



TO: Denver City Council
FROM: Elizabeth Weigle, Senior City Planner
DATE: November 5, 2020
RE: (A) Denver Zoning Code – Text Amendment #7 to create E-SU-B1.
(B) Official Zoning Map Amendment Proposal #2019I-00191 rezoning multiple properties in Chaffee Park from E-SU-B, E-SU-D, and E-SU-Dx to E-SU-B1, E-SU-D1, and E-SU-D1x.

Staff Report and Recommendation

A. Text Amendment

Based on the review criteria for a text amendment stated in the Denver Zoning Code (DZC), Section 12.4.11 (Text Amendment), staff recommends **approval** for Text Amendment #7 to create the E-SU-B1 zone district.

B. Map Amendment

Based on the review criteria for a map amendment stated in the Denver Zoning Code (DZC), Section 12.4.10 (Map Amendment), staff recommends **approval** for map amendment #2019I-00191.

Summary and Purpose

A. Text Amendment

Councilmember Amanda Sandoval is sponsoring a text amendment to the Denver Zoning Code to create the E-SU-B1 zone district.

The Urban Edge Context currently has the E-SU-D1 and E-SU-D1x zone districts, which are single unit residential districts that allow an accessory dwelling unit with a minimum lot size of 6,000 square feet. There is an E-SU-B zone district, which is a single unit residential district on a minimum lot size of 4,500 square feet, but it does not allow accessory dwelling units. The proposed E-SU-B1 would create a single unit residential district that allows an accessory dwelling unit on a minimum lot size of 4,500 square feet.

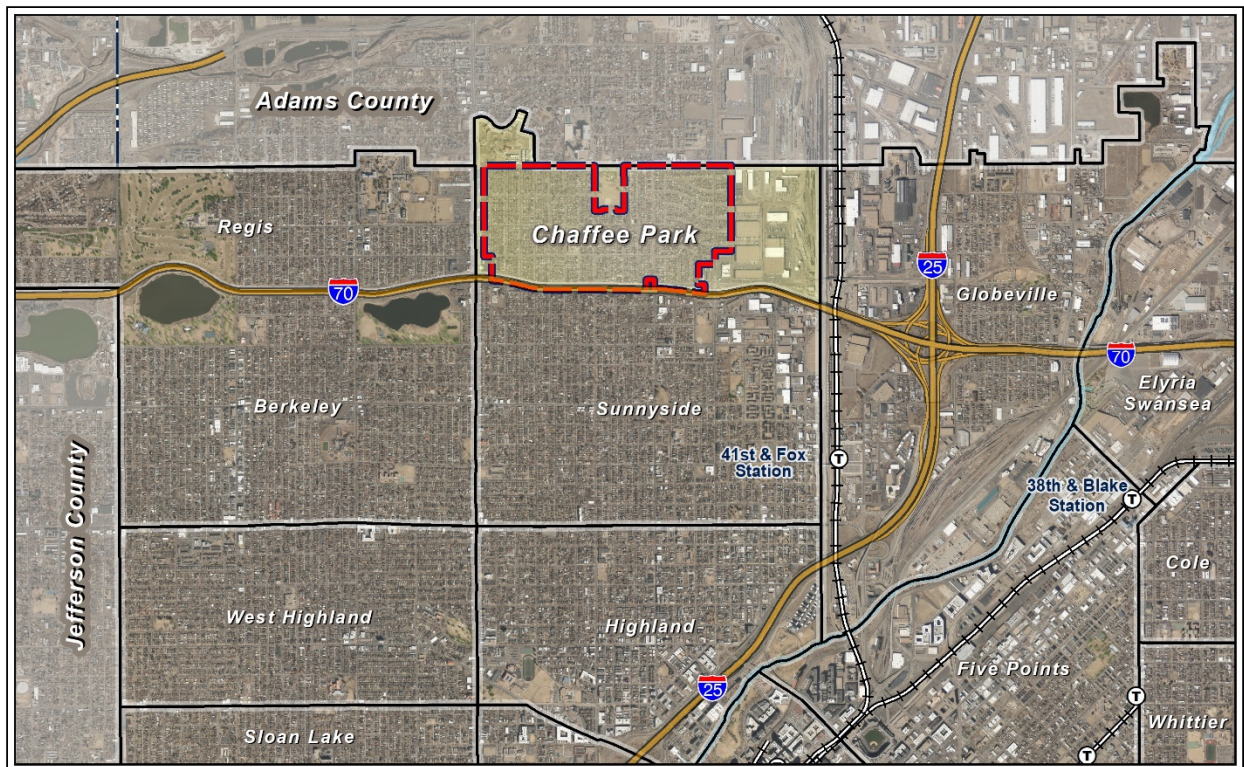
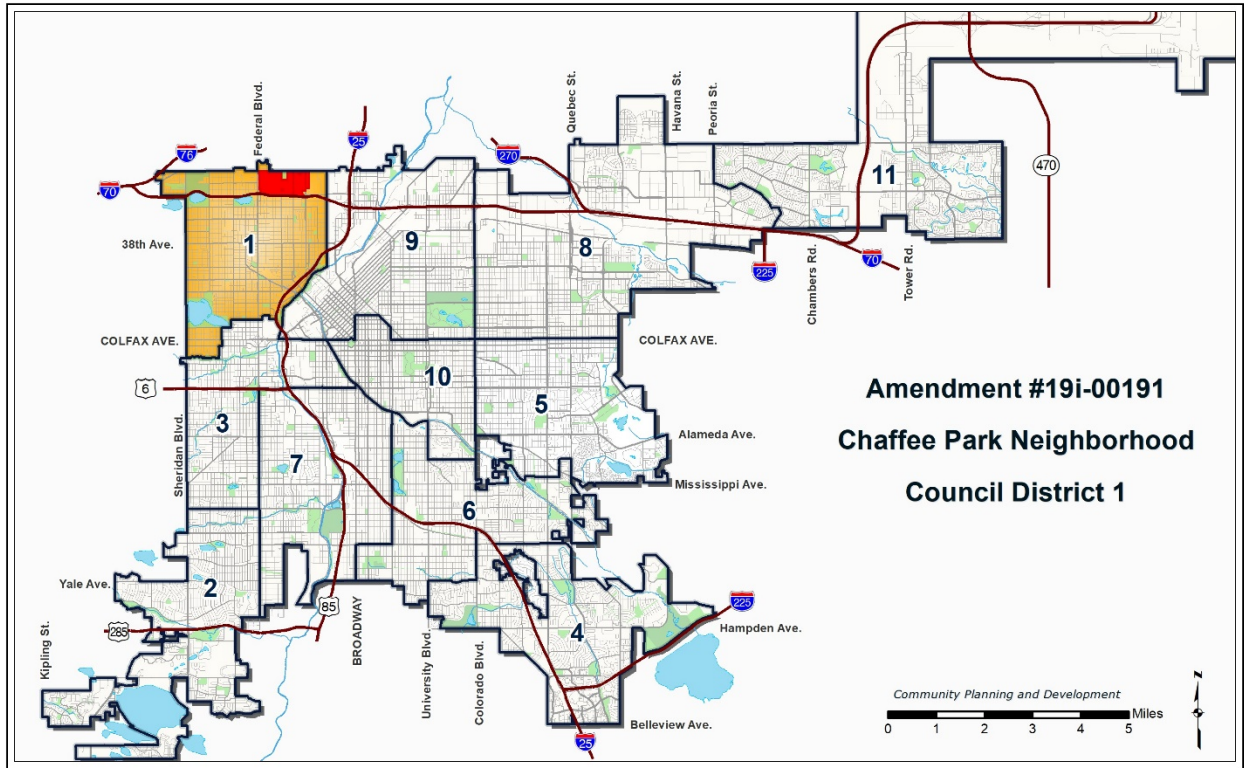
The primary building form standards for the proposed E-SU-B1 are the same as those for E-SU-B, and the accessory building form standards are the same as for E-SU-D1 with the exception of the minimum lot size, which is 4,500 square feet. See the attached draft text amendment for the full proposed language.

