



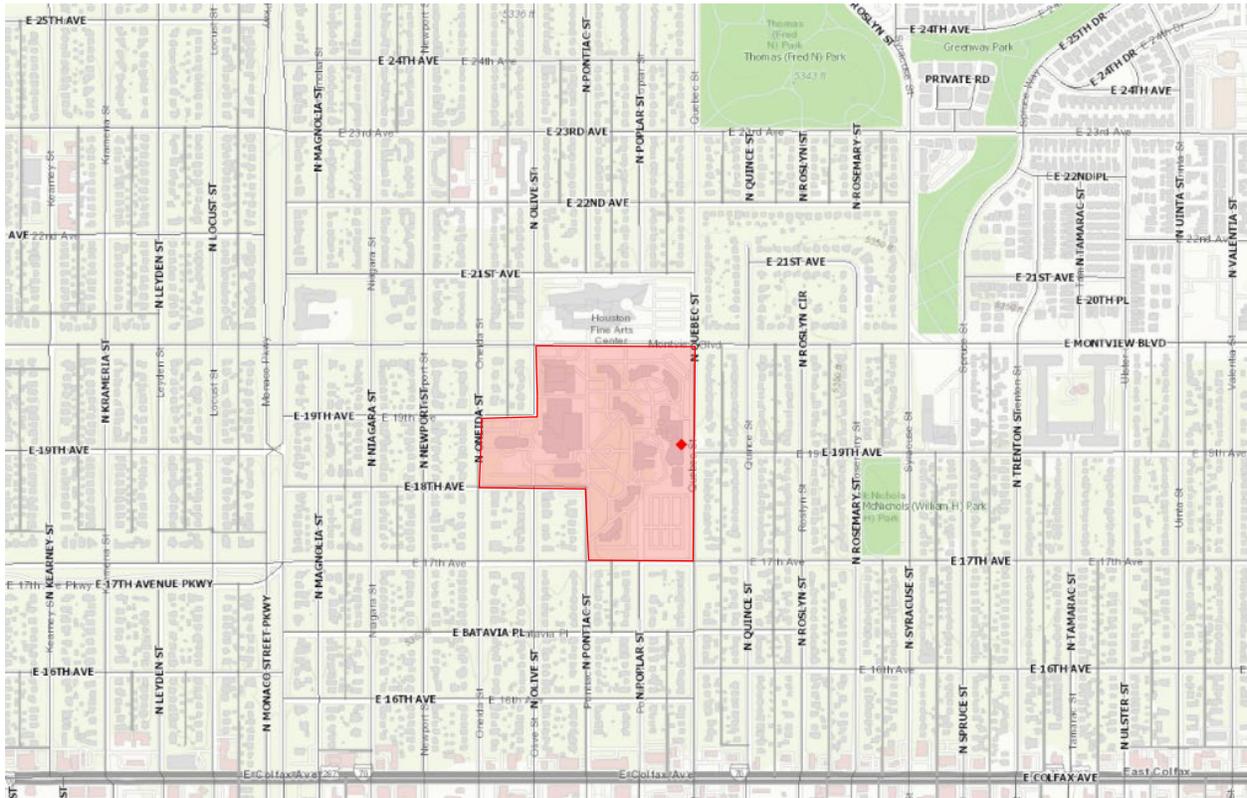
Title of Document: Park Hill Campus Large Development Framework

Subject Property: 1895 N. Quebec Street and 1800 N Oneida Street

Property Legal Description: Refer to Attachment 1 – Legal Description

SUBJECT PROPERTY OWNERS:

DEP LLC	Denver Public Schools	Denver Housing Authority
1600 Downing Street	1860 Lincoln Street	1035 Osage Street
Denver, CO 80218	Denver, CO 80203	Denver, CO 80204



This Framework shall apply to the Property, and requirements forthwith shall be applicable to all owners, successors and/or assigns until such time as this document is formally amended or withdrawn pursuant to DZC Section 12.4.12, as amended

Park Hill Campus Large Development Framework 1895 N. Quebec Street and 1800 N Oneida Street

I. Purpose of Framework

This Large Development Framework (LDF) documents the required regulatory applications, sequencing of applications, and high-level project requirements for the adaptive reuse of existing buildings on the former Johnson and Wales campus located at 1895 N. Quebec Street and 1800 N Oneida Street. No new development is anticipated at this time. The LDF is required per Section 12.4.12 of the Denver Zoning Code (DZC) following determination by the Development Review Committee (DRC) that the proposed development is subject to the Large Development Review (LDR) Process.

This LDF is intended to:

- Document the project as initially proposed.
- Document initial feedback from the community on the proposed project.
- Provide for the coordinated assessment of general land development proposals by the City and other interested public agencies.
- Ensure that development in the LDR area is consistent with City Council adopted plans.
- Ensure that development in the LDR area will implement adopted plan policies related to infrastructure, open space, and public parks, as applicable, by establishing the appropriate timing and requirements for subsequent regulatory steps, submittals and approvals.
- Establish known project requirements based upon the scope of the development proposal.

