



**TO:** Denver Planning Board  
**FROM:** Brandon Shaver, Senior City Planner  
**DATE:** March 24, 2021  
**RE:** Official Zoning Map Amendment Application #2020I-00092  
235 West Evans Avenue  
Rezoning from I-A, UO-2 to C-MX-8

### Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends **approval** for Application #2020I-00092.

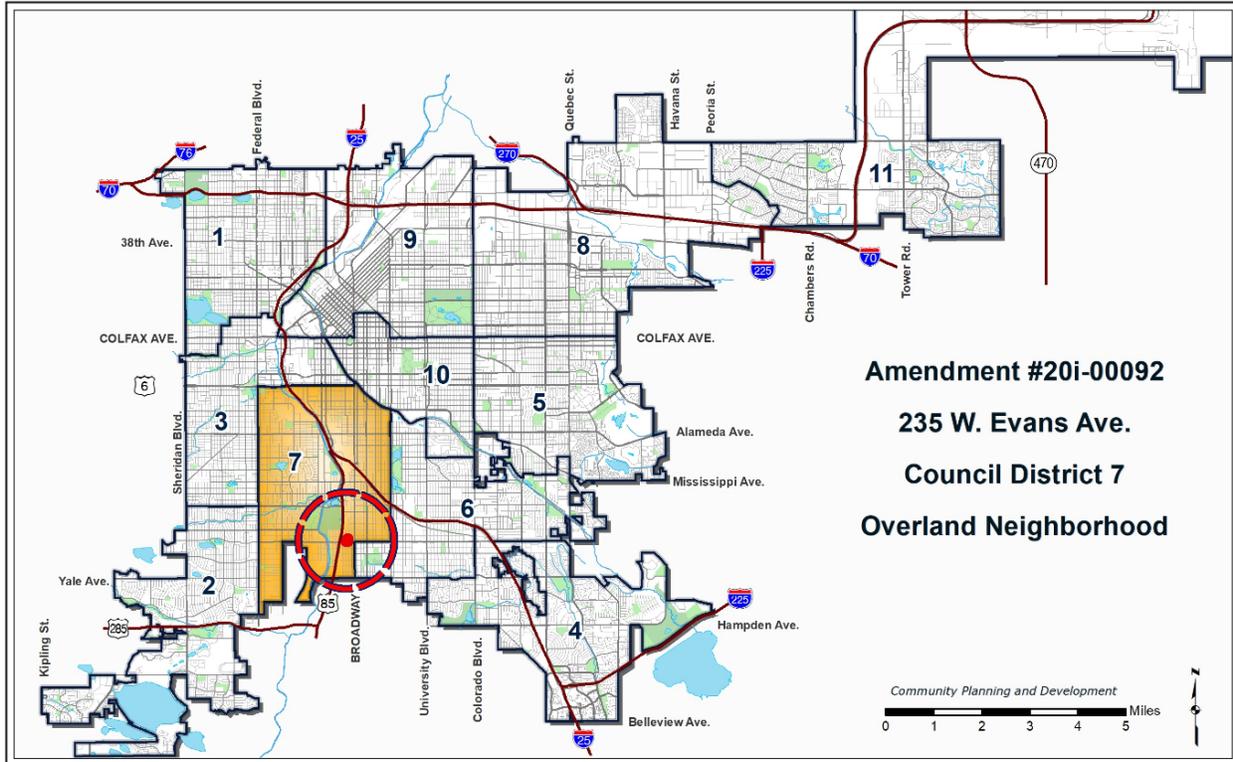
### Request for Rezoning

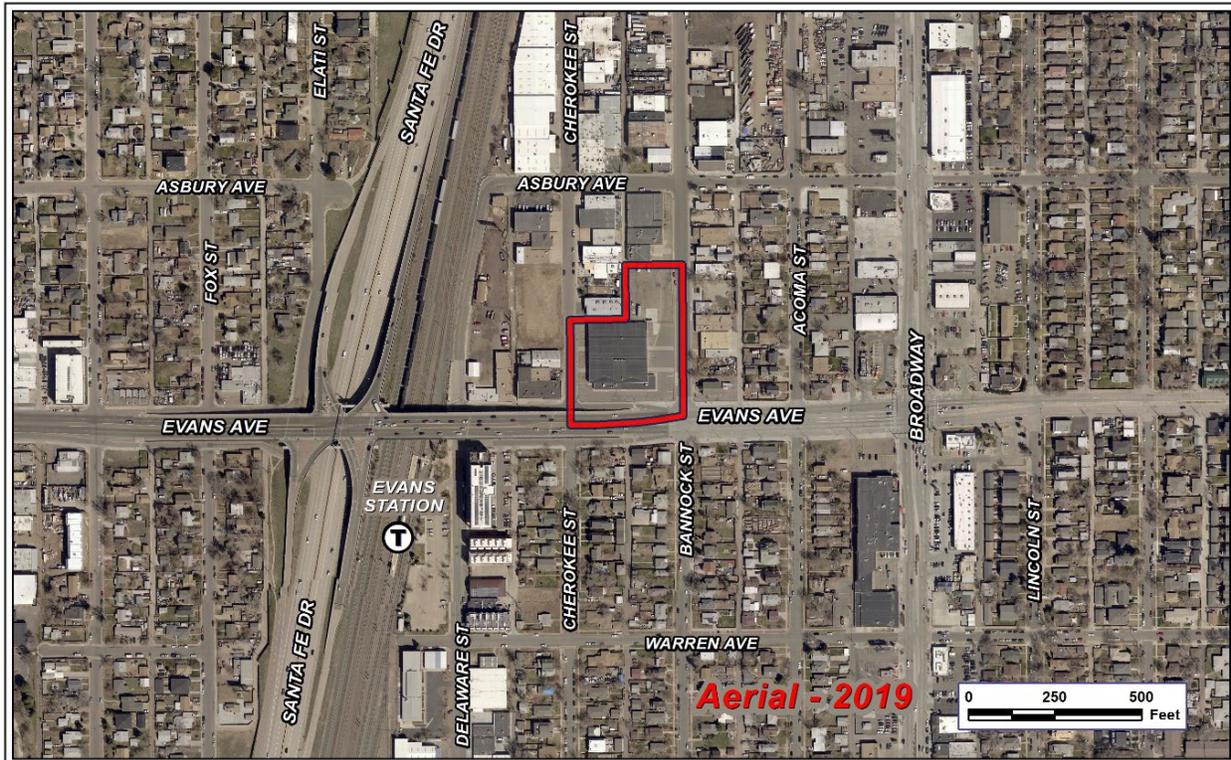
Address: 235 W. Evans Ave.  
Neighborhood/Council District: Overland / Council District 7  
RNOs: Inter-Neighborhood Cooperation (INC), Overland Park  
Neighborhood Association (OPNA)  
Area of Property: 82,430 square feet or 1.89 acres  
Current Zoning: I-A, UO-2  
Proposed Zoning: C-MX-8  
Property Owner(s): 235 West Evans LLC  
Owner Representative: Andrew Davis

