



**TO:** Denver Planning Board  
**FROM:** Tony Lechuga, Senior City Planner  
**DATE:** February 25, 2026  
**RE:** Official Zoning Map Amendment Application 2025-REZONE-0000019

### Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends **approval** for Application 2025-REZONE-0000019.

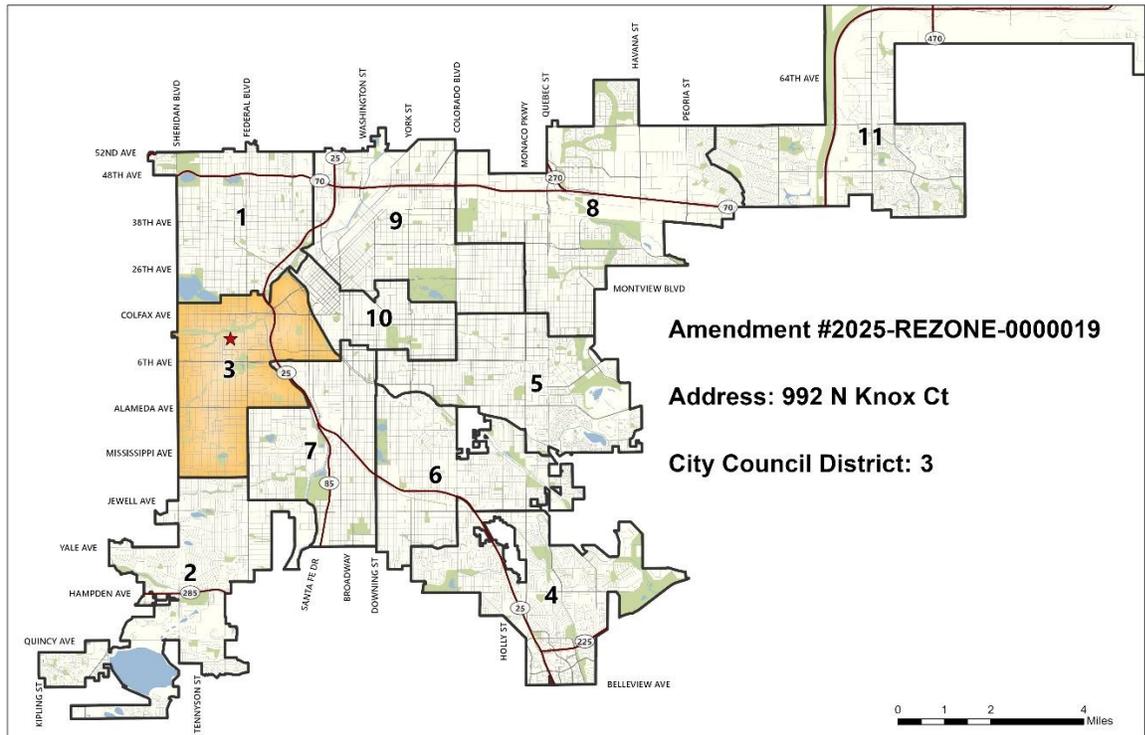
### Request for Rezoning

Address: 992 North Knox Court  
Neighborhood/Council District and CM: Villa Park/ Council District 3, Councilmember Torres  
RNOs: Villa Park Neighborhood Association; Sloan's Lake Citizens Group; Inter-Neighborhood Cooperation  
Area of Property: 12,500 square feet or 0.29 acres  
Current Zoning: E-SU-D  
Proposed Zoning: E-MS-3  
Property Owner(s): 992 Knox Ct LLC  
Owner Representative: Niles Emerick and Stephen McCullough

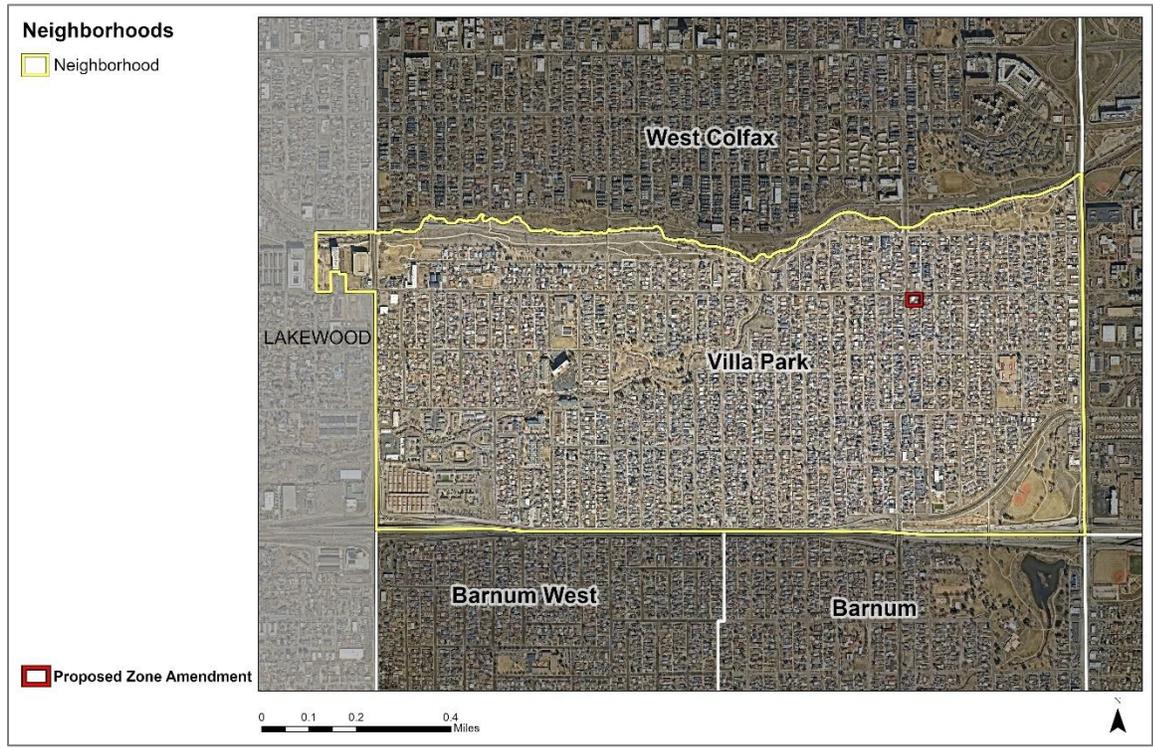
### Summary of Rezoning Request

- The property is in the Villa Park neighborhood, six blocks west of Federal Boulevard and one block south of Lakewood Gulch. The property is on the southeast corner of the intersection of West 10<sup>th</sup> Avenue and North Knox Court.
- The lot is about twice the size of the average residential property in the area. The property consists of a single-unit residential building first constructed in 1899, with numerous additions over the years including multiple accessory structures and a garage. Nearly half of the property consists of the garage and paved surface parking.
- The current zoning would allow for the construction or maintenance of only a single-unit residential with a detached accessory dwelling unit.
- The requested Urban Edge-Main Street-3 story (E-MS-3) zone district is a commercial mixed use zone district allowing either residential or commercial uses up to 3-stories in height. Further details of the requested zone district can be found in the proposed zone district section of the staff report (below) and in Article 4 of the Denver Zoning Code (DZC).

