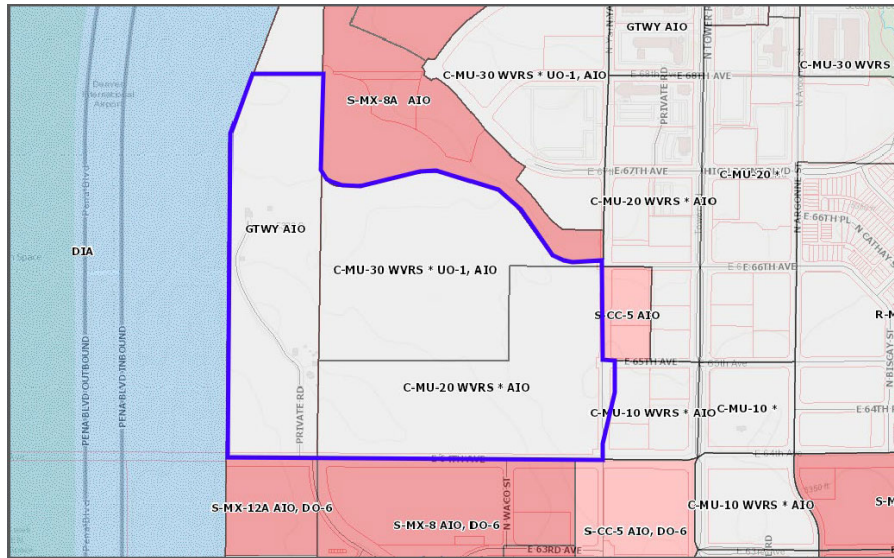
Aerial Image of Property A&B. Photo view taken from corner of Yampa Street and 64th Avenue looking northwest.

The Property is currently located within multiple zone districts, as follows:

- Parcel A (North). The north portion of Parcel A is located within the following districts:
 - The Commercial Mixed Use 30 district (the "**C-MU-30 District**") with waivers. The C-MU-30 District is a zone district pursuant to the Former Chapter 59 Zoning Code (the "**Former Chapter 59 Code**"), and is intended to facilitate a wide range of commercial, office, retail, industrial, and residential uses. *Former Chapter 59 Code*, § 59-301. The waivers to the C-MU-30 district were approved pursuant to Ordinance No. 138, Series 2000. These waivers restrict certain residential, commercial, industrial, and parking uses and require execution and recording of an air rights covenant and avigation easement.

- The Adult Use Overlay District (the “**UO-1 District**”), which is an overlay use district pursuant to the current Denver Zoning Code (the “**DZC**”), and which allows certain adult business uses. *DZC, § 9.4.4.6.*
- The DIA Influence Area Overlay Zone (the “**AIO District**”), which is an overlay district pursuant to the DZC. This district prohibits residential uses north of 64th Avenue due to its proximity to Denver International Airport (“**DEN**”). *DZC, § 9.5.3.*
- Parcel A (South). The south portion of Parcel A is located within the following districts:
 - The Commercial Mixed Use 20 district (the “**C-MU-20 District**”) with waivers. The C-MU-20 District is a zone district pursuant to the Former Chapter 59 Code, and is intended to facilitate a wide range of commercial and residential uses, and limited industrial uses. *Former Chapter 59 Code, § 59-301.* The waivers to the C-MU-20 district were approved pursuant to Ordinance No. 131, Series 2000. These waivers restrict certain residential and parking uses and require execution and recording of an air rights covenant and avigation easement.
 - The AIO District.
- Parcel B. This parcel is located within the following districts:
 - The Gateway District, which is a zone district pursuant to the Former Chapter 59 Code, and is intended to provide for and encourage quality development of the gateway area and protect and enhance nearby Denver neighborhoods. *Former Chapter 59 Code, § 59-341.*
 - The AIO District.

A depiction of the current zoning is below:



As noted above, the C-MU-30 District, the C-MU-20 District, and the Gateway District are pursuant to the Former Chapter 59 Code and are outdated, antiquated, and incompatible with the City’s adopted plans for the Property. The Rezoning provides an opportunity for the Property to come under and comply with the DZC and thereby further City goals.

The properties surrounding the Property are zoned as follows:

- S-MX-8A, AIO to the north
- CC-5 AIO and C-MU-10 with waivers AIO to the east
- S-MX-12A, AIO, DO-6 and S-MX-8, AIO, DO-6 to the south.

The purpose of the Rezoning is to rezone the Property to a PUD with a base zoning of CMP-EI pursuant to the DZC, and to retain the current AIO overlay zoning.

The PUD zone district is a flexible zoning mechanism intended to serve as an alternative to conventional land use regulations by consolidating land use, density, site planning, and building form into a single review process. *DZC, § 9.6.1.1(A)*. It is intended for “unique and extraordinary circumstances” where standard zoning is insufficient, allowing for tailored development without the need for multiple variances or waivers. *DZC, § 9.6.1.1(A)*.

According to the DZC, the base CMP-EI zoning proposed for the PUD is within the Campus Context, which is characterized by mid-sized or large sites designated for medical, institutional, education, or entertainment uses. *DZC, § 9.2.1*. The CMP-EI zone district is tailored generally to educational

institutions and is intended to foster “flexible placement of buildings, and unified treatment of signs, open space, landscaping and other site elements that may be recognized through an urban design plan that expresses stakeholder visions for the campus and its surrounding area.” *DZC, § 9.2.4.1*. Although the CMP-EI zone district is not specifically tailored to a corporate campus, it is an appropriate and adaptable base zoning for a PUD for a corporate campus.

The AIO zone district is an overlay zone district whose purpose is to restrict residential uses due to its proximity to DEN and potential noise concerns. *DZC, § 9.5.3.3*. Single unit and two unit dwelling are not permitted anywhere in the AIO district. *DZC, § 9.5.3.3(A)*. On properties, such as the Property, that are located north of 64th Avenue, multi-unit dwellings, live/work dwellings, congregate living and residential care, hospitals, bed and breakfasts, and all educational uses that include residential accommodations are further prohibited. *DZC, § 9.5.3.3(B)*.

PROJECT DESCRIPTION

In recent years, DEN has been United’s fastest growing hub, with United being the most flown airline out of DEN. DEN plays a crucial role in connecting United’s passengers to various domestic and international destinations and allows United to offer a wide range of flights and services to and from Denver. As Denver’s largest private employer, United operates a flight training center at its Denver Quebec Campus, which currently serves as United’s only flight training center for its more than 18,000 pilots. The Denver Community Impact 2025 summary attached hereto as **Exhibit A** outlines United’s ongoing investment in Denver and its workforce.

United is in the process of increasing the size of its fleet and expects to have 700 new planes by 2033. This increase in the number of planes (and the consequential need for more pilots) requires a significant increase in flight training center capacity, with the current Quebec Campus at its maximum capacity both in terms of square footage and throughput of trainees. Expansion of United’s flight training facilities is a critical business need in the near term.

To address this critical business need, United intends to develop the Property with a new flight training center with up to 60 additional full-flight-simulator bays. This project is referred to herein as the “**Project**.” The success of the Project and flight training center operations will require development and integration of various ancillary uses that may include training support spaces, offices, meeting rooms, an energy center, and amenity spaces. It is also intended to incorporate surface parking and structured parking facilities as well as outdoor amenity spaces for United on-site employees and visiting pilots. United hopes to move quickly on a first phase that can accommodate 12-14 new full-flight simulators. Up to four additional flight training buildings are currently planned (totaling up to 60 additional flight simulator bays) to be built at later phases. Depending on United’s business requirements the rest of the site would be designed at later stages. Until the Project is fully developed, United intends to maintain undeveloped portions of the Property as vacant agricultural land.

The PUD zone district with base CMP-EI zoning is well-suited to the Project. The CMP-EI zoning, in general, allows flexible placement of site elements, including buildings and open space amenities, which is critical for the success of the Project. However, the CMP-EI zone district is tailored to the development of an educational campus, whereas the Project requires a corporate campus. The more prescriptive requirements of the PUD adapt the CMP-EI zone district to be more suited to the development of a corporate campus like the Project and promote development that is more compatible with the surrounding neighborhood. Specifically, among other things, the PUD adds additional uses necessary for the development of the Project and modifies building form design standards consistent with a corporate campus development, existing uses, and the City's adopted plans. The AIO zone district is also well-suited to the Project, as no residential uses are proposed for the Property.

The proposed Rezoning to PUD, AIO will meet United's expansion needs, provide numerous public benefits for the community, better align it with the surrounding properties, and be consistent with the City's adopted plans, as detailed below.

CITY MEETINGS AND NEIGHBORHOOD OUTREACH

The development of the Project involves multiple City processes and approvals, in addition to the Rezoning, including but not limited to large development review ("**LDR**"), an infrastructure master plan ("**IMP**"), subdivision plats, and site development plans. United has collaborated closely with the City throughout the process by participating in three multi-departmental workshops with City staff, and has incorporated feedback from those workshops in the plans for the Project and Property. United made a pre-LDR submission on December 22, 2023, and provided a follow-up presentation to the Development Review Council on January 2, 2024. United submitted its LDR application in April 2024 and after working through revisions with City staff, the Large Development Framework was approved on October 31, 2024.

United also hosted a community information meeting on March 14, 2024. The meeting was planned to be held in person at the Green Valley Ranch Recreation Center but was shifted to Zoom due to a severe snowstorm. The meeting was attended by 83 members of the community, City staff and representatives of the project team. Attendees included Councilwoman Gilmore, who represents District 11, where the Property is located. Questions from community members focused on employment opportunities and traffic management. As noted in the meeting, while there will be some construction traffic and trucks delivering flight simulators, the facility will not generate heavy truck traffic once operational. Additionally, United intends to provide shuttle service for pilots arriving for training from DEN to their hotels and to the flight training center, further reducing single occupancy vehicle trips.

The Community Outreach Report included with this Rezoning application details the community outreach in which United has engaged in connection with the Project and demonstrates United's strong commitment to soliciting and responding to community feedback. United will continue to meet with and reach out to various neighborhood organizations and, if desired, individual neighbors, for the duration of the Rezoning process.

ANALYSIS

Rezoning to a PUD District requires approval through an official zone map amendment process. *DZC, § 9.6.1.2(A)*. The City Council may approve a zone map amendment if the zone map amendment complies with specified criteria set forth in Section 12.4.10.7 of the DZC. Additionally, because the proposed Rezoning is to a PUD, the Rezoning must also fulfill the additional review criteria in Section 12.4.10.8 of the DZC. What follows is an analysis of how the application for the Rezoning satisfies each of these criteria.

I. Criteria for Zone Map Amendments

The City Council may approve the Rezoning as an official zone map amendment if the Rezoning complies with specified criteria in Section 12.4.10.7 of the DZC. The Rezoning complies with those criteria, as explained in detail below.

1. Consistency with Adopted Plans.

The first criterion is that the Rezoning must be "consistent with the City's adopted plans." As described in more detail below, the Rezoning fulfills this criterion.

a. Comprehensive Plan 2040 (2019)

The City's Comprehensive Plan 2040 (the "**Comp Plan**") was adopted in 2019 to describe the vision for the City. The Comp Plan sets forth six vision elements and numerous goals to help guide future development within the City. The proposed Rezoning, alongside the requirements of the associated LDR and IMP, is consistent with many of the vision elements, goals, and recommendations in the Comp Plan, including, but not limited to:

- **Vision Element 1 - Equitable, Affordable and Inclusive**
 - *Goal 1: "Ensure all Denver residents have safe, convenient and affordable access to basic services and a variety of amenities."*
 - *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."*

Development of the Project will enhance the City's goal of ensuring that Denver residents have access to amenities. These amenities will include approximately 11 acres of contiguous usable open space that is accessible to the public and United employees. Landscaped zones will include natural conditions around the Property perimeter, semi-landscaped areas, and curated hardscape zones that facilitate a variety of uses.

In furtherance of City's Goal 1, Strategy C (quoted above), the Project will also involve the installation of multiple trails that are intended to connect to the regional trail system. One trail will be installed along the Property's western border near the A-line, which will ultimately connect First Creek to Second Creek. Another trail will be installed along the northern property line between proposed 66th Avenue and Dogwood Gulch, which will connect the Tower Road commercial corridor and Yampa Street bike lane to the regional trail to the west. The site configuration is intended to allow the trails and open space to complement one another.

- *Vision Element 2 - Strong and Authentic Neighborhoods*
 - *Goal 2: "Enhance Denver's neighborhoods through high-quality urban design."*
 - *Goals 2, Strategy C: "Create people-oriented places that embrace community character with thoughtful transitions, aspirational design and an engaging public realm."*
 - *Goal 2, Strategy D: "Use urban design to contribute to economic viability, public health, safety, environmental well-being, neighborhood culture, and quality of life."*

The Project will include amenities intended to enhance the well-being of the employees that work there and the general public. As described in detail above, these amenities are intended to include well-curated open space and various trails that connect to the regional system.

The AIO zoning will also enhance public health and safety and encourage strong neighborhoods that respond to neighborhood context by prohibiting the placement of residences near airport noise.

