



**TO:** Denver Planning Board  
**FROM:** Tony Lechuga, Senior City Planner  
**DATE:** October 8, 2025  
**RE:** Official Zoning Map Amendment Application #2025I-00029

## Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends approval for Application #2025I-00029.

## Request for Rezoning

Address: 709 South Delaware Street  
Neighborhood/Council District and CM: Baker / Council District 7, CM Alvidrez  
RNOs: Baker Historic Neighborhood Association; Inter-Neighborhood Cooperation, South Broadway Business Association.  
Area of Property: 260,387 square feet or 5.98 acres  
Current Zoning: C-MX-16  
Proposed Zoning: PUD-G 39  
Property Owner(s): Denver Real Estate Ventures, LLC  
Owner Representative: Guiselle Torres

## Summary of Rezoning Request

- The general location of this project is in the I-25 and Broadway Station Area, the core of which is south of Interstate 25, east of Santa Fe Drive, west of Broadway, and north of East Mississippi Avenue. The Consolidated Main Line (CML), train tracks utilized by Regional Transportation District (RTD) and freight trains operated by Burlington Northern Santa Fe Railway (BNSF) and Union Pacific, runs north-south through station area. This area was the location of the Gates Corporation until they closed in 1991. The RTD Central Corridor Light Rail Line opened the I-25 and Broadway Station in 1994. Except for some new development along the western and southern edges of the station area along Broadway and Mississippi, the area has been dormant for the last three decades.
- The subject site is in the northeast corner of the station area bound by I-25 to the north and Santa Fe Drive to the east. A future park, Vanderbilt East Park, will be constructed immediately to the south of the site, stretching all the way to West Kentucky Avenue. The eastern boundary of the site will be a future pedestrian way with anticipated new development between the PUD and the train tracks farther to the east.
- The existing zoning, C-MX-16 (Urban Center – Mixed Use – 16 Stories) allows for a diversity of uses with a strong sense of urbanism and heights up to 16 stories or 200 feet.
- The proposed zoning is Planned Unit Development – General (PUD-G) 39. This is customized zoning based on the Campus Entertainment (CMP-ENT) zone district and the C-MX-16 zone district. Further details of the requested zone district can be found in the proposed zone district section of the staff report (below).

Rezoning Application #2025I-00029

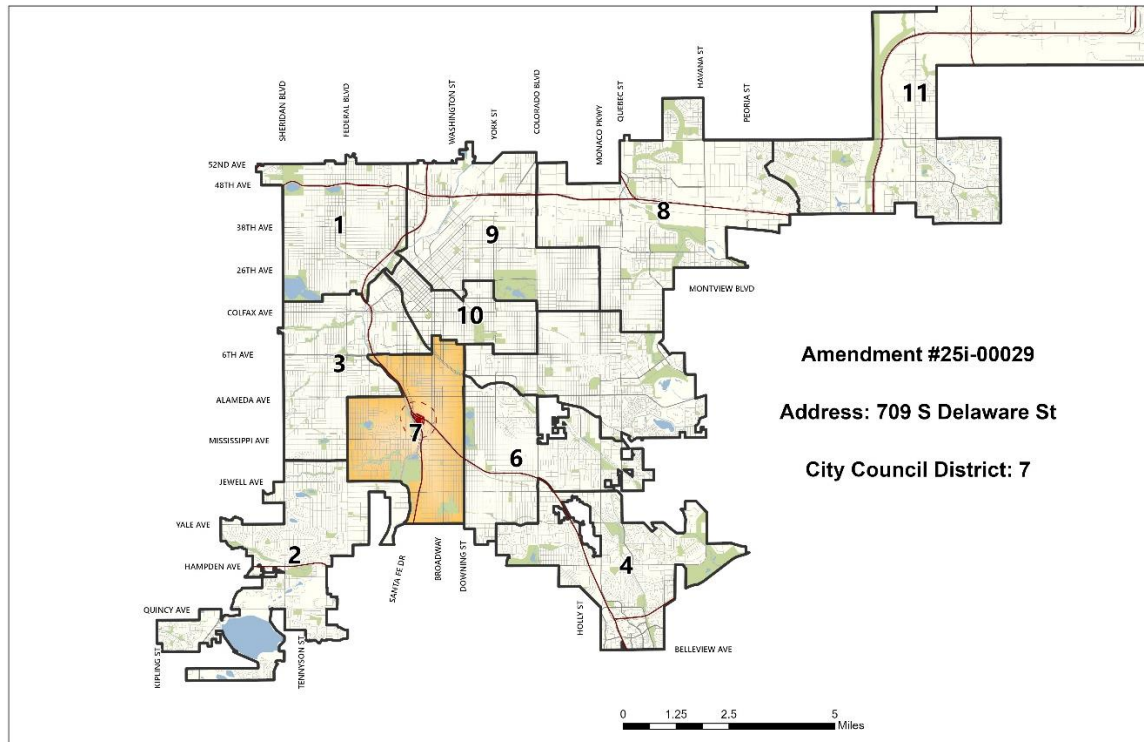
709 South Delaware Street

10.08.25

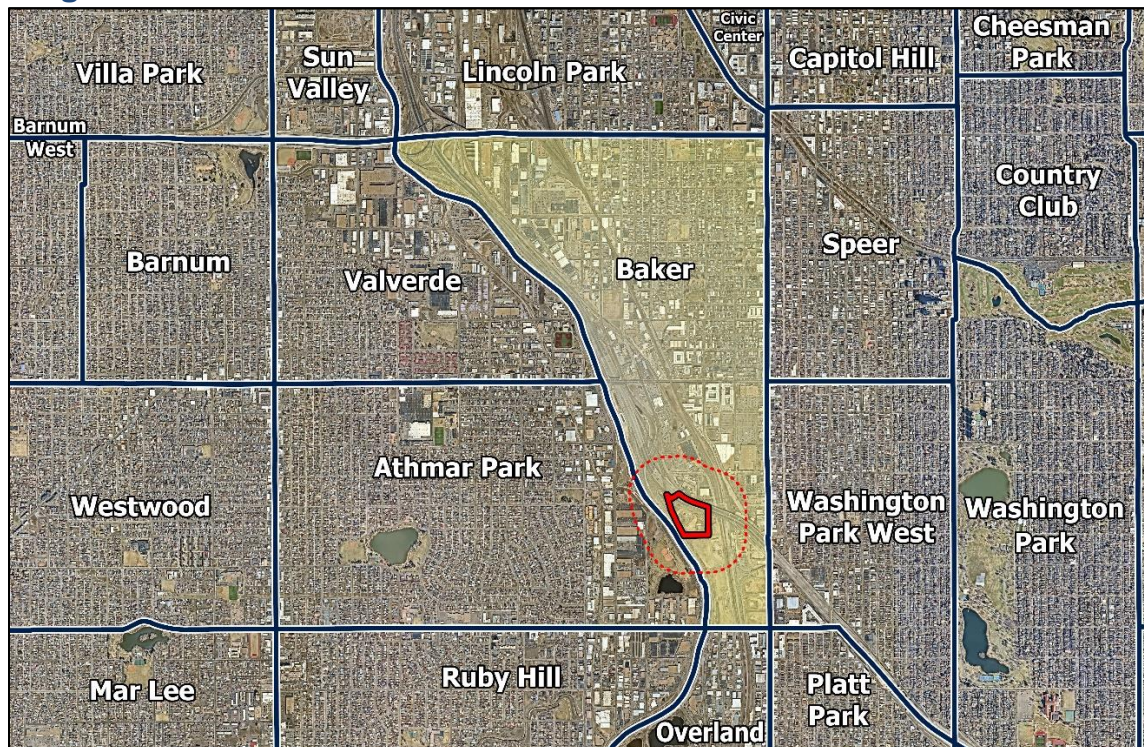
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- The intent of the rezoning is to allow for the construction of a soccer stadium for use by Denver Summit FC, an expansion team of the National Women's Soccer League (NWSL).