### Summary of Rezoning Request

- The property is in the Overland statistical neighborhood at the northwest corner of West Evans Avenue and South Bannock Street.
- The property, owned by 235 West Evans LLC, is currently occupied by a one-story industrial building.
- The applicant is requesting this rezoning to enable mixed-use redevelopment.
- The proposed zone district, C-MX-8, can be summarized as follows (see map below illustrating proposed zone district):
  - The C-MX-8 zone district stands for Urban **C**enter, **M**ixed Use, with a maximum height of **8** stories. The C-MX zone districts are mixed-use zone districts that allow a wide range of residential and commercial uses with minimum build-to and increased transparency requirements intended to promote active pedestrian areas on public streets. The C-MX-8 zone district allows up to 8 stories and 110 feet in building height.
  - Further details of the zone district can be found in Division 7.1 of the Denver Zoning Code (DZC).
  - The applicant's request includes removing the Billboard Use Overlay, UO-2, on the property. There are no billboards currently on the subject property and no future billboards are contemplated in connection with this rezoning. Further details of the Billboard Use Overlay can be found in Section 9.4.4 of the Denver Zoning Code (DZC).

### Existing Context



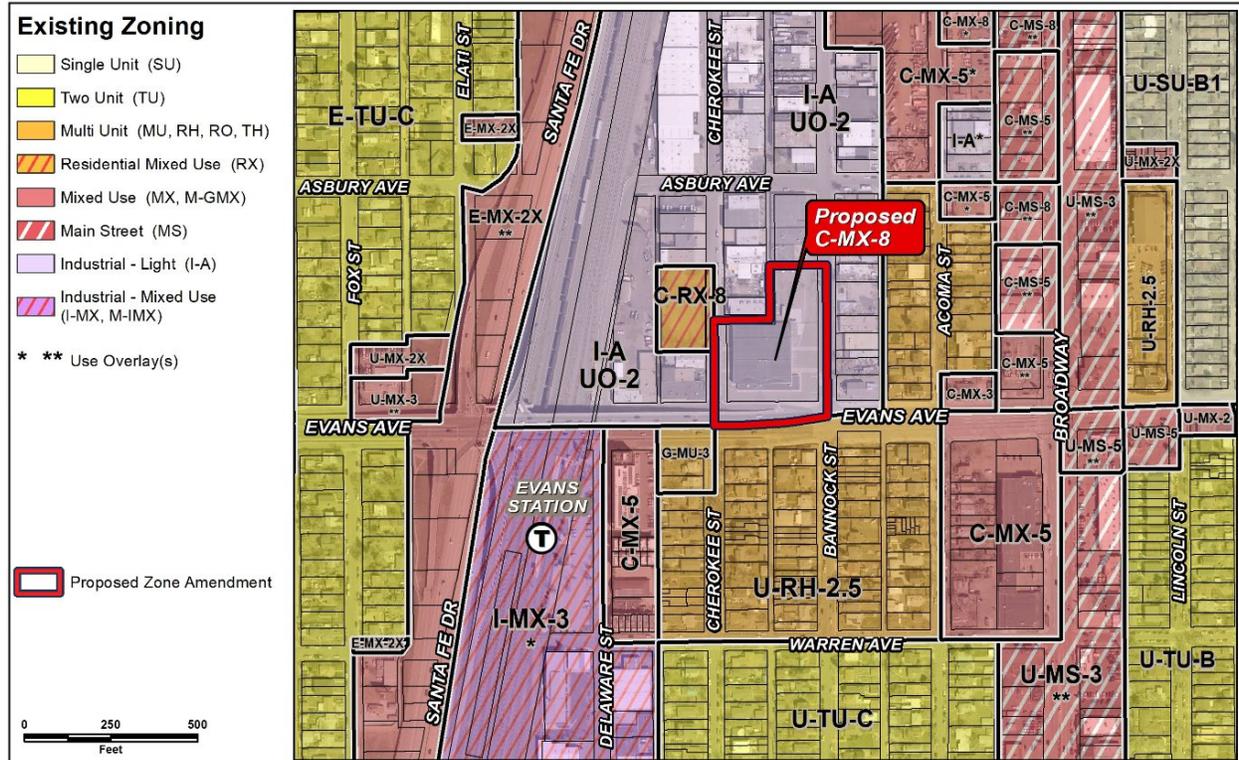


The subject property is located within the Overland neighborhood, at the northwest corner of West Evans Avenue and South Bannock Street. Significant public and private reinvestment in the station area and along South Broadway (two blocks east of the subject property) in recent years suggest this area is continuing to transition from mostly light industrial to more mixed-use in nature. The subject site has approximately 395 feet of frontage along South Bannock Street and has a lot depth range of approximately 125 to 263 feet. Union Pacific, Burlington Northern Santa Fe and RTD rail lines are located approximately 400 feet west of the subject site. The subject property has access to the west side of the railroad tracks via the West Evans Avenue viaduct and is served by RTD's frequent bus routes 0, 0L and 21 along South Broadway and West Evans Avenue, respectively. The Evans Light Rail Transit (LRT) station platform is located one block west and one-half block south of the subject site.