- *Vision Element 3 – Connected, Safe and Accessible Places*
 - *Goal 1: "Deliver a multimodal network that encourages more trips by walking, rolling, biking and transit."*
 - *Goal 4: "Create an equitable and connected multimodal network that improves access to opportunity and services."*
 - *Goal 8: "Strengthen multimodal connections in mixed-use centers and focus growth near transit."*
 - *Goal 8, Strategy A: "Improve multimodal connections within and between mixed-use centers including downtown, Denver International Airport and major urban centers."*

United has been exploring many strategies to promote sustainable transportation methods and minimize reliance on single occupancy vehicles. A mobility study was facilitated as part of the IMP process. This study identified right-of-way ("ROW") determinations, street cross-sections, and intersection conditions. Further, a Transportation Demand Management ("TDM") was incorporated to reduce single occupancy vehicle trips. Some of the transportation strategies may include providing shuttle service for all site users to 61st and Pena Station and other United regional facilities, including DEN and the Quebec Campus; incentivizing carpooling and carshare access through preferential parking; operating a micromobility (bicycle/scooter) sharing program to connect the Property to adjacent transit options; and providing non-driving amenities on-site, including showers, lockers, bike storage, and real-time transit information.

- Vision Element 4 – Economically Diverse and Vibrant
 - *Goal 1: "Ensure economic mobility and improve access to opportunity."*
 - *Goal 1, Strategy A: "Improve economic mobility through workforce training, career development, quality education and wealth creation."*
 - *Goal 4: "Ensure Denver has a productive, competitive and knowledgeable workforce."*
 - *Goal 4, Strategy C: "Encourage businesses to work with local workforce training and education organizations to better prepare residents for job and career opportunities."*
 - *Goal 5: "Strengthen Denver as a global city that will be competitive in the economy of today and tomorrow."*

United expects to fulfill the aforementioned goals by providing skilled jobs to Denver residents. Currently, United plans to hire approximately 3,000 people in Denver between 2025 and 2026. United's current Quebec Campus, which is about a third of the size of the total 113.7-acre Property, provides approximately 1,600 jobs, representing 24 different departments in roles that include flight instructing, flight evaluating, scheduling, pilot hiring, human resources, and flight standards. United currently employs approximately 11,000 people in the City, and DEN remains United's fastest-growing hub, with United being the most flown airline out of DEN. In 2024, United hired over 1,000 people in Denver. United is the career destination of choice for pilots, offering the largest widebody fleet in North America, and the most comprehensive global network and hubs across the U.S. United's commitment to investing and expanding in the City is evident, and this Project is one of its many growth investments. In 2026, United plans to hire more than 1,300 pilots.

- Vision Element 5 – Environmentally Resilient
 - *Goal 1: "Mitigate climate impact by significantly reducing greenhouse gas emissions."*
 - *Goal 3: "Conserve water and use it more efficiently."*
 - *Goal 9: "Protect and Improve Air Quality."*

In 2020, United was the first airline to commit to a net zero goal to reduce greenhouse gas emissions by 100% by 2050, and it plans to implement net zero strategies into the Project. The Project will utilize LEED, targeting LEED's certification and best practices. For specific aspects of the Project, there may also be opportunities for third-party certification for zero carbon and health & wellness elements, such as Envision and Fitwel, in addition to a potential Living Building certification for net zero sustainable performance. The Project will aim to reduce potable water usage as much as possible and can take advantage of the nearby Denver Water's purple pipe non-potable water distribution system. Additionally, future building projects and infrastructure can take advantage of Xcel Energy's incentives for efficiency and renewable energy equipment, as the local utility positions the regional grid to be 100% renewable (zero fossil fuel or greenhouse gas emissions) by 2050. Buildings will be designed for resilience based on their programmatic needs and identified threats to operation or safety. The developed Project will meet or exceed the sustainable performance of Peña Station Next, the development to the south of the Property, which will feature significant solar arrays, a resilient on-site battery system and microgrid, and LEED silver minimum buildings. In Denver, nearly 40% of United's ground vehicle equipment is electric powered, with a goal of increasing the number of electric vehicles.

- *Vision Element 5 – Healthy and Active*

- *Goal 1: "Create and enhance environments that support physical activity and healthy living."*
 - *Goal 1(B): "Promote walking, rolling and biking through the development of a safe and interconnected multimodal network."*
- *Goal 2: "Provide high-quality parks, recreation facilities and programs that serve all Denver residents."*
 - *Goal 2(A): "Ensure equitable access to parks and recreation amenities for all residents."*

As noted above, the approximately 11 acres of open space, the trail installations, and the Project's facilitation of various transportation and ROW improvements will further the goals in the Comp Plan to facilitate a healthy, active, and interconnected community.

- *Denver and the Region*

- *Goal 1: "Be a regional leader in smart growth."*
- *Goal 2: "Embrace Denver's role as the center of regional growth."*
- *Goal 4: "Capitalize on Denver's role as a transportation hub and enhance connections to the region and beyond."*

The Project represents a significant step in the City's regional growth. United anticipates making significant investments at this Property, and while exact investment numbers are unknown, these may include, but are not limited to, job creation, infrastructure development, construction and building development, dedication of open space, support of hospitality sector, and other initiatives. The

benefits of development are not limited to the Property alone: For example, in 2024, more than \$41 million was spent on hotel room nights in Denver for pilots visiting the training facility.

While the Rezoning would likely accomplish many more strategies and recommendations in the Comp Plan, the above list, at a very minimum, demonstrates the extent to which the Rezoning is consistent with the adopted Comp Plan.

b. Blueprint Denver (2019)

As an adopted supplement to the Comp Plan, Blueprint Denver (“**Blueprint**”) provides the framework for the City’s major land use and transportation decisions and establishes citywide policies and specific strategies to achieve the visions set forth in the Comp Plan. Blueprint identifies the following components that should be considered in rezoning requests (*p. 67*):

- Neighborhood context
- Place
- Street Type
- Plan Policies and Strategies
- Equity Concepts

The Project is compatible with each of these components, as described below.

i. Neighborhood Context

Blueprint states that when a new potential zone district is identified and proposed for a site, the neighborhood contexts map should guide which zone districts are appropriate. *p. 67*. On the neighborhood contexts map, the Property is designated as “Suburban.” *p. 139*. In Blueprint, the Suburban context is characterized by a range of uses from single-unit and multi-unit residential to commercial corridors and centers, which is consistent with the PUD zoning and with the Project, as the Project will enhance the characterization of the local area as a commercial center. *p. 136*. To ensure the Project is consistent with the “Suburban” designation in the neighborhood context map, the PUD has imposed a height limit of 110 feet, consistent with the height limitation in the S-MX-8 district. Further, for Subarea B adopts many of the building form standards from S-MX-8 as well, including the same options related to building form siting. Although the Suburban context “is more auto-oriented than others, there should still be quality multimodal connectivity,” which is what the Project will provide.

The Suburban context also is intended to be “walkable and bikeable with access to transit but still mostly reliant on cars,” which is consistent with the Project’s emphasis on biking trails, wayfinding, access to the nearby 61st & Peña RTD Commuter Rail Station, and carpooling. *Id.* Additionally, the

Suburban context emphasizes “parks of various sizes,” “civic and social spaces, and “a range of recreational amenities,” which is consistent with the Project’s vision to provide nearly 11 acres of open space. *Id.* The Suburban context is also consistent with AIO zoning in that it allows commercial corridors and centers.

Although the Property is intended to be a campus, it is not currently designated within the “Campus” district by Blueprint. However, Blueprint allows for interpretive flexibility in applying neighborhood contexts: “The mapping of neighborhood context is at the citywide scale, so the boundaries of the contexts may be interpreted with limited flexibility if the request furthers the goals of Blueprint Denver and is consistent with the overall intent of the neighborhood contexts map.” *p. 66.* Because only existing campuses were designated as “Campus” at the time of mapping, this flexibility is essential to accommodate future campuses, such as the proposed Project, that align with Blueprint’s overarching goals and the intent of the neighborhood context map. Introducing a campus to the Suburban context is also appropriate, as Blueprint acknowledges that the Suburban context is highly adaptable: “the suburban context represents the most varied development in Denver’s neighborhoods.” *p. 189.* Moreover, campuses themselves are intended to be diverse in form and scale, as they “vary greatly in size and form.” *p. 291.* Blueprint also states the Suburban context areas can contain residential uses, but “commercial development is focused along main corridors and centers bordering residential areas,” which is consistent with the development of the Property as a campus center. *p. 189.* Like Suburban districts, Campus districts are described as areas that “often provide retail, restaurants, offices and residential uses to support the primary use and serve the surrounding neighborhoods.” *p. 291.*

The neighborhood contexts map also designates the Property as within the “DIA Influence Area.” *p. 139.* Blueprint emphasizes that development in the DIA Influence Area “must support and enhance the ability for the airport to function at its highest capacity and expand as needed through land uses that are compatible with current and future airport operations.” *p. 290.* By facilitating the United Project, the Rezoning will support the functioning of DEN as a United hub, which is compatible with current and future airport operations. The AIO zoning is particularly consistent with this designation, as it is designed to promote development compatible with DEN. Blueprint further states with respect to the DIA Influence Area that buildings will vary in size, but that most will be “large, single-use structures built for a specific aviation related or associated use but some buildings may be mixed-use with prominent architecture.” *p. 290.* This vision is consistent with the PUD zoning, which is designed to facilitate the development of an aviation-related flight training center and permits building forms up to 110 feet in height.

ii. Place

Blueprint states that a proposed zone district should be consistent with Blueprint’s guidance for future place, including the places map and growth strategy map. *p. 67.*

On the places map, the Property is designated as “Community Center.” *p. 143*. Blueprint states that centers are mixed-use places, which is consistent with the proposed PUD zoning. *p. 145*. Community Centers are intended to balance residential and employment uses and contain mid-scale buildings. *p. 144*. They are intended to be accessible by a variety of transportation options, and provide open spaces that promote social interaction and respond to the uses within them. *Id.* As noted above, the Project provides employment uses and is restricted from providing residential uses by the AIO District, and the PUD district allows mid-scale buildings that are compatible with the zoning of adjacent properties and not as tall as those permitted in S-MX-12. Additionally, the Project is intended to be accessible by a variety of transportation options, including by bicycle, commuter rail, and car, and to provide almost 11 acres of open space. Therefore, the PUD zoning and the Project are compatible with the designation of the Property on the places map as Community Center.

On the growth strategy map in Blueprint, the Property is designated as within the “Community centers and corridors” placetype, which is a placetype intended to account for 20% of new jobs and 25% of new households by 2040. *p. 51*. The map acknowledges that some centers and corridors, such as the Property, may only have new jobs—and no new households—due to restrictions such as the AIO District. As noted above, the Project is anticipated to create jobs at the training facility and facilitate the training of pilots, which is consistent with the designation of the Property on the growth strategy map.

iii. Street Type

According to Blueprint, street types are also assessed when determining whether the intensity of nearby development is appropriate. According to the street types map, the adjacent streets are identified as commercial collectors. *p. 157*. Commercial streets are intended to contain commercial uses, including shopping centers, auto services and offices, and are therefore compatible with the Project. *p. 159*. Additionally, a mobility study will be facilitated in connection with the IMP process, which will help to identify ROW determinations, street cross-sections, and intersection conditions.

iv. Plan Policies and Strategies.

Blueprint sets forth specific policies and strategies to achieve its vision, organized by the three elements of a complete neighborhood: Land Use and Built Form, Mobility, and Quality-of-Life Infrastructure. The Rezoning aligns closely with many of the policies and strategies in Blueprint, including, but not limited to:

- Land Use and Built Form - General
 - General Policy 03: “Ensure the Denver Zoning Code continues to respond to the needs of the city, while remaining modern and flexible.”

- General Policy 03 Background: *“The city adopted the Denver Zoning Code (DZC) in 2010. Although the majority of the city was rezoned in 2010 to be included in DZC, a significant portion of Denver is still covered by the old zoning code, called Former Chapter 59. This presents challenges to consistent and efficient administration and means that many properties are not able to enjoy the benefits of a modern, flexible and context-based zoning code.”*
- General Policy 03, 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.”*

The Rezoning would accomplish these goals by bringing the Property from under the existing zoning under Former Chapter 59 Code to the current DZC. This furthers Blueprint’s goal of having modern, flexible and uniform land use regulations.

- Land Use and Built Form - Economics

- Economics Policy 01, Background: *“The employment-oriented growth areas contain the majority of Denver's jobs. New jobs should be directed to regional centers, community centers and corridors, downtown and urban center high and high-medium intensity residential areas and certain districts—value manufacturing, innovation/flex, university and hospital campuses, and the airport.”*
- Economics Policy 02, Strategy D: *“Align workforce training, career development and education programs with job opportunities in regional centers and create programs to connect workers with employers in regional centers.”*
- Economics Policy 07: *“Protect and promote Denver International Airport as the primary economic engine for the state of Colorado.”*
 - Policy 07, Strategy B: *Encourage further commercial development near the airport and protect DEN’s ability to grow and thrive for generations to come.*

The Rezoning would further these goals by directing new jobs to the Property, which is designated as within “Community centers and corridors” on the growth strategy map in Blueprint. Also, as noted above, the Project is intended to create new jobs in the vicinity of DEN which will support operation of United's hub.