## City Location



## Neighborhood Location





## 1. Existing Context



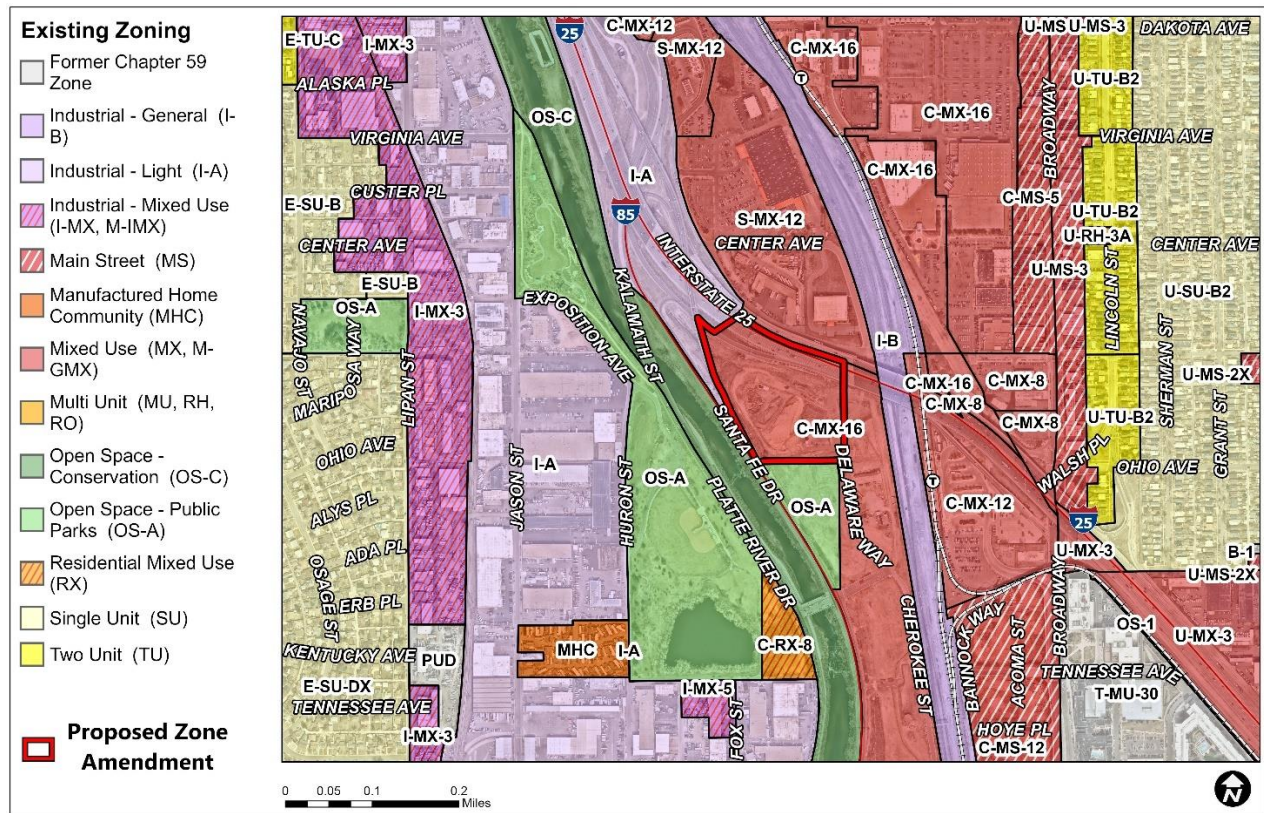
The site is located in the southern end of the Baker neighborhood in an area of the city characterized by historic industrial uses. The site is immediately adjacent to two large thoroughfares, Interstate-25 to the north and Santa Fe Drive to the west. The CML, utilized by RTD and freight operators BNSF and Union Pacific, runs north-south through the neighborhood just to the east of the site. The South Platte River runs north-south immediately to the west of the site and serves as a border between the Baker and Athmar Park neighborhoods. The presence of large vehicular routes and the CML harkens back to the area's industrial roots which have resulted in large block sizes. The area was home to the Gates Rubber Company, one of the nation's largest manufacturers of rubber products for the automotive and industrial businesses. At its peak the site employed over 5,000 individuals and operated as a mixed-use industrial campus with administrative, recreational, and retail uses for employees. The I-25 and Broadway RTD station is accessed by an existing pedestrian bridge three blocks to the south of the site and is served by the D Line to Littleton, the E Line to Lone Tree and the H Line to Aurora all of which continue along the I-25 corridor into downtown Denver. The station is also served by the O and OL buses running north-south along Broadway between Union Station and Englewood, the 11 bus running east-west between Lakewood and Aurora, and the 14 bus running west to Lakewood. Vanderbilt Park is located to the west of the site, across the South Platte River, and is accessible in the by a newly constructed bridge at West Kentucky Avenue. There is an existing pedestrian bridge crossing the CML at West Tennessee Avenue and a planned pedestrian bridge at the I-25 & Broadway Station. Additional park access will be available immediately south of the site where the City and County of Denver plans to construct Vanderbilt East Park.

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  | C-MX-16         | Vacant                                          | N/A                                                                                                                             | Vacant, former industrial land that lacks an existing grid or streets. A future grid of streets within the district has been planned but will remain irregular with limited access points due to the presence of major highways, I-25 to the north and Santa Fe Drive to the west, as well as the CML to the east. |
| North | S-MX-12, UO-2   | Right of Way; Industrial; and Commercial Retail | Interstate 25; 1-story large scale industrial with surface parking for semi-trucks and large setbacks; 3-story storage facility |                                                                                                                                                                                                                                                                                                                    |
| South | OS-A            | Vacant                                          | N/A                                                                                                                             |                                                                                                                                                                                                                                                                                                                    |
| East  | C-MX-16         | Vacant                                          | N/A                                                                                                                             |                                                                                                                                                                                                                                                                                                                    |
| West  | I-A, UO-2       | Right of Way                                    | Santa Fe Drive                                                                                                                  |                                                                                                                                                                                                                                                                                                                    |



## 2. Existing Zoning



The existing C-MX-16 zone district allows a wide range of residential, commercial, and institutional uses in the Town House, General, and Shopfront building forms. The minimum primary street setback is 0', except for the Town House building form which has a 10' minimum primary street setback. Build-to requirements range from 50% to 75% depending on building form. Maximum building heights in the Town House form are 5 stories or 70 feet. Maximum heights in the General and Shopfront building forms are 16 stories or 200 feet. The subject site is within ¼ mile from the outer boundary of the I-25 and Broadway train station platform and so the Drive-Thru Services and Restaurant building form would not be allowed by zoning. For additional details of the existing zone district, see DZC Sections 7.2.2, 7.3 and 7.4.

## 3. View Planes

The site is within the boundary of the Washington Park View Plane which limits heights on the site to between 150 and 170 feet depending on the distance from the view plane origin point. While the view plane regulations supersede the underlying zoning regulations, the proposed PUD-G 39 limits heights across the site to 150 feet to align with the Washington Park View Plane.

#### **4. Urban Design Standards & Guidelines (UDSG)**

The Broadway Station Development Urban Design Standards and Guidelines apply to development on this site. The purpose of the Broadway Station Development UDSG is to illustrate the vision for implementing the land use, urban design, public realm, and infrastructure improvements for the station area. The document provides a roadmap for developers, urban designers, and architects to guide in the process of designing streets, pedestrian connections, buildings, and outdoor spaces consistent with the transit-oriented mixed-use vision of the adopted plans. The document provides guiding principles, intent statements, prescriptive standards, and guidelines for four sub-areas of the larger Broadway Station. The document sets forth the required design review process for applicants which includes staff-level review through the Site Development Plan Review process. The UDSG apply to the area currently and would continue to apply if the site is rezoned.