The LDF is not a development agreement between the City and County of Denver and the Applicant. Nothing in this LDF prescribes a specific or guaranteed project outcome. The high-level project requirements outlined in this LDF are based upon initial assessment of the proposed adaptive reuse of existing buildings against adopted plans, studies and regulatory programs as identified in this framework and may change based upon the outcome of project reviews and negotiation with the City.

All formal plan and technical reviews and permitting shall occur in accordance with the prescribed application and review process identified within this LDF document. Further, they shall be reviewed and permitted in accordance with process and procedures for each regulatory application established in the Denver Zoning Code, City and County of Denver Municipal Code, or any applicable adopted Rules and Regulations of the City and County of Denver, as applicable. [Conflicts between this LDF and the foregoing regulations shall be resolved in favor of such regulations.](#)

II. Applicant and Owner Information

Applicant: Urban Land Conservancy Anna Mercurio 1600 Downing Street Denver, CO 80218	Property Owner: DEP LLC Aaron Miripol 1600 Downing Street Denver, CO 80218	Property Owner: Denver Public Schools Jim Carpenter 1860 Lincoln Street Denver, CO 80203	Property Owner: Denver Housing Authority David Nisivoccia 1035 Osage Street Denver, CO 80204
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III. LDR Boundary

The boundary for the LDR shall include the property known as 7150 E. Montview Blvd., the former Johnson and Wales Campus, with Tax Assessor schedule numbers of 01324-00-008-000, 01324-00-006-000 and 01324-00-007-000, and further described by the legal description in [Attachment 1](#) and represented in Figure 1 below (hereinafter referred to as the “Subject Property” or “Property”).

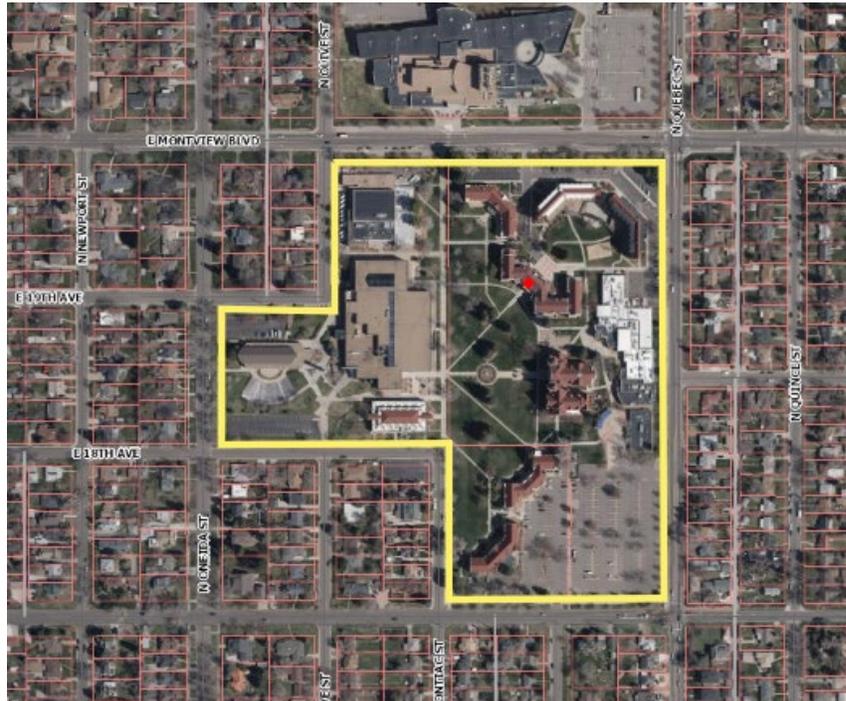


Figure 1 – LDR Boundary

IV. Project Information

The Subject Property is located at the corner of E. Montview Blvd. and N. Quebec Street. The Subject Property is within Council District 8, South Park Hill Neighborhood and it is surrounded primarily by single family residential, with the exception of Denver School of the Arts which is located on the north side of E. Montview Boulevard.

The Subject Property is currently zoned Campus-Education/Institution with a Historic Use Structure Overlay (CMP-EI-UO3). The CMP-EI zone district is intended for educational institutions that incorporate primary, intermediate, high school, college and university uses and associated programming including student boarding facilities. This district also accommodates other types of large scale civic, public and institutional uses such as museums, public and religious assembly uses. The district is established to allow for flexible placement of buildings, and unified treatment of signs, open space, landscaping and other site elements while providing compatible transitions between the campus and adjacent neighborhoods. [See Attachment 2 - Application](#)

A. Overview:

The Urban Land Conservancy’s (ULC) affiliate entity, DEP, LLC (DEP or Owner), acquired the full campus from Johnson & Wales University (JWU) on June 8, 2021, and concurrently sold the

West Campus and South Campus parcels to DPS and DHA, respectively. DEP retains ownership of all land and buildings on the East Campus and has leased the Culinary Arts Building and Vail Hall to Kitchen Network. DEP also has a signed Letter of Intent with Archway Communities for the purchase of four student housing buildings for future use as affordable housing for families.