### City Location



### Neighborhood Location



## 1. Existing Context



The property is located just south of West 10<sup>th</sup> Avenue which serves as a border between the Urban neighborhood context to the north and Urban Edge neighborhood context to the south. Urban Edge is primarily single- and two-unit residential with some embedded small scale, multi-unit development. Commercial and mixed-use development is primarily found along major corridors with some smaller-scale commercial located within the interior of residential areas. The area around the property is reflective of those descriptions as most of the area is single-unit residential with some two- and multi-unit residential scattered throughout. Additionally, while most commercial development is located six blocks east of the property along Federal Boulevard, the two properties at the northeast and northwest corners of West 10<sup>th</sup> Avenue and North Knox Court are both small-scale embedded commercial within the residential neighborhood.

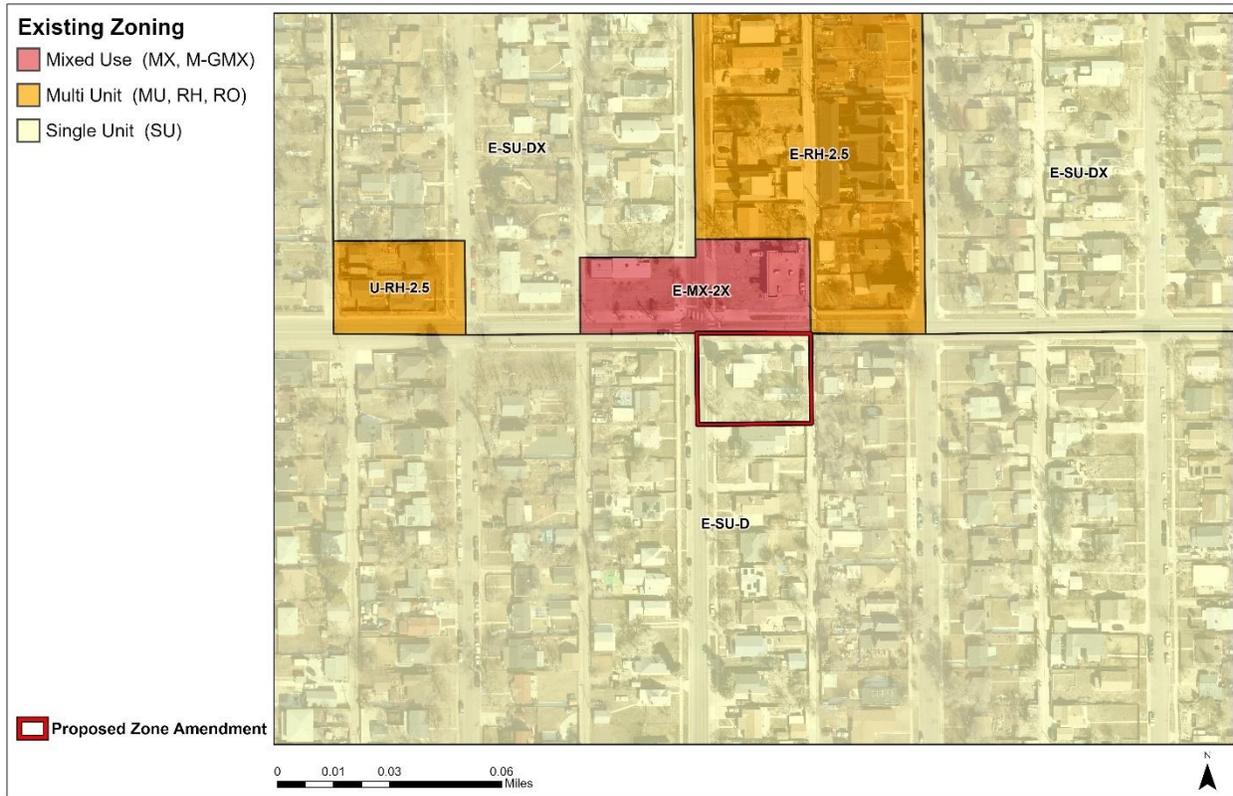
The property is located one block south of Lakewood Gulch which provides multi-use paths travelling west past Sheridan Boulevard and east to the South Platte River. Lakewood Gulch also provides access to the Rude Recreation Center about 0.8 miles to the northeast. The property is also two blocks south of Paco Sanchez Park which includes a skatepark, splash pad, soccer fields, and playground. The property is less than a half mile from Eagleton Elementary School, four blocks to the southeast. The property is well served by transit. At the corner of West 10<sup>th</sup> Avenue and North Knox Court there is a stop for the RTD 1 bus which runs from Lakewood

Commons in the west to Civic Center Station, with service running north along Knox Court to Colfax Avenue and the Auraria Campus. At the corner of West 10<sup>th</sup> Avenue and North Knox Court there is also a stop for the RTD 9 bus which runs along 10<sup>th</sup> Avenue from the Lakewood/Wadsworth train station in the west to the Santa Fe Arts District, Civic Center Station, and Union Station to the east. The property is also about two blocks south of the RTD Knox train station which runs between Golden and Union Station.

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

	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
Site	E-SU-D	Vacant	2-story clapboard house with multiple 1-story accessory structures and a detached garage accessed by a driveway from Knox Court.	Generally regular grid of streets and alleys interrupted to the north and west by Lakewood Gulch. Block sizes and shapes are generally consistent and rectangular. Despite the presence of alleys, many homes have no garages. Those with garages are often accessed by curb cuts from the street.
North	E-MX-2x	Commercial/Retail	1-story restaurant set far back from the street with abundant surface parking and curb cuts on both 10 <sup>th</sup> Avenue and Knox Court.	
South	E-SU-D	Single-unit Residential	1-story home built in 2004 with an attached garage accessed by a driveway from Knox Court.	
East	E-SU-D	Single-unit Residential	Across the alley, two 2-story homes each built in 1900, one clapboard, the other adobe, neither with a garage.	
West	E-SU-D	Single-unit Residential	Across Knox Court, two 1-story clapboard homes, neither with a garage.	

