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TO: Land Use, Transportation, and Infrastructure Committee
FROM: Rob Haigh, Senior City Planner
DATE: July 11, 2023
RE: Official Zoning Map Amendment Application #2022I-00257
3625 West 10th Avenue
Rezoning from E-SU-D1x to U-RH-3A

Staff Report and Recommendation

Based on the criteria for review in the Denver Zoning Code, Staff recommends **approval** for Application #2022I-00257.

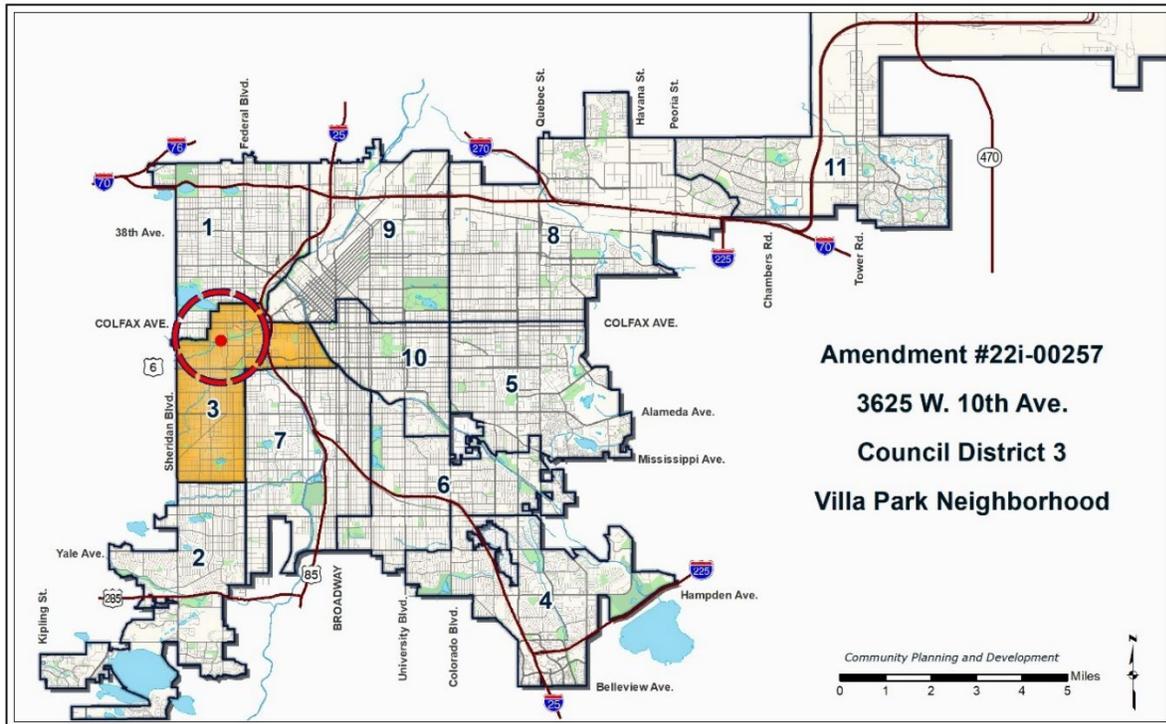
Request for Rezoning

Address: 3625 W 10th Ave
Neighborhood/Council District: Villa Park / Council District 3
RNOs: Inter-Neighborhood Cooperation (INC), Strong Denver, West Colfax Association of Neighbors (WeCAN), Sloan's Lake Citizens Group, Villa Park Neighborhood Association, United Northwest Denver
Area of Property: 9,370 square feet or 0.21 acres
Current Zoning: E-SU-D1x
Proposed Zoning: U-RH-3A
Property Owner(s): 3625-2635 West 10th Avenue Trust
Owner Representative: Nick Young

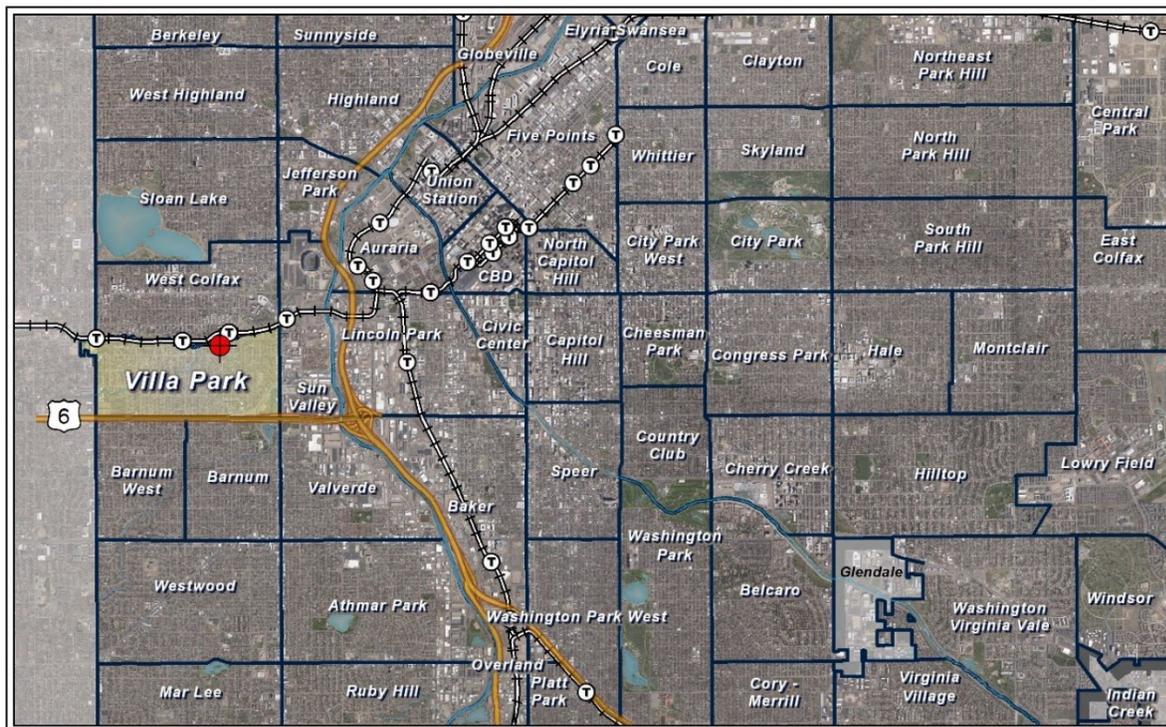
Summary of Rezoning Request

- The subject property contains a single-story, single-unit dwelling built in 1926. There is also a second detached dwelling located along the alley. It is located within the Villa Park statistical neighborhood at the corner of West 10th Avenue and North Meade Street.
- The property owner is proposing to rezone the property to allow for the development of row homes.
- The proposed U-RH-3A, **U**rbane, **R**ow **H**ouse, **3** stories, zone district allows the urban house, duplex, tandem house and row house primary building forms as well as detached accessory dwelling units (only allowed as accessory to a primary single-unit residential use). Additionally, the Apartment Building Form is allowed on corner lots where at least one of the intersection streets has a functional street classification of Collector or Arterial. 10th Avenue is designated as a Collector. The maximum height of the allowed primary building forms ranges from 30 to 38 feet for the front 65% of the zone lot and 17 to 38 feet in the rear 35% of the zone lot. The Detached Accessory Dwelling Unit form can be a maximum height of 24 feet. This district is intended for use in the Urban Neighborhood Context, which is characterized by single- and two-unit uses and allows for embedded multi-unit uses. Further details of the zone district can be found in the proposed zone district of this staff report (below) and in Article 5 of the Denver Zoning Code.