- Kitchen Network is operated by BuCu West, a development association with a mission to promote and support entrepreneurs, small businesses, and cultural organizations in along Morrison Road in the Westwood neighborhood of Denver. The Kitchen Network's existing facility at 4986 Morrison Road serves as Colorado's largest incubator of culinary businesses by providing access to commercial cooking and baking equipment, food storage, business development resources, and related services.

At the Park Hill Campus, Kitchen Network will put the existing commercial cooking and baking kitchens and related equipment, formerly used by Johnson & Wales culinary school students, to good use as an East Denver extension of their current Westwood facility while continuing a tradition of culinary education. Jorge de la Torre, the former Dean of the Culinary College within Johnson & Wales, will lead this transition by bringing together food related organizations to provide workforce development and training in research and development, culinary arts, and business management. The combination of organizations will sublease kitchen and office space creating a supportive combination of resources for start-up businesses to flourish in the food industry. The Culinary Arts Building and Vail Hall are uniquely designed to be a combination of learning and production around food. By transitioning from a private university to a more locally accessible public incubator, these two buildings will help to satisfy the demand for more job opportunities and places to go for entertainment vocalized in community surveys of area residents during the East Area Plan outreach and engagement processes.

- Archway Communities is a well-regarded local non-profit affordable housing developer, property manager, and supportive services provider whose stated mission is to "elevate lives by providing access to affordable housing, food security and the supportive social services people need to thrive." Archway owns and operates 10 income-qualified communities in the Denver metro area and along the Front Range.

At the Park Hill Campus, Archway will develop repurpose four existing student housing buildings to serve as high quality affordable housing for individuals and families earning up to 60% of the Area Median Income (AMI).

Additional Information to Consider:

- DEP acquired the Park Hill Campus in order to preserve its historic character and to continue its presence as a community-serving property.
- No redevelopment is being proposed, nor any exterior renovations are proposed at this time.
- Archway's proposed interior renovations would result in a net reduction in total residential units and required parking related to such housing.

- Kitchen Network’s proposed uses are a continuation of the food-related uses that have taken place within the Culinary Arts Building and Vail Hall throughout their history. The key difference is that the programming will no longer be operated by a university and will instead be publicly accessible.
- The other campus partners, DPS, DHA, and St. Elizabeth’s School, all intend to occupy the existing structures and to conduct interior renovations. Like Archway, DHA’s renovations of Gaebe and Triangolo Halls would likely result in a net reduction of total units within those buildings by combining some existing units.

	East Campus	West Campus	South Campus
Owner	DEP, LLC (a Colorado limited liability company whose sole member is Urban Land Conservancy, a Colorado nonprofit corporation)	Denver Public Schools	Denver Housing Authority
Reconfigured Parcel Size¹	13.475 acres	8.505 acres	3.299 acres
Building Names (and approx. sizes for those subject to this LDR applicability review)	Culinary Arts (36,381sf) Vail Hall (7,100sf) Presidents Hall (34,500sf) Founders Hall (57,900sf) Johnson Hall (43,500sf) Wales Hall (43,500sf)	Wildcat Center Academic Center Aspen Hall Whatley Chapel	Gaebe Hall Triangolo Hall

- West Campus: Denver Public Schools (DPS)**
Land: DPS
 - Wildcat Center (1)
 - Academic Center (6)
 - Aspen Hall (10)
 - Whatley Chapel (5)
- South Campus: Denver Housing Authority (DHA)**
Land: DHA
 - Triangolo Hall (12)
 - Gaebe Hall (13)
- East Campus: ULC & Partners**
Land: ULC
 - The Kitchen Network**
 - Culinary Arts (8)
 - Vail Hall (11)
 - St. Elizabeth’s School**
 - Centennial Hall (9)
 - Archway**
 - Johnson Hall (3)
 - Wales Hall (4)
 - Presidents Hall (2)
 - Founders Hall (7)



Figure 2 – Concept Plan

V. Plan Guidance

The following adopted Plans, studies and regulatory programs provide clear and sufficient guidance for review of the proposed adaptive reuse project and will serve as a basis for providing a framework for interconnected land uses, streets, open space, public parks, and other infrastructure.