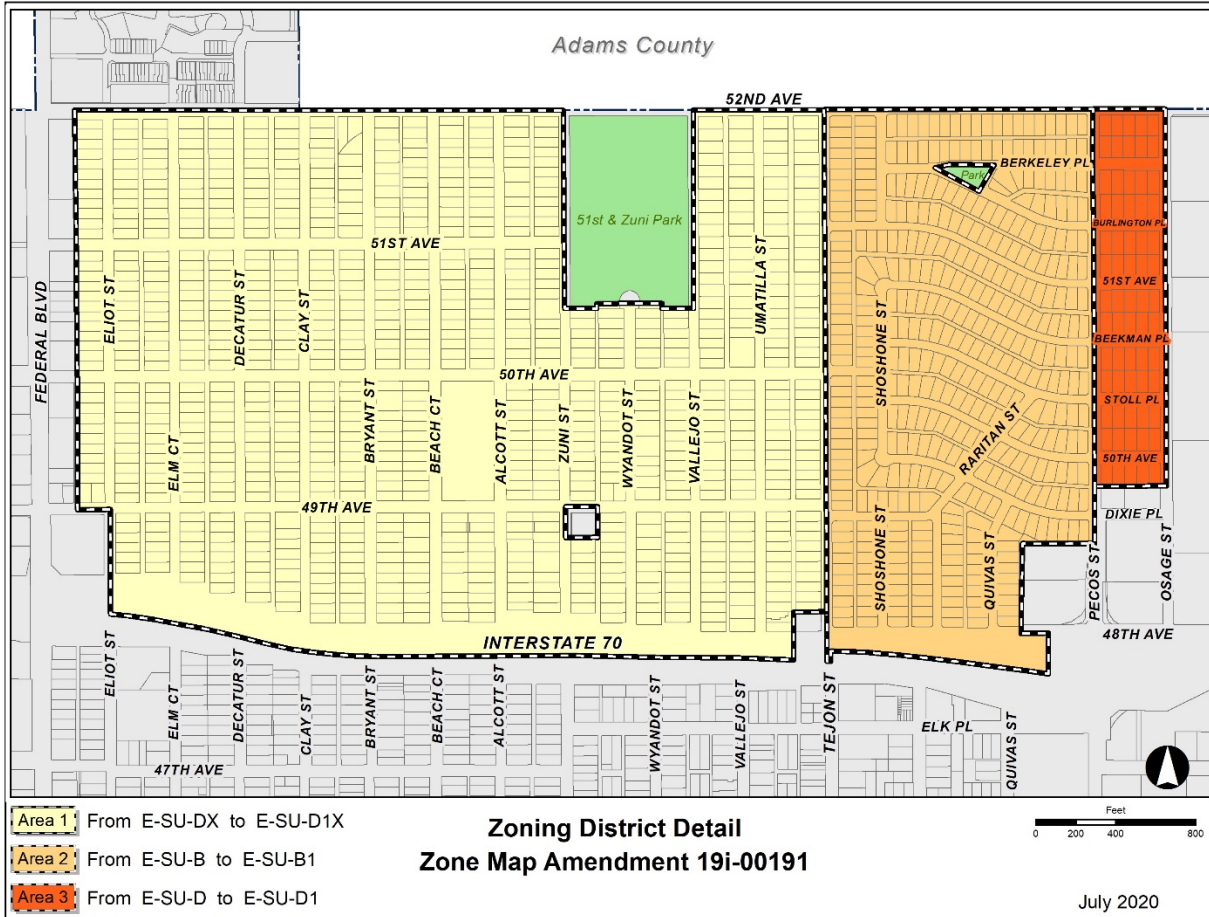
The number for this text amendment was listed as #8 in previous drafts, but it has been updated to #7 to reflect the timing of consideration by City Council.

B. Map Amendment

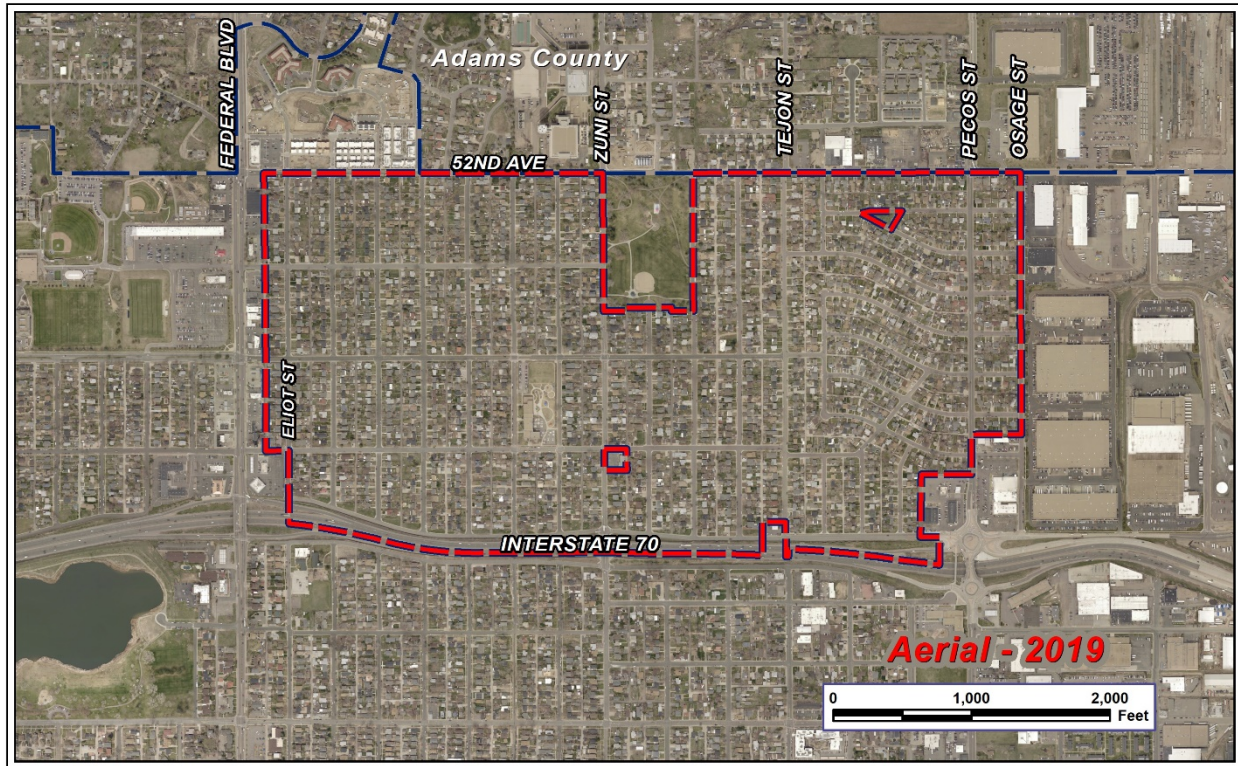
Councilmember Amanda Sandoval is also sponsoring a map amendment to rezone the single-unit residential zone districts in the Chaffee Park neighborhood to allow accessory dwelling units.

- The proposed rezoning includes the area in the Chaffee Park neighborhood that has residential zoning. This includes approximately 207 acres bounded by Federal Boulevard, Osage Street, 52nd Avenue, and Interstate 70.
- The proposed rezoning includes over 1,400 single unit residential properties. The proposed map amendment intends to rezone properties between Federal Boulevard and Tejon Street that are currently E-SU-Dx to E-SU-D1x; properties between Tejon Street and Pecos Street that are currently E-SU-B to the proposed E-SU-B1; and properties between Pecos Street and Osage Street that are currently E-SU-D to E-SU-D1.
- The proposed zone districts are the same as the current districts except that they allow the accessory dwelling unit use, either within the primary structure or in a detached structure. Further details of the requested zone districts can be found in the proposed zone district section of the staff report (below), in the attached text amendment, and in Article 4 of the Denver Zoning Code (DZC).
- According to DZC Section 12.4.10.12, "Except as otherwise provided in Section 9.4.2.1 and Section 12.3.3.9, no land may be rezoned into any zone district not established in this Code." According to DZC Section 12.3.3.9.C., "Notwithstanding Section 12.4.10.2, zone districts Not Available for Rezoning, creation of a new zone district by text amendment according to Section 12.4.11, Text Amendment, may, with the Manager's approval, be filed and reviewed concurrent with a map amendment according to Section 12.4.10, Official Map Amendment (Rezoning). In no case, however, shall a map amendment rezoning land into a new zone district be approved until the text amendment creating the new zone district is approved." CPD approved filing and reviewing this text amendment and map amendment proposal concurrently. Because the E-SU-B1 zone district has not yet been established, the map amendment proposal shall not be approved until after city council approves the text amendment to create the E-SU-B1 zone district.