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

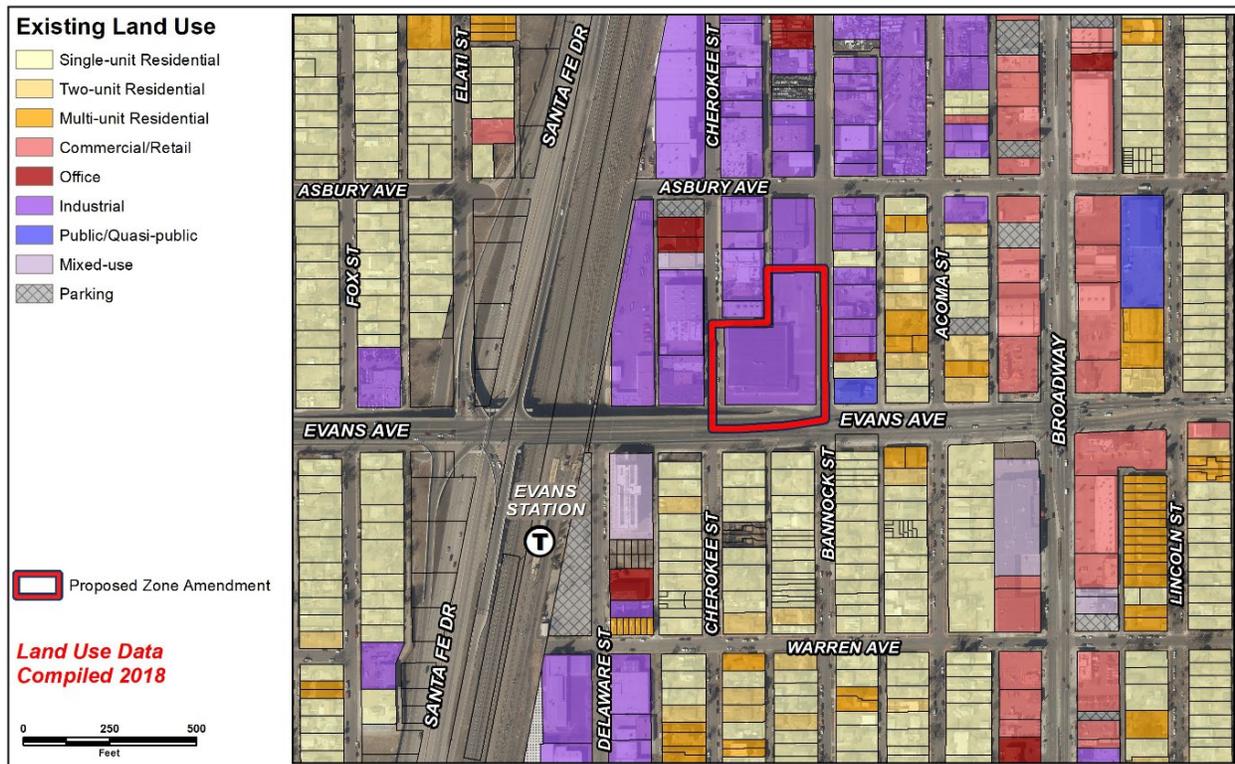
	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
Site	I-A, UO-2	Industrial	1-story industrial building with surface parking along the south, west and east frontages	The area is served by the Denver cardinal street grid and block pattern is regular except for the railroad tracks to the west running southwest/northeast. Major street connections are provided to South Broadway, West Evans Avenue and South Santa Fe Drive.
North	I-A, UO-2	Industrial	1-story industrial buildings with surface parking along South Bannock Street edge without sidewalks	
South	U-RH-2.5	Single-unit Residential	Low-scale, single-unit residences with detached sidewalks and minimal curb cuts	
East	I-A, UO-2	Industrial, Single-unit Residential, Office	1-story brick structures used for industrial offices and two 1-story single-unit residences, all without sidewalks	
West	I-A, UO-2 & C-RX-8	Industrial	1-story industrial building without sidewalks and an 8-story multi-unit residential building under construction	

### 1. Existing Zoning



The existing zoning on the subject property is I-A, UO-2 which is a light industrial district that allows office, business and light industrial uses with the billboard use overlay. Residential uses are only permitted in the light industrial zone where a residential structure existed prior to July 1, 2004. The I-A zone district allows the General and Industrial primary building forms and regulates building mass through a maximum floor area ratio (FAR) of 2:1. This zone district does not specify a maximum building height except for sites within 175 feet of a protected district, in which case the maximum building height is 75 feet. The subject property is within 175 feet of a protected zone district (U-RH-2.5) across West Evans Avenue and along South Acoma Street. Building forms in the I-A district do not include a build-to requirement, transparency requirement, or street-level activation standards and surface parking is permitted between the building, primary and side streets.

## 2. Existing Land Use Map



The existing land use on the subject property and many surrounding properties is industrial with some mixed-use interspersed. Single-unit residential uses, mostly constructed in the 1890s, are also in existence along South Acoma and Bannock streets from West Asbury Avenue to West Evans Avenue. Commercial/retail, mixed-use and office uses are largely focused along South Broadway.

### 3. Existing Building Form and Scale



Site - Aerial view, looking west (Source: Google Maps)



Site - from West Evans Avenue (Source: Google Maps)



Site - from South Bannock Street (Source: Google Maps)

Rezoning Application #2020I-00092

235 W. Evans Ave.

March 24, 2021

Page 7



**North** – from South Bannock Street (Source: Google Maps)



**East** – from South Bannock Street (Source: Google Maps)



**South** – from South Bannock Street (Source: Google Maps)



**West** – from South Cherokee Street (Source: Google Maps)

## Proposed Zoning

### C-MX-8 Zone District

The requested C-MX-8 zone district has a maximum height of 8 stories or 110 feet with allowable encroachments. A variety of mixed residential and commercial uses are allowed. For additional details regarding building form standards in the C-MX-8 zone district, see DZC Section 7.3.3.4.