- Blueprint Denver 2019
- Comprehensive Plan 2040
- One Water Plan
- Transportation Standards and Details for the Engineering Division (April 2017)
- Vision Zero
- Denver Moves
- Complete Streets Design Guidelines
- Denver Parks and Recreation Game Plan
- East Area Plan
- Stapleton Perimeter Assessment

Highlights from adopted plans include the following:

Blueprint Denver

1. Blueprint Denver Future Neighborhood Context: Special District

- a. Special districts are areas that serve a specific purpose, usually highly specific based on uses, such as education, industry or health care. Block patterns, urban design and mobility connections vary based on specific use.
- b. The transportation network varies by district, responding to specific conditions due to land use, built form and surrounding context.
- c. A range of parks and quasi-public outdoor spaces with flexible open space and hardscaped plazas. Varies greatly by place and use.

2. Blueprint Denver Future Place Type: Campus

- a. Typically dominated by a single, large institutional user. Universities, medical centers and large research facilities are examples. Supporting retail and residential uses also occur. Campus buildings vary greatly in size and form, but multi-story, single and mixed-use buildings are typical.
- b. Internal circulation is typically multimodal, with emphasis on pedestrians and possibly people riding bicycles. The street grid may be interrupted with large blocks and parking is consolidated.
- c. Open green spaces, enhanced hardscaped plazas and gathering places for public life. Abundant trees, gardens and plantings. Green infrastructure best practices are common.

3. Blueprint Denver Modal Priority: N. Quebec Street & E Montview Blvd. for Pedestrians. E. Montview Blvd. for Bicycles

- a. Historically, a disproportionate amount of transportation investment focused on infrastructure for automobiles. This created an outcome of spending more time on congested roadways. To encourage a mode shift toward more efficient travel modes, investments must be made that support multimodal infrastructure. Identifying modal

priority streets indicates where investment will occur to support people walking or rolling, biking or taking transit.

East Area Plan

1. 2.1.2 Neighborhood Contexts

- a. **Recommendation B:** When new development occurs on larger campuses, including the former VA Hospital, Rose Medical Center, National Jewish, and Johnson & Wales University campus, new public open space, pedestrian connections, and pedestrian-friendly building frontages should be encouraged (See Policy E-12 and specific guidance for the Johnson & Wales University campus in Policy PH-L2).
- b. Large Development Review should be required for large campus redevelopment.

2. 2.4.2 Parks, Recreation and Open Space

- a. **Recommendation D:** Strengthen partnerships with private property owners, and develop future intergovernmental agreements (IGAs) with schools, institutions and hospitals to create shared open spaces within the community. Potential locations include the following: VA Hospital, Rose Medical Center, Park Hill Elementary School, Palmer Elementary School, Odyssey School of Denver, Denver School of the Arts, Montview Community Preschool, Johnson & Wales University campus, St James School, Montclair School of Academics and Enrichment, and Ashley Elementary School.
- b. **Recommendation E:** Work with large campuses to explore opportunities to establish public open spaces through future redevelopment. This could include partial redevelopment within campuses that are continuing operation. Locations include Johnson & Wales University campus, the VA Hospital, Rose Medical Center, and National Jewish Health (See Policy L1, L2).

3. 2.4.3 Environmental Quality and Climate Resiliency

- a. **Tree Canopy:** The tree canopy is notably missing along commercial and transportation corridors and commercial and large block development pockets within the East area. These areas with minimal tree canopy coverage generally have a development pattern that includes larger building footprints and more surface parking lots, more closely resembling downtown Denver. These areas include Colorado Boulevard and Colfax Avenue, the Rose Medical Center Campus, the 9th and Colorado redevelopment, the Mayfair Town Center, and the Johnson & Wales University campus.

4. 2.4.4 Access to Healthy Food

- a. **Recommendation Q13, B.** Seek out partnerships with institutions that might have available land to dedicate to community gardens, including Johnson & Wales University campus in South Park Hill.

5. 3.5.4 South Park Hill Recommendations:

- a. Ensure new development on the Johnson & Wales University campus helps meet plan goals should it transition to another use besides an educational campus.

The Johnson & Wales University campus plays an important role in the South Park Hill community as a major employer and educational institution. Continued use an educational

campus is supported by this plan. If, in the future, a new property owner proposes to change the use from an educational campus, the following guidance would apply.

- i) Conduct more detailed planning for the site through a master planning or small area plan process with diverse, inclusive community engagement.
 - ii) New development on the site should help achieve the goals of the East Area Plan, including: 1. Affordable housing 2. Evaluation and preservation of historic resources 3. Public open space 4. Community-serving uses and services 5. Pedestrian and bike connectivity through the site.
 - iii) Large Development Review should be used to coordinate new development and infrastructure improvements.
 - iv) New development should be designed to be compatible with the neighborhood and transition appropriately to surrounding residential areas (See Policy L1).
6. **3.5.4 South Park Hill Recommendations:** Expand diversity of housing types and affordability to support households of different sizes, ages, and incomes in all neighborhoods.
- a. South Park Hill, which is predominantly single-unit residential, is considered unaffordable according to the Housing + Transportation Index. In this area, the housing and transportation costs for a typical household in Denver would exceed 45 percent of its income. Integrating new, compatible housing types would help to provide more attainable options in the neighborhood. The area around Johnson & Wales University campus also provides an opportunity to provide housing for students, faculty and staff should the educational campus remain.