#### **5. Status of Development Services Review**

The previous property owners, Broadway Station Partners, have engaged with the City and County of Denver over many years to advance various site plans and additional regulatory documents such as an amended Infrastructure Master Plan (IMP). The current owners have been working concurrently with this proposed rezoning to update the IMP and advance a Site Development Plan for the proposed soccer stadium development. The IMP anticipates construction of a multi-use pedestrianized roadway running north-south from West Kentucky Avenue along the eastern edge of Vanderbilt East Park and the proposed stadium which would create a unique and highly accessible access point to the park and stadium. The IMP anticipates a pedestrian path along the northern edge of Vanderbilt East Park between the park and the stadium entrance. The IMP anticipates a newly constructed South Cherokee Street running north-south from West Kentucky Street along the CML and continuing under I-25 creating a new connection point to the road network to the north of the site. The IMP anticipates a newly constructed road along the northern edge of the property adjacent I-25 to create back-of-house access to the proposed stadium, keeping delivery access off the primary public access points. The IMP also outlines necessary work for sanitary and stormwater management of the site, including controlled drainage into the South Platte River.

#### **6. Large Development Review**

On April 1<sup>st</sup>, 2025, a Pre-Application meeting was held to discuss the proposal for a new soccer stadium, and the Development Review Committee (DRC) determined that the LDR process was not required. Factors in making this determination included the existence of an Infrastructure Master Plan, master engineering plans, and negotiated agreements. The DRC noted that two critical paths forward included the need for an additional mobility study based on the proposed use which had not been previously considered and a subdivision plat to determine the relocation of a previously planned Delaware Street.

## **7. Development Agreement**

The site is subject to an existing development agreement between the City and County of Denver and Broadway Station Partners LLC (BSP), signed in 2016. The agreement applies to the land bounded by Interstate 25 to the north, West Mississippi Avenue on the south, South Broadway on the east, and Vanderbilt Park on the west. The development agreement includes requirements around open space, transportation infrastructure, environmental cleanup, prevailing wages,

- Open Space
  - A minimum 10% open space within the net developable area, with Vanderbilt East Park to county toward 50% of that requirement in accordance with the requirements of the DA
  - BSP to design and construct Vanderbilt East Park, in coordination with Denver Parks and Recreation (DPR)
  - BSP to provide certain outlined improvements around Vanderbilt Park
- Transportation
  - Required pedestrian and bicycle connections
  - Construction of a Northern Pedestrian Bridge
- Environmental
  - Compliance with the State of Colorado Voluntary Cleanup Program
- Prevailing Wages
  - Employees of BSP or BSP's subcontractors may be subject to

## **8. Affordable Housing Agreement**

The Broadway Station area is subject to a previously negotiated Agreement to Restrict Rentals and Eligibility between the City and County of Denver and Broadway Station Partners LLC. The agreement outlines a set number of rent restricted units and the procedural steps for delivering those units.



**Existing Land Use**

- Single-unit Residential
- Two-unit Residential
- Multi-unit Residential
- Commercial/Retail
- Office
- Industrial
- Public/Quasi-public
- Mixed-use
- Park/Open Space
- Trans/Comm/Utilities
- ROW/Road
- Parking
- Other/Unknown
- Vacant

**Proposed Zone Amendment**

0 0.05 0.1 0.2 Miles

Map showing existing land use and the proposed zone amendment (red outline) in the Riverfront area. The map includes a legend for land use types and a scale bar.

*All images from Google Maps Street View.*



Aerial view of the site looking north.





View of the site looking east from Santa Fe Drive



View of the site looking south from Interstate 25

### **Proposed Zoning**

The applicant has requested this rezoning to PUD-G 39 per Denver Zoning Code Section 9.6.1. The purpose of the Planning Unit Development (PUD) district is to provide an alternative to conventional land use regulations, combining use, density, site plan and building form considerations. A PUD district is intended to respond to unique and extraordinary circumstances, where more restrictive or flexible zoning than what is achievable through a standard zone district is desirable and multiple variances, waivers and conditions can be avoided.

Consistent with this purpose, the proposed zoning, if adopted, in conjunction with the applicant UDSG, would allow for a sports and/or entertainment arena or stadium use, as well as other mixed commercial, residential and entertainment uses allowed in the underlying CMP-ENT and C-MX-16 districts. The PUD includes customized zoning allowances that would only be applicable if a stadium or arena is the primary use on the zone lot. Otherwise, development will comply with the regulations of the C-MX-16 zone district with minimal customization. The customizations for a stadium or arena are based on the Campus-Entertainment (CMP-ENT) zone district including:

- Establish a maximum building of 150 feet
- Remove upper-story setbacks that would be incompatible with a stadium on a small lot
- Add transparency and street level active use requirements that align with the vision of the small area plan and the UDSG
- Customized sign allowances that will support a professional sports stadium use such as allowing larger, electronic, multi-media displays, while protecting from adverse impacts on adjacent right-of-way and uses, and allowing for a larger number of total signs. This includes allowances

for animated and flashing signs and for off-site advertising on the east and south frontages, subject to a Comprehensive Sign Plan that would be reviewed by Planning Board.

- Customized rules for site fencing which allows for compliance with security requirements of a stadium while ensuring reasonable visibility for pedestrians to create a more appealing and active edge within the Broadway Station district.

The proposed PUD's customized provisions allow for a broader mix of uses and destinations on this infill site near the light-rail station, while ensuring pedestrian activation, high quality design, and appropriately scaled development.

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

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

**Assessor:** Approved – No Response

**Asset Management:** Approved – No Response

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

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

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

**Department of Transportation and Infrastructure:** Approved – See Comments Below

- DES Transportation approves the subject zoning change. The applicant should note that redevelopment of this site will require additional engineering, ROW dedication to the City, access changes, traffic studies and right of way improvements.

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

**Development Services – Project Coordination:** Approved - See Comments Below

- We have provided comments on the draft PUD and evaluated the conceptual plans against the draft PUD, we will continue to coordinate with the applicant and Planning Services through the development review.

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

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

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



## Public Review Process

|                                                                                                                                                                                                                                                                                              | Date                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| 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: | 7/30/25                 |
| 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:                                                               | 9/30/25                 |
| Planning Board Public Hearing                                                                                                                                                                                                                                                                | 10/15/25                |
| 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:                                                                                          | 10/8/25<br>(tentative)  |
| South Platte River Committee of the City Council:                                                                                                                                                                                                                                            | 10/22/25<br>(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:                                                                                                    | 11/10/25<br>(tentative) |
| City Council Public Hearing:                                                                                                                                                                                                                                                                 | 12/1/25<br>(tentative)  |

- **Public Outreach and Input**

- The applicant's community engagement, which includes multiple meetings with registered neighborhood organizations and community members, is outlined in the application.
- **Registered Neighborhood Organizations (RNOs)**  
As of the date of this staff report, staff has received no letters from RNOs.
- **General Public Comments**  
As of the date of this staff report, staff has received eleven letters of support from the public. This includes multiple letters from local business owners. They note their support based on the increased connectivity, activation, and economic impact of the proposed stadium.

## 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 – Criteria for all rezonings**

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

### **DZC Section 12.4.10.8 – Criteria for PUD rezonings**

4. The PUD District is consistent with the intent and purpose of such districts stated in Article 9, Division 9.6 (Planned Unit Development) of this Code;
5. The PUD District and the PUD District Plan comply with all applicable standards and criteria stated in Division 9.6;
6. 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;
7. The PUD District and the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property; and
8. The PUD District and the PUD District Plan establish permitted building forms that are compatible with the adjacent 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.

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

The following adopted plans apply to this property:

- *Denver Comprehensive Plan 2040* (2019)
- *Blueprint Denver* (2019)
- *I-25 and Broadway Station Area Plan* (2016)

### ***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 map amendment would allow for infill development of a regional destination stadium and/or dense mixed-use district near transit, providing additional cultural amenities and quality of life benefits to the neighborhood, consistent with the following strategies from the Equitable, Affordable, and Inclusive vision element (p. 26-31):

- Goal 1 – Ensure all Denver residents have safe, convenient, and affordable access to basic services and a variety of amenities.

