



October 27, 2023

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Community Development
2255 W Berry Ave
Littleton, CO 80120

Re: 700 W Mineral – Future Land Use Character Amendment Application – Decision Criteria Narrative

DECISION CRITERIA NARRATIVE

Applicant’s response to the relevant decision criteria/considerations described in the ULUC for a specific process.

Section 10-9-4.5 Amendment to the Future Land Use and Character Map

- Compatibility.* The land use types and characteristics of the proposed land use category will be compatible with the properties in the immediate vicinity of the subject property.
Response: As evident in the Comprehensive Plan, the City of Littleton zoning policy is transitioning from a traditional zoning perspective to a community character primer. The “community character approach to evaluating and planning for land use emphasizes the variation in physical conditions experienced along a spectrum from natural and rural landscape at the edges of a community to its most urbanized environments.” This character-based approach focuses on development intensity, which encompasses:

 - The density and layout of residential development*
 - The scale and form of non-residential development; and*
 - The building and pavement coverage relative to the extent of open space and natural vegetation of landscaping*

As shown in the Comprehensive Plan Future Land Use and Character charts below, the existing Suburban Business Park designation and the proposed Suburban Residential Multi-Family land use exhibit the same ratio of character elements, with most of the land covered by open space and buildings, and little emphasis on paving. This keeps with the Suburban character area that has a “noticeably less intensive use of land, with open and green spaces balancing the extent of land covered by structures and surfaces.” Overall, the proposed land use amendment from Suburban Business Park to Suburban Residential Multi-Family has little effect on the overall character of the area, but will provide much needed new high-density housing to the area.

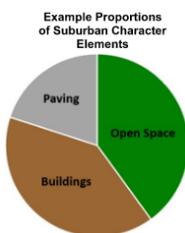


Figure 1: Suburban Multi-Family Character Elements (Proposed Character)

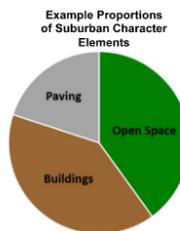


Figure 2: Suburban Business Park Character Elements (Existing Character)



Development within the MFR zone district is required to comply with the neighborhood design standard identified in code, which are designed to:

- *Provide for safe, attractive, and highly livable neighborhoods.*
- *Create a variety of housing types and living formats to meet the needs of all residents.*
- *Enable homeowners to improve and reinvest in their properties without a burdensome process.*
- *Protect the value and enjoyment of residential properties by providing for good compatibility and transition standards.*
- *Improve walkability within neighborhoods and provide for safe connections to nearby service and convenience uses.*

The Comprehensive Plan also states certain uses can be located amid other predominant use types. The land surrounding the site is characterized by the Suburban Business Park Future Land Use, which encompasses:

- *Primarily office uses*
- *Light industrial uses (including warehousing/distribution), well screened and in building with enhanced architectural design*
- *Research and technology*
- *Commercial retail and service uses secondary to the primary office focus, to serve local workers and visitors.*

Compatibility between varying suburban land uses is not completely without precedent. This is evident by:

- *the neighboring Monte Vista Apartments (Parcel ID: 2077-34-2-01, located at northeast corner of W Mineral Avenue and S Elati Street), which places Suburban Residential Multi-Family adjacent to Suburban Business Park and Suburban Commercial*
- *The neighboring Pinnacle at Highline Condos (Parcel ID: varies; located at southwest corner of W Canal Circle and Southpark Lane), which places Suburban Residential Multi-Family adjacent to Suburban Business Park*

These residential uses complement the predominantly industrial/commercial adjacent site uses through:

- *use of similar building height, scale, site coverage and intensity*
- *similar buffer/screening requirements*
- *consistent tree/vegetation cover*
- *auto-centric circulation and suburban layout.*

With the addition of future residential rooftops permitted as a part of future land use amendment, the adjacent site to the north is anticipated to be redeveloped and likely implement a more retail-based use than the existing office park. The proposed multi-family residential use provides an appropriate transition and much needed housing for the surrounding Suburban Business Park land uses. Landscape buffers and setback requirements within the proposed zone district create additional transitions to the existing auto-oriented business park design that surrounds the site.