## 2. Existing Zoning



The current E-SU-D zone district is a residential district with building form standards and uses that promote a desirable residential area, allowing only the urban house and detached accessory dwelling units on lots with a minimum area of 6,000 square feet. The E-SU-D zone district has a maximum height of generally 30 feet with allowances up to 35 feet on larger lots. The zone district allows for minimum setbacks depending on the lot size. For additional details of the zone district, see DZC Section 4.3.3.

## 3. Status of Development Services Review

Concurrently with the rezoning, the property owner has submitted a concept plan that was reviewed by CPD in October 2025. The concept considered construction of 15 residential units including five 3-bedroom townhomes, one 2-bedroom townhome, and nine 1-bedroom units. The concept plan included two income-restricted units in compliance with a voluntary housing agreement negotiated with the Department of Housing Stability as explained in the next section. Additionally, the concept plan included construction of a ground-floor retail/eatery at the northwest corner of the property immediately adjacent to the intersection of West 10<sup>th</sup> Avenue and North Knox Court.

#### 4. Affordable Housing Plan/Development Agreement

Concurrently with the rezoning, the property owner has submitted a voluntary housing agreement negotiated with the Department of Housing Stability (HOST). The agreement, included in the rezoning application for reference, requires the property owner to provide 12% of units as income-restricted units to households making no more than 70% of the are-median income (AMI) if for rent or 90% AMI if for sale. The agreement notes that the units must be built on-site, and the agreement cannot be satisfied through payment of fee-in-lieu or standard linkage fees.

#### 5. Existing Land Use Map



## 6. Existing Building Form and Scale



View of the subject property from North Knox Court, facing east.



View of the subject property from West 10<sup>th</sup> Avenue, facing south.



View of the property to the north, across West 10<sup>th</sup> Avenue, facing north.



View of the properties to the east across the alley, along North Julian Street, facing west.



View of the property to the south along North Knox Court, facing east.



View of the properties to the west across North Knox Court, facing west.

**Proposed Zoning**

The requested E-MS-3 (Urban Edge-Main Street-3 story) zone district allows for the town house and shopfront building forms. Notably, the property is within 0.25 miles of the Knox train station so the drive thru building forms are not allowed. The maximum height of the town house building form is 38-feet and uses are limited to residential. The maximum height of the shopfront building form is 45-feet, or 55-feet with affordable housing incentives, and allows for a diversity of residential and commercial uses. For additional details of the requested zone district, see DZC Section 4.3.3.

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

Design Standards	E-SU-D (Existing)	E-MS-3 (Proposed)
Primary Building Forms Allowed	Urban House	Town House and Shopfront
Stories/Heights (max)	2.5/30'	Town House – 3/38' Shopfront – 3/45'*
Primary Build-To Percentages (min)	N/A	Town House – 75% Shopfront – 75%
Primary Build-To Ranges	N/A	Town House - 10' to 15' Shopfront – 0'-10'**
Minimum Zone Lot Size/Width	6,000 square feet	N/A
Primary Setbacks (min)	Calculated by reference to adjacent properties	Town Hose – 10' Shopfront – 0'
Building Coverages (max)	45%	N/A

\*4 stories or 55' with affordable housing incentives

\*\*Standard varies by use

## **Summary of City Agency Referral Comments**

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

**Assessor:** Approved – No Comments

**Asset Management:** Approved – No Comments

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

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

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

**Department of Transportation and Infrastructure:** Approved – No Comments

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

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

**Development Services - Fire Protection:** Approve – No Comments

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

**Development Services- Wastewater:** Approved – See Comments Below

- There is no objection to the rezone, however applicant should be under notice that DOTI will not approve any development of this property without assurance that there is sufficient sanitary and storm sewer capacity. Please review the 2025 Denver Storm Drainage Master Plan for stormwater pattern and depth within and adjacent to this parcel. A sanitary study and drainage study may be required depending on development plans. These studies may result in a requirement for the developer to install major infrastructure improvements or a limit to development if current infrastructure is insufficient. Approval of this rezone on behalf of Wastewater does not state, or imply, public storm/sanitary infrastructure can, or cannot, support the proposed zoning.

**Public Review Process**

	<b>Date</b>
Property legally posted for a period of 15 days within 10 days of the submission of a complete application and CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, property owners, and tenants:	1/2/26
Property legally posted for a period of 15 days and CPD written notice of the Planning Board public hearing sent to all affected members of City Council, registered neighborhood organizations, property owners, and tenants:	2/17/26
Planning Board Public Hearing:	3/4/26
CPD written notice of the City Council committee meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten (10) working days before the meeting:	3/10/26 (tentative)
Committee of the City Council:	3/24/26 (tentative)
Property legally posted for a period of 21 days and CPD notice of the City Council public hearing sent to all affected members of City Council and registered neighborhood organizations:	4/13/26 (tentative)
City Council Public Hearing:	5/4/26 (tentative)

- **Public Outreach and Input**

The applicant conducted engagement prior to submitting the application. The engagement is documented as part of the attached application.

- **Registered Neighborhood Organizations (RNOs)**

As of the date of this staff report, no comments from RNOs have been received.

- **General Public Comments**

As of the date of this staff report, 1 letter of support was received. The commentor identified themselves as a resident of the neighborhood in support of bringing new business and additional residents.

## Criteria for Review / Staff Evaluation

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

### DZC Section 12.4.10.7

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

#### 1. Consistency with Adopted Plans

The following adopted plans apply to this property:

- *Denver Comprehensive Plan 2040* (2019)
- *Blueprint Denver* (2019)
- *West Area Plan* (2023)

#### ***Denver Comprehensive Plan 2040***

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

The proposed rezoning would allow for additional small-scale commercial and housing options near transit within an established neighborhood, consistent with the following strategies in the Equitable, Affordable and Inclusive vision element:

- Goal 1, Strategy A – Increase development of housing units close to transit and mixed-use developments (p. 28).
- Goal 2, Strategy A – Create a greater mix of housing options in every neighborhood for all individual and families (p. 28).
- Goal 3, Strategy B – Use land use regulations to enable and encourage the private development of affordable, missing middle, and mixed-income housing, especially where close to transit (p. 28).

The proposed rezoning would allow for additional small-scale commercial and housing options near transit within an established neighborhood, consistent with the following strategies in the Strong and Authentic Neighborhoods vision element:

- Goal 1, Strategy B – ensure neighborhoods offer a mix of housing types and services for a diverse population (p. 34).
- Goal 4, Strategy A – Grow and support neighborhood-serving businesses (p. 35).

The proposed rezoning would help concentrate subtle increases in density closer to transit, consistent with the following strategy in the Connected, Safe, and Accessible Places vision element:

- Goal 8, Strategy B – Promote transit-oriented development and encourage higher density development, including affordable housing, near transit to support ridership (p. 42).