Existing Context



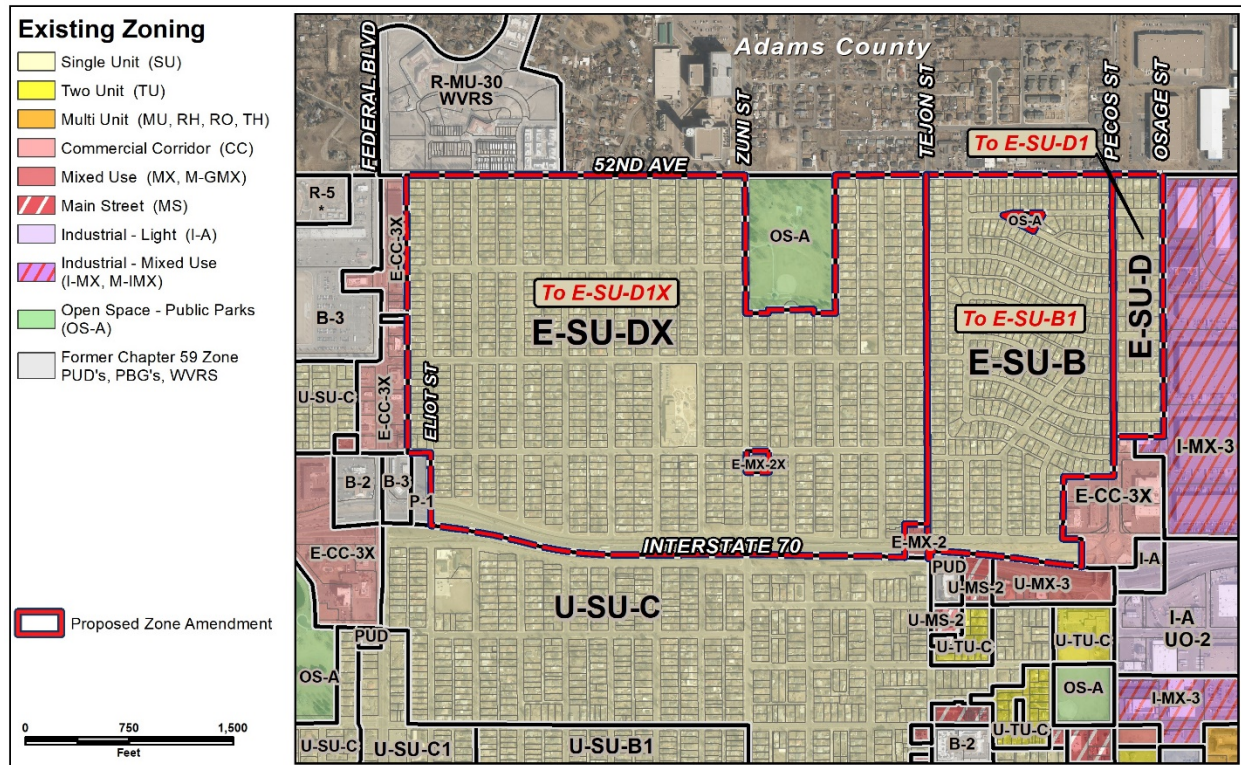
The Chaffee Park neighborhood is largely single-unit residential, with an orthogonal grid in most of the neighborhood. The area contains the park at 51st and Zuni and the Beach Court Elementary School. Bus service runs on 50th Avenue, Pecos Street, and Zuni Street.

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-B, E-SU-D, E-SU-Dx	Single unit residential	Residential buildings, 1-1.5 stories in height, large setbacks	Generally regular grid of streets interrupted by the 51 st and Zuni Park; modified grid between Tejon Street and Pecos Street with smaller lots. Block sizes and shapes are generally consistent and rectangular.
North	R-MU-30 with Waivers, Adams County	Single-unit, multi-unit residential, commercial, industrial	1- to 2-story residential buildings, 2- to 3-story townhouses, 1- to 3-story commercial and industrial buildings	
South	U-SU-C	Interstate 70; single-unit residential	Interstate 70; Residential buildings, 1-1.5 stories in height, large setbacks	

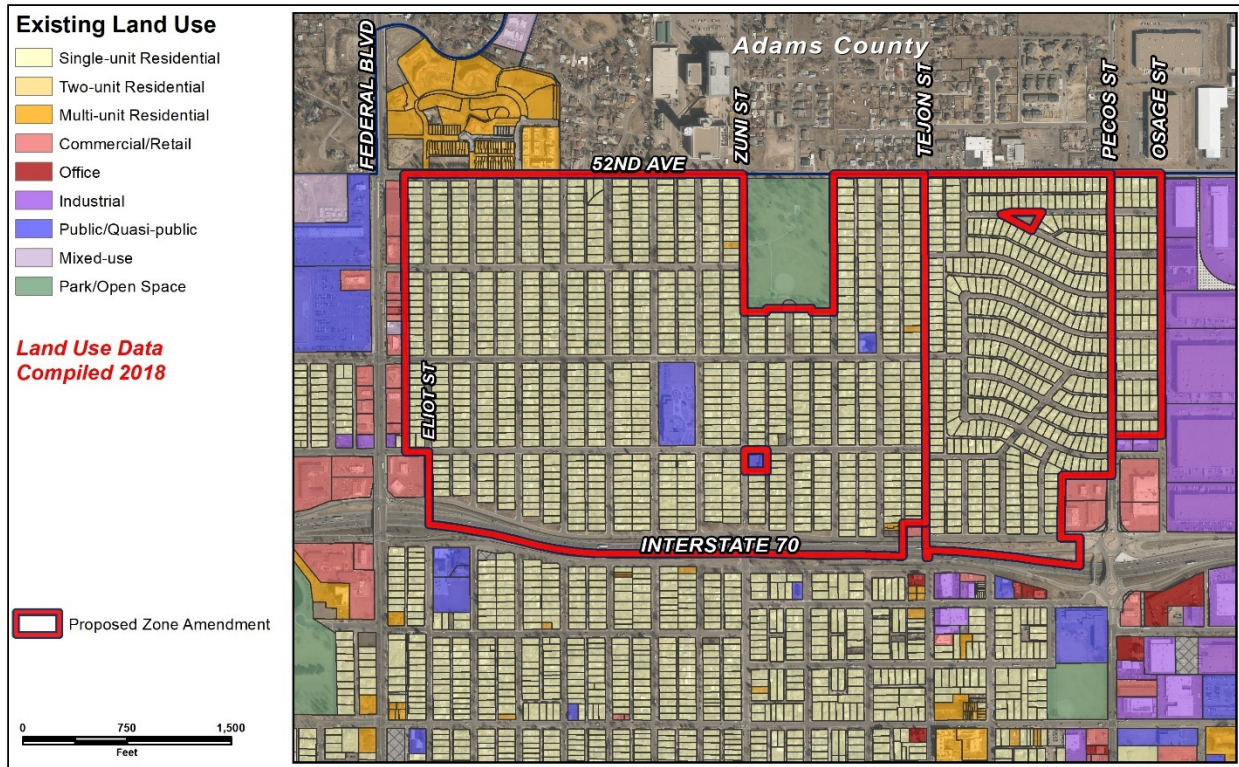
	Existing Zoning	Existing Land Use	Existing Building Form/Scale	Existing Block, Lot, Street Pattern
East	I-MX-3, E-CC-3x	Industrial, commercial/retail	1- to 2-story industrial and commercial buildings with large setbacks and surface parking lots between the buildings and the street	Vehicle parking to the side or rear of buildings (alley access except for between Pecos Street and Osage Street).
West	E-CC-3x, E-MX-3A, B-3, P-1	Commercial/retail, office, mixed use, industrial	1-story commercial buildings ranging from small to large setbacks and surface parking	

1. Existing Zoning



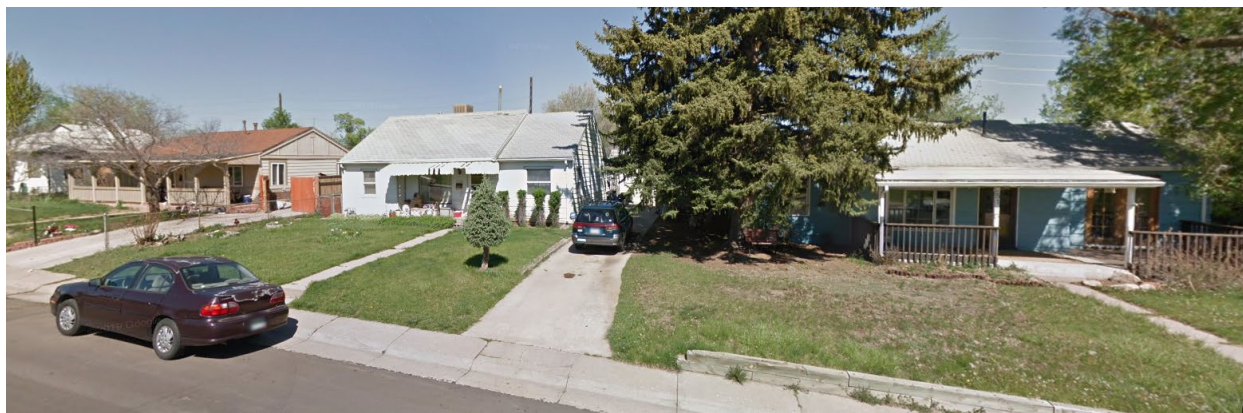
The proposed rezoning area is currently zoned E-SU-B, E-SU-D, and E-SU-Dx. All three zone districts are single-unit residential districts allowing the urban house primary building forms with a maximum height of 30 to 35 feet. E-SU-Dx also allows the suburban house primary building form. For E-SU-B, the minimum lot width is 35 feet wide, and minimum lot area is 4,500 square feet. For E-SU-D and E-SU-Dx, the minimum lot width is 50 feet wide, and minimum lot area is 6,000 square feet.