- 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.

The proposed map amendment would allow for infill development that revitalizes former industrial land and encourages land development that stitches neighborhoods back together. It would also provide for a regional destination to activate underutilized and inaccessible land at the crossroads of various neighborhoods, consistent with the following strategies from the Strong and Authentic vision element (p. 34-35):

- Goal 2 – Enhance Denver’s neighborhoods through high-quality urban design.
  - Strategy C – Create people-oriented places that embrace community character with thoughtful transitions, aspirational design, and an engaging public realm.
  - Strategy D – Use urban design to contribute to economic viability, public health, safety, environmental well-being, neighborhood culture, and quality of life.
- Goal 9 – Ensure all neighborhoods are safe.
  - Strategy A - Encourage design and new development to improve public health and safety.

The proposed map amendment and its adjacency to the I-25 and Broadway Station and the South Platte River trail would encourage transit-oriented development that is connected to safe, high-quality, multimodal transit consistent with the following goal from the Connected, Safe, and Accessible Places vision element (p. 40-42):

- Goal 8 – Strengthen multimodal connections in mixed-use centers and focus growth near transit.

The proposed map amendment would allow for the construction of a new stadium, creating access to additional diverse jobs and a space that can be an economic driver through events on site and for businesses within the vicinity, consistent with the following strategies from the Economically Diverse vision element (p. 46-48):

- Goal 2 – Grow a strong, diversified economy.
  - Strategy A – Broaden the tax base with a focus on fiscal activity that is resilient to changes over time.
  - Strategy D – Ensure a broad range of jobs to align with the skills and interests of local residents.

The proposed map amendment would allow for infill development near existing infrastructure and services, and encourage mixed-use communities, consistent with the following strategies from the Environmentally Resilient vision element (p. 52-54):

- Goal 8 – Clean our soils, conserve land, and grow responsibly.
  - Strategy A – Promote infill development where infrastructure and services are already in place.



- Strategy B – Encourage mixed-use communities where residents can live, work, and play in their own neighborhoods.
- Strategy C – Focus growth by transit stations and along high- and medium-capacity transit corridors.
- Strategy D – Support the redevelopment of brownfields to foster environmental clean-up and advance healthy communities.
- Goal 9 – Protect and improve air quality.
  - Strategy B – Improve Denver’s air by reducing the use of single-occupancy vehicles, advancing renewable energy sources, expanding the use of transit, promoting innovative and alternative technologies, and supporting mixed-use, walkable neighborhoods.

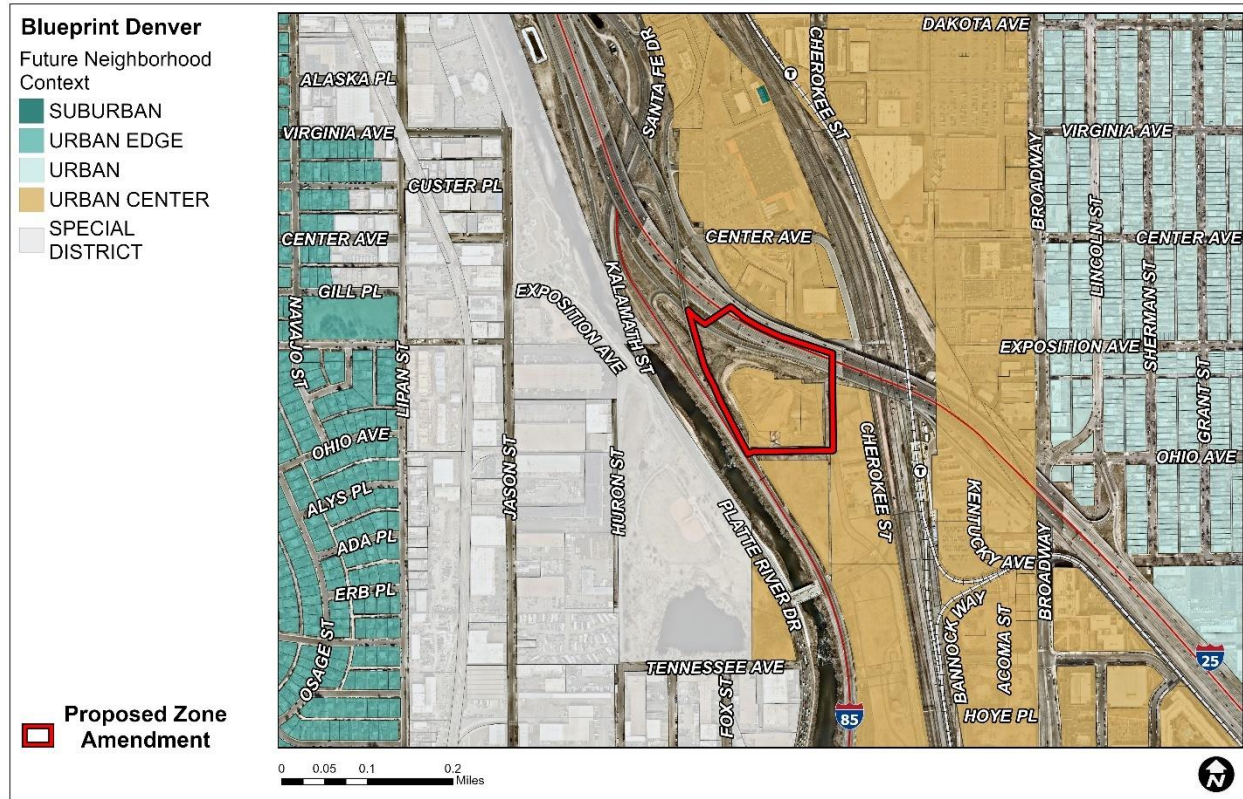
The proposed map amendment, by encouraging ridership to a regional destination, would be consistent with the following strategies from the regional goals (p. 64-65):

- Goal 1 – Be a regional leader in smart growth.
  - Strategy A – Demonstrate the benefits of compact, mixed-use development for the region.
- Goal 2 – Embrace Denver’s role as the center of regional growth.
  - Strategy A – Direct significant growth to regional centers and community centers and corridors with strong transit connections.
- Goal 4 – Capitalize on Denver’s role as a transportation hub and enhance connections to the region and beyond.
  - Strategy A – Leverage the regional investment in RTD’s FasTracks program to develop a network of transit-oriented centers at rail stations.

## 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 Regional Center place within the Urban Center Neighborhood Context and provides guidance from the future growth strategy for the city.