VI. Equity

A. What is equity and how does it relate to my project?

Equity is when everyone, regardless of who they are or where they come from, has the opportunity to thrive. Where there is equity, a person's identity does not determine their outcome. The city's vision is for every resident to live in a complete neighborhood with access to jobs, amenities and services so that all Denverites – regardless of their race, ability, income, age, gender, etc. – can thrive.

New development projects can impact equity for an area through factors such as access to open space, access to and the mix of jobs, and housing choices. Each LDR proposal provides an opportunity to understand how one project can improve, or at least not increase, existing inequities.

B. How do we measure equity?

Equity is measured using three concepts from Blueprint Denver: Access to Opportunity; Vulnerability to Displacement; and Housing and Jobs Diversity. Each equity concept is measured using multiple metrics. For example, Access to Opportunity measures several indicators that reflect the city's goal for all neighborhoods to have equitable access to a high quality of life, including access to transit, fresh food, and open space.

C. How to read equity scores?

Each equity concept is given a score to help measure and understand equity for a particular area of Denver. Below is an interpretation of the scoring metrics:

Access to Opportunity



Access to Opportunity - Measures access to opportunity for an area through Social Determinants of Health (percent of population who are high school graduates and percent of families below the poverty line), Built Environment (access to fresh food and open space), Access to Healthcare, Child Obesity, Life Expectancy, Access to Transit, and Access to Centers and Corridors. The site area’s average score is 3.67 out of 4. Generally speaking, this means that the area is considered to have good access to opportunity.

Vulnerability to Displacement – Measures the area’s vulnerability to involuntary displacement through three metrics: Educational Attainment, Rental Occupancy, and Median Household Income.

Vulnerability to Displacement



Vulnerability to Displacement includes additional data that highlight demographic changes and housing market conditions for an area. This helps us understand changes over time that indicate vulnerability to displacement. The site area’s average score is 0 out of 3. Generally speaking, this means that the area is considered not vulnerable to displacement.

Housing Diversity – Measures the diversity of housing stock for an area compared to the entire city. This includes measuring the following for a given area: Missing Middle Housing, Diversity of Bedroom Count Per Unit, Ratio of Owners to Renters, Housing Costs, and Income Restricted Units. The site area’s average score is 0 out of 5. Generally speaking, this means that the area is considered not diverse in providing a better and more inclusive range of housing in the neighborhood.

Housing Diversity



Job Diversity – Jobs diversity measures two key factors related to the availability and variety of employment options: (1) Jobs density: the amount of jobs in different parts of the city, depicted by intensity of color and measured as jobs per acre, and (2) Jobs diversity: the mix of jobs in different parts of the city. The mix of jobs is depicted by different colors (below) and the jobs diversity in this area is dissimilar to the City’s overall job mix, with fewer retail and manufacturing options compared to the rest of the City.

Job Diversity					
The job mix is dissimilar to the city's overall job mix because there is more emphasis on Retail.	Less than 100 jobs. Data Values below are not applicable.	The job mix is dissimilar to the city's overall job mix, because there is more emphasis on Innovation.	The job mix is similar to the city's overall job mix.	The job mix is dissimilar to the city's overall job mix, because there is more emphasis on Manufacturing.	The job mix is dissimilar to the city's overall job mix, because there is more emphasis on Retail and Manufacturing.

D. Equity Summary

The conclusion of the analysis points to generally good access to opportunity with the area scoring high on every indicator except for access to transit. The area scores well when measuring educational attainment, rental occupancy and median household income and is not considered vulnerable to displacement. However, it should be noted that the Park Hill Campus is adjacent to the East Colfax Neighborhood which is an area of the City considered to be especially vulnerable to displacement. The area is neither within a ½ mile of high-capacity transit, nor is it within a ¼ mile of frequent transit. When considering housing diversity, the area scores low on every indicator as compared to the rest of the City. Staff anticipates that the repurposing of the existing student housing to serve as high-quality affordable housing for individuals and families will increase housing diversity in the area. Finally, the job diversity in the area is dissimilar to the City's overall job mix, with fewer retail and manufacturing options but a larger percentage of innovation jobs compared to the rest of the City. The proposal to provide workforce development and training in culinary arts and business management could create a more inclusive range of employment options, thus improving the area's low jobs diversity score and further strengthening the area's vulnerability to displacement score.