4. Existing Land Use Map



5. Existing Building Form and Scale

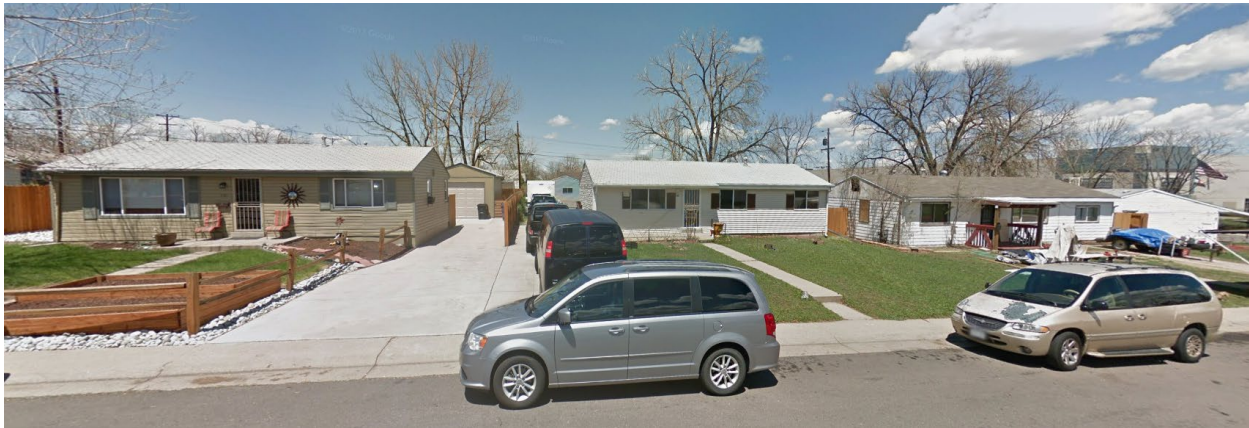
All images are from Google Street View.



View facing east on Vallejo Street north of 50th Avenue – within proposed rezoning (E-SU-Dx)



View facing north on 51st Avenue between Tejon Street and Pecos Street – within proposed rezoning (E-SU-B)



View facing north on 50th Avenue east of Pecos Street – within proposed rezoning (E-SU-D)



View facing east on Federal Boulevard north of 49th Avenue– adjacent to proposed rezoning



View facing east on Osage Street north of 51st Avenue – adjacent to proposed rezoning



View facing east on Pecos Street north of 48th Avenue – adjacent to proposed rezoning

Proposed Zoning

All three proposed zone districts are single-unit residential districts allowing the urban house primary building forms with a maximum height of 30 to 35 feet. E-SU-Dx also allows the suburban house primary building form. The three zone districts allow accessory dwelling units, including a detached accessory dwelling unit in the rear yard. For E-SU-B1, if the concurrent text amendment is adopted, the minimum lot width would be 35 feet, and minimum lot area would be 4,500 square feet. For E-SU-D1 and E-SU-D1x, the minimum lot width is 50 feet wide, and minimum lot area is 6,000 square feet. Setbacks and lot coverage standards accommodate front and side yards similar to E-SU-B, E-SU-D, and E-SU-Dx. Further details of the zone districts can be found in Article 4 of the Denver Zoning Code (DZC) and the attached text amendment.

The primary building forms allowed in the proposed zone districts are the same as those allowed in the existing zone districts.

Summary of City Agency Referral Comments

As part of the DZC review process, the text amendment and rezoning proposal 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.

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

Development Services - Transportation: Approved – No response.

Development Services – Wastewater: Approved – No response.

Development Services – Project Coordination: Approved – No comments.

Development Services – Fire Prevention: Approved – No response.

Public Review Process

	Date
Property owner mailers and flyers (by Councilwoman Sandoval and Chaffee Park Neighborhood Association)	Fall 2019
Neighborhood canvassing (by Chaffee Park Neighborhood Association)	10/26-27/2019
Two town halls (Hosted by Councilwoman Sandoval; 51 total attendees)	11/6/2019, 11/11/2019
Online survey (by Councilwoman Sandoval)	9/19/2019- 12/15/2019
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:	5/27/2020

Presentation to INC Zoning and Planning Committee	7/25/20
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:	8/31/2020
Planning Board public hearing:	9/16/2020
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:	9/15/2020
Land Use, Transportation and Infrastructure Committee of the City Council:	9/29/2020
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:	10/19/20
City Council Public Hearing:	11/9/2020

- Registered Neighborhood Organizations (RNOs)**
 Chaffee Park Neighborhood Association submitted a letter of support with the submitted proposal and an RNO position statement recording support for this rezoning in a vote of 5-0 dated July 17, 2020.
- General Public Comment**
 As of the date of this report, staff received 26 comments in support, citing a desire and appropriateness for ADUs in this neighborhood and the importance of ADUs as a tool to promote affordability. Staff received six comments in opposition to this rezoning, citing concerns around parking, density, neighborhood character, and short-term rentals.
- Planning Board**
 Planning Board held a public hearing on September 16, 2020 and voted unanimously (9-0) to recommend approval of the proposed text and map amendment. There were 12 speakers at the public hearing, ten in support and two in opposition.

Criteria for Review / Staff Evaluation

The criteria for review of this text amendment and rezoning are found in DZC, Section 12.4.11.4 and Section 12.4.10.7, respectively. These criteria are summarized as follows:

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

Note: Because the City Attorney's Office has determined this to be a legislative map amendment proposal, the additional criteria for non-legislative map amendments in DZC Section 12.4.10.8 do not apply.

1. Consistency with Adopted Plans

The following adopted plans apply this text amendment and map amendment:

- *Denver Comprehensive Plan 2040 (2019)*
- *Blueprint Denver (2019)*
- *Housing an Inclusive Denver (2018)*

Denver Comprehensive Plan 2040

The proposed text amendment and rezoning are consistent with *Denver Comprehensive Plan 2040* strategies, which are organized by vision element.

The text amendment creates a new zone district that will allow ADUs, and the map amendment enables ADUs in an entire neighborhood. ADUs can provide additional housing options, including for seniors and families, and they can provide residents more flexibility to remain in their houses. Therefore, the text and map amendment are consistent with the following Equitable, Affordable and Inclusive strategies:

- 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 2, Strategy D – *Increase the development of senior-friendly and family-friendly housing, including units with multiple bedrooms in multifamily developments (p. 28).*

Because ADUs are not currently allowed in the Chaffee Park neighborhood, the text and map amendments would provide an additional housing type and are therefore consistent with the following Strong and Authentic Neighborhoods strategy:

- Strong and Authentic Neighborhoods Goal 1, Strategy B – *Ensure neighborhoods offer a mix of housing types and services for a diverse population (p. 34).*

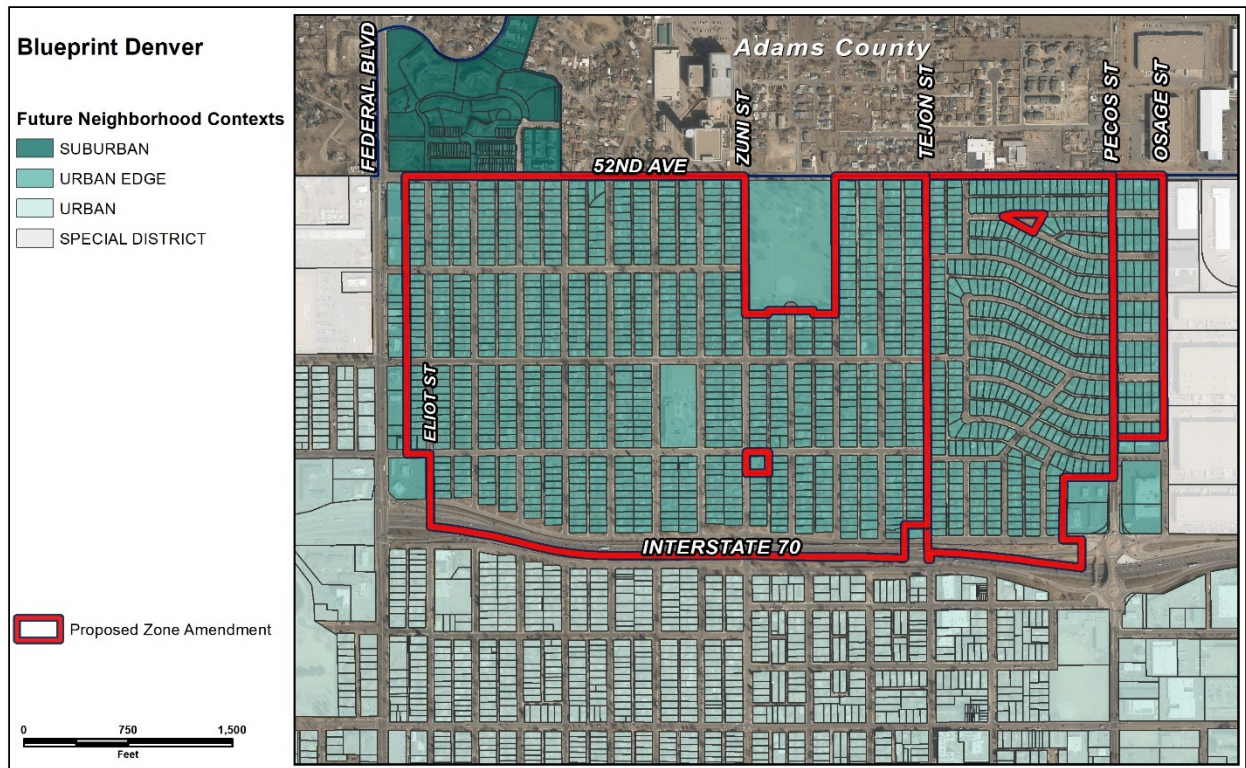
Similarly, the text and map amendment will allow additional housing units on lots with existing houses where infrastructure and services such as water, stormwater, and transit already exist. Therefore, the text and map amendment are consistent with the following Environmentally Resilient strategy:

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

Blueprint Denver

Blueprint Denver identifies the proposed rezoning as part of a Residential Low place within the Urban Edge Neighborhood Context and provides guidance from the future growth strategy for the city.

Blueprint Denver Future Neighborhood Context



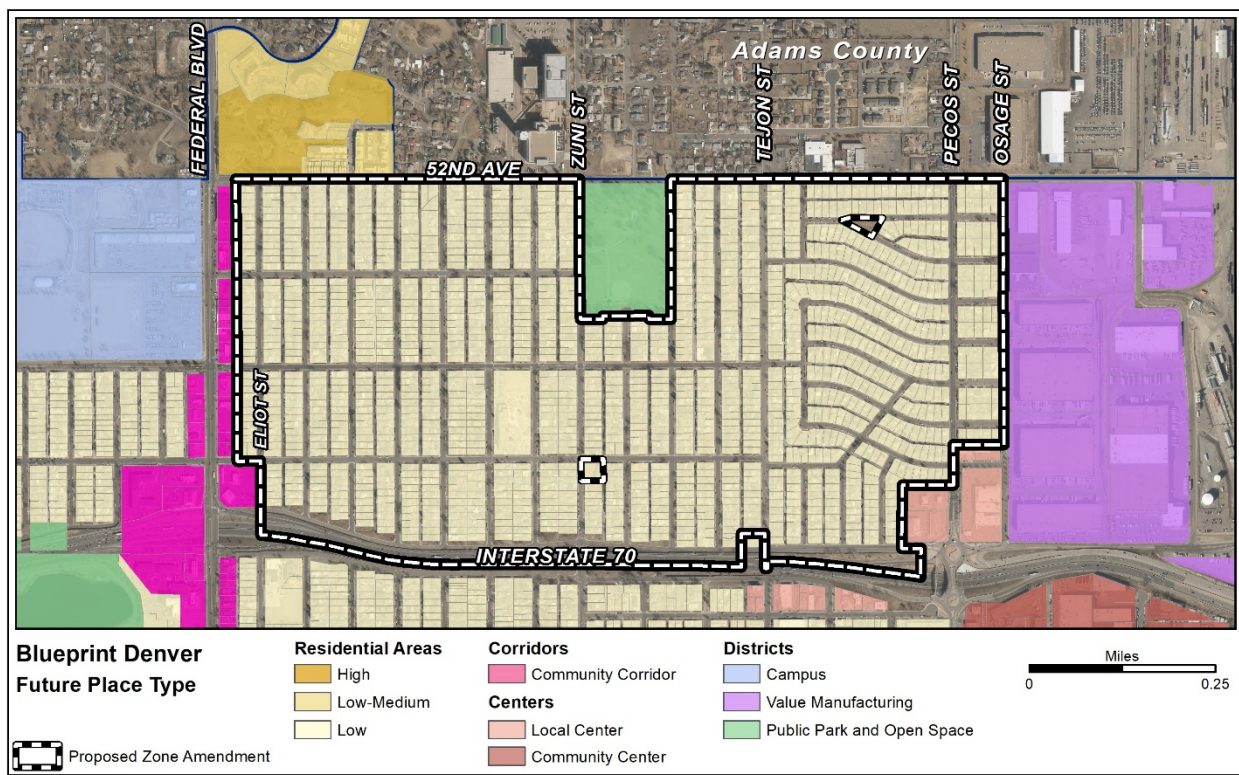
The proposed rezoning is within the Urban Edge neighborhood context, which predominantly contains “single-unit and two unit uses, with some low-scale multi-unit embedded throughout” with “a mix of suburban and urban elements— streets may be rectangular or curved and alleys are sometimes present” (p. 206).

The Denver Zoning Code states that zone districts within the Urban Edge context are “intended to promote and protect residential neighborhoods within the character of the Urban Edge Neighborhood

Context,” further clarifying that “the building form standards, design standards and uses work together to promote desirable residential areas” (DZC 4.2.2.1).

The text amendment to create an E-SU-B1 zone district is consistent with the Urban Edge *Blueprint* context because it creates a low-scale residential district that is appropriate in this context. The proposed rezoning to E-SU-B1, E-SU-D1, and E-SU-D1x is consistent because these zone districts will promote the residential character by allowing single-unit residential uses with low-scale accessory dwelling units that will be compatible with the existing residential area.

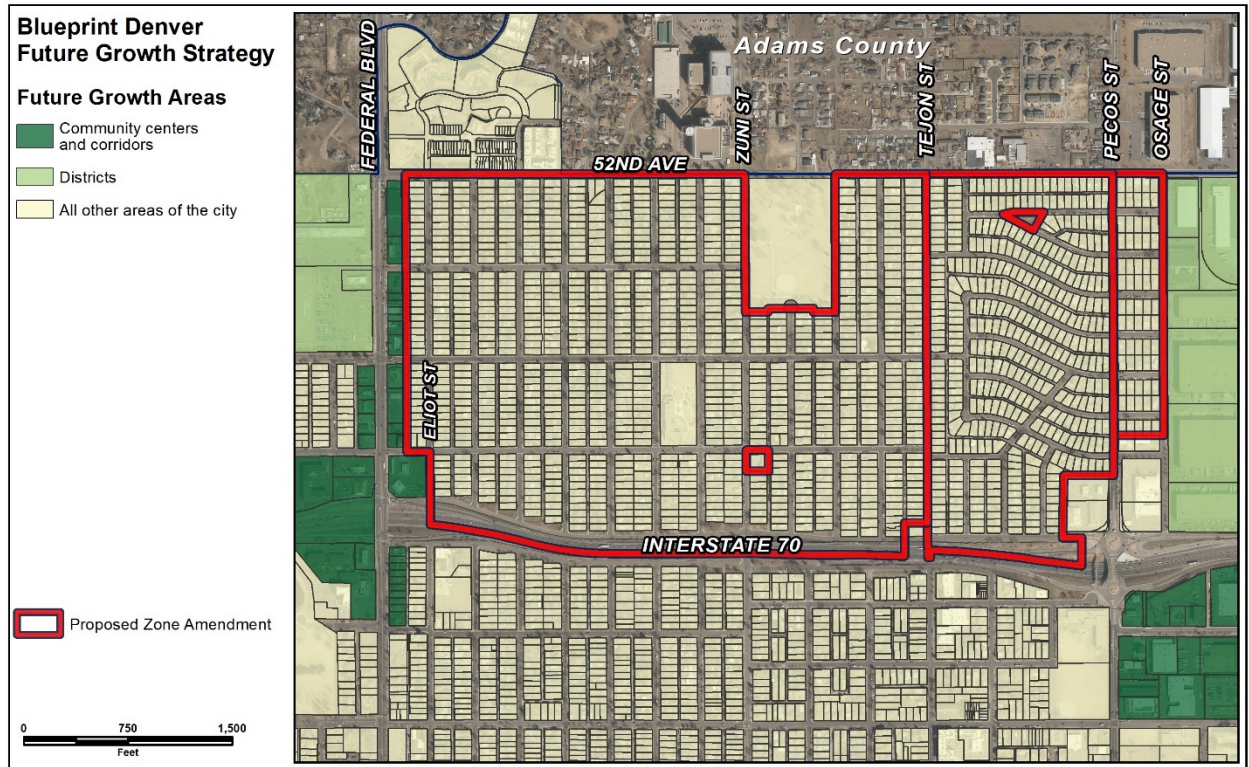
Blueprint Denver Future Places



The proposed rezoning is within the Residential Low future place, which is “predominately single- and two-unit uses on small or medium lots. Accessory dwelling units and duplexes are appropriate and can be thoughtfully integrated where compatible,” and “buildings are generally up to 2.5 stories in height” (p. 214).