- Mobility Policy Recommendations

- Policy 01: *“Encourage mode-shift – more trips by walking and rolling, biking and transit – through efficient land use and infrastructure improvements.”*

The Rezoning would further this goal by encouraging biking and use of transit including the commuter rail, and providing other transportation opportunities that are intended to reduce trips by single

occupancy vehicles such as carpooling and shuttles. The Project will provide access to a comprehensive network of on and off-street bicycle facilities.

- Quality-of-Life Infrastructure Policy Recommendations
 - Policy 02: “Protect and expand Denver’s tree canopy on both public and private property.”
 - Policy 04: “Promote environmentally-friendly development strategies in the public and private realms.”
 - Policy 05: “Ensure attractive streets and outdoor spaces in all centers and corridors, giving priority to pedestrian spaces and amenities.”

The Rezoning would further this goal by encouraging environmentally-friendly development. As described in detail above, in 2020, United was the first airline to commit to a net zero goal to reduce greenhouse gas emissions by 100% by 2050, and United plans to implement net zero strategies into the Project. Additionally, the Project will ensure attractive streets and outdoor spaces with adequate landscaping.

v. Equity Concepts.

According to Blueprint Denver, the data used to measure equity is most applicable to larger rezonings. In connection with the LDR application, an equity analysis was performed for the Property that evaluated various factors including access to opportunity, vulnerability to displacement, housing diversity, and jobs diversity. United has carefully considered community and City feedback and is implementing various strategies to enhance equity on the site, including access to open space, development of trails, and creation of job opportunities. Therefore, the Rezoning to PUD, AIO would enhance equity improvements on the Property.

c. Far Northeast Area Plan

The Far Northeast Area Plan (“FNE Plan”) was adopted in 2019 and amended in 2022, and supersedes and rescinds the Gateway Concept Plan (1990, amended in 1993) that previously applied to the area. The FNE Plan envisions the development of the DIA Neighborhood as a dense, vibrant mixed-use neighborhood. *p. 178*. The Project is a key step in developing the Property in alignment with the planning directives set forth in the FNE Plan and fulfilling the City’s vision for the area with respect to mobility, connectivity, trail networks, street designs, parkland dedication, regional and community centers, development typologies, work force development, design excellence, safety, and other essential aspects.

As proposed development of an existing greenfield site, the Project is consistent with the goals of the FNE Plan. In fact, the FNE Plan states with respect to the area north of 64th Avenue, “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 ample additional space for expansion.” *p. 200*. This is exactly what United envisions for this Property. This goal with respect to development of greenfields is echoed throughout the FNE Plan, which sets objectives as follows:

- “Leverage existing greenfield sites as an opportunity to attract large-scale employment use where appropriate.” (*p. 62*)
- “As a greenfield area, the 61st and Peña transit community has the opportunity to showcase the best in transit-oriented development.” (*p. 189*).
- “The greenfield sites of the DIA neighborhood coupled with the restriction on housing development create an opportunity to support employment centers in this area.” (*p. 200*).

As a proposed commercial development in existing greenfields that will create jobs and take advantage of the proximity to DEN and the 61st and Peña transit station, the Project is closely tailored to these goals.

The proposed Rezoning is also compatible with the FNE Plan in the following ways:

- The strategy with respect to zoning in the FNE Plan area is intended to encourage rezoning from Former Chapter 59 Code zoning to DZC zoning. *p. 58*. This goal is echoed in LU-18: “Rezoning Former Chapter 59 properties into the Denver Zoning Code.” The FNE Plan further states that Former Chapter 59 zoning is “an obstacle to achieving the long-term vision” of the FNE Plan. (*p. 57*). Because the proposed Rezoning will bring the Project under DZC zoning, it is compatible with these goals.
- The FNE Plan, like Blueprint, identifies the Property as within the Suburban context and Community centers and corridors, which, as discussed above, is compatible with the PUD, AIO zoning. *p. 32*. The FNE Plan provides that in the Suburban context, commercial development should be focused along main corridors and centers that border residential areas, and there should be quality multimodal connectivity. *p. 31*. As described throughout this letter, the Project will be focused along the commercial arterial and collector streets and will facilitate multimodal transportation by bicycle, commuter rail, carpooling, and car.
- The recommended maximum building height set forth in the FNE Plan for the Property is 8 stories, which is consistent with the maximum height of 110 feet proposed in the PUD (and which, for reference, is the maximum height permitted in the S-MX-8 zoning district). *p. 40*. While the CMP-EI base zone district does not have this limited of a height restriction, United knows it is important to limit the height to the 110 feet to be consistent with the FNE Plan so included this additional restriction.

- The overview and vision for the DIA area is to “Capitalize on the area’s direct access to the airport and proximity to commuter rail transit to create new and exciting neighborhoods, destination areas, and employment hubs.” *p. 12*. The Rezoning will directly foster new development in this area and further this vision.

Additionally, the Rezoning would be compatible with many of the recommendations of the FNE Plan, including but not limited to the following:

- *LU-4 “Create new community and regional centers in large undeveloped areas.”*
 - *4.1(c): Encourage shared parking and structured parking to minimize the need for surface lots.”*

As noted above, the Rezoning will support the ability of the Project to develop the site as a regional employment center in a currently undeveloped greenfield area. As noted above, the Rezoning will also support the Project’s ability to establish connections between adjacent streets, such as completing the Telluride Way connection between 64th and 67th Avenues. The Project’s vision embodies the spirit of FNE Plan guidance, with proposed drive aisle extensions across the property that align with the existing street grid.

Based on the development’s proximity to rail transit, United will incorporate TDM strategies with opportunities for reductions in parking supply and use of structured parking. Additionally, the Project will incentivize carpooling and carshare access and provide shuttle service, which can help minimize the need for surface parking.

- *LU-5 “Create quality streetscapes that contribute to the neighborhood character and sense of place.”*
 - *LU-5.1 “Create pedestrian friendly streets through attractive building facades, street trees, landscaping, lighting and street furnishings.”*
 - *LU-5.3 “Encourage mixed-use development and infill.”*
 - *LU-5.4 “Create a variety of public spaces for recreational and social interaction, such as plazas, parks, playgrounds and community gardens.”*
 - *LU-5.4 “Ensure that building massing, height, and design appropriately reflect the human scale.”*
- *LU-6 “Develop a proportionate sense of street enclosure in centers and along corridors.”*

As described in more detail above, the Project is intended to provide significant amounts (approximately 11 acres) of well-landscaped and usable open space, along with multiple trails to facilitate an attractive pedestrian experience, including a trail along the A-line and a trail between proposed 66th Avenue and Dogwood Gulch. These spaces and trails will create a variety of public spaces and amenities for the public and employees of the training center.

- *LU-7 “New development should be of good design and quality construction.”*
 - *LU-7.3 “Incorporate sustainable design solutions that utilize passive solar design, energy and water conservation, waste management, reduction in urban heat island effect through permeability, color, light, greenery and natural materials.”*
- *QOL-11. “Support the implementation of green infrastructure.”*

As described in detail above, United’s goal is to reduce 100% of its greenhouse gas emissions by 2050, and United will implement a variety of net zero strategies into the Project. Additionally, the final stormwater management system is intended to utilize distributed water quality treatment and small detention basins to implement runoff rate reduction and achieve compliance with Municipal Separate Storm Sewer Systems (MS4) compliance. The system may include low impact development infrastructure including permeable pavements, bioswales, infiltration basins, and/or green roofs to support sustainable stormwater strategies and environmental goals.

- *LU-18.4 “Support rezoning efforts that will result in the development of significant job opportunities and expansion of employment sectors.*
- *LU-19 “Support employment growth in Far Northeast.”*

The Rezoning would support these goals by facilitating the Project, which is anticipated to result in additional employment opportunities and the continued economic development of DEN by enhancing its status as a United hub.

- *LU-16 “Create street networks in undeveloped greenfields.”*
- *MOB-4 “Introduce new transit services and operational enhancements”*
 - *MOB-4.3 “Support last mile connections between large employment areas and light-rail stops.”*
- *MOB-5 “Build bicycle infrastructure and conduct more planning and development for future routes.”*

The Project is intended to take advantage of and promote the use of transit services by implementing TDM strategies that may include shuttles, bicycle trails, and wayfinding improvements. Also with respect to mobility, the FNE Plan recommends certain extensions of the street grid, and the Project is intended to be compatible with these extensions. *p. 74.*

The internal site circulation network is designed for consistency with the FNE Plan’s vision for a connected grid of local streets, with sufficient width for rights-of-way for 65th Ave, 66th Ave and N Waco Street through the Property. Other internal roadways will provide access to parking facilities for all users, as well as providing access for service and emergency vehicles. The Project will also facilitate vehicular access to local and regional arterials. With the buildout of N Telluride Way and E 64th Ave, the Project will have access to the region via Tower Rd, 56th Ave, and Peña Boulevard.

The future IMP will also support the following:

- Link Telluride Way between 64th Ave and 67th Ave, and coordinate alignment with adjacent property owners, including Peña Station North development.
- Provide additional site area sufficient to accommodate a 132' ROW for 64th Ave between Yampa St and Telluride Way. ROW improvements and details are further refined through the IMP, plat, transportation engineering plan, and site development plan processes.
- Main private drives within the Property shall be aligned with existing street grids as to not preclude future extension of Waco St., 65th and 66th Avenues.
- A section of the regional trail connection (from 64th Ave to 67th Ave) as part of trail network between First Creek and Second Creek. This section of trail will be aligned with Telluride Way, along the western edge of the ROW.
- A trail between proposed 66th Avenue and Dogwood Gulch.

The Project will not preclude at least one north-south private internal circulation corridor to be aligned with the existing Waco Street and at least one east-west private internal circulation corridor to be aligned with the existing 65th and/or 66th Avenue.

- *QOL-7. Grow parks and recreation access and diversify services and programs.*

The Project will provide approximately 11 acres of contiguous open space, as noted above. The southern portion of the open space may also include environmental education, courts, fields or smaller trails. The Project will also incorporate various outdoor recreation spaces that will enhance community while also providing a stormwater filtration asset.

Finally, the FNE Plan also highlights the importance of the development of the area around the 61st and Peña station and the opportunity to foster a “vibrant urban center and compact, transit-oriented community” for the area, built around four principles: (1) Transit Community – “The station area is a pedestrian-friendly, transit-oriented community with a rich mix of uses and a variety of building types that promote a strong sense of place.”; (2) Connected – “The station area optimizes connectivity of the rail station to the entire station area and surrounding neighborhoods through a comprehensive, multi-modal approach to mobility and accessibility.”; (3) Vibrant – “The station area core is a vibrant, walkable, compact, urban center characterized by high quality urban places and interconnected open space accessible to a wide variety of users.”; and (4) Catalyze – “The station area catalyzes a sustainable development pattern for the regional aerotropolis, promoting economic vitality and housing opportunities, while respecting the unique high plains ecosystem for the betterment of today’s

residents and future generations.” *p. 190*. The Project takes advantage of its proximity to 61st and Peña by implementing mobility strategies that are consistent with the “Transit Community” and “Connected” principles and adds amenities such as open space, trails, and employment opportunities that will “Catalyze” the area and make it more “Vibrant.” More specifically, the Project will support connectivity with 61st and Peña by exploring options such as a “micromobility (bicycle/scooter)” sharing program, real-time transit information, and on-site amenities such as showers and bike storage that will encourage users of the Property to use transit and visit the 61st and Peña hub.

2. Public Interest.

The second criterion is that the proposed Rezoning must be “in the public interest.”

The City has adopted multiple plans in the interest of public health, safety, and the general welfare, including the Comp Plan, Blueprint, and the FNE Plan. As described in detail above, the Rezoning furthers the goals, policies, and strategies in these City plans, and thus furthers the public interest.

Additionally, United shows alignment with the public interest in Denver through the following activities, which would be supported by the Rezoning:

- United donated nearly \$1.4M to local nonprofits and organizations in 2025.
- United works directly with more than 10 community partners, including Denver Public Schools Foundation, Girls Inc. of Metro Denver, Veterans Community Project, and Food Bank of the Rockies.
- United employees volunteered for more than 9,200 hours in 2025 and monthly at Food Bank of the Rockies for 67 consecutive months.

Finally, bringing the Property currently under the Former Chapter 59 Code into compliance with the DZC furthers the general welfare of the City. It is a City goal to rezone property from the Former Chapter 59 Code to the new Code where possible. *See, e.g., Blueprint, p. 73*. This Rezoning would help achieve that result.

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

The third and final criterion is that the Rezoning must be “consistent with the description of the applicable neighborhood context, and with the stated purpose and intent of the proposed zone district.”