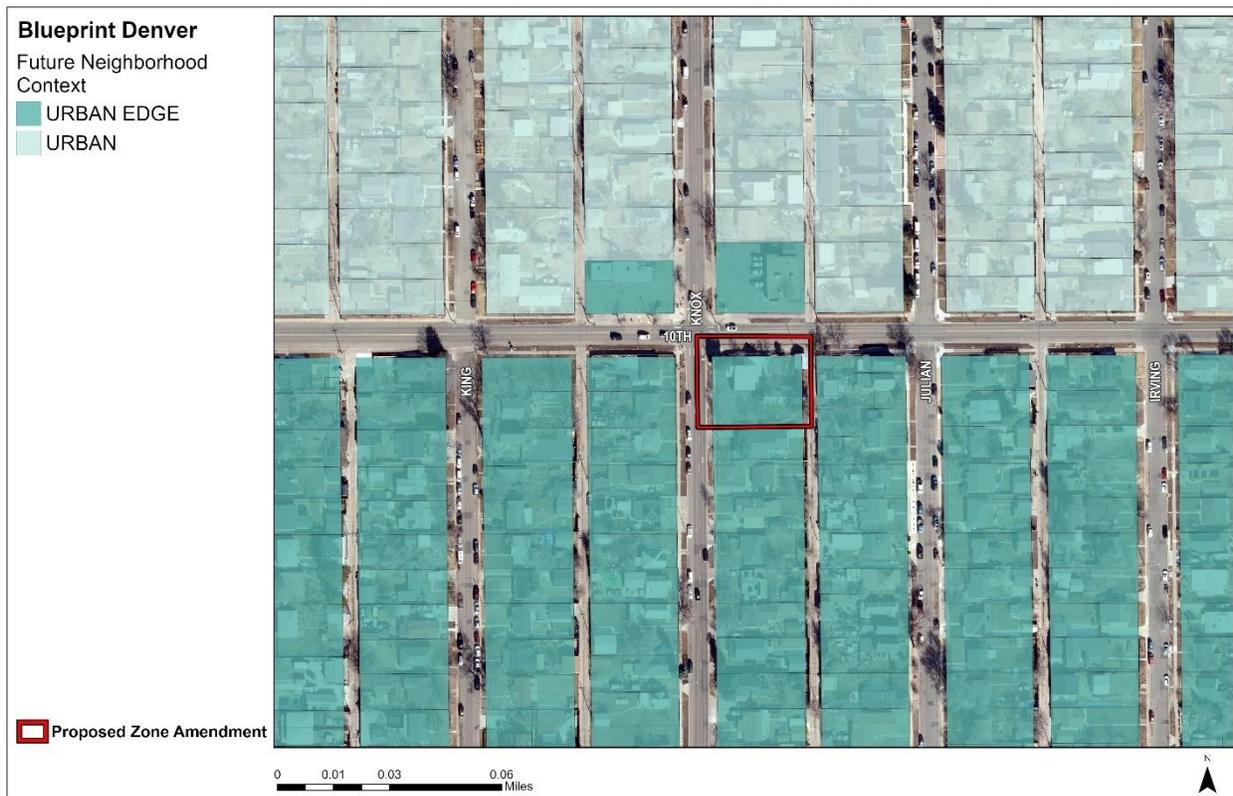
The proposed map amendment would allow for compatible infill development in an established neighborhood and near transit, consistent with the following strategies from the Environmentally Resilient vision element:

- Goal 8, Strategy A - Promote infill development where infrastructure and services are already in place (p.54).
- Goal 8, Strategy C – Focus growth by transit stations and along high- and medium-capacity transit corridors (p. 54).

### ***Blueprint Denver***

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

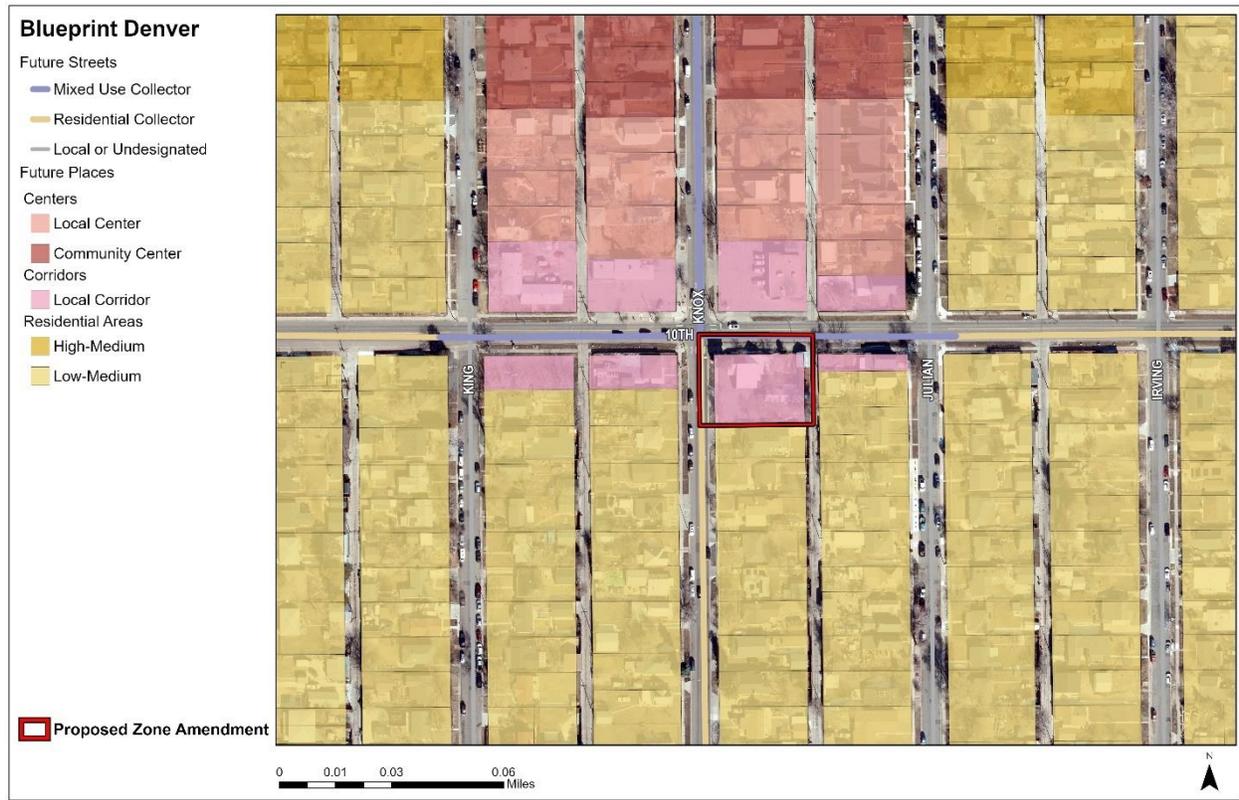
### **Blueprint Denver Future Neighborhood Context**