Please see the attached Equity Brief for an equity overview and applicant responses ([Attachment 3 – Equity Brief](#))

VII. Anticipated Development Outcomes Consistent with Adopted City Plans

In addition to preliminary project requirements identified in the Preliminary Scope, based on review of City plans and assessment of the site by City agencies, adaptive reuse of the Subject Property shall take into consideration the following key elements:

A. Land Use and Site Design

Overview: With three different property owners that make up the campus, the LDR Framework will guide adaptive reuse of the existing buildings as well as document a shared vision. Both the City and the applicant have the shared goal of keeping the former Johnson & Wales functioning as a unified campus. To support this goal, the property owners have created the Park Hill campus Master Association, Inc. through a master declaration (reception #2021229831). The DPS School District No. 1, Denver Housing Authority and Urban Land Conservancy are all parties to the declaration. Per the declaration, the purpose is to provide a plan for the creation and operation of a Master Association for the operation and maintenance of a planned community.

Rezoning: As of the time of this Large Development Framework, the rezoning application, for a portion of the campus, has been initiated. The future zone district will need to take into account the needs for the Kitchen Network in the near and distant future.

Zone Lot: The reconfiguration of the Zone Lot will need to take into account the zoning standards, such as parking, open space, setbacks, etc.

Future Development: This Large Development Framework (LDF) is based on evaluation of the proposed adaptive reuse of the existing buildings. In the future, if new development is proposed for the Park Hill Campus an amendment to this Large Development Framework will be required. Amendments to the LDF will follow the process outlined in the Denver Zoning Code, including evaluation of plan guidance and a Community Information Meeting. At such meeting, the proposed development will be presented to the community for comments and input.

B. Transportation Services

Future City Goals and Objectives:

CCD's ultimate vision for the Quebec corridor includes widening the current roadway through land acquisitions and dedications. Future improvements would bring current corridor improvements in-line with CCD standards as current bond-funded improvements do not meet standards due to restricted ROW in the area.

Quebec Bond Project:

The City of Denver has initiated a bond project to address existing mobility needs along Quebec and at the 17th/Quebec intersection. Bond-funded improvements will be completed by the City of Denver. Improvements within the bond project are taking place within the available ROW. As such, not all improvements meet current CCD standards due to ROW constraints. Specific items CCD is pursuing within the current bond project include:

- Land dedication to achieve standard ROW improvements
- Detached sidewalks, tree lawns, curb, and gutter
- Pedestrian ramps, bus stops, and curb cuts
- Access consolidation
- Utility improvements to match current ROW design (relocation of streetlights, signal poles/equipment/and other utilities)

Future Campus Improvements:

The adaptive reuse of the existing buildings, specifically Johnson, Wales, Founders, Presidents, Triangolo and Gaebe Halls, as proposed within their existing footprints (e.g., dormitories to residential apartments) will not trigger offsite improvements. However, the redevelopment will be held to improve their ROW frontages pursuant to the DMC, [Sec. 49-551.1. - Maintenance of improvements in public right-of-way](#). New development within the Subject Property would be subject to standard City of Denver development review processes. Those review processes will determine the applicability, responsibility, and appropriate nexus between the proposed development and its potential impact on area infrastructure to

determine the extent of required off-site transportation improvements, if any. This will be determined on a project-by-project basis through the City's standard regulatory processes.

C. Disability Rights

An accessible route for wheelchair access will be required from all accessible entrances to all accessible parking and to a public sidewalk.

Primary building entrance shall be accessible and part of the accessible route to all accessible dwelling units in the building.

An accessibility plan for the overall campus is encouraged.

D. Parks and Open Space

Open Space: The Park Hill Campus's existing open space, including the north/south connection and the central quadrangle open space, has a unique history and relationship to the surrounding community. The City's adopted plans speak to the importance of preserving and providing public access to open space. The City's objective is to provide public access to as much of the existing campus open space as possible. It is also important that community awareness and participation is incorporated into the process to provide publicly accessible open space. More specifically:

- *Required Open Space:* In order to ensure publicly accessible open space, the Denver Zoning Code, Section 10.8.1, requires a minimum of 10% of the net development area be provided in accordance with the regulations and standards set forth in the Denver Zoning Code ("Minimum Required Amount of Open Space"). The boundary of the Minimum Required Amount of Open Space shall be agreed upon by the applicant and City staff and subject to a perpetual easement granted to the City and/or the general public in a form approved by the City.
- *Remaining Campus Open Space:* The Park Hill Campus includes open space over and above the Minimum Required Amount of Open Space. For purpose of this LDF, the term "Remaining Campus Open Space" does not include the Minimum Required Amount of Open Space. As part of the adaptive reuse of the campus proposed, the Remaining Campus Open Space is intended to remain accessible to the community and forms an important component of the campus. In the future, if new development is proposed for the Park Hill Campus an amendment to this LDF will be required. Amendments to the LDF will follow the process outlined in the Denver Zoning Code, including evaluation of plan guidance and a Community Information Meeting.