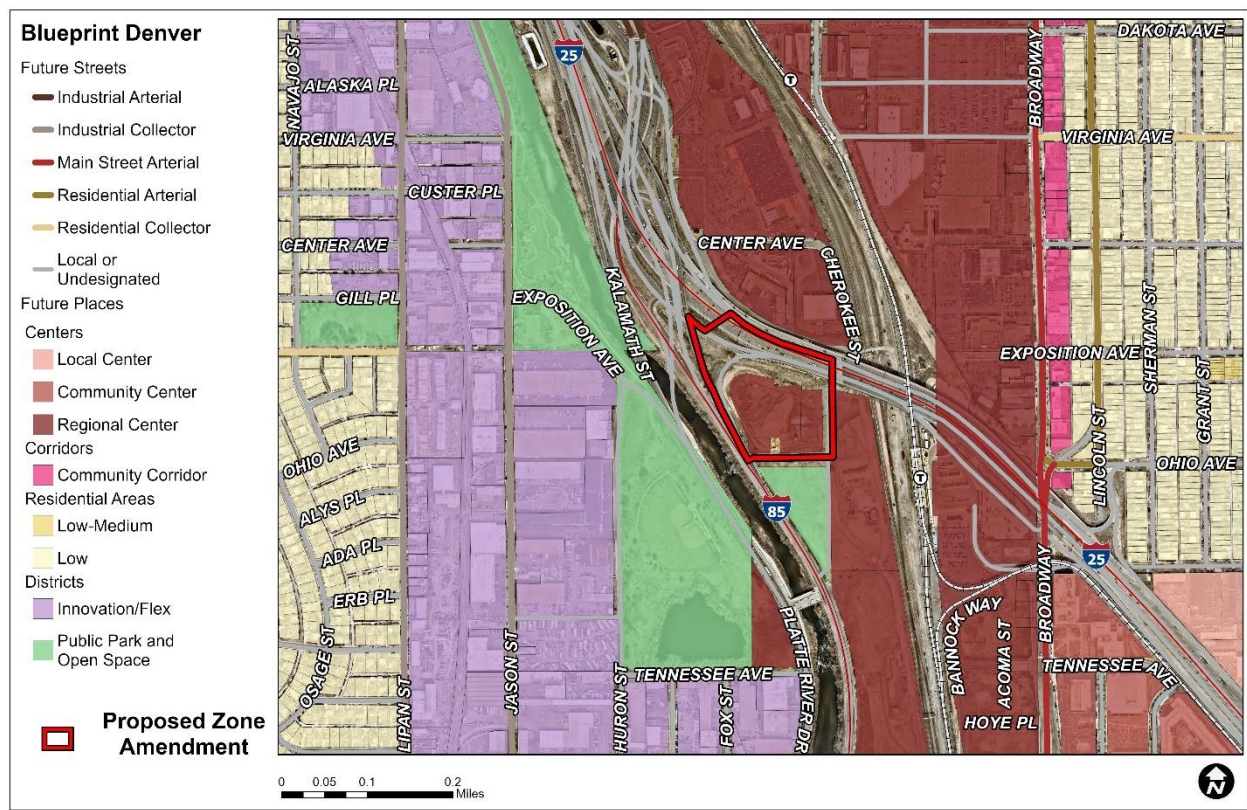
## Blueprint Denver Future Neighborhood Context



In *Blueprint Denver*, future neighborhood contexts are used to help understand differences between land use, built form, and mobility at a high scale, between neighborhoods. The subject property is shown on the context map as within the Urban Center Neighborhood Context, which is used to guide appropriate zone districts (p. 66). *Blueprint Denver* describes the land use and built form of the Urban Center Neighborhood Context as follows: “Urban Center neighborhoods are dense and vibrant areas that support residents and visitors. This context contains high intensity residential and significant employment areas. Development typically contains a high mix of uses, with good street activation and connectivity. Residents living in this context are well served by high-capacity transit and have access to ample amenities and entertainment options” (p. 251). *Blueprint Denver* provides additional applicable guidance on how to apply plan direction on neighborhood context to rezonings stating, “The mapping of neighborhood context is at the citywide scale, so the boundaries of the context 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 context map” (p. 66). None of the Urban Center zone districts allow for the Sports and/or Entertainment Arena or Stadium use. The proposed PUD-G 39 customizes district

provisions and allows for the broad uses in the Campus-Entertainment (CMP-ENT) district, including the stadium use. The PUD's building form standards include a mix of customized CMP-ENT standards and C-MX-16 standards. The standards are consistent with the Urban Center context, including minimal setbacks, transparency requirements, and street level active use requirements. Campuses are part of the District future neighborhood contexts and are, "typically dominated by a single, large institutional user" with "supporting retail and residential" (p. 150). PUD-G 39 allows for a stadium and other mixed uses on the site with supporting design requirements for strong urbanism. Therefore, CPD finds the proposed PUD-G 39 to be consistent with the narrative descriptions of an Urban Center future neighborhood context.

### **Blueprint Denver Future Places**



The neighborhood context of Urban Center 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 Regional Center. *Blueprint Denver* describes the aspirational characteristics of Regional Centers in the Urban Center context as, "Contains a high mix of uses...larger scale mixed-use buildings are common. Structures should respond in form and mass to the streets and public spaces around them. High degree of urbanism with continuous build frontages to define the public realm. Heights are generally the tallest in the context and transition gradually with the center to the surrounding residential areas" (p. 256). The allowance customized signs align with the Regional Center place by working to activate the district while minimizing impacts on surrounding uses. PUD-G 39's allowance for a dense mix of uses, including a



stadium, and its high urbanism requirements align with the description of an Urban Center Regional Center.

### **Blueprint Denver Growth Strategy**



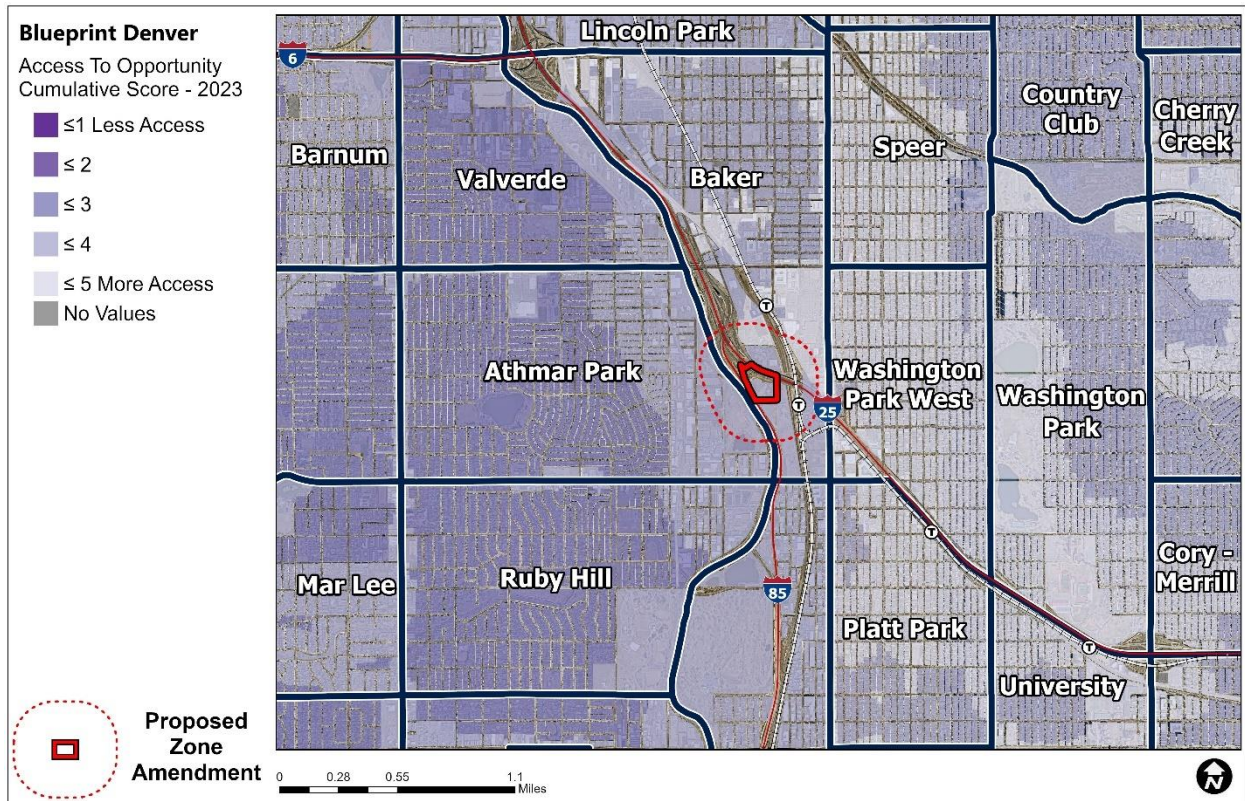
*Blueprint Denver's* growth strategy map is a version of the future places map, showing the aspiration for distributing future growth in Denver (p. 51). The subject property is part of a Regional Center. Regional Centers are anticipated to see around 30% of new housing growth and 50% of new employment growth by 2040" (p. 51). Focusing growth in centers and corridors helps to provide a variety of housing, jobs and entertainment options within a comfortable distance to all Denverites and is a key element of building complete neighborhoods throughout Denver" (p. 49). The proposed map amendment will focus mixed-use growth to a Regional Center where it has been determined to be most appropriate. Access to jobs, housing, services, and cultural amenities contribute to the vibrancy of Regional Centers,, and this site is accessed by multiple bus routes and the RTD train line.