City Location



Neighborhood Location



Existing Context

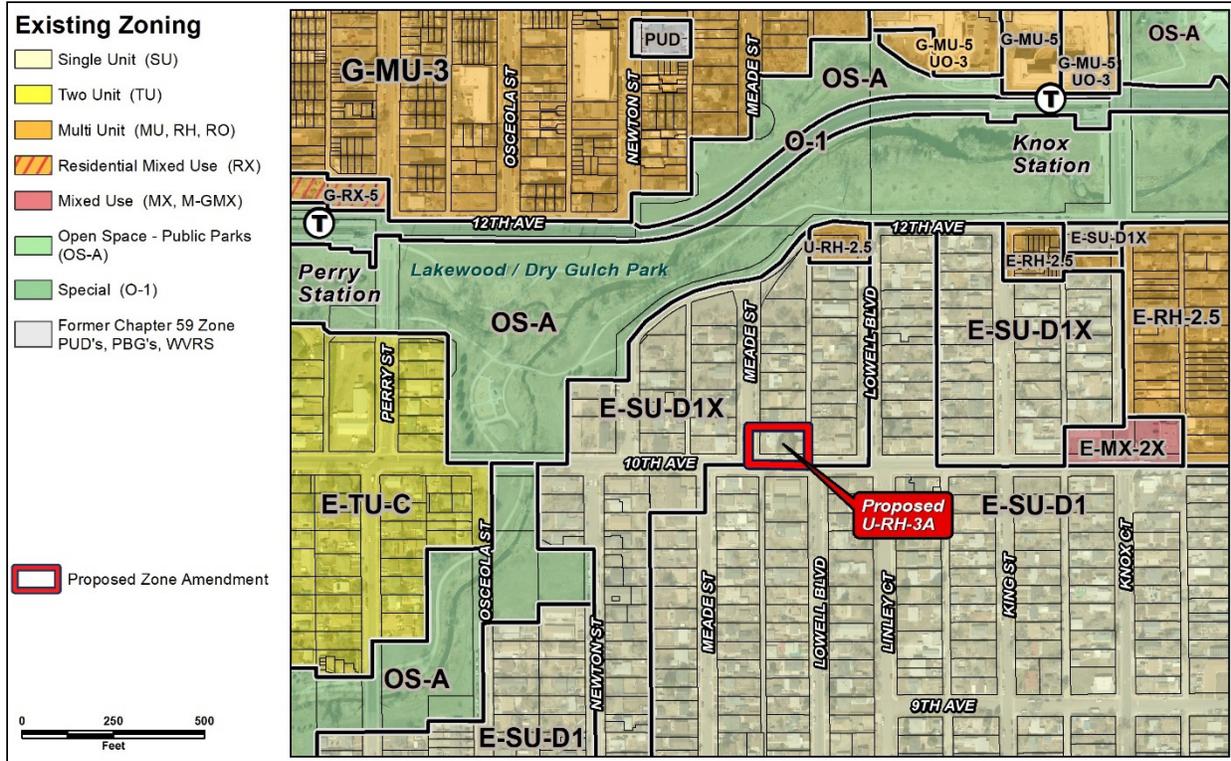


The subject property is located within the Villa Park statistical neighborhood, two blocks west of the southwest corner of West 10th Avenue and Knox Court and one block south of the Lakewood Dry Gulch Park is north of the property running east-west and Paco Sanchez Park is .2 miles northeast from the subject site. The subject site is within the quarter mile buffer of the Knox Street RTD Light Rail Station and is also served by RTD bus route 1 on North Knox Court and bus route 9 on West 10th Avenue.

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-D1x	Two detached dwelling units	Two 2-story dwelling units with detached garage	Block sizes and shapes are consistent and rectangular and shaped by a grid street pattern. Sidewalks are attached. Driveways with front-loaded garages are present and alleys exist on most blocks.
North	E-SU-D1x	Single-unit residential	1-story house	
East	E-SU-D1x	Two-unit Residential	1.5-story duplex structure	
South	E-SU-D1x	Two-unit Residential	1-story duplex residential structure	
West	E-SU-D1x	Two-unit Residential	1.5-story duplex residential structure	