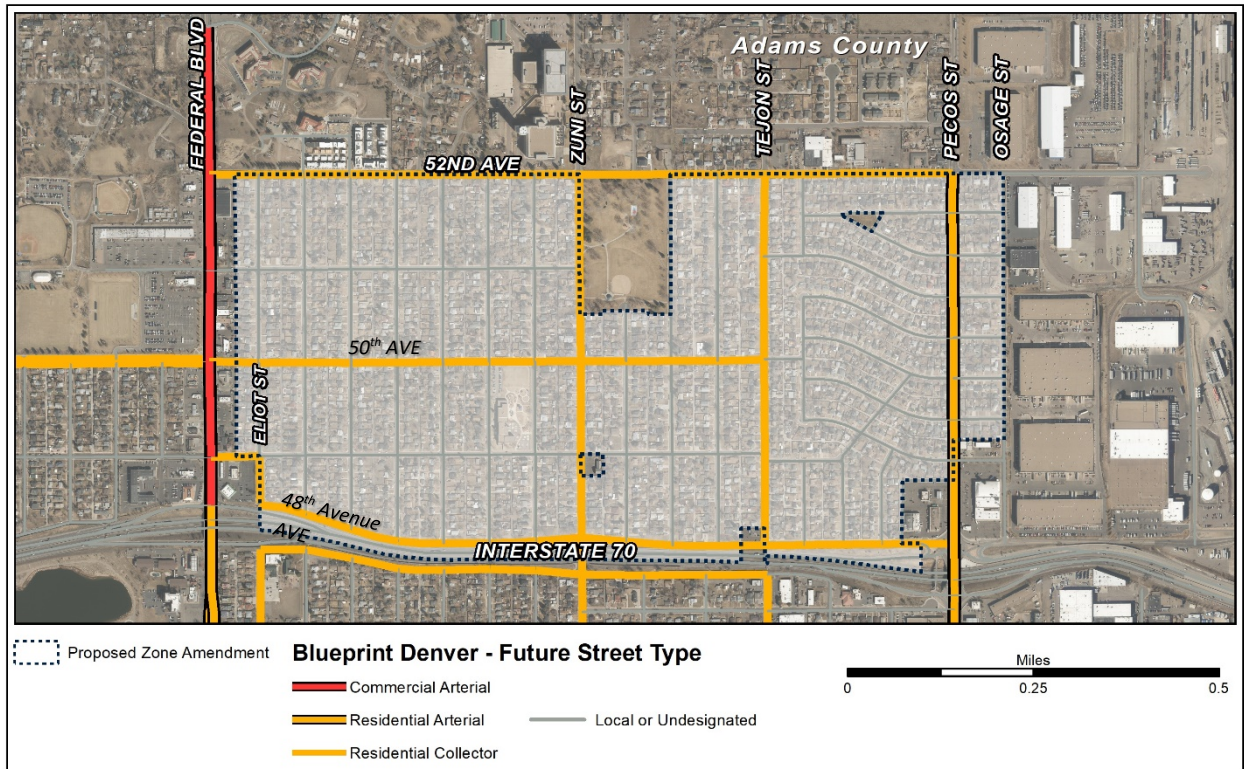
The text amendment to create E-SU-B1 and the proposed map amendment to E-SU-B1, E-SU-D1, and E-SU-D1x are consistent with the Residential Low plan guidance. These three zone districts are 2.5-story, single unit residential districts that allow an accessory dwelling unit, which is consistent with the Low Residential future place description.

Growth Strategy



Because the subject property is designated Residential Low in the Future Places map, the *Blueprint* Growth Strategy categorizes it as “All other areas of the city.” These areas are anticipated to experience approximately 20% of new housing growth and 10% of new employment growth by 2040 (p. 51). The text amendment and map amendment are consistent with this growth strategy because they will allow low-intensity residential growth in this area, which is consistent with the growth strategy.

Blueprint Denver Street Types



Street types help inform the appropriate intensity of the adjacent development (p. 67). *Blueprint Denver* classifies Pecos Street as a Residential Arterial, which is “designed for the highest amount of through movement and the lowest degree of property access” (p. 154). *Blueprint Denver* classifies 48th Avenue, 50th Avenue west of Tejon Street, 52nd Avenue, Zuni Street, and Tejon street as Residential Collectors. “Collector streets are in between a local street and an arterial street; they collect movement from local streets and convey it to arterial streets” (p.159). The remaining streets in the proposed rezoning are undesignated local streets, which are “most often characterized by residential uses [and] provide the lowest degree of through travel but the highest degree of property access” (p. 154). E-SU-B1, E-SU-D1, and E-SU-D1x are all residential districts within the Urban Edge context, which include regulations intended to “reinforce desired development patterns in existing neighborhoods while accommodating reinvestment” (DZC Section 4.2.2.1.D). Therefore, the proposed text and map amendments will result in an intensity that is appropriate for the network of street types in the area.

Blueprint Denver Strategies

Blueprint Denver includes additional recommendations that are relevant for this proposed text and map amendments.

Land Use & Built Form, Housing, Policy 4:

- This policy recommends "Diversify[ing] housing choice through the expansion of accessory dwelling units throughout all residential areas" (p. 84), which is consistent with both the text and map amendments.
- The policy includes several strategies for integrating accessory dwelling units, including using "an inclusive community input process to respond to unique considerations in different parts of the city" and "identify[ing] strategies to reduce involuntary displacement" (p. 84). The map amendment process was community-driven and included extensive outreach to the Chaffee Park neighborhood.
- Strategy E states that a "citywide approach to enable ADUs is preferred." The proposed text amendment would create the E-SU-B1 district, which could be mapped in other parts of the city. The Land Use & Built Form, General, Policy 11 Strategy A explains why this plan direction is not relevant for the map amendment, detailed below.

Land Use & Built Form, General, Policy 11:

- This policy is to "Implement plan recommendations through city-led legislative rezonings and text amendments" (p. 79).
- **Strategy A** recommends "prioritiz[ing] larger-scale, legislative rezonings over site-by-site rezonings to implement plan recommendations and to achieve citywide goals, including equity goals" (p. 79). Given broad interest in rezoning to allow ADUs on single properties in Chaffee Park, a legislative rezoning for the entire area is consistent with this strategy.
- **Strategy B** states, "Use text amendments combined with map amendments to apply strategies recommended by Blueprint Denver at the effective, area appropriate scale. Text amendments and large legislative rezonings should be guided by the equity concepts and maps in Chapter 2" (p. 79). This proposed text amendment creates a zone district to implement Land Use & Built Form, Housing, Policy 4, detailed above. Discussion of the equity concepts is included below.
- **Strategy C** directs text amendments and city-led rezonings to utilize "a robust and inclusive community input process." The effort to seek zoning that allows ADUs in Chaffee Park was community-initiated and community-driven. A months-long public outreach process included: mailers to all affected property owners; an online survey with 398 responses showing majority support for the rezoning; two community town halls; and door-to-door canvassing by community members (see the full proposal in Attachment 2 for data).

Land Use and Built Form: General, Policy 5:

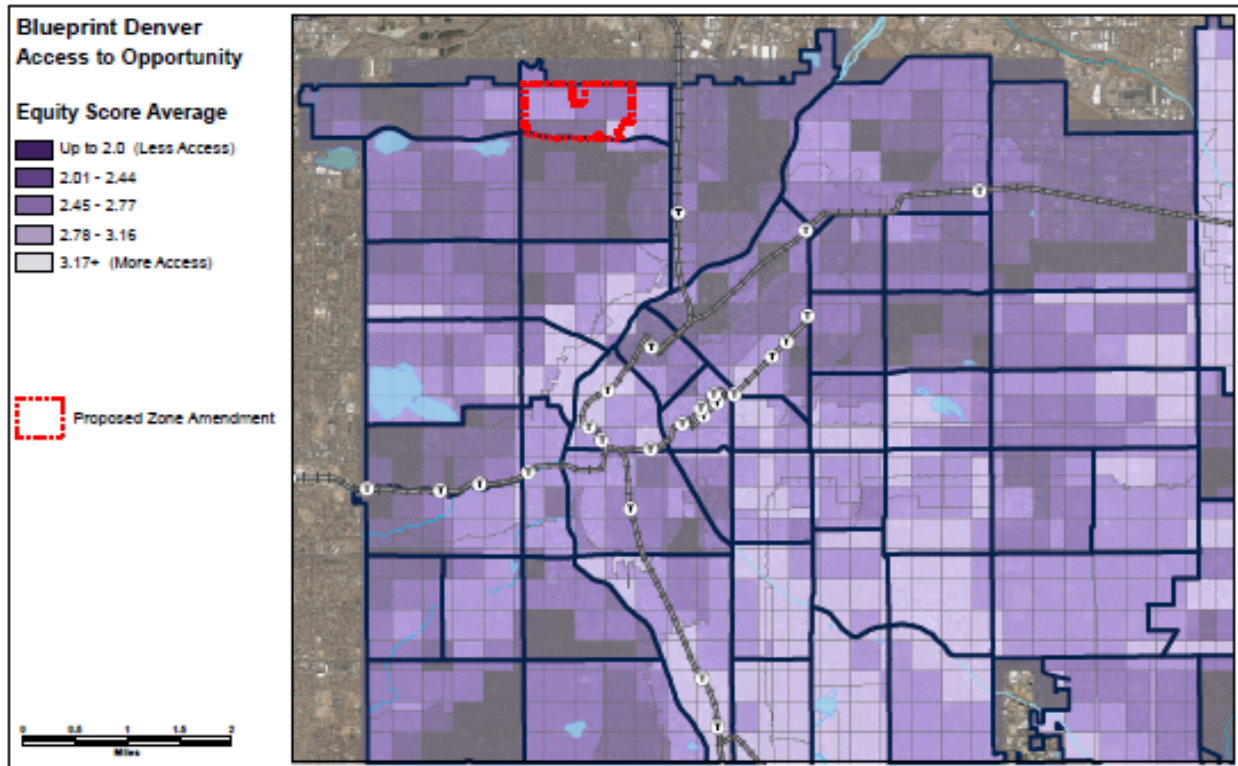
- This policy is to "Integrate mitigation of involuntary displacement of residents and/or businesses into major city projects" (p. 75)
- **Strategy B** recommends "For major city investments and projects—including regulatory changes and legislative rezonings— analyze the potential for the involuntary displacement of lower-income residents and local businesses." Discussion of impacts on involuntary displacement is included below *Blueprint Denver* equity concepts.