	Comprehensive Plan Land Use Designation	Zoning
Site	Suburban Business Park (existing), Suburban Residential Multi-Family (proposed)	Industrial Park (IP)/Planned Overlay District (PL-O) (existing), Multi-family Residential (MFR) (proposed)



North	Suburban Commercial, Suburban Residential Multi-Family	IP/PL-O
South	Suburban Business Park	IP/PL-O
East	Suburban Business Park	IP/PL-O
West	Suburban Business Park	IP/PL-O

2. *Impact Mitigation.* The amendment may serve to mitigate adverse impacts of the use and development of land on the natural or built environments, including, but not limited to, mobility, air quality, water quality, noise levels, stormwater management, and vegetation, or will be neutral with respect to these issues;

Response: No harm to natural features or adjacent properties is anticipated. The design of the site, buildings, and open spaces are anticipated to comply with the standards of the Unified Land Use Code. Impacts identified during the Master Development Plan and/or Site Plan process will be reviewed at that time. There is adequate off-site storm sewer infrastructure in the vicinity of the proposed site to convey treated and detained flows to the public right-of-way. Denver Water has indicated that there is sufficient water pressure and infrastructure to provide water service to the proposed site. At the time of this submittal the project team is working with the City of Littleton and the Southwest Metropolitan Water & Sanitation District to determine if the public sanitary lines in the vicinity of this project are adequate for the additional flows or need reinforcement. The proposed amendment encourages a more complete mix of uses, allowing residents more opportunities to live, work and play in a mixed-use neighborhood while redevelopment of the overall site will require improvements to the limited, existing pedestrian circulation.

3. *Comprehensive Plan.* The proposed amendment supports the goals of the comprehensive plan.

Response proposed amendment helps meet the housing needs identified within the Plan:

Housing needs derived from the Comprehensive Plan state:

- *A need for 6,550 additional housing units to help support the nearly 15,000 additional residents anticipated over the next 20 years.*

and the 2017 Littleton Housing Study notes:

- *71.7% of Littleton's housing stock is at least 30 years old, there is a strong need for new, high-density development as much of the land is originally developed.*
- *Out of 29,500 primary jobs in Littleton, only 2,325 both live and work in Littleton. That is, 88% percent of working Littleton residents are out-commuters and 92% of Littleton's jobs are held by in-commuters.*

Additionally, the Comprehensive Plan discusses the Future Land Use and Character, noting that the identified uses are what are expected to be predominate in areas and that they will possibly evolve. It goes on to state that transitions can occur through redevelopment of previously built sites, that other complementary uses may emerge in particular areas and that mixing uses on sites may occur as the market accommodates and zoning allows. In this case, this approximately 18-acre parcel is part of a larger redevelopment that is intended to add commercial retail and service uses secondary to the primary office focus (a use that covers much of the balance of the Suburban Business Park land use in this portion of Littleton). This overall balance of office, commercial retail/service and now multi-family uses collectively create the mix of uses needed for a complete neighborhood that meets many of the details of the Comprehensive Plan's guiding principle about Littleton being an increasingly connected and accessible place.

This future land use and character amendment is further supported by a variety of goals and policies identified in Envision Littleton:



- Goal H&N 1: A quantity and diversity of housing options that makes living in Littleton attainable for a wide range of age groups and income levels.
The majority of the permitted uses within the MFR zone district are residential (which is not allowed in the existing zone district); this encourages the redevelopment to be residential in nature, increasing both the quantity of housing options in the City as well as diversity of housing options in the area (much of the limited, existing housing in the surrounding area is lower density single family). Any new residential development will require compliance with the City's Inclusionary Housing Ordinance, which further contributes to attainable housing options within the City.
- Policy H&N 1: Encourage an array of residential options within the City – through new development, redevelopment and maintenance of existing housing stock – to respond to the need for varied housing types, sizes, and price points that are attainable for prospective owners and renters at all levels of income.
The majority of the permitted uses within the MFR zone district are residential (which is not allowed in the existing zone district); this encourages the redevelopment to be residential in nature, increasing both the quantity of housing options in the City as well as diversity of housing options in the area (much of the limited, existing housing in the surrounding area is lower density single family). Any new residential development will require compliance with the City's Inclusionary Housing Ordinance, which further contributes to attainable housing options within the City.
- Goal L&C 1: A land use allocation and pattern that supports and promotes Littleton's pride in, and reputation for, quality neighborhoods and an abundance of parks and preserved open space.
Response: Rezoning the property from Industrial Business Park to Multi-Family Residential will assist in addressing the identified housing needs within the City of Littleton. Multi-Family Residential (MFR) zoning will allow for up to 48 du/ac permitting up to 868 of the projected 6,550 additional units needed in the next 20 years. As evident in the Comprehensive Plan, the City of Littleton zoning policy is transitioning from a traditional zoning perspective to a community character primer. The "community character approach to evaluating and planning for land use emphasizes the variation in physical conditions experience along a spectrum from natural and rural landscape at the edges of a community to its most urbanized environments." This character-based approach focuses on development intensity, which encompasses:
 - *The density and layout of residential development*
 - *The scale and form of non-residential development; and*
 - *The building a pavement coverage relative to the extent of open space and natural vegetation of landscaping*
- Goal L&C 2: A sustained focus on the long-term fiscal sustainability of Littleton City government while recognizing the direct connection to the community's land use mix, especially for sales tax revenue needs.
Response: While the proposed rezoning only covers a portion of the redevelopment of the Lumen Technologies campus, it allows for additional rooftops that help support commercial redevelopment of the balance of the campus. Further, the proposed development within the MFR zone district could generate over one million dollars (\$1,000,000) in property taxes annually. In comparison, the current development paid less than two hundred and eighty thousand dollars (\$280,000). Construction in the proposed MFR district is projected to employ hundreds of workers and once completed, the property could employ multiple on-site staff members that are likely to reside in Littleton. The MFR zoning also encourages development of affordable units aimed



toward meeting Littleton's workforce housing needs – providing housing options for schoolteachers, first responders, childcare workers, nurses, social workers, and mechanics.