In *Blueprint Denver*, future neighborhood contexts are used to help understand differences in things like land use and built form and mobility options at a higher scale, between neighborhoods. The subject property is shown on the context map as Urban Edge neighborhood context. The neighborhood context map and description help guide appropriate zone districts (p. 66). The Urban Edge neighborhood context is described as, “predominantly residential”, “single- and two-unit residential with some small-

scale multi-unit residential”, and “commercial and mixed-use development...along the main corridors” (p. 205). The proposed E-MS-3 zone district is part of the Urban Edge context and “applies to local or collector street corridors, or may be embedded within a commercial shopping center or mixed-use area” (DZC 4.2.6.2.C). Since the proposed district allows a small-scale mix of uses and allowable building forms that along mixed-use corridor where there are established commercial properties, the proposed rezoning to an Urban Edge context is appropriate and consistent with the plan.

### **Blueprint Denver Future Places**



The neighborhood context of Urban Edge provides nuance to the aspirations of the individual places shown on the map. The Future Places Map shows the subject property as part of a Local Corridor. *Blueprint Denver* describes the aspirational characteristics of Local Corridor in the Urban Edge context as, “Provides options for dining, entertainment, and shopping. May also include some residential and employment uses. When residential occurs, it should primarily be located to encourage active street frontages. Buildings have a distinctly linear orientation. Heights are generally up to 3 stories” (p. 212). West 10<sup>th</sup> Avenue is a Mixed-Use Collector, which is described as having “varied mix of uses including retail, office, residential, and restaurants” (p. 159). The proposed district of E-MS-3 provides a wide range and mix of uses consistent with the future place designation and street type. The future proposed height of up to 3 stories is appropriate for a Local Corridor in this location.

### **Blueprint Denver Growth Strategy**

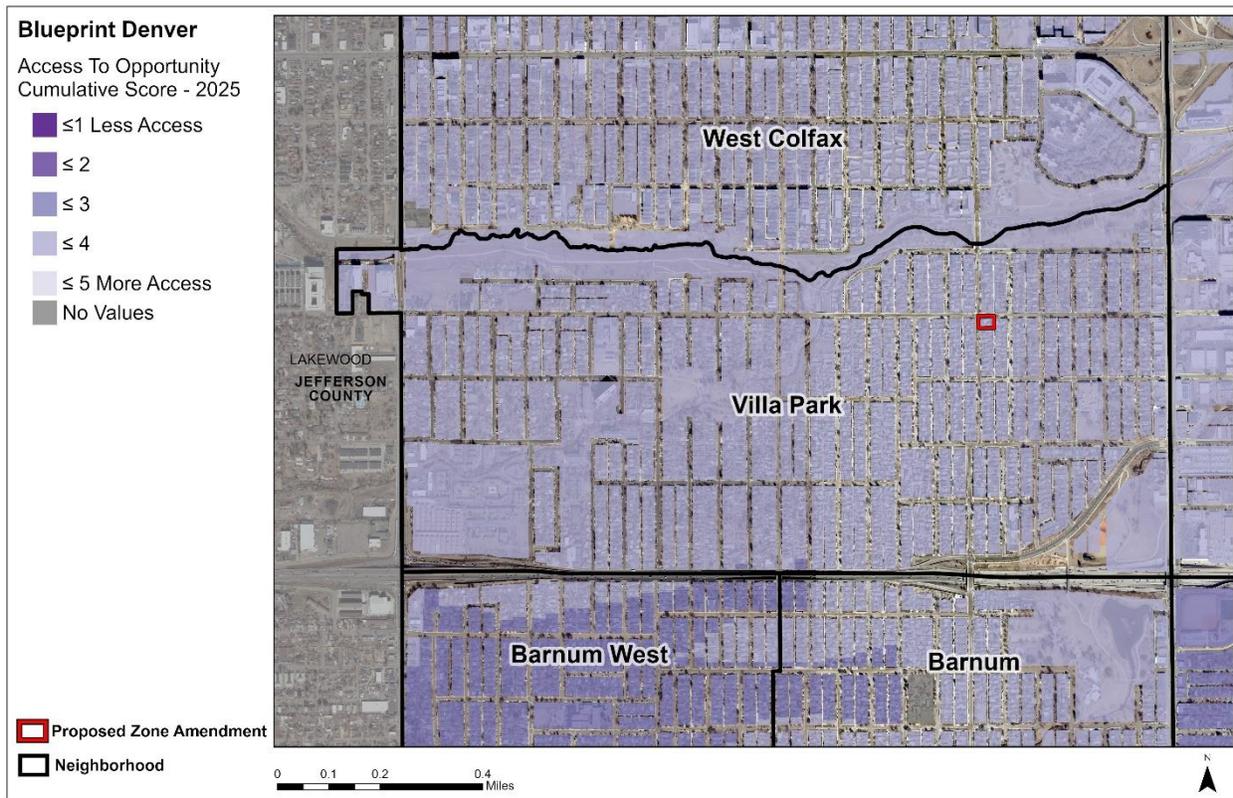


*Blueprint Denver's* growth strategy map is a version of the future places map, showing the aspiration for distributing future growth in Denver (p. 51). The subject property is part of All other areas of the City. These areas are anticipated to see around 20% of new housing growth and 10% of new employment growth by 2040" (p. 51). The proposed E-MS-3 zone district will focus small-scale mixed-use growth at this location where limited growth across the neighborhood is anticipated.