Blueprint Denver Equity Concepts

Blueprint Denver contains three equity concepts to help guide change to benefit everyone. Each equity concept has associated measurements that help inform implementation actions through large rezonings along with other implementation actions.

I. Access to Opportunity

The access to opportunity score 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. This equity concept helps the city consider if it’s making progress towards achieving the vision for complete neighborhoods citywide.

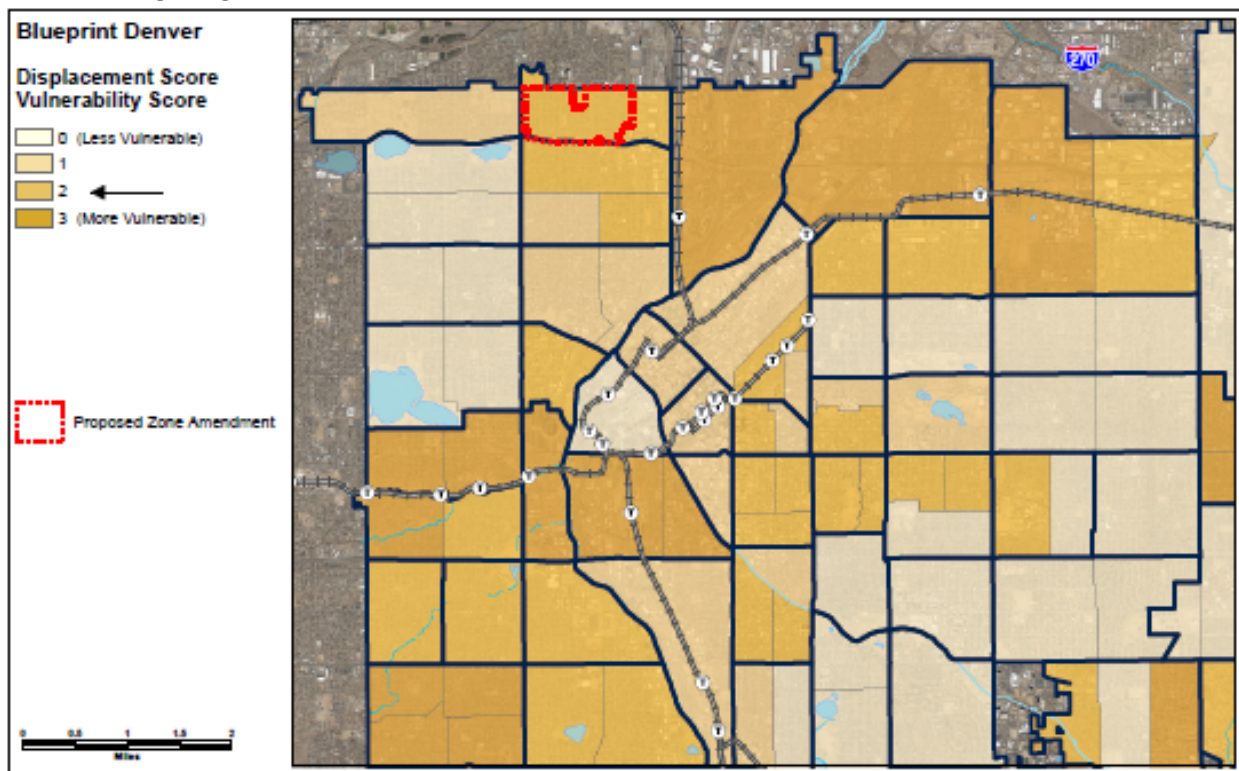


The subject property is in an area with average access to opportunity. Chaffee Park is somewhat equitable on the neighborhood equity index measurement (social determinants of health, access to healthcare, child obesity, and built environment subjects). The neighborhood scores lower in regards to access to transit because it is not located with a ½ mile of a light-rail transit station. However, the neighborhood has access to several bus lines, including along Federal Boulevard (Route 31), Pecos Street (Route 19), and 50th Avenue (Route 52). The access to centers and corridors indicator varies throughout the neighborhood. The portions of the neighborhood covered by a walk, bike, or driveshed to a center or corridor ranges from 25% to 100%. The proposed rezoning to allow ADUs throughout the neighborhood will bring more residents to an area that has access to healthcare and high life expectancy. It will also allow more residents to have access to bus transit and centers and corridors. The proposed rezoning will not have a direct impact on increasing neighborhood access to amenities or transit as it will only allow residential and limited civic/public/institutional uses as is currently allowed in the existing zone districts today.

The text amendment creating the E-SU-B1 district will advance *Blueprint Denver's* vision for all neighborhoods to have more equitable access to amenities and quality-of-life infrastructure. By creating a new zone district within the Urban Edge neighborhood context that allows ADUs, more residents can live in neighborhoods where there is access to healthcare, healthy foods, and other basic services.

II. Vulnerability to Involuntary Displacement

The basis for measuring vulnerability to involuntary displacement is the vulnerability to displacement index developed by the Denver Economic Development and Opportunity Office (now the Department of Housing Stability). This combines U.S. Census data from median household income, percent of renter-occupied units, and percent of residents with less than a college degree.



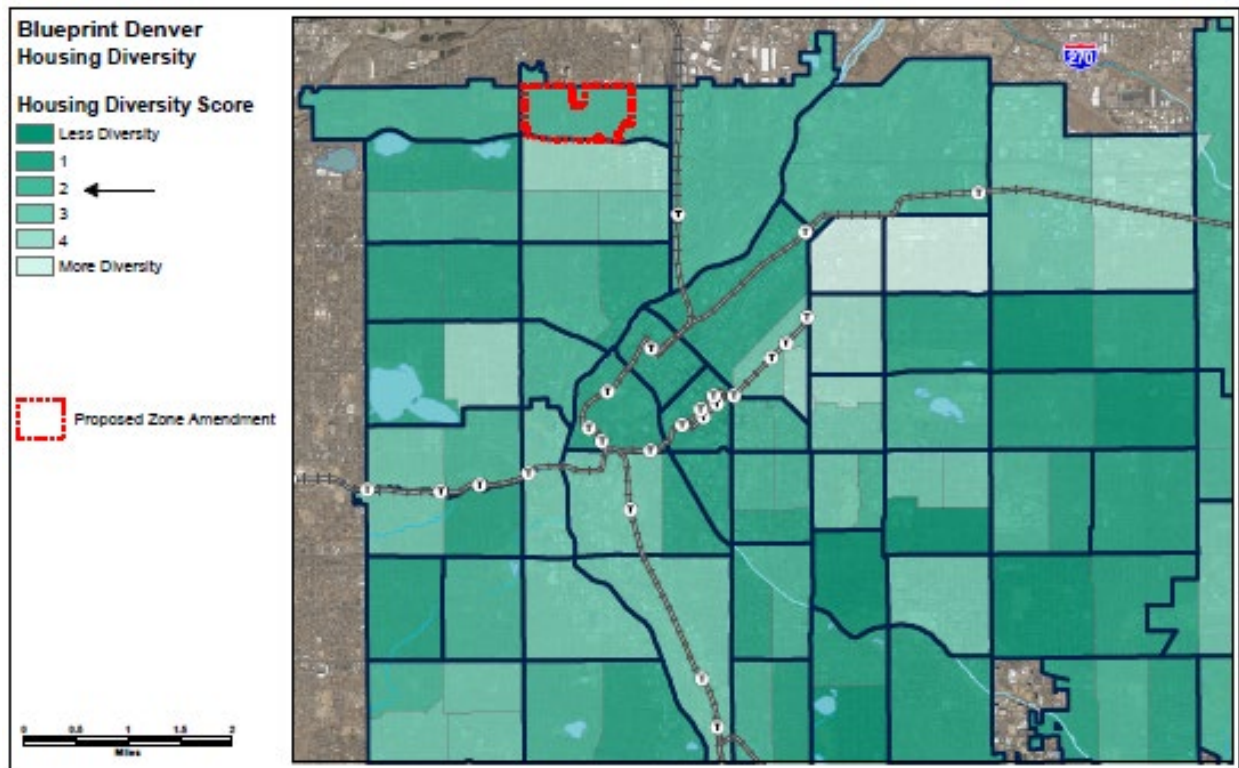
The subject property is in an area that is moderately vulnerable to involuntary displacement. Chaffee Park scores as vulnerable on two (percent of population with less than a college degree and median household income) of the three indicators. This proposed map amendment will provide opportunities for existing homeowners to supplement their income while also increasing housing options in the neighborhood. Allowing ADUs throughout Chaffee Park will help residents at a range of income levels continue to live in the neighborhood.