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

Design Standards	I-A, UO-2 (Existing)	C-MX-8 (Proposed)
Primary Building Forms Allowed	General, Industrial	Town House; General; Shopfront
Height in Stories / Feet (max)	N/A, except max height of 75' within 175' of a protected district	8 stories/110'
Primary Street Build-To Percentages (min)	N/A	70% to 75%*
Primary Street Build-To Ranges	N/A	0' to 15'*
Minimum Zone Lot Size/Width	N/A	N/A
Primary Street Setbacks (min)	20'	0' to 10'*
Floor Area Ratio (Max)	2:1 FAR	N/A

\*Standard varies between building forms

## Proposed Affordable Housing Agreement

Concurrent with the rezoning, the applicant is also facilitating a voluntary affordable housing agreement to be signed and recorded by the property owner. The agreement would apply to the entirety of the site. General terms under discussion as of the writing of this report include a commitment to construct at least 10% of total units affordable to residents earning 80% or less of Area Median Income (AMI)

resulting in 28 units under the current proposal. 10% of these income-restricted units (IRUs) would be affordable to residents earning 60% AMI. 19 of the 28 IRUs would be 2-bedroom units. The income-restricted units would remain at this level of affordability for a minimum period of 99 years.

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

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

**Assessor:** Approved – No response

**Asset Management:** Approved – No comments

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

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

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

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

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

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

**Development Services – Project Coordination:** Approve rezoning only – See comments below

- 1) The site will be subject to a Site Development Plan review and approval.
- 2) Available building forms in the C-MX-8 are Townhome, General, and Shopfront. The General form has limitations on uses for the second floor and above. The Shopfront form requires a minimum 24' building height.
- 3) The site is located within the Evans Station Area Plan. The plan recommends a Mixed-use residential land use for the site and active edges on all street frontages.
- 4) The area plan also recommends only a 5-story development for this location (per Figure 7) and includes recommendations for transitions to existing adjacent residential and remaining compatible with the neighborhood scale. Buildings up to 8 stories are recommended in strategic locations, such as adjacent to railroad tracks or for intersections that exceed the TOD principle expectations. Other guidance document elements and the proximity to the Evans Station recommend the 8-story height in this location.
- 5) The Evans Station Area Plan also recommends "right-size" parking to promote the intended Transit Oriented Design based on the proximity to Broadway and the Evans Station.
- 6) The site is located within the Washington Park-Mountain View plane. Buildings will need to comply with the view plane height limitations in this location.

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

## Public Review Process

	Date
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:	<b>8/17/20</b>
Applicant submitted revised application requesting a different zone district:	<b>1/26/21</b>
Property legally posted for a period of 15 days and CPD written notice of the Planning Board public hearing sent to all affected members of City Council, registered neighborhood organizations, and property owners:	<b>3/16/21</b>
Planning Board Public Hearing (tentative):	<b>3/31/21</b>
CPD written notice of the Land Use, Transportation and Infrastructure Committee meeting sent to all affected members of City Council and registered neighborhood organizations, at least ten working days before the meeting (tentative):	<b>3/26/21</b>
Land Use, Transportation and Infrastructure Committee of the City Council meeting (tentative):	<b>4/6/21</b>
Property legally posted for a period of 21 days and CPD notice of the City Council public hearing sent to all affected members of City Council and registered neighborhood organizations (tentative):	<b>4/26/21</b>
City Council Public Hearing (tentative):	<b>5/24/21</b>

### Public Outreach and Input

- **Registered Neighborhood Organizations (RNOs)**  
 As of the date of this report, staff has received one written comment from an RNO pertaining to this application.
  - The Overland Park Neighborhood Association (OPNA) supports the rezoning based on the Good Neighbor Agreement they have negotiated with the applicant.
- **Other Public Comment**  
 As of the date of this report, staff has received three written comments pertaining to this application.
  - All three letters, from adjacent property owners, are in support of this application.

## Criteria for Review / Staff Evaluation

The criteria for review of this rezoning application are found in DZC, Sections 12.4.10.7 and 12.4.10.8, as follows:

### **DZC Section 12.4.10.7**

1. Consistency with Adopted Plans
2. Uniformity of District Regulations and Restrictions
3. Public Health, Safety and General Welfare

### **DZC Section 12.4.10.8**

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

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

The following adopted plans currently apply to this property:

- *Denver Comprehensive Plan 2040*
- *Blueprint Denver* (2019)
- *Evans Station Area Plan* (2009)
- *Shattuck District Plan* (2003)
- *Overland Neighborhood Plan* (1993)

### ***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 mixed-use development, including an increase in allowed housing density, while also enabling additional housing units close to services and amenities. It is therefore consistent with the following strategies in the Equitable, Affordable and Inclusive vision element:

- Equitable, Accessible and Inclusive Goal 1 – *Ensure all Denver residents have safe, convenient and affordable access to basic services and a variety of amenities* (p. 28).
- Equitable, Affordable and Inclusive Goal 1, Strategy A – *Increase development of housing units close to transit and mixed-use developments* (p. 28).
- Equitable, Affordable and Inclusive Goal 2, Strategy A - *Create a greater mix of housing options in every neighborhood for all individuals and families* (p. 28).
- Equitable, Affordable and Inclusive Goal 3, Strategy B – *Use land use regulations to enable and encourage the private development of affordable, missing middle and mixed-income housing, especially where close to transit* (p. 28).

The proposed rezoning would enable mixed-use infill development at a location where services and infrastructure are already in place. The proposed C-MX-8 zoning designation would allow for a broader

variety of uses including housing, retail, and services and is therefore consistent with the following strategies in the Strong and Authentic Neighborhoods vision element:

- Strong and Authentic Neighborhoods Goal 1, Strategy A – *Build a network of well connected, vibrant mixed-use centers and corridors* (p. 34).
- Strong and Authentic Neighborhoods Goal 1, Strategy D – *Encourage quality infill development that is consistent with the surrounding neighborhoods and offers opportunities for increased amenities* (p. 34).
- Strong and Authentic Neighborhoods Goal 2, Strategy D – *Use urban design to contribute to economic viability, public health, safety, environmental well-being, neighborhood culture and quality of life* (p. 34).

As Denver continues to grow and becomes more dense, it is imperative that we shift how we plan around our mobility system. Therefore, the proposed rezoning allowing for a mix of uses near high-capacity transit is consistent with strategies in the Connected, Safe and Accessible Places vision element:

- Connected, Safe and Accessible Places Goal 8 – *Strengthen multimodal connections in mixed-use centers and focus growth near transit* (p. 42).
- Connected, Safe and Accessible Places Goal 8, Strategy B – *Promote transit-oriented development and encourage higher density development, including affordable housing, near transit to support ridership* (p. 42).