### **Blueprint Denver Equity Concepts**

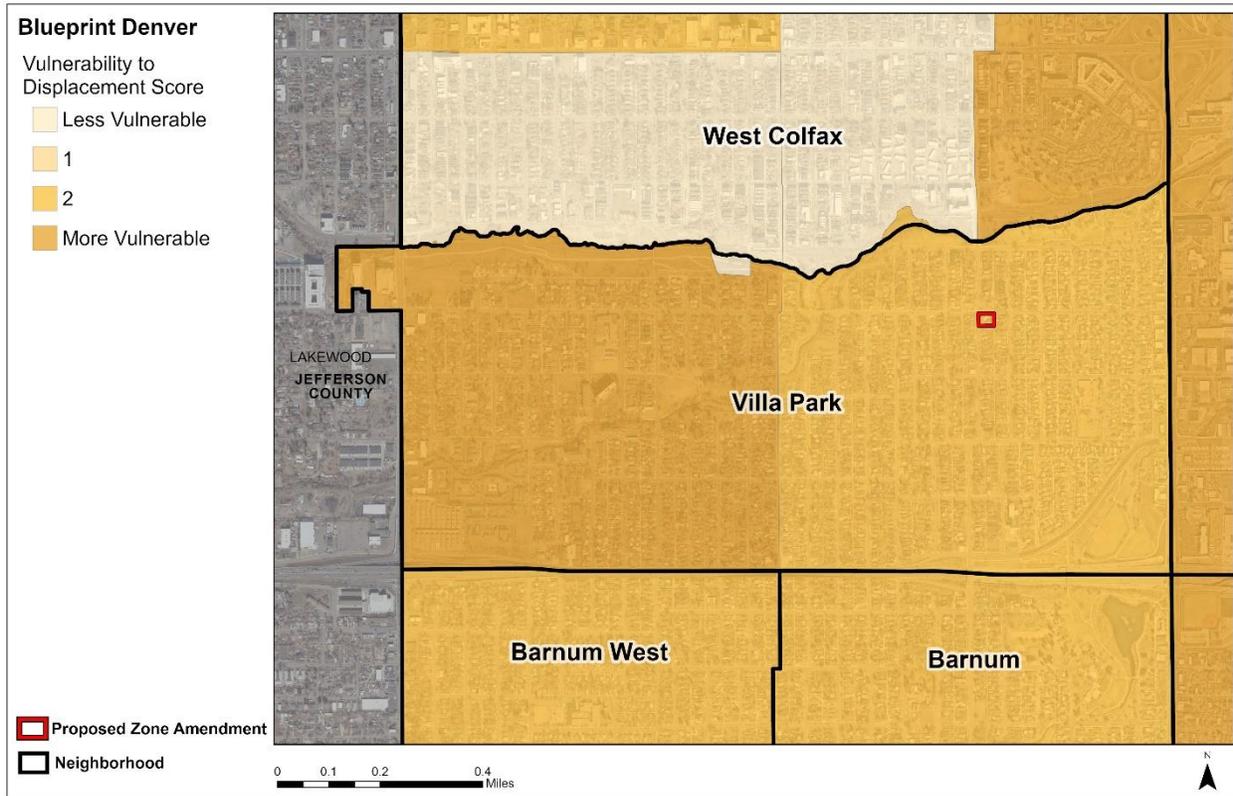
*Blueprint Denver* contains three equity concepts to help guide change to benefit everyone. Each equity concept has associated measurements that helps inform implementation actions through large rezonings along with other implementation actions. Although they cannot be effectively applied to small-scale rezonings, they are helpful in showing patterns across large areas, particularly in areas vulnerable to involuntary displacement. The full equity analysis and applicant response are attached to this staff report.

#### **I. Access to Opportunity**



The subject property is in an area with generally good access to opportunity with a score of 3.4. The basis for measuring access to opportunity is a composite of the neighborhood equity index developed by Denver’s Department of Public Health and Environment, proximity to high-capacity and frequent transit, and access to centers and corridors. Access to opportunity helps us to consider if we are making progress towards achieving the vision for complete neighborhoods across the city. In areas with higher access to opportunity, it is important to increase the range of affordable housing options so that residents of all income levels can live in these neighborhoods. The proposed rezoning, along with the voluntary affordable housing agreement, will provide access to additional commercial as well as new housing typologies including income restricted units near transit which can improve access to opportunity.

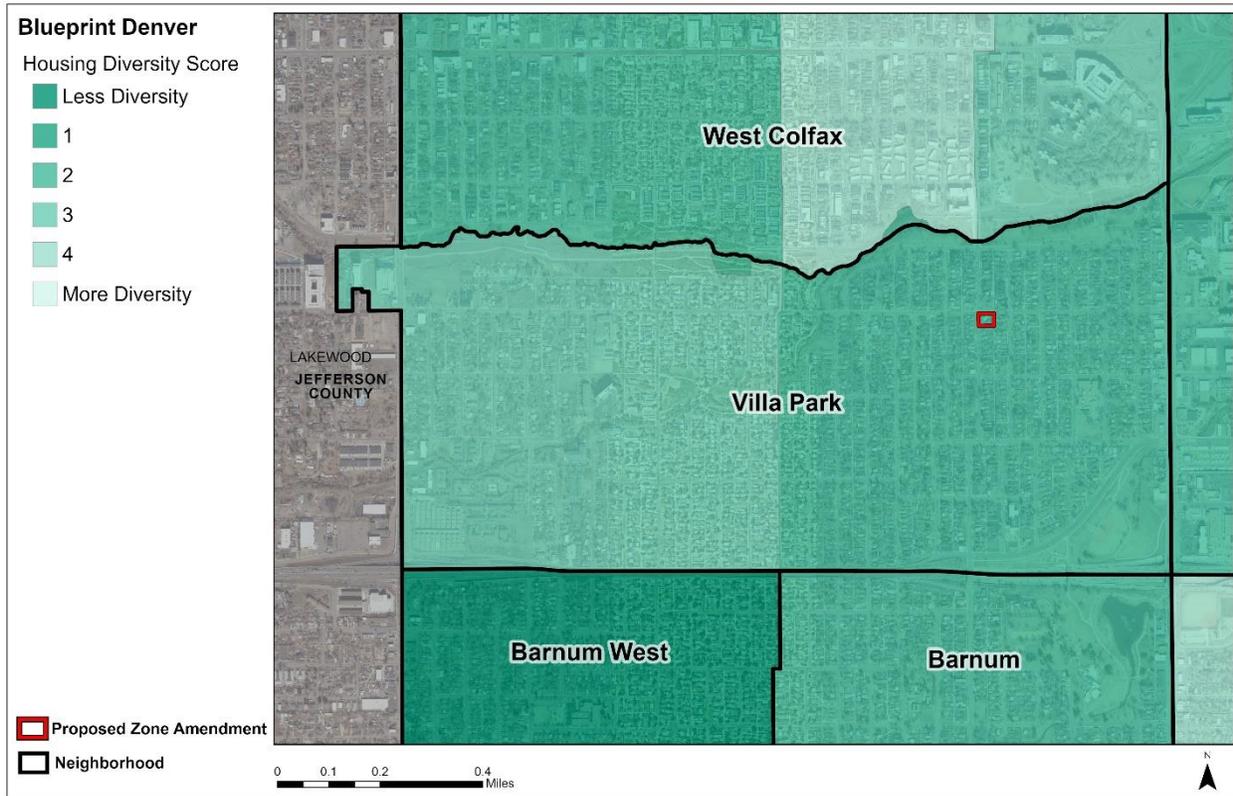
## II. Vulnerability to Involuntary Displacement



The subject property is in an area that has moderate vulnerability to involuntary displacement. The basis for measuring vulnerability to involuntary displacement is the vulnerability to displacement index developed by Denver's Economic Development and Opportunity office. This combines data from median household income, percentage of people who rent housing, and percent of population with less than a college degree. This area scored as vulnerable on 2 of 3 metrics including educational attainment and median household income. In areas with moderate vulnerability to involuntary displacement, it is important to increase affordable housing options so that residents of all income levels can continue to live in these neighborhoods.