As described in detail in Section I.1.b.i, the Rezoning is compatible with the neighborhood context, which is identified in Blueprint as “Suburban” and within the “DIA Influence Area.” More specifically, the PUD zoning is compatible with the commercial uses envisioned for the Suburban context, as well

as the walkable and bikeable nature of the Suburban context. The PUD and AIO zoning are consistent with the DIA Influence Area, as the PUD facilitates the development of the flight training center, which supports the functioning of DEN as a United hub, and the AIO zoning restricts residential uses.

Also as noted above, the DZC states that the base zoning of CMP-EI zoning is within the Campus Context, which is characterized by mid-sized or large sites designated for medical, institutional, education, or entertainment uses. *DZC, 9.2.1*. As described throughout this letter, the Project is designed to be compatible with the Campus Context as modified by the PUD, because it will facilitate the development of a flight training center and related development that will provide employment opportunities while enhancing multimodal connections, all in a corporate campus format. As described in detail in Section II.1 below, the proposed PUD zoning is consistent with the intent and purpose of PUD districts. Additionally, the AIO district prohibits residential uses that are incompatible with DEN. The Project is also compatible with the goals of the adopted City plans for this Property, as described in detail above. Therefore, this criterion is met.

II. Additional Review Criteria for Rezoning to PUD District

In addition to the foregoing criteria, for all Rezoning to a PUD district, the following criteria in Section 12.4.10.8 of the DZC must be met. As described below, all of these criteria are met by the proposed PUD.

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

According to Division 9.6 of the DZC, the “general purpose” of a PUD is “to provide an alternative to conventional land use regulations, combining use, density, site plan and building form considerations into a single process, and substituting procedural protections for the more prescriptive requirements” in the DZC. *DZC, § 9.6.1.1*. A PUD is intended to respond to “unique and extraordinary circumstances” that justify the use of the PUD. *Id.* Section 9.6.1.1(B) of the DZC lists a number of examples of “unique and extraordinary circumstances” that justify a PUD, including, “Where the proposed scale or timing of a development project demands a more customized zoning approach to achieve a successful, phased development.” It is clear that the scale and multi-phased nature of the Project are a “unique and extraordinary circumstance” requiring customized zoning uniquely suited to a corporate campus. No existing zone district in the DZC contemplates or is tailored to a corporate campus designed for a flight training center and all of the ancillary uses and design standards necessary to make the development successful. The uniquely tailored standards in the PUD allow for differentiation from a traditional business agglomeration and therefore make the Project feasible.

Division 9.6 of the DZC further states that a PUD district must not be intended to foster development “inconsistent with the applicable neighborhood context and character, or solely as a vehicle to enhance

a proposed development’s economic feasibility.” In this case, the purpose of the PUD is to create a development that is more consistent with the existing neighborhood context and character and with the City’s adopted plans than would be possible under existing zoning. As described above, no other zone district is tailored to a corporate campus like the Project, and therefore the PUD is necessary for the Project to achieve success.

Finally, Division 9.6 of the DZC requires that, in return for the flexibility of the site design under a PUD, development under such PUD should provide “significant public benefit not achievable through application of a standard zone district, including but not limited to diversification in the use of land; innovation in development; more efficient use of land and energy; exemplary pedestrian connections, amenities, and considerations; and development patterns compatible in character and design with nearby areas and with the goals and objectives of the Comprehensive Plan.” The PUD provides all of these public benefits to a significant degree. As noted in the PUD itself, the PUD is designed to facilitate the following significant public benefits:

- Diversification of land use within site;
- Innovation in development with corporate campus approach; and
- Differentiation from a traditional business agglomeration.

As described throughout this letter, the PUD would also facilitate the creation of an efficient, environmentally-friendly and cohesive campus with a flight training center and a diversity of ancillary uses. It would also be compatible with the equity concepts noted in Blueprint Denver by providing access to open space, trails, bicycle amenities, and new job opportunities. Finally, as described in detail in Section I.1 of this letter, the PUD and the Project will further the goals of the Comp Plan and the City’s other adopted plans.

Therefore, the PUD is consistent with the intent and purpose of PUD districts as set forth in the DZC.

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

As demonstrated throughout the Rezoning application, the PUD complies with all of the standards and criteria in Division 9.6, including those standards related to permitted uses set forth in Section 9.6.1.3.B of the DZC and the standards and criteria related to design standards set forth in Section 9.6.1.3.C of the DZC. More specifically, the PUD complies with these standards by specifying that the design, use, and parking standards of CMP-EI shall apply, except as modified by the PUD. The PUD also explicitly modifies some of the DZC standards applicable to fencing. Therefore, the proposed PUD fulfills this criterion.

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;

As mentioned above, no other zone district in the DZC contemplates or is tailored to a corporate campus, particularly one that is designed for development of a flight training center. It is not possible under the existing zoning, even with variances, waivers, and conditions, to assemble the combination of uses that are necessary to develop the Project, nor would it be practical to modify the design standards of any other single zone district to accommodate the design needs of the Project. The PUD combines standards from the CMP-EI district and the S-MX-8 district with some standards unique to PUD and is the most practical and efficient way to make development of the Project attainable.

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

The proposed PUD establishes primary, accessory, and temporary uses that are compatible with existing land uses adjacent to the Property. The uses permitted in the PUD are the same as those uses allowed in CMP-EI, which are generally civic, commercial, industrial, agricultural, and accessory uses. The PUD introduces additional commercial, industrial, and accessory uses necessary for the Project, such as lodging accommodations, retail sales, commercial food preparation, and conference facilities accessory to a hotel use. As required by the AIO zoning, no residential uses, even those typically permitted in the CMP-EI district, are permitted.

Adjacent to the Property are existing commercial properties and vacant properties anticipated to be developed as corporate office campuses, commercial uses, and multifamily uses as part of Peña Station North and Peña Station Next. As the PUD is intended to foster a corporate campus with a variety of commercial, industrial, and accessory uses, it is compatible with the existing and prospective land uses on adjacent properties.

5. 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).

Development in the proposed PUD is required to comply with the building form design standards applicable to the CMP-EI zone district, as amended by the PUD. The PUD defines two subareas with different building form standards: Subarea A and Subarea B. Subarea A follows all of the CMP-EI zone district building form standards other than that the maximum height in the PUD is lowered to 110 feet from the CMP-EI zone district's maximum height of 150 feet to be more compatible with the heights

envisioned in Blueprint Denver, the FNE Plan, and the heights of surrounding development. Subarea B also includes the maximum height of 110 feet, and also incorporates specific build-to, setback, parking, and transparency standards that are consistent with what is allowed for the General Building Form in the S-MX-8 district and are designed to be compatible with the surrounding area. Overall, these building form standards are very compatible with the surrounding development.

CONCLUSION

As discussed in detail above, the Rezoning satisfies all of the criteria in the Code for approval of a zone map amendment and a rezoning to PUD, AIO. United is committed to developing the Property in a way that is consistent with the City's vision and incorporates the feedback of interested stakeholders. We respectfully request that the City approve the proposed Rezoning.

Sincerely,

A handwritten signature in blue ink that reads "Caitlin S. Quander". The signature is written in a cursive style with a long horizontal flourish at the end.

Caitlin S. Quander

Exhibit A

Denver Community Impact 2025

(see attached)

UNITED

Denver Community Impact 2025



United Airlines in Denver: Flight Training Center expansion and community impact summary

United Airlines is working with the City and County of Denver to expand its Flight Training Center in Northeast Denver. The soon-to-be-expanded FTC — United's only one worldwide — supports Denver's role as a major hub and employer. This summary helps explain United's investment and its impact on the local community as the company engages with residents across the city.



United is Denver's largest private employer

United's expansion in Denver is creating clear pathways for local residents and students to access and prepare for the next generation of aviation careers.

- There are more than **11,000 employees** currently based in our city.
- Nearly **1,500 employees** are based at United's Denver Flight Training Center.
- Between 2025 and 2026, United plans to hire approximately **3,000 people** in Denver.
- United has hired more pilots than any other airline in the past 3 years — the airline now has more than **18,000 active pilots**.
- United plans to hire over **1,300 pilots** in 2026.



United provides Denver with workforce opportunities

United Aviate: Industry-leading pilot career development program and the most secure path to the United flight deck.

- Metropolitan State University of Denver is an Aviate-participating university.

United Aviate Academy: United's wholly owned flight school, a pathway to the flight deck for aspiring aviators.

Technician Pathway Program: Comprehensive mentorship, hands-on learning and career development program for students interested in a career as an aircraft maintenance technician.



United's Flight Training Center is integral to our operation — expansion is critical

Denver is home to United's only Flight Training Center.

Every single United pilot, currently more than 18,000, visits the facility every 9 months for recurrent training needed to maintain their FAA flight certifications.

Pilot training is critical to support the number of new aircraft we will be adding to our fleet in the decades ahead.

United's current Flight Training Center facility does not have capacity for additional growth; in 2024, United opened a new building on the campus — a \$145 million investment.



United's commitment to environmental sustainability

United's goal is to be net zero by 2050 by reducing greenhouse gas emissions by 100% without the use of voluntary carbon offsets.

In Denver, nearly 40% of United's ground vehicle equipment is electric powered, with a goal of increasing the amount of electric vehicles.

United's Flight Training Center's newest building is LEED Silver Certified, as are the new United Clubs at DEN.



United's local community impact and partnerships

United donated nearly \$1.4 million to local non-profits and organizations in 2025.

United works directly with more than 10 community partners in Denver, including:

- Denver Botanic Gardens
- Denver Public Schools Foundation
- Disabled American Veterans
- Food Bank of the Rockies
- Girls Inc. of Metro Denver
- Veterans Community Project
- Wings Over the Rockies
- Special Olympics Colorado
- Warren Village
- GRID Alternatives
- Make-A-Wish
- Volunteers for Outdoor Colorado

United's strategic community partners focus on youth development and STEM education, workforce development, environmental sustainability and innovation, meeting essential needs, employee volunteerism and community engagement.

In 2025, United employees volunteered for more than 9,200 combined hours in Denver.

United employees have volunteered with Food Bank of the Rockies at least once a month for 67 consecutive months (ongoing).

United has provided \$1.4 million in support of Warren Village since 2017.

United has a 27-year collaboration with Disabled American Veterans through the Winter Sports Clinic.



Community Engagement

United Rezoning - Community Outreach Report

United's Denver New Land Development | 1761-17675 East 64th Avenue | 2023-PM-0000478 | 8-27-2025

United Airlines has conducted extensive community and stakeholder outreach concerning the New Land Development at 1761–17675 East 64th Avenue. This document provides a summary of United’s multi-year community outreach and engagement process that has occurred throughout the Large Development Review (LDR) process and leading up to the submittal of a rezoning application. United will continue community outreach efforts for the duration of the rezoning application process.

City Council Outreach:

United Airlines has met with all members of Denver City Council on an ongoing basis since 2023. Given the site’s location in District 11, United has met with and communicated frequently with District 11 Councilmember Stacie Gilmore. Given the length of Large Development Review (LDR) and Planned Unit Development (PUD) drafting process, the United team has had time to hold multiple meetings with each Council office about United’s operations in the City, how the new land development fits into United’s growth in Denver, and elements of our rezoning application and community engagement efforts.

In addition to meetings regarding the site plans, rezoning application, and community outreach process, United offered tours of the existing Flight Training Center at the Quebec Street campus for Councilmembers and their staff. Councilmembers have been interested to learn more about flight training operations, benefits that the new campus will provide, and workforce and community hiring targets.

Registered Neighborhood Organization and Local Stakeholder Outreach:

Early in the process, United Airlines contacted all Registered Neighborhood Organizations (RNOs) within the vicinity of the proposed site rezoning to offer to meet or present at their organization meetings. United also sent subsequent invitations to the RNOs to attend the project’s Community Information Meeting for the LDR process on March 14, 2024. Since those early meetings, United has maintained a consistent presence in the Montbello, Green Valley Ranch, and far northeast Denver community.

Below is a list of RNO and community outreach meetings and presentations held thus far:

RNO and Community Outreach – Meetings and Presentations	
District 11 Town Hall - 2024	2/22/2024
Community Information Meeting	3/14/2024
Montbello 20/20, RNO leadership meeting	5/1/2024
Montbello 20/20, Community Presentation	6/11/2024
District 11 Town Hall - 2025	2/13/2025
Montbello 20/20, Community Event	8/9/2025
Montbello 20/20, Community Presentation	10/9/2025
Montbello 20/20, RNO leadership meeting	12/19/2025
Khadija Haynes, Montbello Organizing Committee	2/2/2026
District 11 Town Hall – 2026	2/18/2026
Montbello 20/20, Community Presentation	<i>Scheduled for 3/12/2026</i>

As a part of the initial Community Information Meeting, United representatives mailed 328 postcards to an expanded radius surrounding the site with information on the meeting and where to learn more about the project.