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

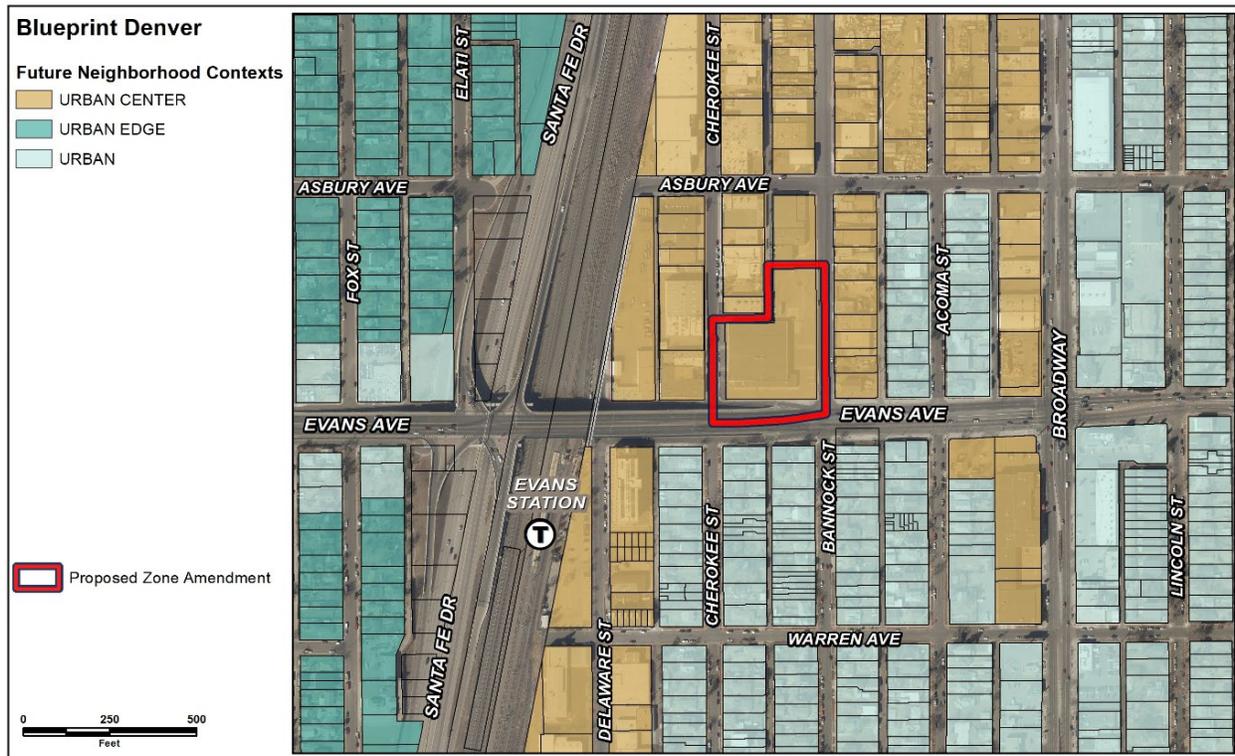
- Environmentally Resilient Goal 8, Strategy A - *Promote infill development where infrastructure and services are already in place* (p. 54).
- Environmentally Resilient Goal 8, Strategy B - *Encourage mixed-use communities where residents can live, work and play in their own neighborhoods* (p. 54).
- Environmentally Resilient Goal 8, Strategy C – *Focus growth by transit stations and along high and medium-capacity transit corridors* (p. 54).

The requested map amendment will enable mixed-use development at an infill location where infrastructure is already in place. The requested zone district broadens the variety of uses allowing residents to live, work and play in the area. Therefore, the rezoning is consistent with *Denver Comprehensive Plan 2040* recommendations.

### ***Blueprint Denver (2019)***

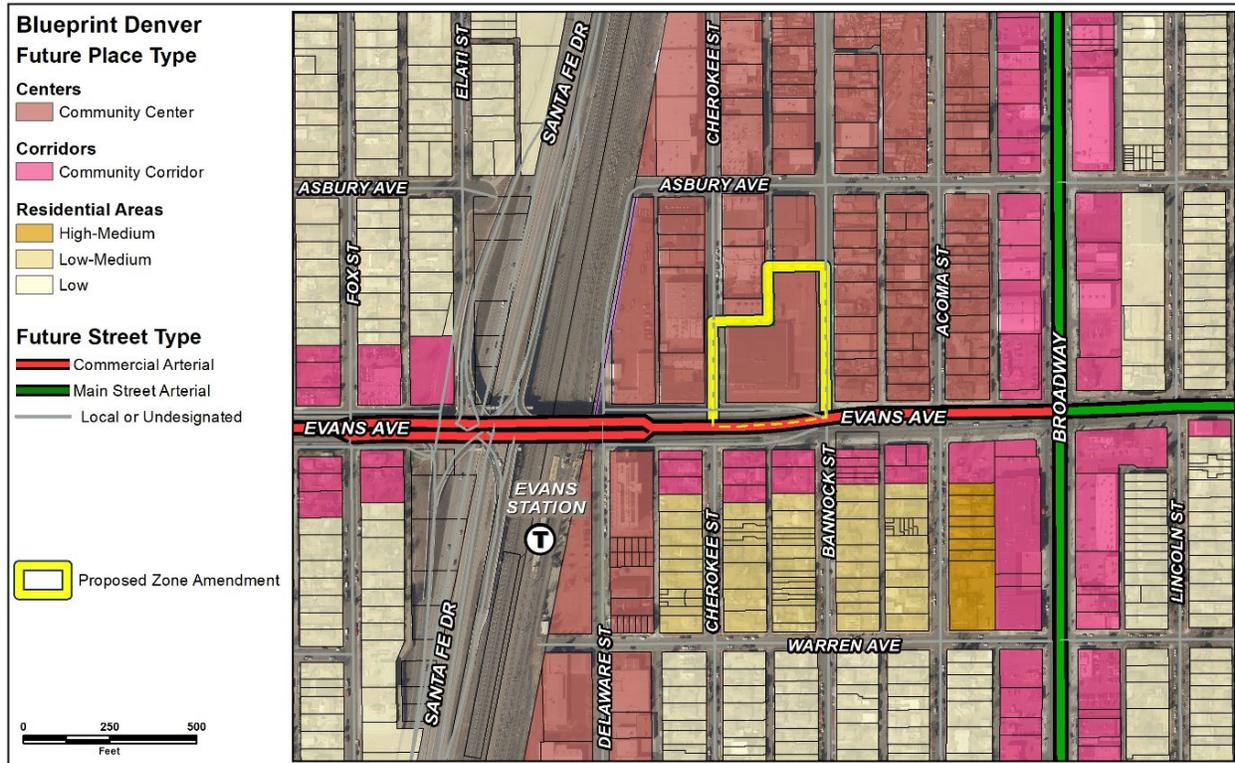
*Blueprint Denver* was adopted in 2019 as a supplement to *Comprehensive Plan 2040* and establishes an integrated framework for the city's land use and transportation decisions. *Blueprint Denver* identifies the subject property as part of a Community Center future place within the Urban Center Context 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 land use and built form and mobility options at a higher scale, between neighborhoods. The subject property is within the District Context. Blueprint states, "This context contains high intensity residential and significant employment areas. Development typically contains a substantial mix of uses, with good street activation and connectivity" (p. 252). The proposed C-MX-8 zone district is part of the Urban Center context and is "intended to promote safe, active, and pedestrian-scaled diverse areas through the use of building forms that clearly activate the public street edge" and "the Mixed-Use districts are focused on creating mixed, diverse neighborhoods" (DZC 7.2.2.1). Since the proposed district allows a mix of uses and allowable building forms that contribute to street activation, the proposed rezoning to an Urban Center context is appropriate and consistent with the plan.