### **Blueprint Denver Equity Concepts**

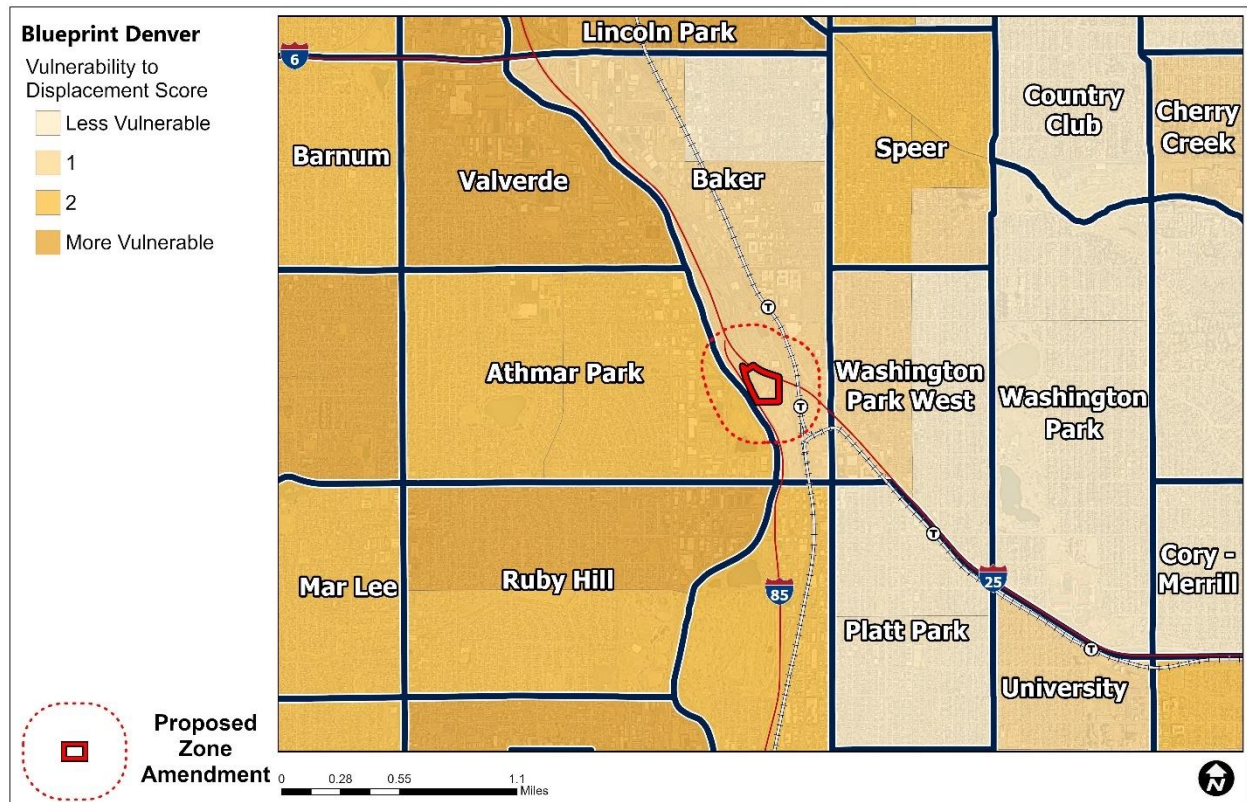
*Blueprint Denver* contains three equity concepts to help guide change to benefit everyone. Each equity concept has associated measurements that helps inform implementation actions through large rezonings along with other implementation actions. They are helpful in showing patterns across large areas, particularly in areas vulnerable to involuntary displacement.

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



The area has average access to opportunity, scoring 3.6 out of 5. This number needs to be tempered a bit as scores are determined by measured horizontal distance, not a measure of access via safe roads or sidewalks. While the subject site's score states that it has good access to parks, fresh foods, and transit, its current isolated nature makes those amenities extremely difficult to access. As part of the proposed development there would be investments in new roads, sidewalks, and infrastructure to make this site accessible to and from those nearby amenities. As part of the larger considerations around the proposed stadium, the City has consistently considered necessary infrastructure to create access to and through the site as well as between the neighborhoods to which this site has long been a barrier.

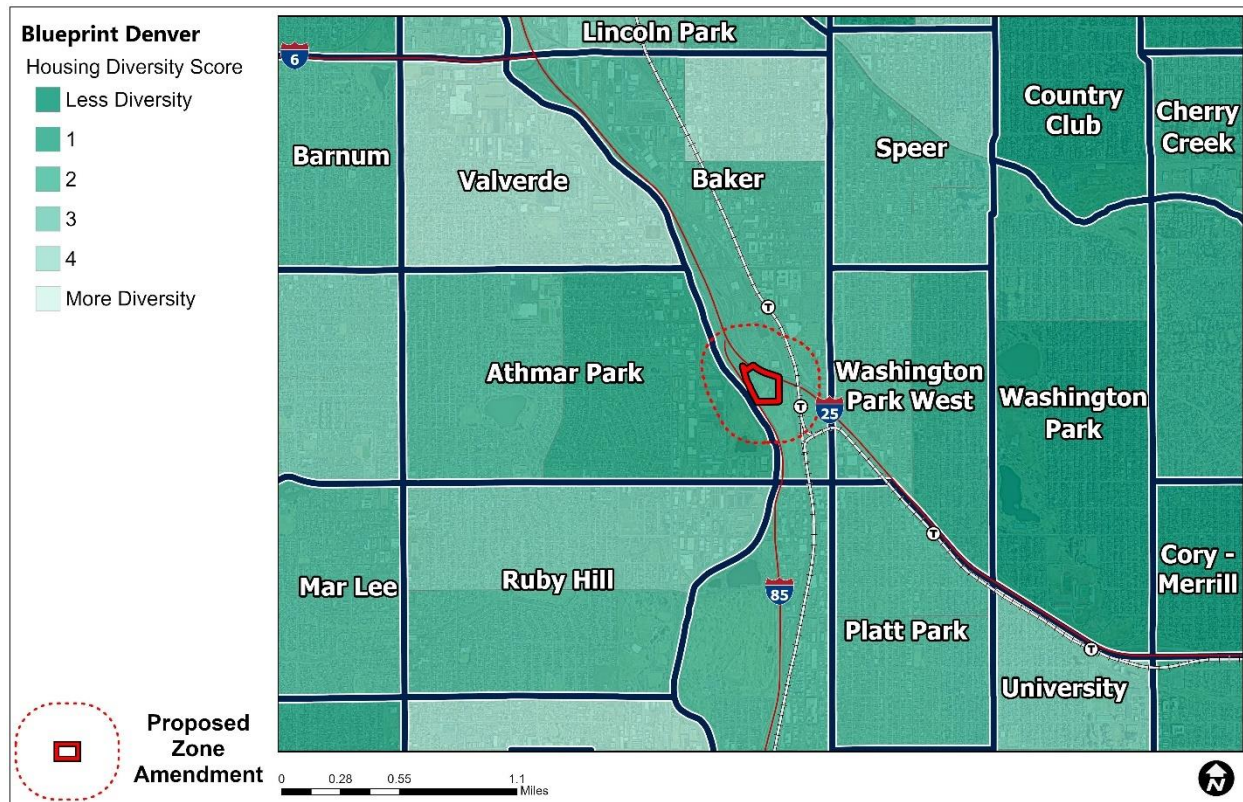
## II. Vulnerability to Involuntary Displacement



The area contains a score of 1 out of 3 for vulnerability to involuntary displacement, suggesting low vulnerability. The only measure for which the site scored as vulnerable is rental occupancy with about 75% of all housing within the area being renter occupied compared to about 50% as the citywide average. An important consideration throughout this process has been that the site is located at a crossroads of various neighborhoods. Those neighborhoods to the west and south have higher vulnerability to displacement. The proposed PUD-G 39 would facilitate many new jobs, including those available to a diversity of educational backgrounds, and would therefore provide economic benefits to the surrounding communities.