As previously mentioned, the applicant is pursuing an affordable housing plan concurrent with the rezoning. Through the housing plan the property owner has committed to constructing a minimum of 12% of the residential units as affordable to residents earning no more than 70% of the Area Median Income (AMI) for rental units and no more than 90% of AMI for the for-sale units. The units will be affordable for a minimum period of 99 years. This commitment helps mitigate involuntary displacement and may help to keep current residents in place. This voluntary affordable housing commitment helps strengthen the application's consistency with *Blueprint Denver*.

### III. Expanding Housing Diversity



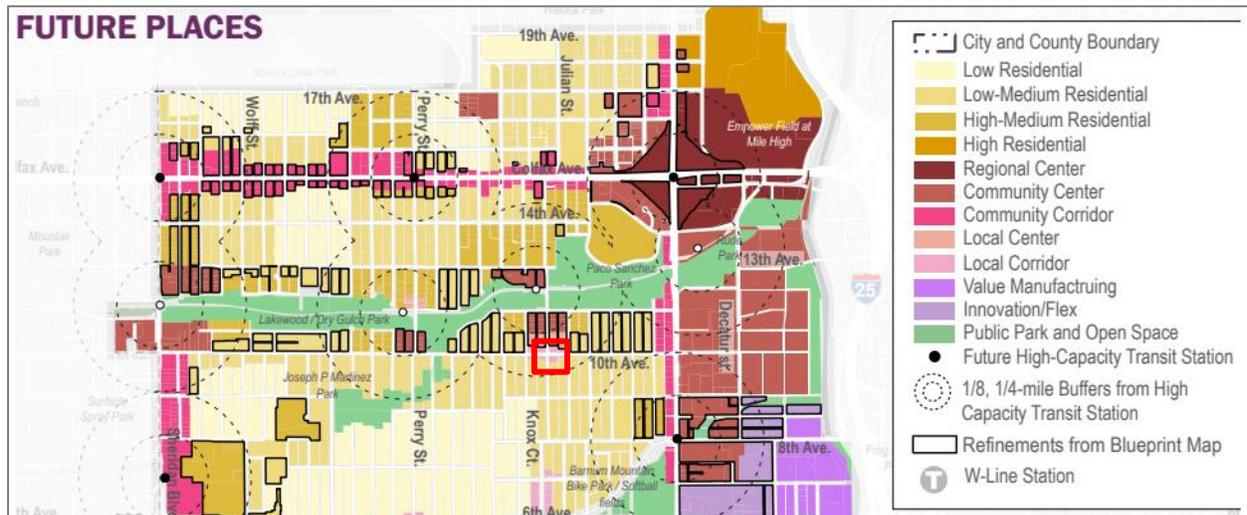
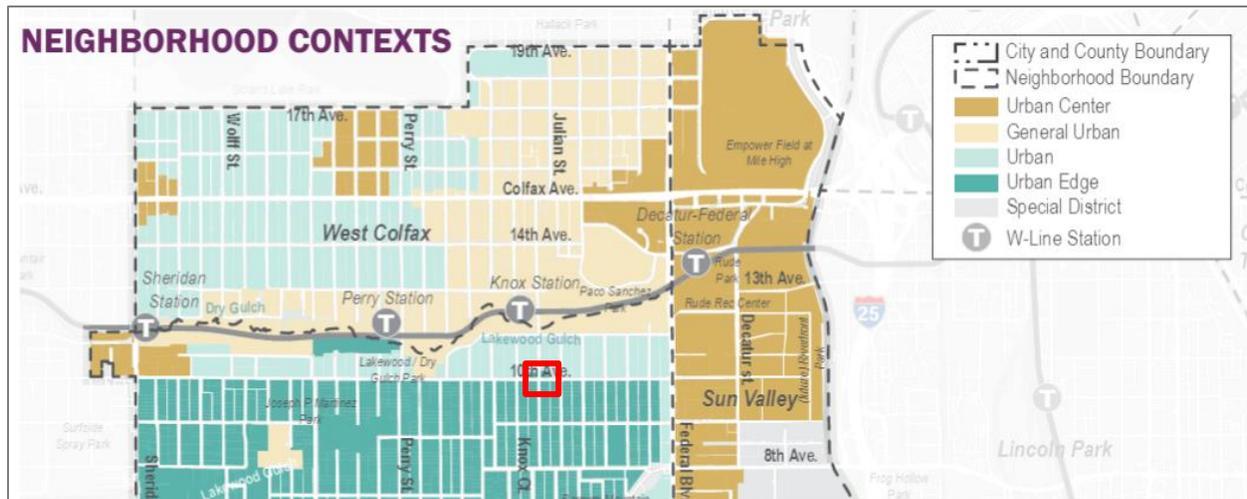
The subject property is in an area that has limited housing diversity. The housing diversity map combines census tract-level data measuring the percentage of middle-density housing (housing with 2-19 units), home size diversity, ownership vs. rental, housing costs and the number of income-restricted units. The area scored as diverse in housing costs and home size. It scored low on missing middle housing, percentage of owners to renters, and income restricted units. The analysis showed that there are currently zero income restricted units in the analysis area. As previously mentioned, concurrent with the rezoning request, the applicant entered into a voluntary affordable housing agreement. This commitment helps the area by providing additional, more inclusive housing options.