Campus Unity: Adopted plans support continued coordination with property owners to ensure the perseveration of existing open space and mature trees. For any future exterior renovations or site work, a concept plan and narrative for improving pedestrian access/entrance to open spaces from Quebec Street and Montview Blvd. will be required.

E. Stormwater and Wastewater

JWU Campus:

When total land disturbance across the campus reaches or exceeds one-half acre, stormwater detention is required, and water quality may also be required if provided at-grade. Land disturbance exceeding one acre or more will require water quality.

The primary concern for Wastewater is related to sanitary capacity. Wastewater will need a sanitary capacity analysis for the campus to ensure adequate downstream capacity. The first step to this will be to confirm routing of existing structures. There are existing Denver public sanitary mains along the east and west side of the campus. Based on the ALTA survey provided and Wastewater records, it is unclear which building are routed to which main, but this will need to be known. Although criteria does not provide guidance on change of use from dormitory to dwelling units, we can discuss methods that can be used.

There is a sanitary covenant covering shared private sanitary, but the extent of buildings, utilities, and infrastructure shared will need to be defined. Understood there are parallel conversations related to this covenant, but the issue will need to be resolved.

Primary scope is change of use and internal remodeling. Wastewater will review the changes specific to each use and building under a Sewer Use and Drainage Permit (SUDP). A Building Department application will also serve as your required SUDP application.

If site infrastructure is proposed which serves more than a single independent structure (such as stormwater collection, sanitary mains- public or private- these will require an SSPR plan set submittal.

DPS Parcel:

Denver will need sanitary easements for the existing public sanitary mains in compliance with Section 3.04.3 of Denver Sanitary Criteria Manual with a minimum 20-foot easement centered over the main. Please contact Wastewater Engineer above to confirm easement widths and guidance on initiating the process

F. Department of Housing Stability

HOST recognizes our strong community partners are repurposing the former campus to bring many benefits to the neighborhood and Denver citywide. These benefits include the incorporation of affordable housing. No additional affordable housing requirements are needed as part of this LDR Framework. HOST looks forward to continued engagement in the LDR process, in order to provide support or resources to the applicants in furtherance of the affordable housing goals.

G. Denver Fire Department

Future construction may require fire and water access to meet building requirements.

Future development will indicate those Code required items that are addressed by the Denver Fire Dept.

Fire access will need to be evaluated with the Zone Lot amendment

H. Landmark

There is an existing study of the historic buildings and landscapes associated with the campus. The study is titled *Historic Context Report and Eligibility Recommendations for the Colorado Woman's College/Johnson and Wales University Campus*. [See Attachment 4](#).

There is an existing conservation easement with Historic Denver, Inc. for Treat Hall. The easement is available with the Clerk and Recorder at reception numbers 2007143183 & 2010066224.

Several preservation tools are available for the campus. Most of the buildings on the campus would be eligible for inclusion in a historic district that could be listed on the National Register of Historic Places or on the State Register of Historic Properties, or as a locally designated Denver Landmark historic district. General Campus Open Spaces may be included as a contributing feature of these potential historic districts. Most of the buildings on campus would also qualify for individual listing on the National Register or State Register, or as individual Denver landmarks. Federal and state tax credits may be available for buildings locally designated or listed on the State or National Registers. The only buildings that would not be considered contributing structures to a historic district, or would not have potential to be individual landmarks would be the Culinary Arts Building and Vail Hall. Historic preservation easements are also a tool that could be utilized for several of these buildings, including portions of the General Campus Open Space.

The historic buildings on the DPS portion of the campus need special attention because the permitting for DPS occurs through the State and won't trigger a typical Landmark Review.

Landmark Preservation is willing to be a resource regarding the use of any of these potential preservation tools on the campus.

I. Environmental Quality

The Denver Department of Public Health & Environment - Division of Environmental Quality (EQ) conducted a cursory review of readily available internal files to help identify potential environmental conditions that could impact the proposed project. EQ is not aware of site-specific environmental concerns.

Although EQ is not aware of any contaminated environmental media at the Site, there is still the potential to encounter contaminated environmental media and regulated materials during development activities. Proper due diligence, including environmental site assessments, should be considered in order to determine the presence, nature and extent of potential contamination and to identify specific cleanup needs. If encountered, contaminated environmental media and regulated materials must be properly managed in accordance with applicable local, state, and federal environmental regulations and statutes. State and federal environmental regulations and guidance may be applicable to the handling and disposition of suspect materials depending on the conditions encountered

General Notes: Most of Colorado is high risk for radon, a naturally occurring radioactive gas. Due to concern for potential radon gas intrusion into buildings, EQ suggests developers consider installation of a radon mitigation system in structures planned for human occupation or frequent use. It may be more cost effective to install a radon system during new construction rather than after construction is complete.