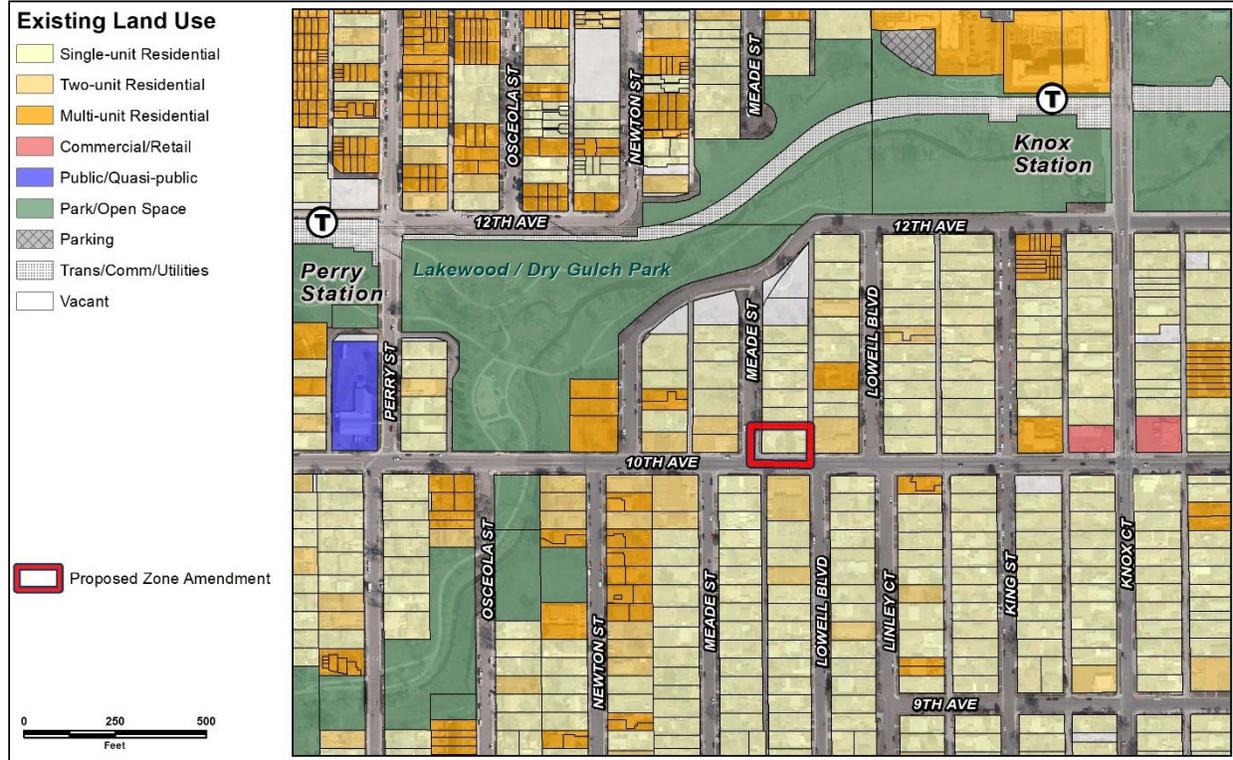
Existing Zoning



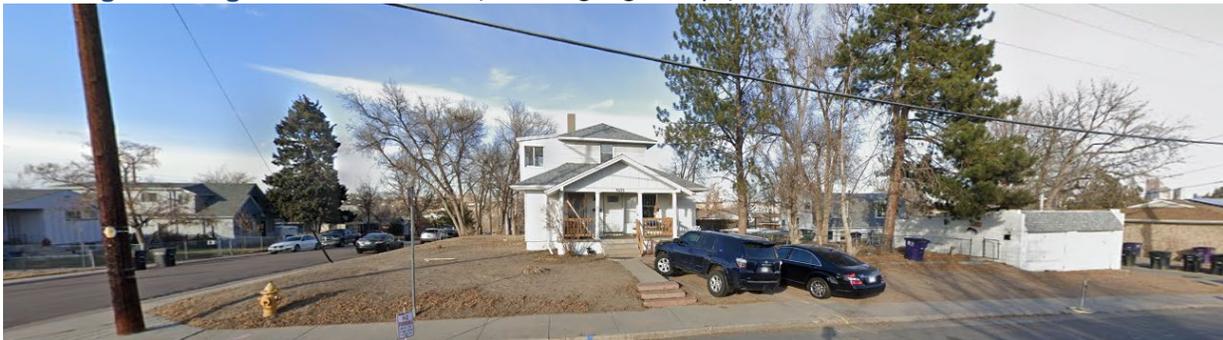
The existing zoning on the subject property is E-SU-D1x which is a single unit district allowing suburban houses, urban houses and detached accessory dwelling units with a minimum zone lot area of 6,000 square feet. Setbacks and lot coverage standards accommodate front and side yards similar to E-SU-Dx and allow a detached accessory dwelling unit in the rear yard. Blocks typically have a consistent pattern of 50-foot-wide lots. Allowed uses in E-SU-D1x are limited to single-unit dwellings and limited nonresidential uses found in single-unit zone districts. For additional details of the zone district, see DZC Section 4.2.2.

The subject property is surrounded by E-SU-D1x district to the east, west, and north, with E-SU-D1 to the south.

Existing Land Use Map



Existing Building Form and Scale (source: google maps)



Site – Subject property, looking north from West 10th Avenue.



South – Property south of the subject property, looking south across West 10th Avenue.



North – View of the property directly north of the subject site, looking east from Meade Street.



West – view of the property to the west of the subject property, looking north from 10th Avenue.



East – View of property east of the subject property, looking north from West 10th Avenue

Proposed Zoning

U-RH-3A Zone District

The applicant is requesting to rezone to U-RH-3A, which allows the Urban House, Duplex, Tandem House and Row House primary building forms up to two and a half stories in height. The Apartment Building Form is allowed on corner lots where at least one of the intersection streets has a functional street classification of Collector or Arterial. West 10th Avenue is designated as a Collector. The intent of the district is to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context. These regulations allow for some multi-unit uses, but not to such an extent as to detract from the overall character of the residential neighborhood. The building form standards, design standards, and uses work together to provide a variety of low to medium residential housing types in a way that is compatible across the district.

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

Design Standards	E-SU-D1x (Existing)	U-RH-3A (Proposed)
Primary Building Forms Allowed	Urban House and Suburban House	Urban House, Duplex, Tandem House, Row House, Apartment
Height in Stories / Feet, Front 65% of Zone Lot,	All forms: 2.5 stories / 30'*	Urban House, Duplex, Tandem House, Row House: 2.5 stories / 35'*** Apartment: 3 stories / 38'
Height in Stories / Feet, Rear 35% of Zone Lot,	Urban House: 1 story / 19' Suburban House: 2.5 stories / 30'	Urban House, Duplex, Tandem House, Row House: 2.5 stories / 24'*** Apartment: 3 stories / 38'
Height in Stories / Feet, Detached Accessory Dwelling Unit, (max.)	24 feet	1.5 stories / 24'
Zone Lot Size (min.)	6,000 sf	6,000 square feet**
Zone Lot Width (min.)	50 feet	50 feet**
Primary Street Block Sensitive Setback Required / If not	Yes / 20'	Yes / 20'
Side Street Setback (min.) *	All Forms: 5'	Urban House, Duplex, Tandem House, Row House: 5'*** Apartment: 10'
Side Interior Setback (min.) *	All Forms: 5'	All forms: 5'***
Rear Setback, Alley / No Alley	All Forms: 12' / 20'	All forms: 12' / 20'
Building Coverage per Zone Lot including all accessory structures (max.), not including exceptions	37.5%	N/A
Detached Accessory Building Forms Allowed	Detached Accessory Dwelling Unit, Detached Garage, Other Detached Accessory Structures	Detached Accessory Dwelling Unit, Detached Garage, Other Detached Accessory Structures

*Based on subject property width of 50 feet

**Standard varies depending on building form

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: Approve Rezoning Only – Will require additional information at Site Plan Review

Denver Department of Public Health & Environment - Division of Environmental Quality (EQ) does not guarantee approval of any proposed development project at this site by providing a response to this Official Map Amendment Referral Agency Review Request. Future development is subject to existing land use controls and other environmental requirements in accordance with applicable local, state, and federal environmental regulations and statutes. EQ recommends the Property Owner conduct an environmental site assessment to determine the potential presence, nature, and extent of possible contamination on the site and to identify specific cleanup needs associated with future development. EQ may have additional information about localized potential environmental concerns at the site. However, providing such information about a specific site is beyond the scope of these zoning application comments.

Denver Parks and Recreation: Approved – No Comments

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

Development Services – Project Coordination: Approved – No Response

Development Services - Fire Protection: Approved – No Comments

Development Services – Transportation: Approved – No Response

Development Services- Wastewater: Approved – No Response

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

Public Review Process

	Date
CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:	4/14/23
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:	5/23/23
Planning Board Public Hearing: <i>Forwarding Recommendation of Approval</i>	6/7/23
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):	6/27/23
Land Use, Transportation and Infrastructure Committee of the City Council meeting (tentative):	7/11/23
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):	7/31/23
City Council Public Hearing (tentative):	8/21/23

Public Outreach and Input

- **Registered Neighborhood Organizations (RNOs)**
 As of the date of this report, staff has not received any comments or position statements from applicable RNOs.

- **Other Public Comment**
 As of the date of this report, staff has not received any public comment.

Criteria for Review / Staff Evaluation

The criteria for review of this rezoning application are found in DZC Section 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

4. Justifying Circumstances
5. Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements

Consistency with Adopted Plans

The following adopted plans currently apply to this property:

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

Denver Comprehensive Plan 2040

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

The proposed rezoning would allow for additional housing units within an established neighborhood, consistent with the following strategies in the Equitable, Affordable and Inclusive vision element:

- 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 allow infill development appropriate for the surrounding neighborhood that broadens the range of housing types available, consistent with the following strategy in the Strong and Authentic Neighborhoods vision element:

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

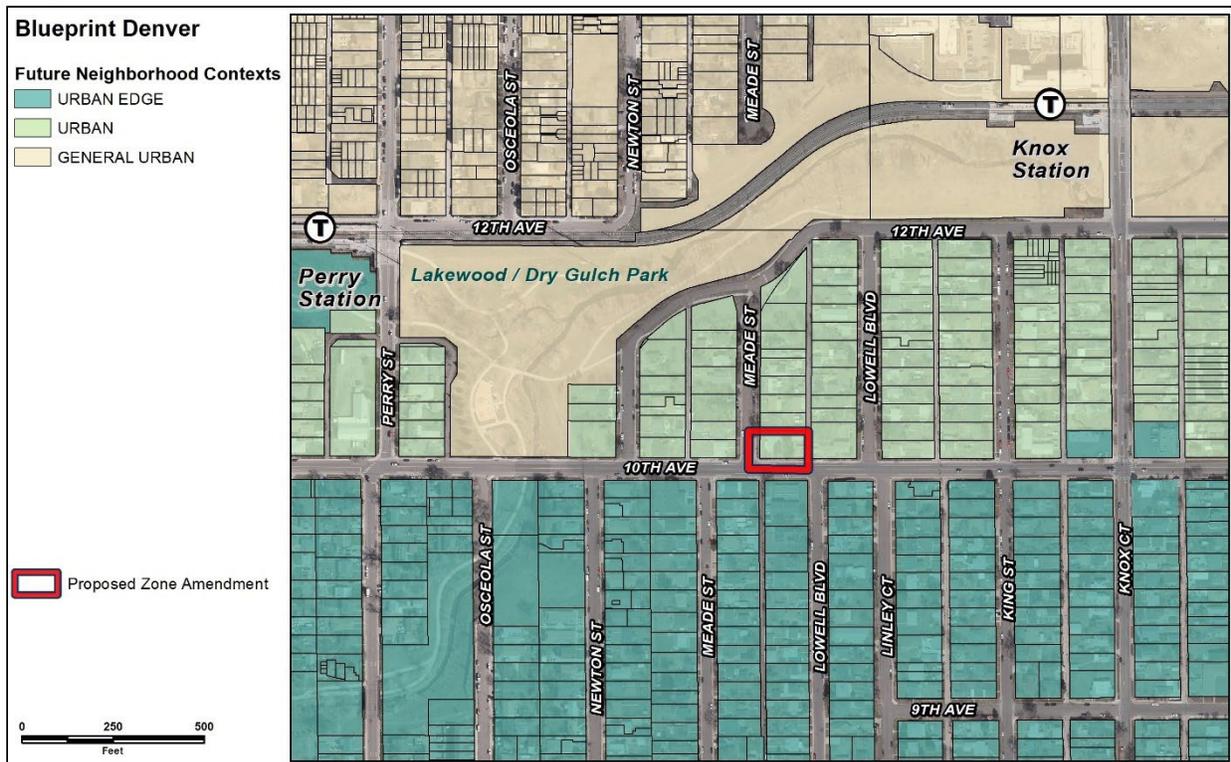
- Environmentally Resilient Goal 8, Strategy A - Promote infill development where infrastructure and services are already in place (p. 54).