### III. Expanding Housing and Jobs Diversity



The area scored 2 out of 5 for housing diversity, signaling that there is a lack of housing diversity in the area. It scored as diverse in terms of housing cost and the number of income restricted units. What this area lacks in terms of diversifying housing is missing middle housing, a diversity of bedrooms counts within units, and for-sale units. While the anticipated development of a stadium on this site does nothing to change the housing supply on-site, PUD-G 39 does allow for the development of housing units which would be subject to the housing agreement within the property's existing development agreement.

#### Climate

As noted earlier in this staff report, the proposed PUD-G 39 would help meet numerous climate goals by promoting infill development where infrastructure and services are already in place, encouraging mixed-use communities where residents can live, work, and play in their own neighborhoods, focusing growth by transit stations, supporting the redevelopment of brownfields to foster environmental clean-up and advance healthy communities, and improving Denver's air by expanding the use of transit, and supporting mixed-use, walkable neighborhoods.



### **Other Blueprint Denver Strategies**

The proposed rezoning also helps further the following *Blueprint Denver* policies:

#### Land Use and Built Form – General (pgs. 70-79)

- Policy 1 - Promote and anticipate planned growth in major centers and corridors and key residential areas connected by rail service and transit priority streets.
  - Strategy A - Use zoning and land use regulations to encourage higher-density, mixed-use development in transit-rich areas.

#### Land Use and Built Form – Economics (pgs. 90-93)

- Policy 1 – Capture 90 percent of job growth in regional centers, community centers and corridors, certain districts, and high-intensity residential area in downtown and urban center contexts.
- Policy 2 – Improve equitable access to employment areas throughout the city to ensure all residents can connect to employment opportunities.
- Policy 6 – Ensure Denver and its neighborhoods have a vibrant and authentic retail and hospitality marketplace meeting the full range of experiences and goods demanded by residents and visitors.
  - Strategy D – Build on Denver’s national and regional entertainment options to continue to blend the arts, entertainment, shopping, and hospitality into unique Denver experiences.

#### Mobility – (pgs. 108-115)

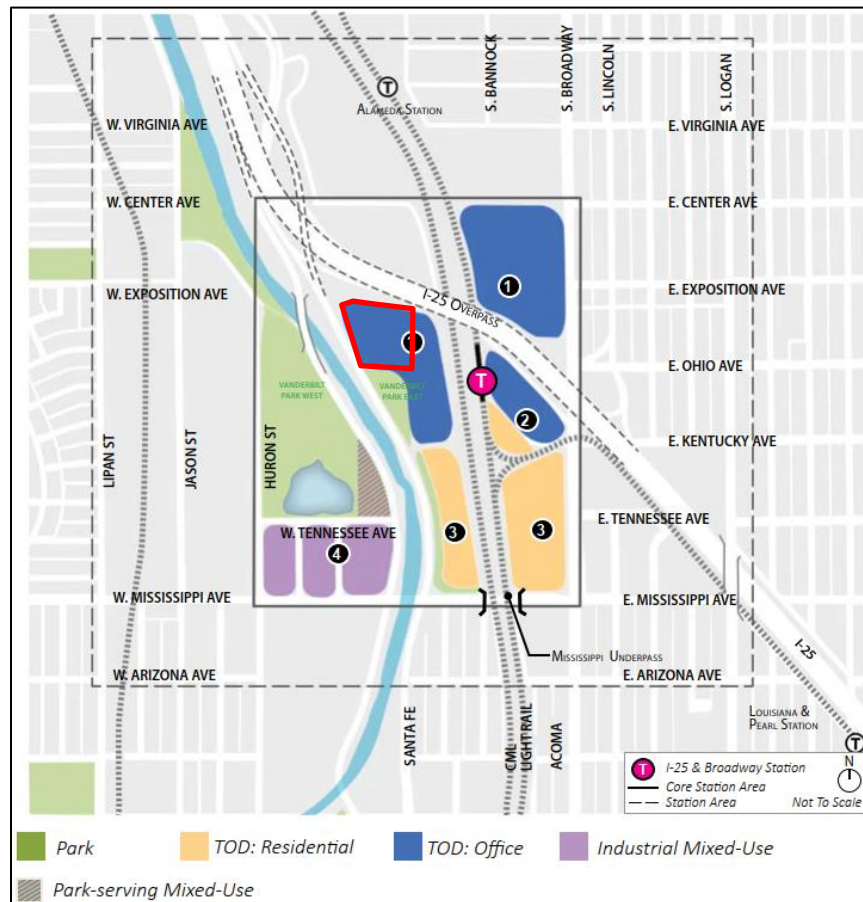
- Policy 1 – Encourage mode-shift – more trips by walking and rolling, biking and transit – through efficient land use and infrastructure improvements.
- Policy 2 – Align the impacts of private development with transportation infrastructure and promote development that creates walkable, transit-friendly communities.

#### Quality of Life – (p. 125)

- Policy 10 – Work with public and private partners to improve access to shops, restaurants, entertainment, civic uses, services and a variety of daily needs for all Denver residents.

### ***I-25 and Broadway Station Area Plan (2016)***

The *I-25 and Broadway Station Area Plan* was written to guide future growth around the station and surrounding neighborhoods with the overall goal of creating a connected, resilient, vibrant and transformative multi-modal transit-oriented development at the station (p. 5). The plan provides a high-level framework for the creation of new streets, pedestrian and bicycle connections, parks and open space, and land use concepts.



The station area plan pre-dated the 2019 *Blueprint Denver* which updated the land use categories across the city and so references the site's older *Blueprint Denver* land use concept of Transit-Oriented Development (TOD). The plan notes that TOD has, "land uses with a direct correlation to the function of a mass transit system" (p. 55). The plan further refines the proposed land use concepts for the largely vacant land within the area into three main categories: TOD Office, TOD Residential, and Industrial Mixed-Use. The introductory language to the refined land use frameworks notes, "the refined land use framework is conceptual and does not allocate specific land uses or intensities" (p. 55). The site of the proposed PUD-G 39 is within the TOD Office category where it is envisioned to, "create a 'Midtown' office location by encouraging high-density office uses near the station to capitalize on visibility and multi-modal access" (p. 27). The plan also states, "The plan allows the latitude to pursue unforeseen opportunities that will arise and to respond to new challenges over the coming years. Development in the station area will occur over multiple phases, reacting to changing market conditions, all while

maintaining the long-range vision of becoming a vibrant, compact, urban center, and world-class transit-oriented development” (p. 20). Notably, the plan pre-dates the Covid pandemic and the transition to widespread work-from-home policies which have precipitated a decline in office demand. TOD Office is further categorized as, “areas [that] have a sizeable employment base while accommodating a variety of mixed uses to activate the Station Area” (p. 56). While the proposed PUD, which expands allowable uses to include a stadium, does not match the precise language of the TOD Office categorization of high-density offices uses, it is consistent with the guidance for promoting urban center densities and activation where, “the station area should include a vertical and horizontal mix of land uses including office, residential, commercial, and industrial along with a range of plazas and open spaces to achieve the vision of an 18-hour, mixed-use district” (p. 54). Staff finds the proposed PUD-G 39 to be consistent with the station area principles to create a transit-oriented mixed-use environment.

The plan also has a guiding principle to incorporate high quality urban design that, “encourages a human scale, comfortable, and walkable environment” and “prioritizes the pedestrian, facilitates community building, encourages community interaction and chance meetings, provides eyes-on-the-street, and engages the river” (p. 58). PUD-G 39 incorporates minimal setbacks that are associated with urban environments as well as transparency and active use requirements that will activate the pedestrian realm on the southern and eastern edges where the proposed stadium will interact with the rest of the district. The proposed customized sign allowances will help enhance the district by encouraging community identity and engagement. Together with the UDSGs described earlier this report, PUD-G 39 will facilitate development with high quality urban design.