**Blueprint Denver Future Places**



*Blueprint Denver* describes a Community Center in the Urban Center context as “providing a mix of office, commercial and residential uses. A wide customer draw both of local residents and from other parts of the city” (p. 256). Buildings are typically larger in scale and orient to the street with a strong degree of urbanism and continuous street frontages. Additionally, “heights can be generally up to 12 stories in the taller areas and should transition gradually within the center’s footprint to the surrounding residential areas” (p. 256).

The proposed C-MX-8 zone district allows for a variety of commercial and residential uses in a pedestrian-oriented pattern with an active street level. While most surrounding buildings are currently lower than the eight-story maximum height allowed under C-MX-8, some 8-story zoning is in place to the west and the station area is envisioned to become much more dense and pedestrian oriented in the future. Additionally, buildings in the I-A zone district are limited by a maximum floor area ratio of 2.0, rather than a maximum height, except when located in proximity to a protected district, and could achieve heights similar to the requested zone district. Therefore C-MX-8 is appropriate and consistent with the future place plan direction.

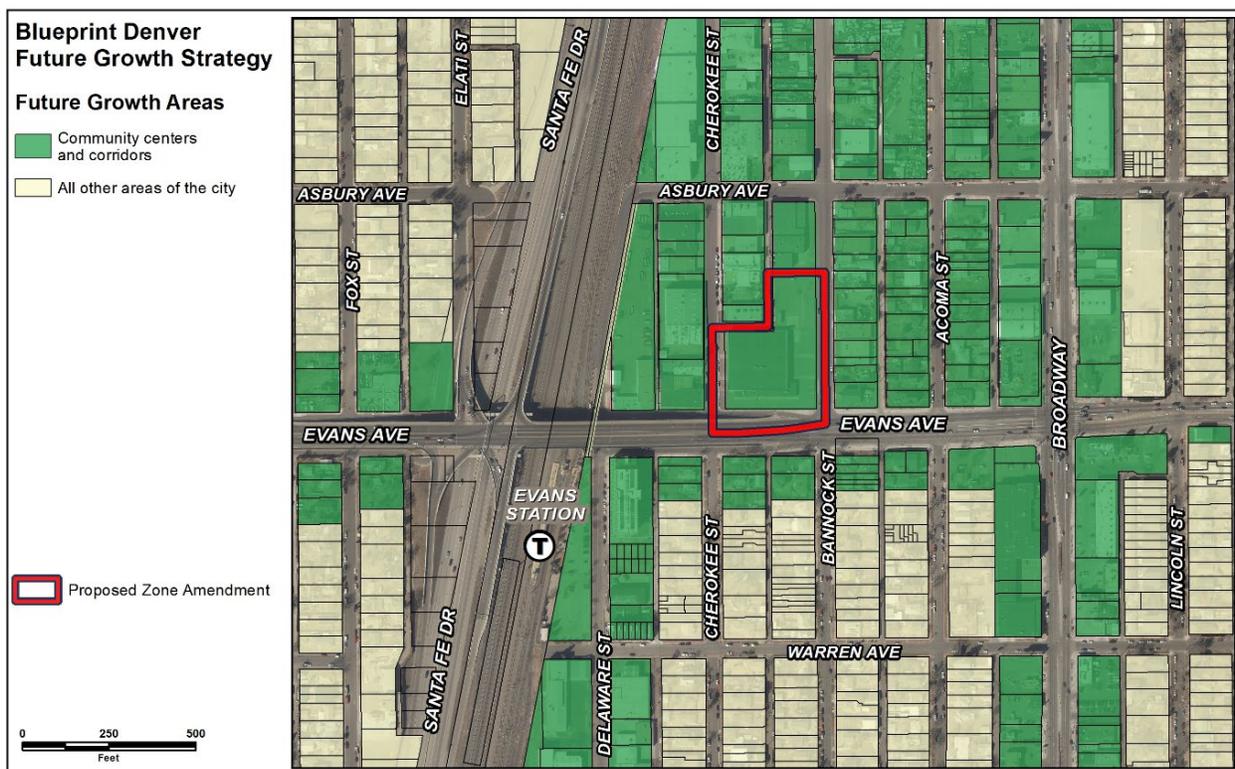
**Street Types**

*Blueprint Denver* classifies West Evans Avenue as a commercial arterial, South Broadway as a main street arterial and South Bannock Street as local or undesignated street. Arterial streets “are designed

for the highest amount of through movement and the lowest degree of property access” (p. 154). This is mostly the case for subject property, although vehicular access can be taken from the West Evans Avenue service road. Local streets “are designed for the highest degree of property access” (p. 154) and “can vary in their land uses and are found in all neighborhood contexts. They are most often characterized by residential uses” (p. 160).