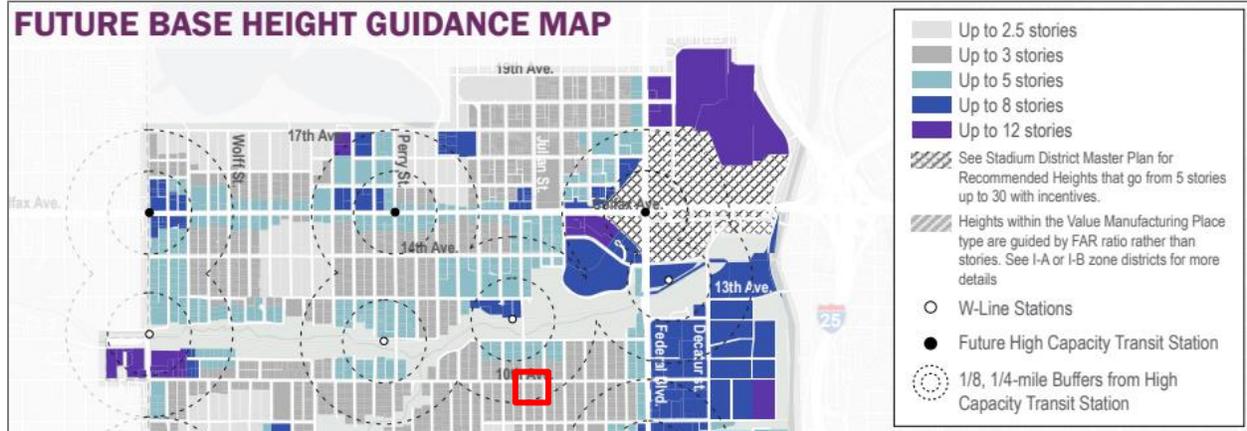
#### **Climate**

This rezoning supports the city's goals to reduce climate impacts by enabling additional housing near transit and the multi-modal Lakewood Gulch Trail. Because many transportation options are available, these areas are less auto-dependent, which can reduce greenhouse gas emissions from transportation. Also, multi-unit buildings are more energy efficient than low density residential development types. This energy efficiency will advance Denver's goals to reduce greenhouse gas emissions from buildings, which contribute to a warming climate.

### West Area Plan

The *West Area Plan* was adopted in 2023 to establish a framework for improvements and growth across six of Denver’s neighborhoods. Within the *West Area Plan*, the subject property’s neighborhood context and future place designation mirror *Blueprint Denver* as Urban Edge and Local Corridor respectively. The plan describes Local Corridor as “primarily provides for commercial and retail activities like dining, entertainment, and shopping and may also include residential and employment uses” where “buildings have a distinctly linear orientation along the street” (p. 166). The plan also provides height guidance for the site at a maximum of 3 stories. The requested E-MS-3 zone district aligns with the plan guidance for this area.





### Additional West Area Plan Priorities

The plan highlights a series of community priorities related to quality of life, food access and housing affordability. Community feedback during the West Area planning process highlights a strong desire for affordable housing options for residents who want to stay in their neighborhood. The plan addresses these issues through strategies to advance equitable housing options, retain residents, and improve quality of life. The following language provides guidance on rezonings in the plan area: “Some of the zoning recommendations in this plan are intended to be implemented legislatively (i.e., initiated by the city) either through citywide processes or area-specific text amendments, instead of through applicant-driven rezonings (e.g., see Policy B-2 (P. 272) . . . Therefore, requests for one-off applicant-driven rezonings should be evaluated to determine if they are better suited as part of a legislative rezoning effort to more effectively advance the vision and recommendations of the plan” p. 14.

The following provides context from community outreach that speaks to a clear need to deploy strategies that counter gentrification and displacement.

- Plan – What We’ve Heard - HOUSING: “A desire for more affordable housing options.... Current housing trends are out of reach for working class families and seniors ... A desire for strategies to counter gentrification and displacement.” (p. 8)
- West Area Today - “The West Area is a vibrant and innovative community today. But the years of disinvestment, historic redlining practices and impacts of infrastructure decisions continue to create barriers between neighborhoods, affect economic conditions and isolate sections of the community today. The *West Area Plan* addresses the inequities and impacts of historical decisions by identifying equitable investment opportunities and future projects that help retain residents, improve quality of life, enhance mobility solutions and reflect neighborhood values and culture for years to come.” (p. 23)

The *West Area Plan* also contains specific recommendations for housing affordability, including examples of tools that can help to ensure affordability for existing residents:

- Recommendations, Policy E.1 - Preserve existing housing affordability and housing quality (p. 211)

- B. Preserve naturally occurring affordable housing, particularly in areas close to transit and in areas vulnerable to displacement, through existing and new tools such as:
  - 1. Incentive programs for owners and landlords that provide financing for rehabilitation of small multi-unit properties and homes in exchange for affordability commitments.
  - 2. Partnering with existing cooperatives and other community-based organizations to assist tenants with acquiring and transforming housing into cooperative housing.
  - 3. Partnerships between the city, land trusts, non-profit organizations, and residents to develop new financial and/or regulatory tools.
- Recommendations, Policy E.2 – Explore strategies so affordable housing is available everywhere by implementing approaches that promote a diversity of affordable housing options within all neighborhoods and new development (p. 212).
  - A. Ensure the value of increased development potential is shared within communities through the provision of on-site affordable housing, a diversity of housing types and elements that promote complete neighborhoods.
- Recommendations, Policy E.3 - Expand diversity of housing types and affordability to support households of different sizes, ages, and incomes in all neighborhoods (p. 213).

Implementing the full intent of the plan requires strategies and programs, such as those referenced above in Policy E.1, to ensure that investment and redevelopment in the area is paired with tools to stabilize existing residents. The applicant has signed a concurrent affordable housing plan that commits to income-restricted housing on the subject property. The AHP puts a tool in place that addresses the plan guidance to mitigate displacement and ensure affordability with new development. The rezoning, with the concurrent AHP, is consistent with this *West Area Plan* guidance.

## **2. Public Interest**

The proposed official map amendment furthers the Public Interest through implementation of the city’s adopted land use plan by fostering the creation of a neighborhood-scale, walkable, mixed-use area, and locating diverse housing types, including affordable housing, close to transit, parks, and jobs.

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

The requested E-MS-3 zone district is within the Urban Edge neighborhood context. The neighborhood context is characterized by primarily single- and two-unit residential uses with small-scale multi-unit residential uses and commercial areas embedded in residential areas (DZC Section 4.11). The proposed E-MS-3 zone district is consistent with the neighborhood context description.

According to the Main Street district purpose statement in the Denver Zoning Code, the Main Street zone district is intended to “promote safe, active, and pedestrian scaled commercial streets” that “enhance the convenience, ease, and enjoyment of transit, walking, shopping, and public gathering” but also “contribute positively to established residential neighborhoods” and “encourage affordable

housing” (DZC Section 4.2.6). The proposed E-MS-3 zone district is consistent with these descriptions.

According to the zone district intent stated in the Denver Zoning Code, the E-MS-3 district “applies primarily to local or collector street corridors, or may be embedded within a commercial shopping center or mixed-use area, where a building scale of 1 to 3 stories is desired” (DZC Section 4.2.6.2.C). North Knox Court is a local street and West 10<sup>th</sup> Avenue is a Mixed-Use Collector. The street classifications and desired building heights in this area are consistent with the zone district purpose and intent statements.

### **Attachments**

1. Application
2. Public Comments
3. Community Engagement
4. Equity Brief and Response