The plan also identifies this site as a proposed location for important architecture as a means of using, “signature architecture at the terminus views into the site from the freeway, light rail, and local street network” (p. 61). The proposed stadium use, PUD-G 39 design standards, and Urban Design Standards and Guidelines will result in architecture that is visually striking and leads the way in creating a district identity.

The proposed rezoning also helps further the following *I-25 and Broadway Station Area Plan* recommendations:

Resilient – 1. Promote Economic Resilience (pgs. 44-45)

- Recommendation 1.3 – Address the need for commercial services.
  - Provide programming and clear, visible signage to ensure commercial success.
- Recommendation 1.6 – Create a framework that is phaseable.
  - Create a phaseable and flexible physical framework.
  - Respond to the market as it evolves over time with flexibility in the overall land use mix.
  - Support the economic resiliency of the Station Area and surrounding neighborhoods with a strong mix of land uses.

Resilient – 3. Enhance Social Sustainability (pgs. 50-51)

- Recommendation 3.1 – Create healthy communities.
  - Design a safe, well-connected public realm that encourages walking, bicycling, and opportunities for social interaction.

Vibrant – 1. Promote Urban Center Densities (pgs. 54-57)



- Recommendation 1.1 – Encourage a variety of uses to activate the Station Area.
- Recommendation 1.2 – Incorporate higher densities near the station.
  - Design buildings to range from five to sixteen stories tall while respecting the establishing Washington Park view plane.

Vibrant – 2. Incorporate High Quality Urban Design (pgs. 58-59)

- Recommendation 2.1 – Shape urban form to create a human scale environment.
  - Encourage quality skyline architecture that will create an identity for I-25 and Broadway Station and promotes the sense of a “Midtown” of Denver.
  - Front streets, parks, and public plazas with buildings to create a sense of enclosure in the public realm.
  - Encourage active edges, promote “eyes-on-the-street” by providing transparent facades and active ground floor uses.
- Recommendation 2.2 – Design public realm for pedestrians.
  - Create well-lit, safe, and comfortable human scale spaces that area accessible to all users.
  - Provide active ground floor uses along primary street edges for new development.
- Recommendation 2.3 – Architecture should be authentic to the time and place.
  - Provide seamless transitions between public and private space by considering how building lobbies, storefronts, balconies, courtyards, and entries interact with the public realm.
  - Locate active uses on the ground floors to activate the street. Provide transparency and street facing entries to help activate and improve safety on the street.

Vibrant – 3. Create a New and Distinct District (p. 60-61)

- Recommendation 3.2 – Create a unique identity within the City and Region.
  - Consider the location of signature architecture at the terminus views into the site from the freeway, light rail, and local street network.
  - Create an architecturally distinctive skyline that is a landmark within the City and along the light rail corridor.

The plan also contains a section on strategies for realizing the vision of the plan (p. 92-95) which are advanced by the proposed PUD-G 39 and its accompanying agreements.

Regulatory and Policy Strategies

- Ensuring that zoning regulations align with the Plan vision is critical for achieving the mix of land uses, densities, and urban design recommendations that will transform the station area into a vibrant, mixed-use district and catalyze redevelopment.

Partnership Strategies

- Work with major property owners, including public and private entities to realize the vision of a vibrant transit-oriented development. An effective partnership between the major property owners and a continued collaboration with community stakeholders will be key to successful development.

#### Investment Strategies

- Tax Increment Financing
- Special Districts
- Partnerships. In addition to public funding sources, public-private partnerships will be instrumental in plan implementation. With limited availability of public improvement dollars, other organizational types often come into broader, more innovative use.

## **2. Public Interest**

The proposed official map amendment furthers the Public Interest through implementation of the city's adopted land use plans and by fostering a walkable, mixed-use, transit-oriented development area and facilitating entertainment and cultural destinations within a dynamic regional center context.

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

The proposed PUD-G 39 is based on a Campus neighborhood context which is embedded throughout the city where medical, institutional, educational, or entertainment sites are found. Campus contexts can be incorporated into more intense development. The design standards of the proposed PUD have been tailored to allow for the construction of a stadium consistent with both the Campus neighborhood context and the adjacent Urban Center neighborhood context.

For analysis on consistency of this rezoning with the PUD zone district purpose and intent statements, see below.

## **4. Additional Review Criteria for Rezoning to a PUD District (12.4.10.8)**

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

- Denver Zoning Code Section 9.6.1.1 states that the general purpose of a PUD District 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. A PUD is intended to respond to unique and extraordinary circumstances, where more flexible zoning than what is achievable through a standard zone district is desirable and multiple variances, waivers, and conditions can be avoided.

PUD-G 39 is consistent with the intent and purpose of a PUD district because the subject site has special characteristics related to the scale of the development project and demands a more customized zoning approach to achieve a successful phased development aligned with adopted plan guidance. While the adopted plans anticipate mixed-use development on this site, including the possibility for entertainment options, and while the campus zone districts are intended to be integrated into existing zone districts, the underlying CMP-ENT zone district was created with the anticipation that a site would be placed on larger zone lots surrounded by vast open space or parking. The

CMP-ENT zone district did not anticipate the location of an urban sports stadium without vast surface parking and embedded in a dense mixed-use district. Additionally, there is no Urban Center zone district which allows for the construction of a sports stadium.

- To address these unique circumstances, the proposed PUD-G 39 district uses the CMP-ENT zone district with customized provisions that align closely with C-MX zone districts by requiring minimal setbacks, transparency requirements, and street level active use standards in character with the anticipated development of the area.
- DZC Section 9.6.1.1.C states that a PUD District is not intended as either a vehicle to develop a site inconsistent with the applicable neighborhood context and character, or solely as a vehicle to enhance a proposed development's economic feasibility.

PUD-G 39 is consistent with the Urban Center neighborhood context and character as noted above. The PUD is intended as a mechanism to ensure that development is consistent with adopted plans, not as a vehicle to enhance the proposed development's economic feasibility.

- According to DZC Section 9.6.1.1.D., in return for the flexibility in site design a PUD District 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.

PUD-G 39 provides significant public benefit not achievable through application of a standard zone district, including 1) diversification of land use while maintaining defining characteristics of the surrounding neighborhood context, 2) exemplary pedestrian amenities through the design standards specified in the PUD and its location adjacent a future pedestrian way and public park, 3) development patterns consistent with the character and design of nearby areas, and 4) advancement of numerous city goals.

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

The PUD District complies with all standards and criteria stated in Division 9.6.

**c. 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**

The PUD District is necessary because there is no standard zone district available that applies appropriate standards to this unique location and development. An unreasonable number of variances or waivers and conditions would be required to achieve the tailored approach in the PUD.



**d. The PUD District and the PUD District Plan establish permitted uses that are compatible with existing land uses adjacent to the subject property**

The PUD District's allowed uses are compatible with the high-density, mixed use regional center surrounding the site and are appropriate in close proximity to transit amenities. a

**e. 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.)**

PUD-G 39 provides tailored building form standards to directly address appropriate transitions to neighboring properties and areas, including:

- Maximum height that is compatible with the existing Washington Park view plane.
- Custom setback standards that enable development like that of the Urban Center neighborhood context.
- Transparency and Street Level Active Use requirements like that of the Urban Center – Mixed-Use zone districts.
- Custom sign standards to support activation of the site and the district.
- Custom fence standards that meet the requirements of the National Women's Soccer League while guaranteeing visual permeability for the general public.

Therefore, PUD-G 39 establishes permitted building forms that are compatible with adjacent existing building forms through appropriate design standards.

## **Attachments**

1. Application
2. Public Comments
3. Engagement Outline
4. Equity Analysis