- Goal L&C 3: Ongoing and effective collaboration between land use and transportation planning to ensure compatibility among decisions and actions taken with respect to each.
Response: Support population growth that ensures continuity of Littleton's desired community identity and characteristics, while recognizing that trends and changes in net migration, transportation networks, household compositions and economic growth may require flexibility in adapting and approving future residential and commercial development. The projected traffic generation is projected to be lower than the existing zoning (see Kimley-Horn Traffic Update letter dated June 7, 2023) and it is believed that the surrounding street network was developed to accommodate full traffic generated by this use, with reserve capacity available in the surrounding street network. The proposed amendment encourages a more complete mix of uses, allowing residents more opportunities to live, work and play in a mixed-use neighborhood while redevelopment of the overall site will require improvements to the limited, existing pedestrian circulation. Collaboration between land use and transportation planning will continue during the development review process (Master Development Plan and/or Site Plan) to study the design details.
- Goal L&C 4: A more attractive community, based on quality design and character of both private development and the public realm.
Response: Development within the MFR zone district is required to comply with the neighborhood design standards identified in code, which are designed to:
 - *Provide for safe, attractive, and highly livable neighborhoods.*
 - *Create a variety of housing types and living formats to meet the needs of all residents.*
 - *Enable homeowners to improve and reinvest in their properties without a burdensome process.*
 - *Protect the value and enjoyment of residential properties by providing for good compatibility and transition standards.*
 - *Improve walkability within neighborhoods and provide for safe connections to nearby service and convenience uses.**The ULUC requirements ensure an attractive community, based on quality design and character, is developed.*
- Policy L&C 1: Emphasize compatible intensities and character when evaluating applications involving more intensive and/or nonresidential development near homes and neighborhoods.
Response: As shown in the Comprehensive Plan Future Land Use and Character charts below, the existing Suburban Business Park designation and the proposed Suburban Residential Multi-Family land use exhibit the same ratio of character elements, with most of the land covered by open space and buildings, and little emphasis on paving. This keeps with the Suburban character area that has a "noticeably less intensive use of land, with open and green spaces balancing the extent of land covered by structures and surfaces." Overall, the proposed rezone from Industrial Business Park (IP) to Multi-Family Residential (MFR), has little effect on the overall character of the area, but will provide much needed new high-density housing to the area.

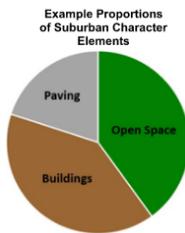


Figure 4: Suburban Multi-Family Character Elements (Proposed Character)

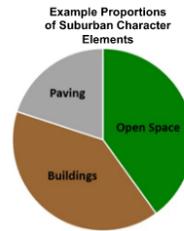


Figure 3: Suburban Business Park Character Elements (Existing Character)

Further, with the addition of future residential rooftops permitted as a part of this future land use amendment, the adjacent site to the north is anticipated to be redeveloped and likely implement a more retail-based use than the current office park that exists now. The proposed multi-family residential use provides an appropriate transition and much needed housing for the surrounding Suburban Business Park land uses. Landscape buffers and setback requirements within the proposed zone district create additional transitions between the existing auto-oriented business park design that surrounds the site.

- Policy L&C 2: Plan for and take actions to maintain the established character of its residential neighborhoods.

Response: The proposed rezoning and redevelopment of this campus contributes much needed housing to the City without disrupting the established character of its existing residential neighborhoods. In the current industrial zoning, residential uses are not permitted. The existing office park and light industrial uses are generally segregated and disconnected from the surroundings sites. As highlighted in the Littleton Comprehensive Plan, the MFR zoning creates opportunities for “planned developments that may integrate a mix of detached, attached and multi-family housing types, with sufficient open space to preserve an overall Suburban character.” Development within the MFR zone district is required to comply with the neighborhood design standards identified in code, which are designed to:

- *Provide for safe, attractive, and highly livable neighborhoods.*
- *Create a variety of housing types and living formats to meet the needs of all residents.*
- *Enable homeowners to improve and reinvest in their properties without a burdensome process.*
- *Protect the value and enjoyment of residential properties by providing good compatibility and transition standards.*
- *Improve walkability within neighborhoods and provide for safe connections to nearby service and convenience uses.*

The ULUC requirements ensure an attractive community, based on quality design and character, is developed.