The requested map amendment will allow an additional residential density at an infill location where infrastructure is already in place. The requested zone district enables building forms and uses which can provide residents with a mixture of housing types. 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 Low-Medium Residential place within the Urban Neighborhood Context and provides guidance from the future growth strategy for the city.

Blueprint Denver Future Neighborhood Context

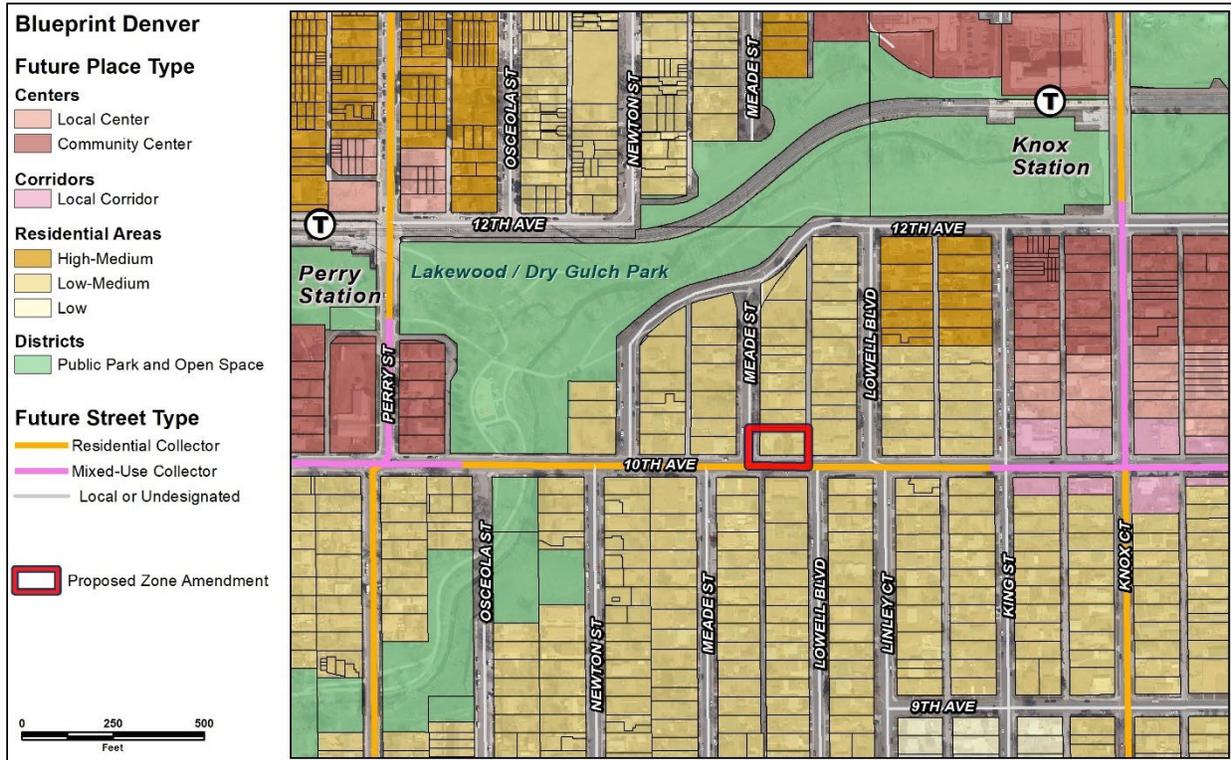


The subject property is shown on the context map as an Urban Neighborhood Context, the description of which is used to guide appropriate zone districts. “Small multi-unit residential and low-intensity mixed-use buildings are typically embedded in single-unit and two-unit residential areas. Block patterns are a regular grid with consistent alley access. Where they occur, multi-unit buildings are low scale. Mixed-use buildings are sited in a pedestrian-friendly manner near the street” (p. 222).

U-RH-3A is a zone district within the Urban Neighborhood Context and is intended “to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context” and “the building form standards, design standards and uses work together to promote desirable residential

areas” (DZC Section 5.2.2.1). U-RH-3A is consistent with *Blueprint Denver’s* future neighborhood context of Urban because it will promote the residential character of the neighborhood by allowing a low-medium-scale multi-unit residential building that will be compatible with the existing residential area.