The proposed text amendment will create a new district that allows ADUs on a smaller minimum zone lot size than the three existing ADU districts in the Urban Edge neighborhood context. This text amendment will allow more property owners in the Urban Edge context neighborhoods to establish an ADU on their

property which can be an opportunity to build wealth and help keep current residents in place and provide more housing options for households who are vulnerable to displacement.

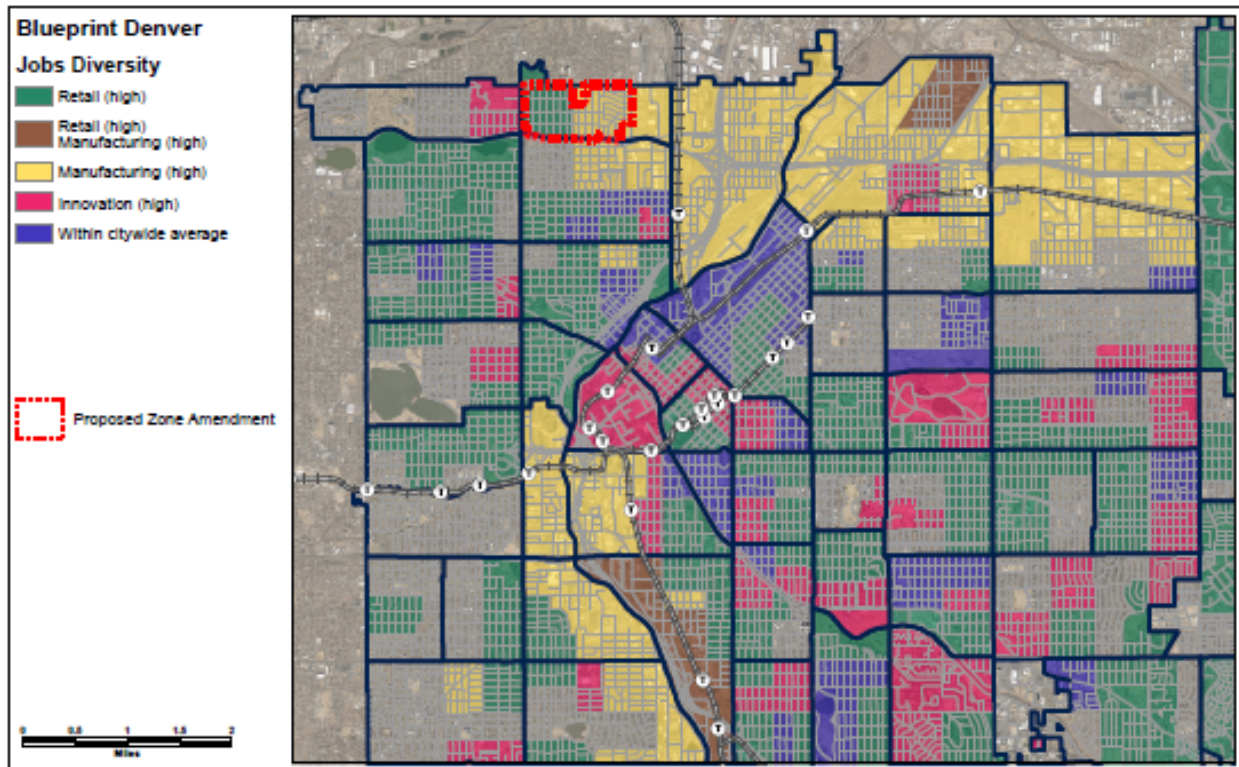
III. Expanding Housing and Jobs Diversity

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 versus rental, housing costs, and the number of income-restricted units.



The subject property is in an area that has some housing diversity. Chaffee Park is considered not diverse for three of the measurements - percentage of middle-density housing, home ownership compared to rental, and number of income restricted units. The area has greater diversity in home size and housing costs. The map amendment to allow ADUs will introduce a new housing type and bring more renters to a largely owner-occupied single-unit residential neighborhood.

The proposed text amendment to create the E-SU-B1 district adds an additional zone district within the Urban Edge Neighborhood Context that permits ADUs, increasing the number of properties eligible to rezone to allow for an ADU. This will expand housing diversity by creating a new housing option that is typically smaller and at a different price point than the existing single-unit homes often found in many Urban Edge neighborhoods. ADUs can accommodate households of different ages, sizes, and incomes in Denver's Urban Edge neighborhoods, which will advance the goal to increase racial, ethnic, and socioeconomic diversity in city's neighborhoods.



The map above shows the mix of jobs in areas of the city (dominant industry depicted by color). With a greater emphasis on retail and manufacturing jobs, the area within which the subject property is located has a mix of jobs that is dissimilar to the city's overall mix of job types. The existing and proposed zone districts do not allow for commercial uses so the rezoning will not impact jobs diversity.

Likewise, the creation of the E-SU-B1 zone district will likely not impact the diversity of jobs in Urban Edge neighborhoods because it offers another residential district option in these areas and will likely be mapped in single-unit areas. The district could enable residents with different incomes and education levels to live in Urban Edge neighborhoods that have greater access to a variety of jobs, leading to wealth-building opportunities.

Housing an Inclusive Denver

Housing an Inclusive Denver is not adopted as a supplement to the Comprehensive Plan, but the plan was adopted by City Council in 2018 and can be considered relevant to the review criteria for this text and map amendment. The text and map amendments are reducing regulatory barriers to developing ADUs and are therefore consistent with the following plan guidance:

- **Legislative and Regulatory Priorities, Recommendation 2:** *Expand and strengthen land-use regulations for affordable and mixed income housing. Through Blueprint Denver and supplemental implementation actions such as zoning modifications, the City should support land-use regulations*

that incentivize affordable and mixed-use housing, including expanding the development of accessory dwelling units (p. 9)

- **Attainable Homeownership, Recommendation 1:** *Promote programs that help households maintain their existing homes. Promote development of accessory dwelling units as a wealth building tool for low and moderate income homeowners in vulnerable neighborhoods and to support intergenerational households (p. 14)*

2. Uniformity of District Regulations and Restrictions

This text amendment will result in uniform regulations applicable to all new development within the E-SU-B1 zone district.

The proposed rezoning to E-SU-B1, E-SU-D1, and E-SU-D1x will result in the uniform application of zone district building form, use and design regulations within each zone district.

3. Public Health, Safety and General Welfare

The proposed text amendment and map amendment further the public health, safety, and general welfare by allowing implementation of *Blueprint Denver*, which recommends “the expansion of accessory dwelling units throughout all residential areas” (*Blueprint Denver*, p. 84), and by allowing for new housing that is consistent with the Urban Edge neighborhood context and Low Residential Place type. The proposed rezoning will improve public health outcomes by allowing more residents in an area that has higher life expectancy and access to healthcare, bus transit, and centers and corridors. It will also further the general welfare of the city by providing housing diversity and opportunities to help residents at a range of income levels continue to live in the neighborhood.

CPD Recommendation

A. Text Amendment

Based on the review criteria for a text amendment stated in the Denver Zoning Code (DZC), Section 12.4.11 (Text Amendment), staff recommends **approval** for Text Amendment #7 to create the E-SU-B1 zone district.

B. Map Amendment

Based on the review criteria for a map amendment stated in the Denver Zoning Code (DZC), Section 12.4.10 (Map Amendment), staff recommends **approval** for map amendment #2019I-00191.

Attachments

1. Text Amendment
2. Map Amendment Proposal
3. Public and RNO comment letters