At the District 11 Town Hall meetings and Montbello 20/20 community presentations, United has brought United team members from flight training, talent acquisition, community partnerships and government affairs to present on the full range of topics—including the New Land Development plan and City process, as well as United’s community partnerships and community hiring efforts and programs. As a result of the community outreach, United has partnered with Montbello 20/20 to support the last two annual Health, Wellness and Back to School Events and maintained a consistent presence in the community.

Recently, following continued community engagement efforts, United created a Denver Community Impact Report that details United’s employment and job growth, workforce development and training programs, diverse contracting and sourcing partnerships, environmental sustainability efforts, and local community partnerships and corporate social responsibility. The United team will continue to share this information and United’s story with the community as we continue our outreach process throughout the rezoning application stage.

Rezoning Application Outreach:

Initially, following the Large Development Framework (LDF), the thought process between the City and applicant team was that rezoning to S-MX was the likely direction. As such, in August 2024, the United team submitted an S-MX-8 rezoning application that triggered a round of notifications to nearby property owners and RNOs. Since that time and following comments from CPD staff, we have learned that the S-MX zone district is not the best fit for the site due to the size the property and unique security needs of the Flight Training Center. A Planned United Development (PUD) based on the Campus Educational Institution (CMP-EI) zone district is a better fit for the property. This has triggered another round of outreach to individuals and stakeholders we met with previously to provide an update on the change in zone district approach.

Overall, the responses from community members have demonstrated excitement and support for the project with more of a focus on job creation and attracting a top employer such as United versus the form-based elements of S-MX vs. PUD (based on CMP-EI). United has a proven record of successfully partnering with local disadvantaged business enterprises. Many small businesses leaders in the community are looking forward to opportunities to work with United Airlines.

The community has expressed an interest in making sure young people have quality career opportunities within Northeast Denver. United Airlines has brought in the requisite leaders and experts from their team to attend these meetings and to talk about the workforce programming United participates in and how the New Land Development represents an expansion of those opportunities. In past projects and discussions, neighboring residents have identified a strong desire to see additional community-serving retail, amenities and eating and drinking establishments in their community. The community hopes the United project will catalyze further business development in Northeast Denver. Infrastructure and traffic have been the largest topics of concern identified through our community outreach efforts and the United team has informed neighbors about the traffic planning and traffic study that will be done as a part of the process.

Summary:

United’s community outreach team has already conducted extensive community and stakeholder outreach and plans to continue proactive community outreach to community groups, RNOs and neighbors, local businesses, property owners and others throughout the rezoning process.

Large Development Review | Community Information Meeting Report

United's Denver New Land Development | 1761-17675 East 64th Avenue | 2023-PM-0000478

What:	Community Information Meeting as required by LDR
Date Time:	March 14, 2024 @ 6:00PM
Location:	Virtual - Via Zoom
Attendance:	83 Participants Total

Meeting Attendance:

United Airlines hosted a community information meeting for the site on Thursday, March 14, 2024 over Zoom. The meeting was planned to be held at the Green Valley Ranch Recreation Center but was shifted entirely to Zoom due to a severe snowstorm. The meeting included 20 panelists representing United Airlines and the City and County of Denver and different subject matter expertise. The turnout and attendance for this community meeting was strong, particularly given the site's location in a greenfield area with limited development within 500 feet of the site.

Meeting Structure:

The meeting was moderated by Mizraim Cordero, Director of State & Local Government Affairs for United Airlines. After a brief introduction, welcoming remarks were given by Councilwoman Gilmore, representing District 11 in Northeast Denver. Then, representatives from United's team spoke about the company's commitment to Denver and its impact on job and economic growth as one of the largest employers in the state.

- Jonna McGrath, Vice President of the United Hub at DEN – highlighted Denver's growth as a United Hub, and the airline's significant investments at Denver International Airport. She announced new non-stop flights, increased gate capacity, and plans for further growth, including hiring 1,000 people in the coming year.
- Captain Jeff Ohman, Director of Flight Training with United – gave an overview of United's current and future needs for the Flight Training Center and how important training is to the airline's growth.
- Justin Petrochko, Global and Community Engagement Leader with United – discussed the many community partnerships United participates in and how future growth in Denver can foster enhanced opportunities for community partnerships.

City Staff, Stephen Wilson and Jason Morrison, presented the Large Development Review (LDR) process and goals, including identifying issues early in the process, providing information to the community, and creating a framework for coordinated development. The LDR process involves reviewing that the proposed development is in alignment with adopted plans and providing comments based on those plans: Far Northeast Area Plan; Blueprint Denver; and Comprehensive Plan 2040. The next steps included completing a Large Development Framework (LDF), Infrastructure Master Plan (IMP), Rezoning, and Site Development Plan Applications (SDP). They outlined how the City's review includes an equity analysis and Stephen encouraged questions and public participation in the process.

Following the City's presentation, Lilly Djaniants and Dan Simpson from ZGF Architects and United's design team discussed the Master Plan framework, outlining the site framework and organization concept, open space considerations, options for future roadway network, and the first phase of development for the Flight Training Center. Dan also emphasized United's commitment to sustainability and community well-being.

Mizraim Cordero then introduced his colleagues Angela Selak and Mark Adams, who discussed employment opportunities with United and the potential for onsite interview skill building. Angela also mentioned plans to

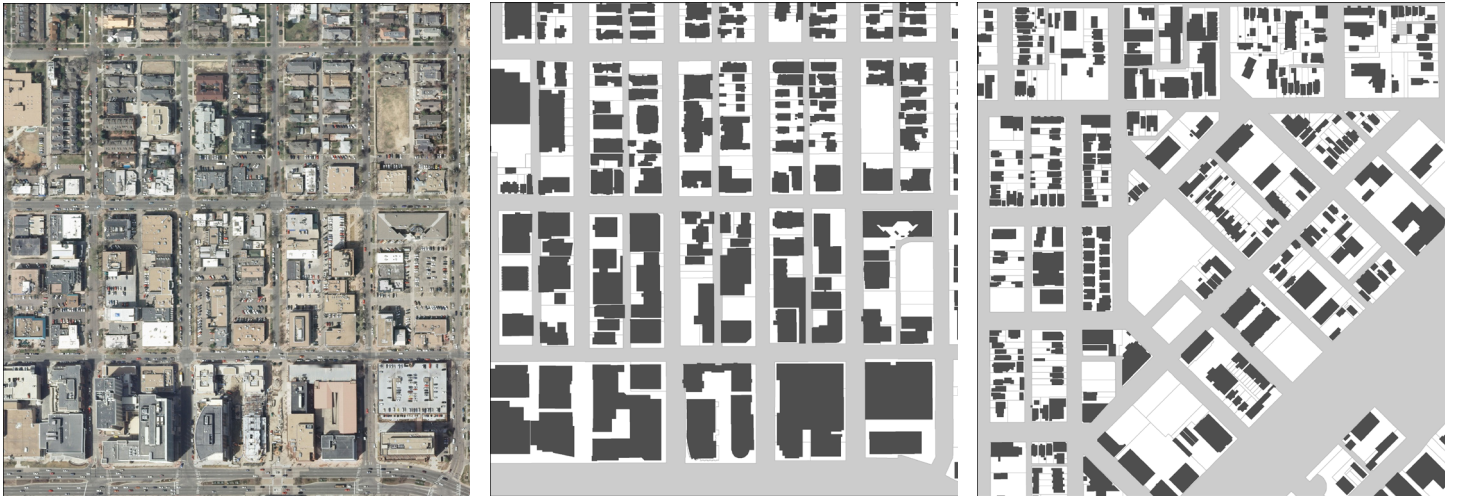
schedule a full day training for interview and resume building skills. Mark shared details about United's recent expansion at the Quebec Flight Training Center, emphasizing the airline's commitment to the local economy through contracting with local and traditionally disadvantaged businesses.

Community Feedback and Questions:

Mizraim Cordero opened the meeting for participant questions. The community members in attendance asked a wide variety of thoughtful questions, which were answered by the appropriate person from United's team and other information and resources were shared in this period of the meeting. A full summary and more detailed description of the meeting presentation and community feedback and questions was provided as part of the Large Development Review process. Overall, the project was well received by community members and a majority of the questions were focused on employment opportunities and traffic management.

Planned Unit Development

PUD-G #40



17671-17675 East 64th Avenue
Official Map Amendment:
#2026-REZONE-0000015
Effective Date: 06/29/2026

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CHAPTER 1. ESTABLISHMENT AND INTENT

SECTION 1.1 PUD-G 40 AND SUBAREAS ESTABLISHED

1.1.1 PUD-G 40 Established

The provisions of this PUD-G 40 apply to the land depicted on the Official Zoning Map with the label PUD-G 40, and more generally described as approximately 113 acres of land within the DIA statistical neighborhood of the City and County of Denver, State of Colorado, as further described in Section 1.1.2, Subareas Established, below.

1.1.2 Subareas Established

The following subareas are hereby established within PUD-G 40 for the purpose of applying the zoning standards contained herein. All subareas established are shown generally on Figure 1-1 below, and described legally as follows:

A. Subarea A Legal Description

Beginning at a point of intersection with the North-South Centerline of the South One-Half of Section 4, Township 3 South, Range 66 West, 6th P.M. and the north Right-of-Way line of E. 64th Ave. (R.O.W. Varies), whence the South One-Quarter Corner of said Section 4 bears S. 00°47'39" W., a distance of 30.00 feet, said point also being the POINT OF BEGINNING;

Thence along said north Right-of-Way line, N. 89°47'25" W., a distance of 628.76 feet to the east line of a parcel of land recorded at Reception Number 1992054138, City and County of Denver Records;

Thence along said east line, N. 00°19'11" E., a distance of 2,159.11 feet;

Thence continuing along said east line, N. 20°51'33" E., a distance of 485.76 feet to the north line of the Southwest One-Quarter of said Section 4;

Thence along said north line, S. 89°53'19" E., a distance of 479.98 feet to the Center One-Quarter Corner of said Section 4;

Thence along said North-South Centerline of Section 4, S. 00°47'39" W., a distance of 636.45 feet to the south line of Tract A, Denver International Business Center Filing No. 5 recorded at Reception Number 2015112451, City of County of Denver Records;

Thence along said south line the following Eight Courses (8);

1. Along the arc of a tangent curve to the left, a radius of 135.00 feet, a central angle of 95°46'05", a distance of 225.65 feet, (a chord bearing S. 47°05'12" E., a distance of 200.28 feet);
2. N. 85°01'46" E., a distance of 94.06 feet;
3. N. 81°28'27" E., a distance of 150.71 feet;
4. N. 77°22'15" E., a distance of 256.32 feet;
5. Along the arc of a tangent curve to the right, a radius of 548.00 feet, a central angle of 29°11'47", a distance of 279.25 feet, (a chord bearing S. 88°01'52" E., a distance of 276.23 feet);

6. S. 73°25'58" E., a distance of 247.02 feet;
7. Along the arc of a tangent curve to the right, a radius of 365.00 feet, a central angle of 37°08'36", a distance of 236.62 feet, (a chord bearing S. 54°51'40" E., a distance of 232.50 feet);
8. S. 36°17'22" E., a distance of 105.69 feet to the north line of Tract A, Denver International Business Center Filing No. 7 recorded at Reception Number 2018012488, City of County of Denver Records;

Thence along the north, west, and south lines of said Tract A the following Five Courses (5);

1. N. 89°33'36" W., a distance of 51.69 feet;
2. S. 00°27'23" W., a distance of 311.47 feet;
3. S. 89°49'52" E., a distance of 229.18 feet;
4. S. 48°39'43" E., a distance of 36.75 feet;
5. S. 89°47'26" E., a distance of 306.65 feet to the westerly Right-of-Way line of Yampa St. (R.O.W. Varies);

Thence along said westerly Right-of-Way line the following Seven Courses (7);

1. S. 00°12'34" W., a distance of 27.50 feet;
2. S. 89°47'26" E., a distance of 6.00 feet;
3. S. 77°17'26" E., a distance of 15.39 feet;
4. S. 00°44'14" W., a distance of 601.12 feet;
5. S. 77°18'01" W., a distance of 15.60 feet;
6. N. 89°48'44" W., a distance of 6.54 feet;
7. S. 00°11'16" W., a distance of 34.00 feet;

Thence departing said westerly Right-of-Way line, N. 89°48'44" W., a distance of 603.37 feet;

Thence S. 00°11'16" W., a distance of 629.50 feet to said north Right-of-Way line of E. 64th Ave. (R.O.W. Varies);

Thence along said north Right-of-Way line, N. 89°47'31" W., a distance of 1,327.63 feet to the POINT OF BEGINNING.

City and County of Denver, State of Colorado.

The above-described contains 4,563,571 sq. ft. (104.765 acres), more or less.