Blueprint Denver Future Place

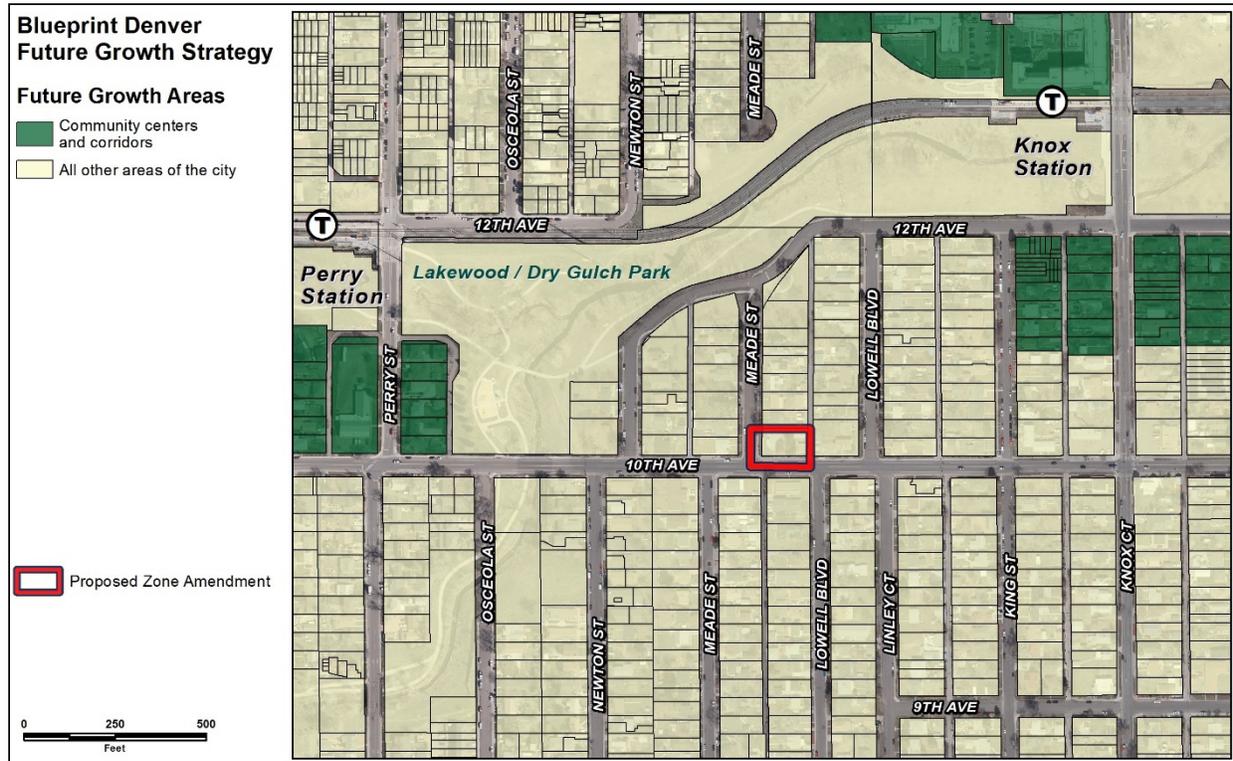


Within the Urban Neighborhood Context, the subject property is categorized as a Low-Medium Residential future place with a land use and built form defined by *Blueprint Denver* as “Mix of low- to mid-scale multi-unit residential options. Small-scale multi-unit buildings are interspersed between single- and two-unit residential” (p. 232). Additionally, *Blueprint Denver* also provide guidance that in Low-Medium Residential areas, “Buildings are generally 3 stories or less in height. Higher-intensity buildings should be compatibly integrated.” (p. 149). The proposed U-RH-3A zone district allows multiple building forms up to 2.5 stories in height and the Apartment building form up to 3 stories in height on certain corner lots like this one. The proposed zone district is compatible with this future place.

Blueprint Denver Future Street Types

In *Blueprint Denver*, future street types work in concert with the future places to evaluate the appropriate intensity of adjacent development (p. 67). *Blueprint Denver* classifies West 10th Avenue as Residential Collector Future Street Type, these streets are described as having primarily residential uses and conveying traffic from local streets to larger arterial streets. This future street type aligns with the current functional classification of West 10th Avenue. *Blueprint Denver* classifies Meade Street as Local or Undesignated Future Street Type. The proposed U-RH-3A district is consistent with this street type because it allows for residential uses only at a scale compatible for an intersection where one street is a Residential Collector Future Street Type.

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 the "All other areas of the city" growth area. These areas anticipate experiencing around 20 percent of new housing growth and 10 percent of new employment growth by 2040" (p. 51). This growth area contains "mostly residential areas with embedded local centers and corridors (that) take a smaller amount of growth intended to strengthen the existing character of our neighborhoods" (p. 49). The proposed U-RH-3A zone district is appropriate in this growth area as it will contribute to growth in the neighborhood while maintaining the area's residential character. Therefore, the proposed rezoning is consistent with the *Blueprint Denver* growth strategy.

Additional Applicable Strategies

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

- Land Use & Built Form – Housing Goal 2: *Diversify housing options by exploring opportunities to integrate missing middle housing into low and low-medium residential areas (p. 82).*
- Land Use & Built Form – Housing Goal 2: *Integrate missing middle housing into low and low-medium residential areas, especially those that score low in housing diversity. This allowance should advance goals for affordability, such as including a requirement to provide affordability in exchange for increased density (p. 82).*

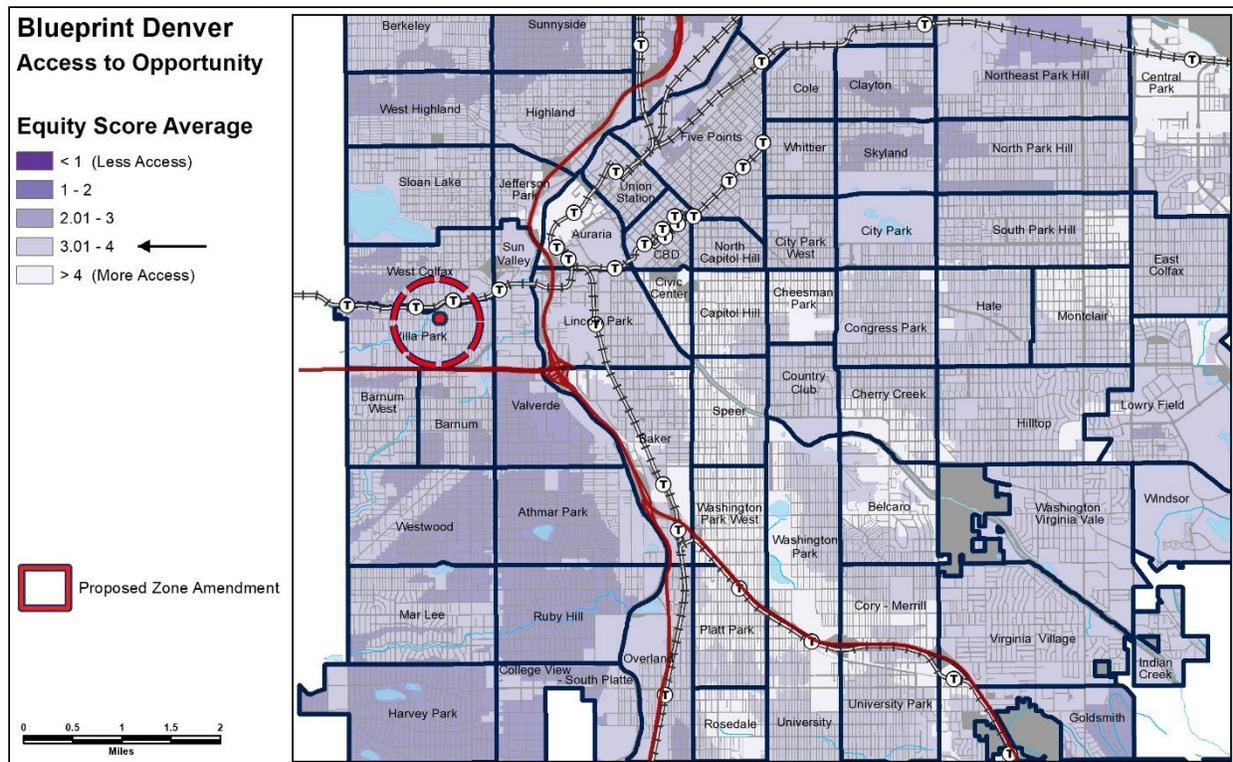
This rezoning to a U-RH-3A zone district allows for additional missing middle housing built forms in this Low-Medium Future Place type and is consistent with *Blueprint Denver* recommendations. Additionally,

the rezoning of the subject property will provide affordable missing middle housing options for residents in the neighborhood. The proposed map amendment is therefore consistent with the above strategies.

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. Given that the subject site is within one of Denver’s Neighborhood Equity and Stabilization (NEST) focus neighborhoods, an equity analysis is included in this staff report and was shared with the applicant for consideration. The applicant’s response is included with the application that is attached to the staff report.