The proposed C-MX-8 zone district is intended for areas served primarily by arterial streets (DZC Section 7.2.2.2.C). As both South Broadway and West Evans Avenue are arterial streets, the requested zone district is appropriate considering the surrounding street type designations.

### **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 located within the “Community centers and corridors” growth area, these areas are anticipated to see around 25% of new housing growth and 20% of new employment growth by 2040 (p. 51). The proposed map amendment to C-MX-8 is consistent with the “Community centers and corridors” growth area in that it will allow a broad range of job opportunities and housing types and direct more intense and appropriate growth to this area than the existing zoning allows.

### **Additional Applicable Strategies**

The proposed rezoning is also consistent with the following strategies from *Blueprint Denver*:

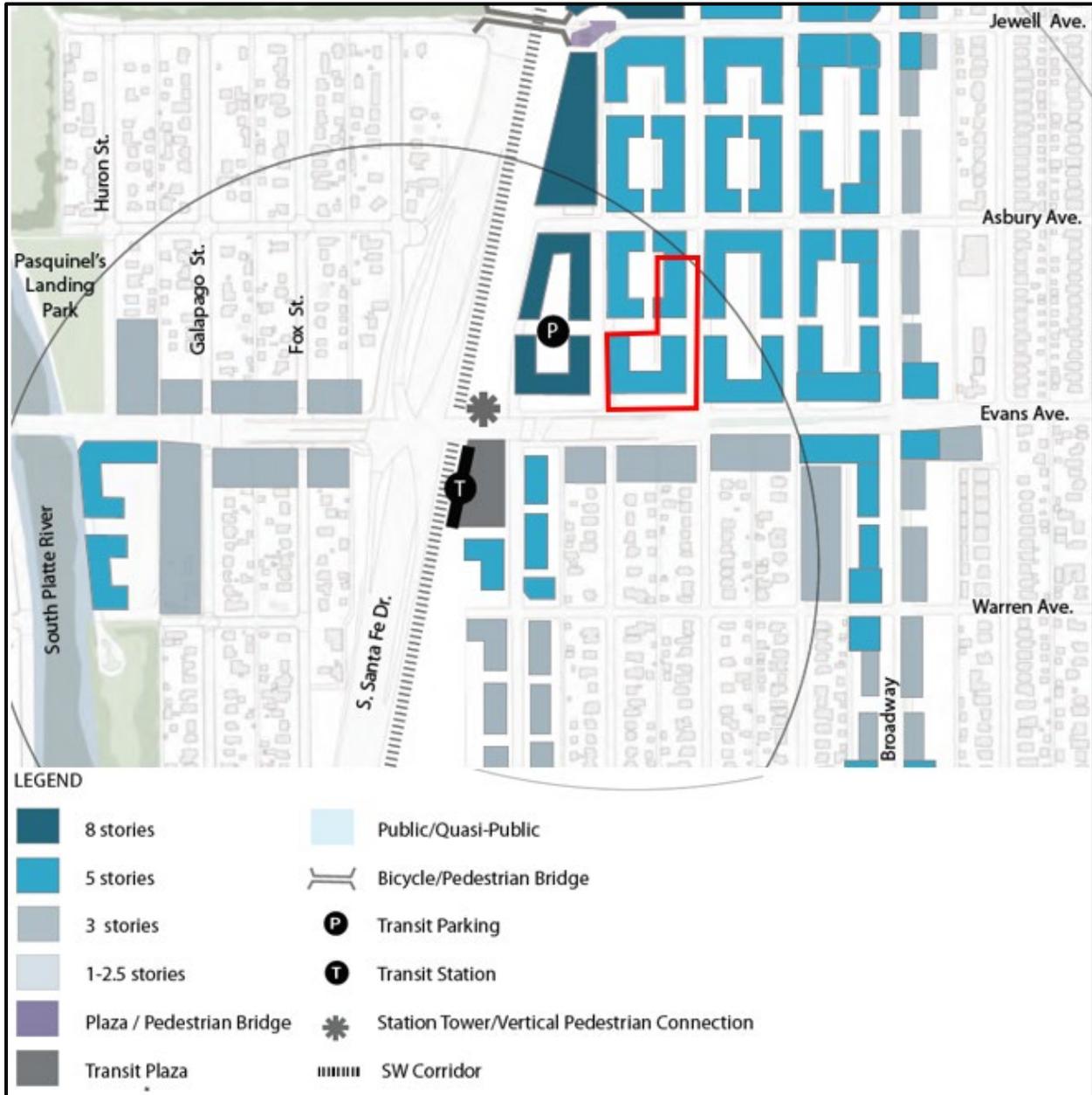
- Land Use and Built Form – General Policy 1 – *Promote and anticipate planned growth in major centers and corridors and key residential areas connected by rail service and transit priority streets* (p. 72).
- Land Use and Built Form – General Policy 2 – *Incentivize or require efficient development of land, especially in transit-rich areas* (p. 72).
- Land Use and Built Form – Housing Policy 6, Strategy A - *Incentivize affordable housing through zoning, especially in regional centers, community centers and community corridors adjacent to transit. This could include a process—informed by community input—to create citywide height bonuses in the zoning code, where additional height is allowed in exchange for income restricted units. Incentives for affordable housing are particularly important for areas that score high in Vulnerability to Displacement and score low in Housing Diversity* (p. 85).
- Land Use and Built Form – Housing Policy 8 – *Capture 80 percent of new housing growth in regional centers, community centers and corridors, high-intensity residential areas, greenfield residential areas, innovation flex districts and university campus districts* (p. 86).