- Policy L&C 3: Create a regulatory framework that encourages development of diverse and attainable housing options in Littleton in terms of type, size, and cost to buyers and renters.
Response: The majority of the permitted uses within the MFR zone district are residential (which is not allowed in the existing zone district); this encourages the redevelopment to be residential in nature, increasing both the quantity of housing options in the City as well as diversity of housing options in the area (much of the limited, existing housing in the surrounding area is lower density single family). With this rezoning, the site is permitted up to 868 units (48 DU/AC), roughly ~13% of the required 6,500 housing unit



needs identified in the Comprehensive Plan. Any new residential development will require compliance with the City's Inclusionary Housing Ordinance, which further contributes to attainable housing options within the City.

- Policy L&C 4: Create a regulatory framework that signals the City's interest in attracting target business sectors, needed and compatible revenue-generating uses, and lifestyle and leisure uses that support Littleton's livability and residents' quality of life.

Response: While the proposed rezoning only covers a portion of the redevelopment of the Lumen Technologies campus, it allows for additional rooftops that help support commercial redevelopment of the balance of the campus.

- Policy L&C 5: Manage land use patterns near Littleton's many parks, trails, greenways, and open spaces to: protect their ecological functions; prevent physical and other impactful encroachments; maintain public access; and preserve their overall quality and value – especially where public green spaces contribute to neighborhood character and enhance business park and other commercial settings.

Response: Although not directly connected to Littleton's existing parks, trails and greenways, the site is required to comply with the neighborhood design standards identified in code, which are designed to:

- *Provide for safe, attractive, and highly livable neighborhoods.*
- *Create a variety of housing types and living formats to meet the needs of all residents.*
- *Enable homeowners to improve and reinvest in their properties without a burdensome process.*
- *Protect the value and enjoyment of residential properties by providing good compatibility and transition standards.*
- *Improve walkability within neighborhoods and provide for safe connections to nearby service and convenience uses.*

- Policy L&C 6: Recognize and promote land use and development decisions that further community objectives for reduced traffic congestion, more pedestrian- and cyclist-friendly design, and expanded and viable public transit options.

Response: By nature of this rezone allowing this site to contain a mix of uses will lend well to multi-modal traffic conditions for this area. Sidewalks exist along the project frontage of Mineral Avenue, but not yet along Southpark Terrace. Street improvements will be required with redevelopment of this campus, furthering the overall connectivity. Bicycle lanes are striped along a portion of Mineral Avenue providing connections to the east and west. The site is also approximately a 0.5 mile walk to Broadway, which includes bus service along S Broadway at Southpark Drive and W Mineral Avenue and just under 2 miles east of the Littleton/Mineral Light Rail Station. The proposed amendment encourages a more complete mix of uses, allowing residents more opportunities to live, work and play in a mixed-use neighborhood while redevelopment of the overall site will require improvements to the limited, existing pedestrian circulation. Collaboration between land use and transportation planning will continue during the development review process (Master Development Plan and/or Site Plan) to study the design details.

- Policy L&C 7: Promote Littleton's aesthetic appeal through the quality expectations set within the City's Code for landscaping, signage, lighting, and similar design elements.

Response: Development within the MFR zone district is required to comply with the neighborhood design standards identified in code, which are designed to:

- *Provide for safe, attractive, and highly livable neighborhoods.*



- *Create a variety of housing types and living formats to meet the needs of all residents.*
- *Enable homeowners to improve and reinvest in their properties without a burdensome process.*
- *Protect the value and enjoyment of residential properties by providing for good compatibility and transition standards.*
- *Improve walkability within neighborhoods and provide for safe connections to nearby service and convenience uses.*

The ULUC requirements ensure an attractive community, based on quality design and character, is developed.

4. *Changing Conditions.* The amendment may serve to address a changing condition that was not anticipated by the Comprehensive Plan;
Response: Per the Comprehensive Plan 'shifts in political, economic, physical, technological, and social conditions, and other unforeseen circumstances, may influence and change the priorities and fiscal outlook of the community.' In early 2022, Lumen made the decision to close their facility at 700 W. Mineral and sell the property. Lumen hired Newmark Merrill to market the property for sale. The brokers at Newmark Merrill went through a RFQ and RFP processes for the property and received many offers. All of the offers for the property contemplated a redevelopment of the property from its existing use. This proposed redevelopment of the site from its existing use is evidence that the market and priorities of existing and future investors for the site has changed, which the Comprehensive Plan did not anticipate. The proposed amendment encourages a more complete mix of uses, allowing residents more opportunities to live, work and play in a mixed-use neighborhood.