Access to Opportunity

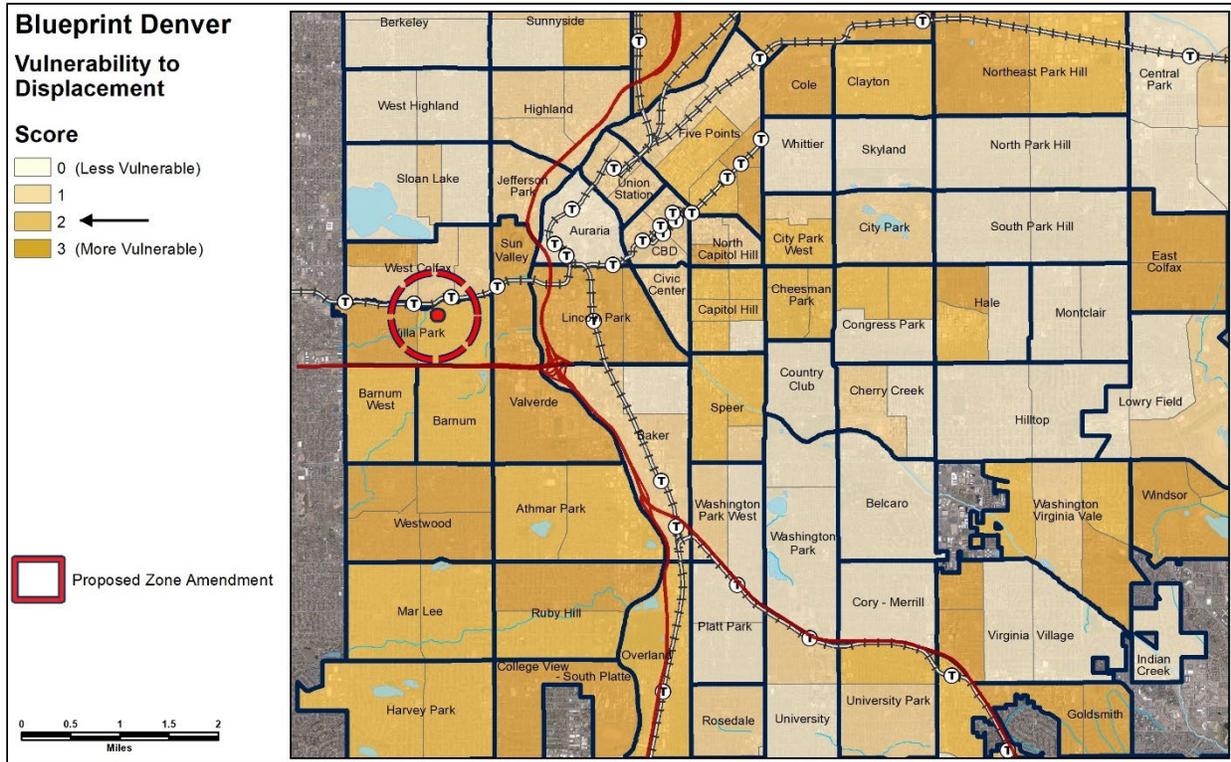


The subject property is in Villa Park, which is identified as an area with less access to opportunity compared to the rest of the city. The basis for measuring access to opportunity is a composite of the neighborhood equity index developed by Denver’s Department of Public Health and Environment, proximity to high-capacity and frequent transit, and access to centers and corridors. Analyzing this metric helps us measure our progress towards achieving the vision for complete neighborhoods across the city. The subject area is less equitable than Denver as a whole when it comes to access to fresh foods and healthcare. These scores are related to a higher-than-average percentage of children with obesity and poverty line.

While the proposed allowance of a multi-unit residential development does not directly increase access to opportunity, an increase in residents may increase the likelihood that more goods, services and amenities will locate in the commercial and mixed-use zoned areas of the neighborhood. Additionally,

the proposed zone district would allow additional housing units at a location that is well-served by transit, providing residents with access to daily needs.

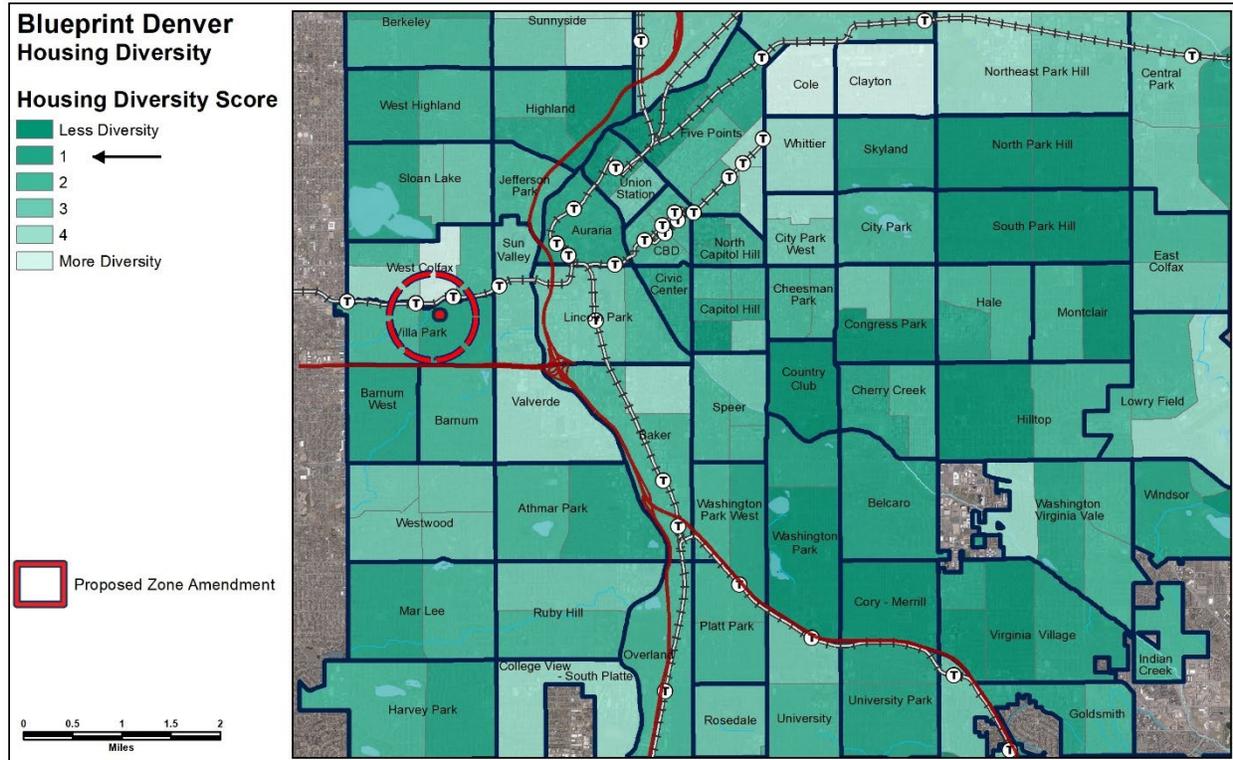
Vulnerability to Displacement



The subject property is in an area that has high vulnerability to involuntary displacement. The basis for measuring vulnerability to involuntary displacement is through the vulnerability to displacement index developed by Denver’s Economic Development and Opportunity office. This combines data from median household income, percentage of people who rent housing, and percent of population with less than a college degree. The subject area scored as vulnerable to displacement in two of the three categories: Educational Attainment and Median Household Income. In areas with high vulnerability to involuntary displacement, it is important to increase affordable housing options so that residents of all income levels can continue to live in these neighborhoods.