B. Subarea B Legal Description

Beginning at a point on the north Right-of-Way line of E. 64th Ave. (R.O.W. Varies), whence the South One-Quarter Corner of Section 4 bears S. 88°54'50 W, a distance of 1,328.27 feet, said point also being the POINT OF BEGINNING;

Thence N. 00°11'16" E., a distance of 629.50 feet;

Thence S. 89°48'44" E., a distance of 603.37 feet to the westerly Right-of-Way line of Yampa St. (R.O.W. Varies);

Thence along said westerly Right-of-Way line the following Six Courses (6);

1. S. 00°11'16" W, a distance of 34.00 feet;
2. S. 89°48'44" E., a distance of 6.01 feet;
3. S. 77°26'03" E., a distance of 15.37 feet;
4. S. 00°44'14" W, a distance of 556.45 feet;
5. N. 89°47'26" W, a distance of 34.41 feet;
6. S. 00°12'34" W, a distance of 36.00 feet to said north Right-of-Way line of E. 64th Ave. (R.O.W. Varies);

Thence along said north Right-of-Way line, N. 89°47'31" W, a distance of 584.63 feet to the POINT OF BEGINNING.

City and County of Denver, State of Colorado.

The above-described contains 389,467 sq. ft. (8.941 acres), more or less.

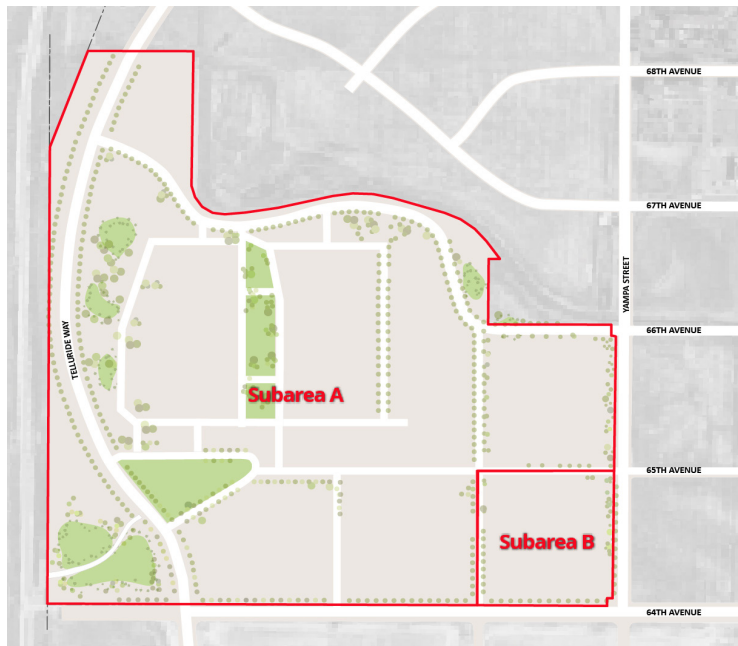


Figure 1-1. Subareas established within PUD-G 40

SECTION 1.2 PUD-G 40 GENERAL PURPOSE

The general purpose of PUD-G 40 is to:

- 1.2.1 Facilitate the development of the site within the Campus Context which allows for flexible placement of buildings and other site elements and open space amenities that express stakeholder visions, while also providing more prescriptive requirements than the conventional Campus – Education Institution (CMP-EI) Zone District found in the Denver Zoning Code to ensure the development is compatible with and contributes to the vibrancy of the surrounding neighborhood.

SECTION 1.3 PUD-G 40 SPECIFIC INTENT

The specific intent of PUD-G 40 is to:

- 1.3.1 Facilitate the creation of significant public benefits not allowed or guaranteed by a traditional zone district, specifically:
 - A. Diversification of land use within site
 - B. Innovation in development with corporate campus approach
 - C. Allows for differentiation from a traditional business agglomeration
- 1.3.2 To establish specific building form standards that accommodate the unique site and location and are compatible with the Neighborhood Context.

CHAPTER 2. NEIGHBORHOOD CONTEXT DESCRIPTION

All development within this PUD-G 40 shall conform to the Denver Zoning Code, Division 9.2, Campus Context Description, as amended from time to time.

CHAPTER 3. DISTRICTS

Development in this PUD-G 40 shall conform to the Denver Zoning Code, Section 9.2.4, Campus-Education/Institution, as specifically applicable to the CMP-EI Zone District, as amended from time to time, except as modified in this PUD-G 40.

CHAPTER 4. DESIGN STANDARDS

Development in this PUD-G 40 shall comply with the Denver Zoning Code, Section 9.2.4.2, Design Standards, and 9.2.4.3, District Specific Standards, as specifically applicable to the CMP-EI Zone District, as amended from time to time, with the following modifications and exceptions:

SECTION 4.1 DESIGN STANDARDS FOR SUBAREA A

Development in Subarea A of this PUD-G 40 shall comply with the Primary Building form standards in Section 9.2.4.3.C of the Denver Zoning Code, with the following modification:

4.1.1 Height

Development in Subarea A of this PUD-G 40 shall have a maximum height of 110 feet.

SECTION 4.2 DESIGN STANDARDS FOR SUBAREA B

Section 9.2.4.3.C of the Denver Zoning Code, District Specific Standards for CMP-EI, shall not apply. Instead, all development in Subarea B of this PUD-G 40 shall comply with the following building form standards in Table 4.1:

TABLE 4.1 SUBAREA B OF PUD-G 40 BUILDING FORM STANDARDS

HEIGHT	Subarea B	
Feet (max)	110'	
SITING	Option A	Option B
RESTRICTION	na	Allowed only if Street Level GFA is equal or greater than 20,000 sf
REQUIRED BUILD-TO		
Primary Street (min build-to % within min/max range)	50% 0'/80'	50% 0'/150'
SETBACKS		
Primary Street (min)	0'	0'
PARKING		
Surface Parking between building and Primary Street/Side Street	Allowed/Allowed	Allowed/Allowed
Surface Parking Screening	See Division 10.5, Landscaping, Fences, Walls and Screening	Garden Wall required within 0'/15' for 100% of the zone lot's Primary and Side Street frontages, excluding access points and portions of building within 0'/15'; according to Section 10.5.4.4, Perimeter Surface Parking Lot Landscaping Standards
Vehicle Access	Access determined as part of Site Development Plan Review	
DESIGN ELEMENTS	Subarea B	
Transparency, Primary Street (min)	40%*	
Transparency, Side Street (min)	25%*	

*Applies only to street-facing portions of building Facade located within 80' of the Primary and or/Side Street

CHAPTER 5. USES

SECTION 5.1 USES

Primary, accessory and temporary uses allowed in this PUD-G 40 shall be those same uses allowed in the CMP-EI Zone District, as stated in the Denver Zoning Code, Section 9.2.8, Uses, as amended from time to time, with the following additions:

KEY: * = Need Not be Enclosed P = Permitted Use without Limitations L = Permitted Use with Limitations NP = Not Permitted Use ZP = Zoning Permit Review

USE CATEGORY	SPECIFIC USE TYPE	PUD-G 40	APPLICABLE USE LIMITATIONS
COMMERCIAL SALES, SERVICES AND REPAIR PRIMARY USE CLASSIFICATION			
Lodging Accomodations	Lodging Accomodations, All Others •Bicycle Parking: 1/ 7,500 s.f. GFA (60/40)	P	
COMMERCIAL SALES, SERVICES AND REPAIR PRIMARY USE CLASSIFICATION			
Retail Sales, Service & Repair (Not Including Vehicle or Equipment Sales, Service, & Repair)	Food Sales or Market* •Bicycle Parking: 1/7,500 s.f. GFA (20/80)	P	
	Retail Sales, Service & Repair, Outdoor* •Bicycle Parking: 1/7,500 s.f. GFA (20/80)	L-ZP	§11.4.16.1
	Retail Sales, Service & Repair, All Others •Bicycle Parking: 1/7,500 s.f. GFA (20/80)	P-ZP	
Vehicle/Equipment Sales, Rentals, Service & Repair	Heavy Vehicle/Equipment Sales, Rentals & Service* •Bicycle Parking: No Requirement	L-ZP	§11.4.22
INDUSTRIAL, MANUFACTURING & WHOLESALE PRIMARY USE CLASSIFICATION			
Industrial Services	Food Preparation and Sales, Commercial •Bicycle Parking: No Requirement	L-ZP	§11.5.5
	Laboratory, Research, Development and Technological Services •Bicycle Parking: No Requirement	L-ZP	§11.5.6
	Service/Repair, Commercial •Bicycle Parking: No Requirement	L-ZP	§11.5.7.3
Transportation Facilities	Terminal, Station or Service Facility for Passenger Transit System •Bicycle Parking: No requirement	P-ZP	
Wholesale, Storage, Warehouse & Distribution	Wholesale Trade or Storage, General •Bicycle Parking: No requirement	L-ZP	§11.5.25
	Wholesale Trade or Storage, Light •Bicycle Parking: No requirement	L-ZP	§11.5.26
Agriculture	Plant Nursery •Bicycle Parking: No requirement	P-ZP	
	Husbandry, Animal •Bicycle Parking: No requirement	P-ZP	
ACCESSORY TO PRIMARY NONRESIDENTIAL USES USE CLASSIFICATION			
Accessory to Primary Nonresidential Uses (Parking is Not Required for Accessory Uses Unless Specifically Stated in this Table or in an Applicable Use Limitation)	Conference Facilities Accessory to Hotel Use	P-ZP	

- A. Single unit and two unit dwellings are not permitted in the DIA Influence Area Overlay Zone District.
- B. Multi-unit dwellings, live/work dwellings, all uses catergorized as congregate living and residential care uses in the Denver Zoning Code, hospitals, bed and breakfasts, and all educational uses that include residential accomodations are not permitted in the DIA Influence Area Overlay Zone District north of 64th Avenue.
- C. Surface parking of vehicles is not permitted as a primary use of land in the DIA Influnce Area Overlay Zone District. Garage parking is permitted.

CHAPTER 6. ADDITIONAL STANDARDS

SECTION 6.1 ARTICLE 1 OF THE DENVER ZONING CODE

6.1.1 Applicability

Development in this PUD-G 40 shall conform to Article 1, General Provisions of the Denver Zoning Code, as amended from time to time.

SECTION 6.2 ARTICLE 9 OF THE DENVER ZONING CODE

6.2.1 Applicability

- A. Development in this PUD-G 40 shall comply with Article 9, Special Districts of the Denver Zoning Code, as amended from time to time.
- B. Development in this PUD-G 40 is within the geographic boundary of the DIA Influence Overlay Zone District and shall comply with Denver Zoning Code Section 9.5.3, DIA Influence Area Overlay Zone (AIO-)

SECTION 6.3 ARTICLE 10 OF THE DENVER ZONING CODE

6.3.1 Applicability

Development in this PUD-G 40 shall comply with the Denver Zoning Code, Article 10, General Design Standards, as specifically applicable to the CMP-EI Zone District, as amended from time to time, except as modified by this section 6.3:

6.3.2 Signs

Development in this PUD-G 40 shall comply with Section 10.10.7, Campus Zone District Sign Standards. Additional sign types and elements shall be allowed by a comprehensive sign plan.

6.3.3 Site Enclosure, Fencing, and Utility Screening

A. Intent

Allow flexibility in maximum fence heights to support necessary site safety and security. Unique fence allowances and requirements are meant to supersede Section 10.5.5.2 of the DZC as well as the Denver Gateway Urban Design Standards and Guidelines. Unique fence requirements are intended to support strong design materials and an appropriate level of transparency into the site.

B. Regulations

1. Section 10.5.5.2, regarding maximum fence heights shall not apply in PUD-G 40 and instead the maximum fence height shall not exceed 12 feet with the exception of light poles, banner supports, and decorative canopies.
2. Fence, wall, and screening materials shall be composed of masonry, natural stone, and/or steel.
3. Fences shall be less than or equal to 40% opaque for any portion erected along the eastern and southern frontages. "Opaque" or "opacity" shall be measured as the amount of solid fence or wall materials area divided by the total surface area of the subject fence or wall section, expressed as a percentage.

SECTION 6.4 ARTICLE 11 OF THE DENVER ZONING CODE

6.4.1 Applicability

Development in this PUD-G 40 shall comply with the Denver Zoning Code, Article 11, Use Limitations and Definitions, as specifically applicable to the CMP-EI Zone District, as amended from time to time, except as amended in this PUD.

SECTION 6.5 ARTICLE 12 OF THE DENVER ZONING CODE

6.5.1 Applicability

Development in this PUD-G 40 shall comply with the Denver Zoning Code, Article 12, Procedures and Enforcement, as amended from time to time.

SECTION 6.6 ARTICLE 13 OF THE DENVER ZONING CODE

6.6.1 Applicability

Development in this PUD-G 40 shall comply with the Denver Zoning Code, Article 13, Rules of Measurement and Definitions, as amended from time to time.

CHAPTER 7. RULES OF INTERPRETATION

Subject to Chapter 8 of this PUD-G 40, whenever a section of the Denver Zoning Code is referred to in this PUD-G 40, that reference shall extend and apply to the section referred to as subsequently amended, recodified, or renumbered; provided, however, if a section of the Denver Zoning Code, as subsequently amended, recodified, or renumbered conflicts with a provision of this PUD-G 40, this PUD-G 40 shall control.