### Evans Station Area Plan (2009)

The Evans Station Area Plan was adopted in 2009 and sets forth a vision to “enhance the Evans Station area’s sense of place by creating a vibrant and sustainable urban neighborhood that encourages people to live and work; invites businesses to thrive; allows people to comfortably walk, bike, or use transit to access local services and attractions; and maintains the residential character of the surrounding community” (p. 10). The plan’s recommendations promote transit-oriented development around the Evans LRT station. In the area where the subject property is located, the plan envisions the “transformation of industrial and commercial property to an active, pedestrian-oriented mixed-use community” (p. 14).



The land use recommendation for the subject site is Mixed-Use Residential. In these areas, the plan states that “the primary use is intended to be residential, but office and retail may also be supported” (p. 14). The plan further recommends that Mixed-Use Residential areas should have a mix of housing types, active ground floors, and an urban form.



The plan recommends a height of 5 stories for the area in which the subject property is located. However, the plan states that the Mixed-Use Residential area north of Evans is appropriate to develop taller buildings and higher residential intensities for prominent buildings or intersections that exceed the expectations of the TOD principles from Denver’s Transit Oriented Development Strategic Plan (p. 24).

The TOD Strategic Plan establishes five guiding principles for implementation including place making, Those principals are summarized in the Evans Station Area Plan, and describe development that provides a rich mix of choices, location efficiency, value capture and maximizes the station's role as a portal to the region (p. 8).

The proposed C-MX-8 zone district is consistent with the vision and recommendations of the Evans Station Area Plan as it will support the transformation of the industrial area into an urban, pedestrian-oriented neighborhood with a mix of uses. Further, the inclusion of voluntary affordable housing and good neighbor agreements exceed the TOD principles and support a greater building height at this prominent intersection in close proximity to the LRT station.

### ***Shattuck District Plan (2003)***

The vision identified in the Shattuck District Plan includes a “neighborhood where people live and work, where housing is affordable, where there are sufficient employment opportunities, where wages are sufficient and public revenues are being produced, where there are households in numbers sufficient to enhance the climate for businesses on Broadway, where there is a mix of businesses, goods and services available to the neighborhood, and where the quality of life is generally good” (p 22). Additional relevant guiding principles from the plan include “Put underutilized commercial / industrial parcels into more productive uses” and “Create a good mix of land use types incorporating households, employers, and consumer goods and services” (p 26).

The proposed C-MX-8 district will facilitate development of a mix of residential and commercial uses in furtherance of the goals of the Shattuck District Plan.

### ***Overland Neighborhood Plan (1993)***

This neighborhood plan was adopted by City Council in 1993 and applies to the subject property. The plan identifies that commercial and industrial businesses have been grouped into corridors. The plan further outlines concerns around providing adequate transition from industrial uses to residential communities. This site is adjacent to residential uses, but it is in an area that transitions from industrial to commercial. The most specifically applicable recommendation in this plan is Action Recommendation LZ-2, which recommends that commercial and industrial businesses invest in their sites, including beautification and clean-up (p. 13). Reinvestment in the site will be enabled by this rezoning.

Based on the foregoing, the proposed rezoning is consistent with the Overland Neighborhood Plan as it will provide a better transition to residential uses across West Evans Avenue and any new development, with pedestrian-oriented design standards, will promote beautification and clean-up in the immediate area.

## **2. Uniformity of District Regulations and Restrictions**

The proposed rezoning to C-MX-8 will result in the uniform application of zone district building form, use and design regulations.

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

The proposed official map amendment furthers the public health, safety, and general welfare through implementation of the city's adopted land use plan. The proposed rezoning would also facilitate increased housing density near services and amenities along South Broadway and foster the creation of a mixed-use, urban area within walking distance to a rail station. An increase in density and broadened mix of uses can also provide better health outcomes through increased physical activity and lessen the need for driving as services and amenities can occur within walkable and bikeable distances.

### **4. Justifying Circumstances**

The application identifies several changed or changing conditions as the justifying circumstance under DZC Section 12.4.10.8.A.4, *"Since the date of the approval of the existing Zone District, there has been a change to such a degree that the proposed rezoning is in the public interest. Such change may include: (a.) Changed or changing conditions in a particular area, or in the city generally; or, (b.) a City adopted plan; or, (c.) that the City adopted the Denver Zoning Code and the property retained Former Chapter 59 zoning"*.

Recent physical changes within proximity to the subject site include new streetscaping improvements along South Broadway that prioritize pedestrians and increase safety along the corridor. Other changes include the construction of new multi-unit residential projects at South Bannock Street and West Jewell Avenue and at South Cherokee Street and West Evans Avenue, adjacent to the railroad tracks. These changes demonstrate the transition from an industrial area to a mixed-use neighborhood where residential uses are compatible, appropriate and complementary to existing uses. Lastly, increasing private investments along South Broadway in recent years justify this rezoning request to recognize the changing conditions.

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

As described in the Denver Zoning Code, the General Character of the Urban Center (C-) district will include "multi-unit residential and mixed-use commercial strips and commercial centers." It is also described as follows: "Multi-unit residential uses are typically in multi-story mixed use building forms. Commercial buildings are typically Shopfront and General forms. Multi-unit residential uses are primarily located along residential collector, mixed-use arterial, and local streets. Commercial uses are primarily located along main and mixed-use arterial streets." This rezoning request is in conformance with recently rezoned properties in the station area, i.e. mostly a mix of C-MX-5 and C-RX-8.

The C-MX zone districts are "intended to promote safe, active and pedestrian-scaled, diverse areas through the use of building forms that clearly define and activate the street edge" (DZC Section 7.2.2.1.A). As these districts are also intended to enhance the ease of walking and transit, C-MX-8 is consistent and appropriate given the purpose of the district and the location in which it has been requested.

Rezoning Application #2020I-00092  
235 W. Evans Ave.  
March 24, 2021  
Page 20

According to the zone district intent stated in the Denver Zoning Code, the C-MX-8 district “applies to areas or intersections served primarily by arterial streets where a building scale of 2 to 8 stories is desired” (DZC Section 7.2.2.2.C). The site is served by an arterial and local street, with West Evans Avenue classified as a commercial arterial. Thus, the street classifications and desired building heights in this area are consistent with the zone district intent statement.

### **Attachments**

1. Rezoning application
2. RNO & Public comments