The proposed rezoning to allow for a multi-unit residential development and additional residential units in this area, which can help provide housing for existing residents and contribute to meeting the citywide demand for housing

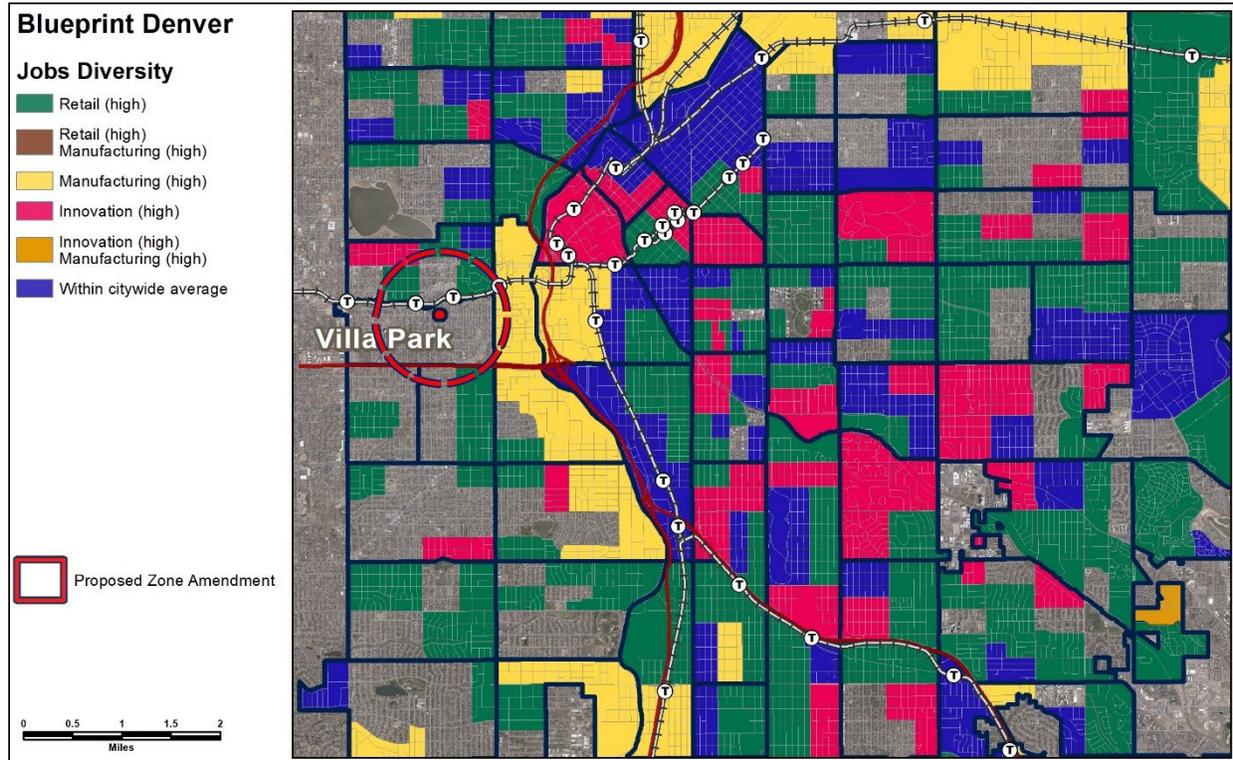
Housing Diversity



The subject property is in an area that has low housing diversity. The housing diversity map combines census tract-level data measuring the percentage of middle-density housing (housing with 2-19 units), home size diversity, ownership vs. rental, housing costs and the number of income-restricted units. The subject area is not diverse in terms of the percentage of owners to renters, number of income restricted units and housing costs. Adding missing middle housing is a strategy to add needed housing diversity.

The neighborhood lacks smaller-scale multi-unit developments compared to the rest of the city and lacks a diversity of housing costs when compared to the Denver average. The proposed rezoning will help diversify the housing stock and encourage a mix of residential development types available.