CHAPTER 8. VESTED RIGHTS

This PUD-G 40 shall be established in accordance with Denver Zoning Code sections 9.6.1.2.C and 9.6.1.5, and vested property rights shall be created 90 days after the effective date of the ordinance approving this PUD-G 40. The property rights vested through approval of this PUD-G 40 shall remain vested for a period of 3 years and shall include the right to commence and complete development of and the right to use the site in accordance with the intent, standards, and uses set forth in the Denver Zoning Code, as amended from time to time, except as modified by this PUD-G 40.

Property Ownership



08/07/2023 11:04 AM
City & County of Denver
Electronically Recorded

R \$33.00

WD

D \$2,220.00

AFTER RECORDING RETURN TO:

Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Attention: Erin Felchner, Esq.

SPECIAL WARRANTY DEED

DIBC Commercial, LLC, a Colorado limited liability company (“Grantor”), whose street address is 1125 17th Street, Suite 2500, Denver, Colorado 80202, for the consideration of Ten Dollars (\$10.00), in hand paid, does hereby sell and convey to United Airlines, Inc., a Delaware corporation (“Grantee”), whose street address is 233 South Wacker Drive, HDQOU, Chicago, Illinois 60606, the real property in the City and County of Denver and State of Colorado described on Exhibit A attached hereto.

TOGETHER with all and singular the hereditaments and appurtenances thereto belonging, or in anywise appertaining, the reversions, remainders, rents, issues and profits thereof, all of Grantor’s right, title and interest, if any, in and to all minerals, oil, gas and other hydrocarbon substances situated thereon, therein or thereunder, all development rights, air rights, water, water rights, water stock relating and well rights, well permits and tributary, non-tributary and not non tributary groundwater rights thereto, if any, and all other estate, right, title, interest, claim and demand whatsoever of Grantor, either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances.

TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto Grantee, and Grantee’s successors and assigns forever, and Grantor warrants title and the quiet and peaceable possession of same in Grantee and the successors and assigns of Grantee, against all and every person or persons claiming the whole or any part thereof, by, through, or under Grantor except and subject only to the exceptions set forth on Exhibit B attached hereto.

*(Remainder of this page intentionally left blank)
(Signature page follows)*

EXHIBIT A**LEGAL DESCRIPTION**

The Southeast Quarter of Section 4, Township 3 South, Range 66 West of the Sixth Principal Meridian Lying South of Denver International Business Center Filing No. 5 recorded August 12, 2015 at Reception No. 2015112451 and West of Yampa Street as shown on the Plat for Denver International Business Center Filing No. 7 recorded February 1, 2018 at Reception No. 2018012488.

Except Tract A of Denver International Business Center Filing No. 7, recorded February 1, 2018 at Reception No. 2018012488.

Except the Right-of-Way for 64th Avenue.

City and County of Denver, State of Colorado.

FOR INFORMATIONAL PURPOSES ONLY: Assessor Parcel No. 00041-00-207-000

EXHIBIT B

PERMITTED EXCEPTIONS

1. Taxes and assessments for the year 2023 and subsequent years, a lien not yet due or payable.
2. Reservations contained in the Patent
From: United States of America
To: Catherine A. Stowe
Recording Date: December 15, 1893
Recording No: Book A24 Page 307

Which among other things recites as follows:

A right of way thereon for ditches or canals constructed by the authority of the United States of America.

The right of the proprietor of a vein or lode to extract and remove his ore therefrom should the same be found to penetrate or intersect the premises hereby granted as provided by law.

3. Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on Annexation as set forth below:

Recording Date: May 26, 1988
Recording No.: Book 3450 Page 751
Annexation Plat
Recording Date: May 26, 1988
Recording No.: Reception No. 817174
4. Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on Annexation and Boundaries as set forth below:
Recording Date: January 16, 1990
Recording No.: Book 3639 at Page 318 (Adams County Records)
Recording Date: February 20, 1990
Recording No.: Reception No. R-90-0015551 (Denver County Records)
5. Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on A New Airport as set forth below:
Recording Date: February 13, 1990
Recording No.: Book 3647 at Page 699
6. Any tax, lien, fee, or assessment by reason of inclusion of the Land in the Gateway Regional Metropolitan District, as evidenced by instrument(s) recorded May 12, 1998 at Reception No. 98000071386, August 25, 1998 at Reception No. 9800141049 and September 16, 1998 at Reception No. 9800154977.
7. Terms, conditions, provisions, agreements and obligations contained in the Air Rights Covenant and Avigation Easement as set forth below:
Recording Date: February 3, 2000
Recording No.: Reception No 200016831 and Reception No. 2000016832
8. The Effect of Denver Ordinance No. 138 Series of 2000(Zoning Classification)
Recording Date: February 25, 2000
Recording No.: Reception No. 2000026686
Recording of Waivers of Certain rights
Recording Date: March 6, 2000
Recording No.: Reception No. 2000031272

Recording of Waivers of Certain rights
Recording Date: March 6, 2000
Recording No.: Reception No. 2000031273

9. Terms, conditions, provisions, agreements and obligations contained in the Denver International Business Center General Development Plan No. 3 as set forth below:
Recording Date: January 7, 2003
Recording No.: Reception No. 2003004076
10. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:
Granted to: Public Service Company of Colorado
Purpose: utilities
Recording Date: June 25, 2020
Recording No: Reception No. 2020087933
11. 25. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:
Granted to: Union Rural Electric Association, Inc.
Purpose: electric transmission and of distribution line or system
Recording Date: October 31, 1978
Recording No: Book 2288 Page 975 (Adams County recording)
12. Declaration of Restrictive Use Covenant recorded May 23, 2023 at Reception No. 2023046834.
13. Conveyance of all water and mineral rights by DIBC Commercial, LLC, a Colorado limited liability company, to Underground LLC, a Colorado limited liability company, in Bargain and Sale Deed recorded August 19, 2021 at Reception No. 2021157511.
Relinquishment and Bargain and Sale Deed of Surface Access Rights recorded August 7, 2023 at Reception No. _____.
14. The Effect of Denver Ordinance No. 131 Series of 2000 (Zoning Classification):
Recording Date: February 25, 2000
Recording No.: Reception No. 2000026679
15. Terms, conditions, provisions, agreements and obligations contained in Agreement set forth in letter from Denver Water recorded July 25, 1995 at Reception No. 9500088500.
16. Terms, conditions, provisions, agreements and obligations contained in the Denver International Business Center General Development Plan No. 2 as set forth below:
Recording Date: October 3, 1996
Recording No.: Reception No. 9600137804
17. Terms, conditions, provisions, agreements and obligations contained in the Memorandum of Right of First Offer Agreement as set forth below:
Recording Date: August 7, 2023
Recording No.: Reception No. _____



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City & County of Denver
Electronically Recorded

R \$33.00

WD

D \$1,080.00

AFTER RECORDING RETURN TO:

Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Attention: Erin Felchner, Esq.

SPECIAL WARRANTY DEED

DIBC Cargo, LLC, a Colorado limited liability company, and Missing Piece Investments LLC, a Colorado limited liability company (collectively, "Grantor"), whose street address is 1125 17th Street, Suite 2500, Denver, Colorado 80202, for the consideration of Ten Dollars (\$10.00), in hand paid, do hereby sell and convey to United Airlines, Inc., a Delaware corporation ("Grantee"), whose street address is 233 South Wacker Drive, HDQOU, Chicago, Illinois 60606, the real property in the City and County of Denver and State of Colorado described on Exhibit A attached hereto, dated December 13, 2023 but made effective as of February 8, 2024.

TOGETHER with all and singular the hereditaments and appurtenances thereto belonging, or in anywise appertaining, the reversions, remainders, rents, issues and profits thereof, all of Grantor's right, title and interest, if any, in and to all minerals, oil, gas and other hydrocarbon substances situated thereon, therein or thereunder, all development rights, air rights, water, water rights, water stock relating and well rights, well permits and tributary, non-tributary and not non tributary groundwater rights thereto, if any, and all other estate, right, title, interest, claim and demand whatsoever of Grantor, either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances.

TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto Grantee, and Grantee's successors and assigns forever, and Grantor warrants title and the quiet and peaceable possession of same in Grantee and the successors and assigns of Grantee, against all and every person or persons claiming the whole or any part thereof, by, through, or under Grantor except and subject only to the exceptions set forth on Exhibit B attached hereto.

(Remainder of this page intentionally left blank)
(Signature page follows)

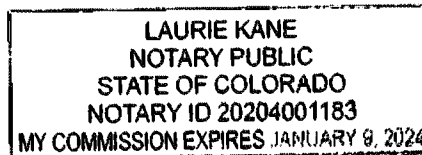
Signed this 13th day of Dec., 2023

GRANTOR:

DIBC CARGO, LLC,
a Colorado limited liability company

By: L.C. Fulenwider, Inc., a Colorado corporation,
Its manager

By: [Signature]
L.C. Fulenwider III, CEO



STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

The foregoing instrument was acknowledged before me this 13 th day of Dec., 2023 by L.C. Fulenwider III, as CEO of L.C. Fulenwider, Inc., as manager and on behalf of DIBC Cargo, LLC.

Witness my hand and official seal.

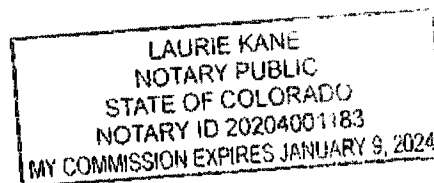
My commission expires: Jan 9, 2024

[Signature]

Notary Public

MISSING PIECE INVESTMENTS LLC,
a Colorado limited liability company

By: [Signature]
L.C. Fulenwider III, Manager



STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

The foregoing instrument was acknowledged before me this 13 th day of Dec., 2023 by L.C. Fulenwider III, as Manager of Missing Piece Investments LLC.

Witness my hand and official seal.

My commission expires:

[Signature]

Notary Public

EXHIBIT A**LEGAL DESCRIPTION**

Parcel of land in the Southwest Quarter of Section 4, Township 3 South, Range 66 West of the 6th Principal Meridian, City and County of Denver, State of Colorado being more particularly described as follows:

Beginning at the Northeast corner of said Southwest Quarter; Thence West along the North line of said Southwest Quarter a distance of 660 feet; Thence along a line parallel to the East line of said Southwest Quarter a distance of 2,640 feet to a point where said parallel line intersects the South line of said Southwest Quarter; thence East along the South Line of said Southwest Quarter a distance of 660 feet to the Southeast corner of said Southwest Quarter; thence North along the East line of said Southwest Quarter a distance of 2640 feet to the Point of Beginning, except that part described in rule and Order recorded May 15, 1992 under Reception No. R-92-0054138

FOR INFORMATIONAL PURPOSES ONLY: Assessor Parcel No. 00041-00-127-000, 00041-00-122-000 and 00041-00-123-000

Exhibit B**PERMITTED TITLE EXCEPTIONS**

- 1) Reservations contained in the Patent
From: United States of America
To: John Reithen
Recording Date: September 23, 1891 Recording No: Book A24 Page 148

Which among other things recites as follows:
The right of the proprietor of a vein or lode to extract and remove his ore therefrom should the same be found to penetrate or intersect the premises hereby granted as provided by law.
- 2) Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:
Granted to: Colorado Interstate Gas company
Purpose: pipeline and incidental purposes
Recording Date: July 6, 1955
Recording No: Book 557 at Page 205
- 3) Terms, conditions, provisions, agreements and obligations contained in the Stipulation of Interests for the Mineral Ownership as set forth below:
Recording Date: April 13, 1972
Recording No.: Book 1791 Page 760
- 4) Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:
Granted to: Union Rural Electric Association, Inc.
Purpose: electric transmission and of distribution line or system Recording Date: October 26, 1978
Recording No: Book 2287 Page 103
- 5) Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on Annexation as set forth below:
Recording Date: May 26, 1988
Recording No.: Book 3450 Page 751

Annexation Plat
Recording Date: May 26, 1988 Recording No.: Reception No. 817174
- 6) Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on Annexation and Boundaries as set forth below:
Recording Date: January 16, 1990
Recording No.: Book 3639 at Page 318 (Adams County Records)
Recording Date: February 20, 1990
Recording No.: Reception No. R-90-0015551 (Denver County Records)
- 7) Terms, conditions, provisions, agreements and obligations contained in the Intergovernmental Agreement on A New Airport as set forth below:
Recording Date: February 13, 1990
Recording No.: Book 3647 at Page 699

- 8) A Memorandum of Option and Lease Agreement with certain terms, covenants, conditions and provisions set forth therein.
Dated: August 1, 1995
Lessor: John and Clara Reither
Lessee: U.S. West
New Vector Group, Inc.
Recording Date: September 13, 1995 Recording No: Reception No. 9500111431
Notice of Exercise of Option recorded April 24, 1996 Reception No. 9600053030
Memorandum of Sublease March 20, 2000 Reception No. 2000038663
Unrecorded Assignment and Assumption of Option and Lease Agreement dated February 8, 2024.

- 9) Conveyance of all water and mineral rights by DIBC Cargo, LLC, a Colorado limited liability company, to Underground LLC, a Colorado limited liability company, in Bargain and Sale Deed recorded February 9, 2023 at Reception No. 2023011972.