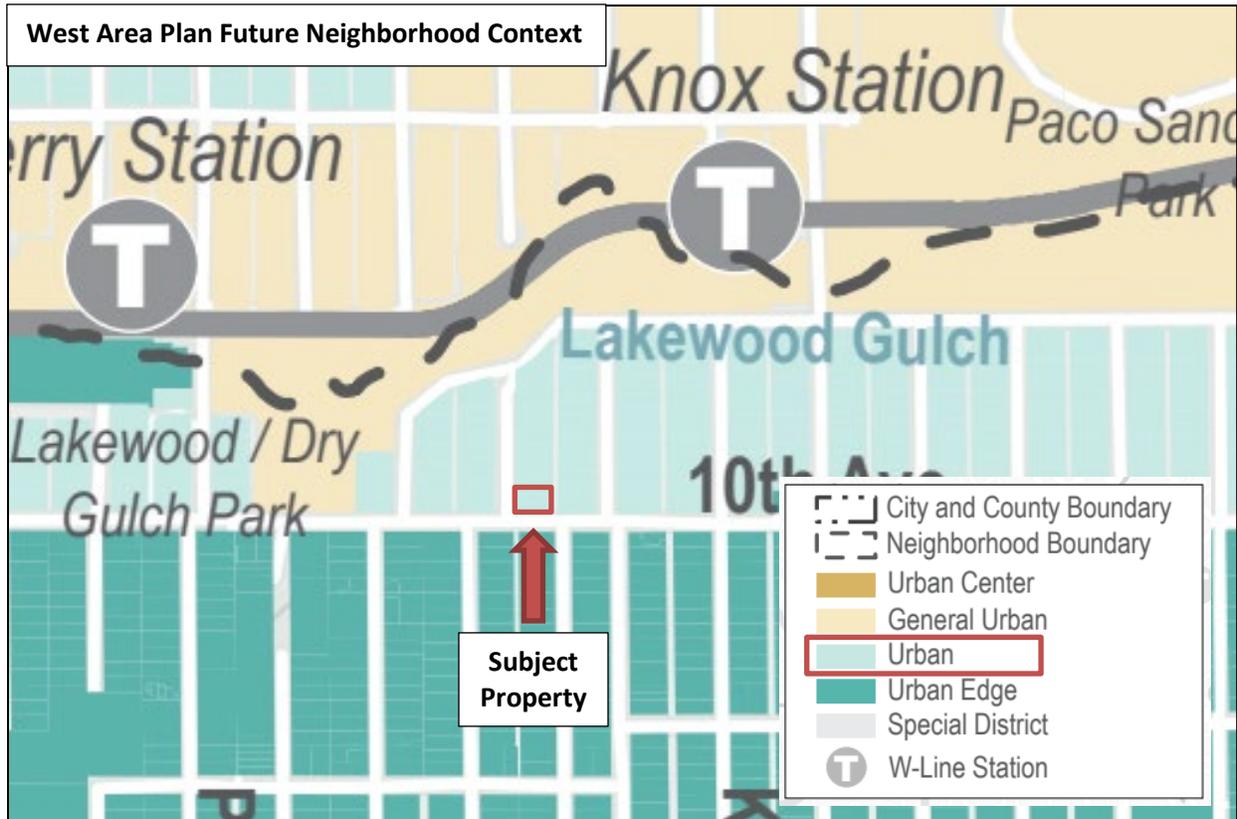
Housing Diversity



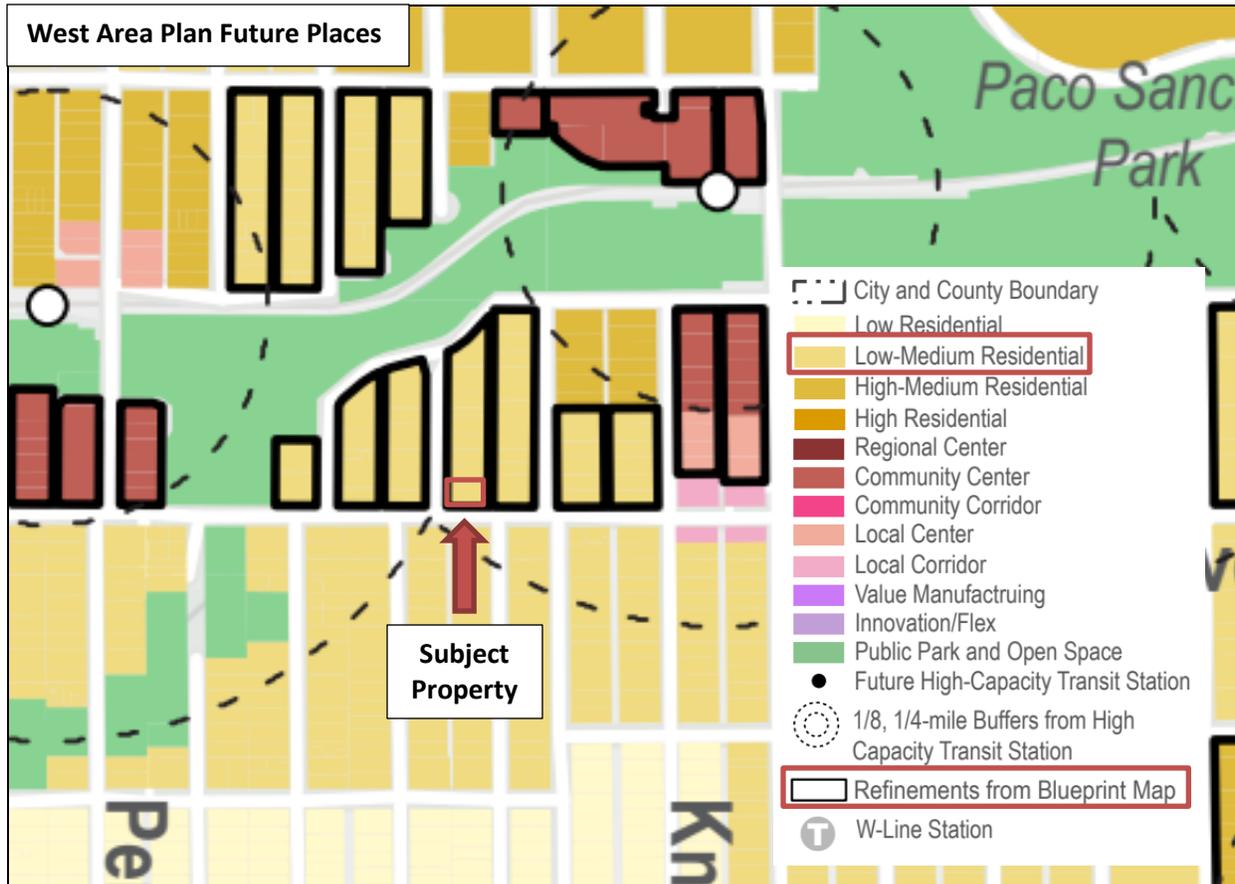
The map above shows the mix of jobs in areas of the city (dominant industry depicted by color). There is not enough data to classify the type of jobs in this part of Villa Park because there are less than 100 jobs per acre, which is typical of largely residential areas. There are a total of 29 jobs or 0.2 jobs per acre. The proposed rezoning to U-RH-3A is not expected to impact jobs diversity.

West Area Plan

The *West Area Plan* was adopted in March 2023 as part of Community Planning and Development’s Neighborhood Planning Initiative and supersedes the *Villa Park Neighborhood Plan* and the *West Colfax Plan*. It also updates the guidance in *Blueprint Denver*.



The subject property is within the Urban Neighborhood Future Neighborhood Context. This guidance supports the proposed change in context from Urban Edge (E-), to Urban (U-). The description of Urban Future Neighborhood Contexts in the *West Area Plan* closely reflects *Blueprint Denver* and states that “Housing types range between single-unit and smaller-scale multi-unit and rowhomes buildings to multi-story residential building forms.” (p. 162). The proposed U-RH-3A zone district allows for the anticipated building forms in this neighborhood context, is supported by this plan guidance.



The Future Place Map classifies the subject property as Low-Medium Residential, which is defined as having “Mix of low- to mid-scale multi-unit residential building forms. Small-scale multi-unit buildings are dispersed among single and two-unit residential building forms” with “a maximum base height of 3 stories, although 2.5 stories is also appropriate”. (p. 166) The proposed U-RH-3A zone district allows for multiple residential building forms up to 2.5 stories, and the apartment building form up to 3 stories in height on select corners. This corner lot meets the qualifications for a 3-story apartment building and would be an appropriate location for additional density as described in the area plan guidance.

Policy L.7 *West Area Plan* provides guidance for developing zoning tools to ensure new 3-story development in Low-Medium Residential places fit into the neighborhood fabric. This guidance is primarily intended to inform the need for additional 3-story zone districts in the Urban and Urban Edge neighborhood contexts. The proposed U-RH-3A zone district allows for primarily 2.5 story building forms, and 3-story apartments are only allowed on select corners. This limited allowance for 3-story development is appropriate and would not allow for an apartment building mid-block or at an intersection that is not located along a collector street.

Therefore, the proposed U-RH-3A zone district is consistent with the direction given in the *West Area Plan*.

Uniformity of District Regulations and Restrictions

The proposed rezoning to U-RH-3A will result in the uniform application of zone district building form, use and design regulations.

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 plans. The proposed rezoning would also facilitate increased housing density near services and amenities and promote a walkable, urban neighborhood within walking distance to public transit.

Justifying Circumstances

The proposed rezoning is justified by several changed or changing conditions as the under DZC Section 12.4.10.8, "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 a change may include: Changed or changing conditions in a particular area, or in the city generally; or, a city adopted plan; or that the city adopted the Denver Zoning Code and the property retained Former Chapter 59 zoning."

The application identifies the recent adoption of the West Area Plan, and the guidance provided in that plan regarding a low-medium residential area with a height up to 3 stories as a justifying circumstance for this rezoning. The zoning on the subject property was established in 2010, and since that time, *Blueprint Denver* and the *West Area Plan* have been adopted. Both of these plans provide guidance that more building forms and additional residential density are in the public interest to advance stated plan goals.

Additionally, changing conditions north of the property along the West Corridor Light Rail line could be a Justifying Circumstance. There has been increasing redevelopment in the Villa Park and West Colfax neighborhoods and significant investment in infrastructure has occurred around the Knox RTD Light Rail station. This increase in the intensity of land use in the area has created additional need for higher intensity residential uses like those allowed in the U-RH-3A zone district. Therefore, the proposed map amendment is justified in order to respond to the changing character of the area and implement city adopted plans.

Consistency with Neighborhood Context Description, Zone District Purpose and Intent Statements

The proposed U-RH-3A zone district is within the Urban Neighborhood Context. The neighborhood context generally consists of primarily single-unit and two-unit residential uses, and small-scale multi-unit residential uses and commercial areas are typically embedded in residential areas. The Urban Neighborhood Context consists of a regular pattern of block shapes surrounded by an orthogonal street grid, providing a pattern of pedestrian and vehicular connections and a consistent presence of alleys. Block sizes and shapes are consistent and include detached sidewalks, tree lawns, street and surface parking, and landscaping in the front setback. Residential buildings typically have consistent, moderate

front setbacks, shallow side setbacks and consistent orientation. The Urban Neighborhood Context is characterized by low-scale buildings except for some mid-rise commercial and mixed-use structures, particularly at nodes or along arterial streets. There is a balance of pedestrian, bicycle and vehicle reliance with greater access to the multi-modal transportation system (DZC, Division 5.1). It is appropriate to apply zoning within the Urban Neighborhood Context at this location due to the adopted plan vision described earlier as well as the existing context. The proposed rezoning to U-RH-3A will enable development that is consistent with the neighborhood context description.

According to DZC 5.2.2.1.A, the general purpose of the Residential zone districts is to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context. The building form standards, design standards, and uses work together to promote desirable residential areas. Lot sizes are consistent within an area, and lot coverage is typically medium to high accommodating a consistent front and side yard. The standards of the two unit and row house districts promote existing and future patterns of lower scale multi-unit building forms that address the street in the same manner as an urban house building form. The regulations provide certainty to property owners, developers, and neighborhoods about the limits of what is allowed in a residentially zoned area. These regulations are also intended to reinforce desired development patterns in existing neighborhoods while accommodating reinvestment. The rezoning to U-RH-3A is consistent with the zone district general purpose and recognizes the existing residential context.

Specifically, U-RH-3A is a multi-unit district that allows up to a two and a half story rowhouse building form. Apartments are allowed up to three stories, on certain corner lots. It also allows the urban house, detached accessory dwelling unit, duplex, and tandem house building forms. The proposed zone district recognizes the subject site's existing condition, surrounding context, and plan guidance, fulfilling this Specific Intent statement.

Attachments

1. Application