Relinquishment and Bargain and Sale Deed of Surface Access Rights dated February 8, 2024 and recorded concurrently herewith.

- 10) Terms, conditions, provisions, agreements and obligations contained in the Memorandum of Right of First Offer Agreement dated as of February 8, 2024 and recorded concurrently herewith.



01/23/2026 03:48 PM
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R \$43.00

WD

D \$7.50

AFTER RECORDING RETURN TO:

Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Attention: Jessica Royel, Esq.

SPECIAL WARRANTY DEED

DIBC Commercial, LLC, a Colorado limited liability company (“Grantor”), whose street address is 270 Saint Paul Street, Suite 300, Denver, Colorado 80206, for the consideration of Ten Dollars (\$10.00), in hand paid, does hereby sell and convey to United Airlines, Inc., a Delaware corporation (“Grantee”), whose street address is 233 South Wacker Drive, HDQOU, Chicago, Illinois 60606, the real property in the City and County of Denver and State of Colorado described on Exhibit A attached hereto (the “Property”).

TOGETHER with all and singular the hereditaments and appurtenances thereto belonging, or in anywise appertaining, the reversions, remainders, rents, issues and profits thereof, all of Grantor’s right, title and interest, if any, in and to all minerals, oil, gas and other hydrocarbon substances situated thereon, therein or thereunder, all development rights, air rights, water, water rights, water stock relating and well rights, well permits and tributary, non-tributary and not non tributary groundwater rights thereto, if any, and all other estate, right, title, interest, claim and demand whatsoever of Grantor, either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances.

TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto Grantee, and Grantee’s successors and assigns forever, and Grantor warrants title and the quiet and peaceable possession of same in Grantee and the successors and assigns of Grantee, against all and every person or persons claiming the whole or any part thereof, by, through, or under Grantor except and subject only to the exceptions set forth on Exhibit B attached hereto.

*(Remainder of this page intentionally left blank)
(Signature page follows)*

EXHIBIT A**LEGAL DESCRIPTION**

A portion of Tract A, Denver International Business Center, Filing No. 7, described as follows:

Beginning at the Southeast corner of Tract A, Denver International Business Center Filing No. 7, recorded at Reception No. 2018012488, City and County of Denver records, also being a point on the West right-of-way line of Yampa St. (R.O.W. Varies) and located in the Southeast one-quarter of Section 4, Township 3 South, Range 66 West, 6th P.M., whence the Southeast corner of said Section 4 bears S 27°55'56" E, a distance of 1507.29 feet, said point also being the Point of Beginning;

thence along the Southerly line of said Tract A, N 89 ° 47'26" W, a distance of 306.65 feet;

thence continuing along said Southerly line, N 48 ° 39'43" W, a distance of 38.00 feet;

thence S 89 ° 47'26" E, a distance of 180.39 feet to the Northerly line of said Tract A;

thence along said Northerly line, S 89 ° 47'26" E, a distance of 154.89 feet to the Northeast corner of said Tract A, also being said West line of Yampa St. (R.O.W. Varies);

thence along the East line of said Tract A, S 00 ° 12'34" W, a distance of 25.00 feet to the Point of Beginning,

City and County of Denver, State of Colorado.

Basis of Bearings: All bearings are based on a line between the Southeast corner of said Section 4, Township 3 South, Range 66 West of the 6th P.M. (Fnd. 3 1/4" aluminum cap in monument box "LS 27278") and the South one-quarter corner of said Section 4, Township 3 South, Range 66 West of the 6th P.M. (Fnd. 2 1/2" aluminum cap stamped "LS 29425 2020") having a bearing of N 89 ° 47'31" W.

EXHIBIT B**PERMITTED TITLE EXCEPTIONS**

1. All taxes and assessments for the year 2025, and subsequent years, a lien but not yet due or payable.
2. Reservations contained in the Patent.

From: United States of America
To: Catherine A. Stowe
Recording Date: December 15, 1893
Recording No: Book A24 Page 307

Which among other things recites as follows:

A right of way thereon for ditches or canals constructed by the authority of the United States of America. The right of the proprietor of a vein or lode to extract and remove his ore therefrom should the same be found to penetrate or intersect the premises hereby granted as provided by law.

3. Any tax, lien, fee, or assessment by reason of inclusion of the Land in the Gateway Regional Metropolitan District, as evidenced by instrument(s) recorded May 12, 1998 at Reception No. 98000071386, August 25, 1998 at Reception No. 9800141049 and September 16, 1998 at Reception No. 9800154977.
4. The Effect of Denver Ordinance No. 138 Series of 2000(Zoning Classification).

Recording Date: February 25, 2000
Recording No.: Reception No. 2000026686

Recording of Waivers of Certain rights
Recording Date: March 6, 2000
Recording No.: Reception No. 2000031272

Recording of Waivers of Certain rights
Recording Date: March 6, 2000
Recording No.: Reception No. 2000031273

5. Terms, conditions, provisions, agreements and obligations contained in the Air Rights Covenant and Avigation Easement as set forth below:

Recording Date: February 3, 2000
Recording No.: Reception No 2000016831 and Reception No. 2000016832

6. Terms, conditions, provisions, agreements and obligations contained in the Denver International Business Center General Development Plan No. 3 as set forth below:

Recording Date: January 7, 2003

Recording No.: Reception No. 2003004076

7. Covenants, conditions, restrictions and lien rights but omitting any covenants or restrictions, if any, including but not limited to those based upon race, color, religion, sex, sexual orientation, familial status, marital status, disability, handicap, national origin, ancestry, source of income, gender, gender identity, gender expression, medical condition or genetic information, as set forth in applicable state or federal laws, except to the extent that said covenant or restriction is permitted by applicable law, and any and all amendments thereto, as set forth in the document.

Recording Date: July 10, 2015

Recording No: 2015095327

8. An oil and gas lease for the term therein provided with certain covenants, conditions and provisions, together with easements, if any, as set forth therein.

Recording Date: January 6, 2017

Recording No: 2017000001755

9. Terms, conditions, provisions, agreements and obligations and easements contained in the Permanent Non-Exclusive Easement as set forth below:

Recording Date: February 2, 2018

Recording No: 2018013336

10. Terms, conditions, provisions, agreements and obligations and easements contained in the Declaration of Shared Access and Utility Easements as set forth below:

Recording Date: April 19, 2018

Recording No: 2018046180

11. An oil and gas lease for the term therein provided with certain covenants, conditions and provisions, together with easements, if any, as set forth therein.

Recording Date: November 28, 2018

Recording No: 2018152132

12. Any taxes or assessments by reason of the inclusion of the Land in the Denver International Business Center Metropolitan District No. 1, as evidenced by Order for Inclusion recorded April 25, 2019 at Reception No. 2019049175, and the Special District Public Disclosure Document recorded December 23, 2014 at Reception No. 2014156584 and First Amendment thereto recorded July 22, 2019 at Reception No. 2019094705.

13. Terms, conditions, provisions, agreements and obligations contained in the Declaration of Payment in Lieu of Taxes recorded May 21, 2019 at Reception No. 2019061820, Amendment recorded July 15, 2022 at Reception No. 2022094852, Second Amendment recorded March 16, 2023 at Reception No. 2023022352.
14. Terms, conditions, restrictions, provisions, notes and easements but omitting any covenants or restrictions, if any, including but not limited to those based upon race, color, religion, sex, sexual orientation, familial status, marital status, disability, handicap, national origin, ancestry, source of income, gender, gender identity, gender expression, medical condition or genetic information, as set forth in applicable state or federal laws, except to the extent that said covenant or restriction is permitted by applicable law, as set forth on the Plat(s) of said subdivision set forth below:

Recording Date: February 1, 2018

Recording No: 2018012488

Surveyor's Affidavit of Correction recorded September 30, 2024 at Reception No. 2024090930.

Authorization Documents

CERTIFICATE OF SECRETARY
OF
UNITED AIRLINES, INC.

I, E. Anna Ha, the duly authorized and acting Secretary of United Airlines, Inc., a corporation organized and existing under the laws of the State of Delaware (the “Company”), in my capacity as such officer and not in any individual capacity, DO HEREBY CERTIFY THAT:

As of the date hereof, Brandon Fair is the Vice President, Corporate Real Estate of the Company and has the authority to execute and submit, on behalf of the Company, any and all (1) documents in connection with the development, zoning, rezoning, subdivision, replatting, and master planning of the Company’s property located at 17671 – 17675 East 64th Avenue, Denver, CO 80249, including documents, plans (including those related to concept and site development) and permits related to the large development review and framework, rezoning and map amendment(s), infrastructure master plan(s), and subdivision, and (2) reports, applications, information, certifications, agreements and documents in connection therewith, in each case subject to the limits set forth in the Company’s Corporate Approval Policy.

IN WITNESS WHEREOF, I have duly executed and delivered this Certificate on this 27th day of August, 2024.



By: _____

Name: E. Anna Ha

Title: Secretary



February 4, 2026


City and County of Denver
Community Planning and Development
201 W. Colfax Avenue, Dept. 205
Denver, CO 80202

To Whom it May Concern,

On behalf of United Airlines, Inc., as the owner of the property located at 17671 – 17675 East 64th Avenue, Denver CO 80249 (Assessor's Parcel Numbers 00041-00-207-000 (Parcel A), 00041-00-231-000 (Parcel B) and metes and bounds (Parcel C)) as legally described on Exhibit A attached hereto, I affirm ownership of the property and hereby authorize Caitlin Quander and Brownstein Hyatt Farber Schreck, LLP to represent us in the rezoning application for the property listed above.

Please contact us with any questions.

Regards,

Signed by:

07E91643E77F4B5...

Brandon Fair
Vice President, Corporate Real Estate, United Airlines, Inc.

Exhibit A

Legal Description

PARCEL A:

The Southeast Quarter of Section 4, Township 3 South, Range 66 West of the Sixth Principal Meridian Lying South of Denver International Business Center Filing No. 5 recorded August 12, 2015 at Reception No. 2015112451 and West of Yampa Street as shown on the Plat for Denver International Business Center Filing No. 7 recorded February 1, 2018 at Reception No. 2018012488.

Except Tract A of Denver International Business Center Filing No. 7, recorded February 1, 2018 at Reception No. 2018012488.

Except the Right-of-Way for 64th Avenue.

City and County of Denver, State of Colorado.

SUBJECT PROPERTY PARCEL A: 3,319,933 SQ/FT OR 76.2152 ACRES, MORE OR LESS.

FOR INFORMATIONAL PURPOSES ONLY: Assessor Parcel No. 00041-00-207-000

PARCEL B:

A Parcel of land in the Southwest Quarter of Section 4, Township 3 South, Range 66 West of the 6th Principal Meridian, City and County of Denver, State of Colorado being more particularly described as follows:

Beginning at the Northeast corner of said Southwest Quarter; Thence West along the North line of said Southwest Quarter a distance of 660 feet; Thence along a line parallel to the East line of said Southwest Quarter a distance of 2,640 feet to a point where said parallel line intersects the South line of said Southwest Quarter; thence East along the South Line of said Southwest Quarter a distance of 660 feet to the Southeast corner of said Southwest Quarter; thence North along the East line of said Southwest Quarter a distance of 2640 feet to the Point of Beginning, except that part described in rule and Order recorded May 15, 1992 under Reception No. R-92-0054138

SUBJECT PROPERTY PARCEL B: 1,633,105 SQ/FT OR 37.4909 ACRES, MORE OR LESS.

FOR INFORMATIONAL PURPOSES ONLY: Assessor Parcel No. 00041-00-231-000

PARCEL C:

A portion of Tract A, Denver International Business Center, Filing No. 7, described as follows:

Beginning at the Southeast corner of Tract A, Denver International Business Center Filing No. 7, recorded at Reception No. 2018012488, City and County of Denver records, also being a point on the west right-of-way line of Yampa St. (R.O.W. varies) and located in the Southeast one-quarter of Section 4, Township 3 South, Range 66 West, 6th P.M., whence the Southeast corner of said Section 4 bears S 27°55'56" E, a distance of 1,507.29 feet; said point also being the Point of Beginning;

Thence along the Southerly line of said Tract A, N 89°47'26" W, a distance of 306.65 feet;

Thence continuing along said Southerly line N 48°39'43" W, a distance of 38.00 feet;

Thence S 89°47'26" E, a distance of 180.39 feet to the Northerly line of said Tract A;

Thence along said Northerly line, S 89°47'26" E, a distance of 154.89 feet to the Northeast corner of said Tract A, also being said West line of Yampa St. (R.O.W. varies);

Thence along the East line of said Tract A, S 00°12'34" W, a distance of 25.00 feet to the Point of Beginning.

City and County of Denver, State of Colorado.

SUBJECT PROPERTY PARCEL C: 8,023 SQ/FT OR 0.184 ACRES, MORE OR LESS

TOTAL AREA: 4,961,061 SQ/FT OR 113.8901 ACRES, MORE OR LESS.