If renovating or demolishing existing structures, there may be a concern of disturbing regulated materials that contain asbestos or lead-based paint. Materials containing asbestos or lead-based paint should be managed in accordance with applicable federal, state, and local regulations.

The Denver Air Pollution Control Ordinance (Chapter 4- Denver Revised Municipal Code) specifies that contractors shall take reasonable measures to prevent particulate matter from becoming airborne and to prevent the visible discharge of fugitive particulate emissions beyond the property on which the emissions originate. The measures taken must always be effective in the control of fugitive particulate emissions on the Site, including periods of inactivity such as evenings, weekends, and holidays.

The Denver Noise Ordinance (Chapter 36- Denver Revised Municipal Code) identifies allowable levels of noise. Construction noise is exempted from the Noise Ordinance from 7 A.M. to 9 P.M. Monday through Friday and 8 A.M. to 5 P.M. Saturday and Sunday. Variances for nighttime work are allowed, but the variance approval process requires two to three months. Be aware, finished projects may change the acoustic environment, but must maintain compliance with the Noise Ordinance. Violations of the Noise Ordinance commonly result from, but are not limited to, the following sources: music, public address and alarm systems, the operation or improper placement of HV/AC units, generators, and loading docks. For variance requests or questions related to the Noise Ordinance, please contact Paul Riedesel (720-865-5410).

Scope & Limitations: EQ performed a limited search for information known to EQ regarding environmental conditions at the project Site. This review was not intended to conform to ASTM standard practice for environmental site assessments, nor was it designed to identify all potential environmental conditions. The City and County of Denver provides no representations or warranties regarding the accuracy, reliability, or completeness of the information provided.

This review was not intended to assess environmental conditions for any potential right-of-way, park, or open space dedication. This review does not constitute an approval or action regarding any future property dedication to the City and County of Denver.

J. Xcel Energy

Please see the attached referral response from Xcel Energy ([Attachment 5](#))

K. Denver Water

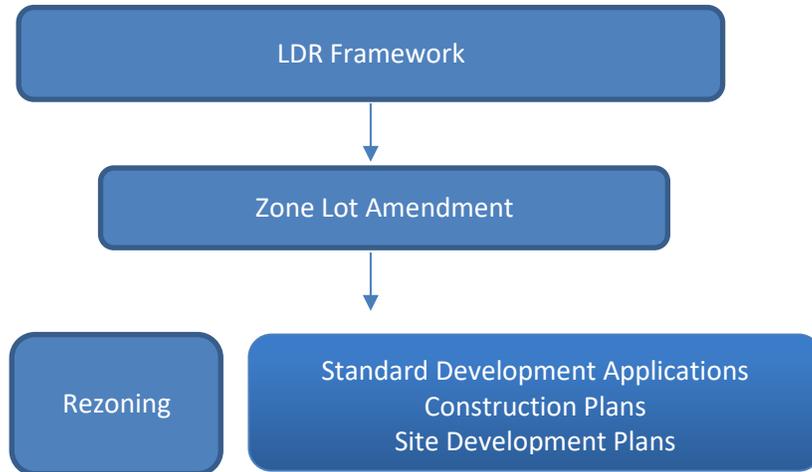
Please see the attached referral response from Denver Water ([Attachment 6](#))

VIII. Required Planning and Regulatory Applications

The following regulatory processes have been identified as necessary for this project to achieve consistency with City adopted plans:

- Large Development Framework: This LDF is based on evaluation of the proposed adaptive reuse of the existing buildings. In the future, if new development is proposed for the Park Hill Campus an amendment to this LDF will be required. Amendments to the LDF will follow the process outlined in the Denver Zoning Code, including evaluation of plan guidance and a Community Information Meeting. At such meeting the proposed development will be presented to the community for comments and input.

- Zone Lot Amendment – The campus is currently one Zone Lot and actions such as permitting cannot be completed for the campus without the signature of all property owners. To separate the ability for independent applications, the campus may be separated into separate Zone Lots.
 - The Zone Lot amendment must be completed prior to issuance of Zoning Permits for the housing projects.
 - An open space easement satisfying the requirements of Section 10.8.1 is needed prior to approval of the Zone Lot amendment. Section 10.8.1 requires that 10% of the entire campus must be preserved via an open space easement. This “required open space” will encompass a portion of existing General Campus Open Space and a portion of the quadrangle.
 - A sanitary sewer easement for the north/south public sanitary main is required prior to approval of the Zone Lot amendment.
 - Shared parking agreements may be needed with the Zone Lot amendment.
 - Update to the sanitary covenant is needed prior to approval of the Zone Lot amendment.
- Rezoning – The Vocational or Professional School use is an allowed and permitted use for the campus; however, the Food Preparation and Sales, Commercial use requires a rezoning or zoning waiver.
- Site Development Plan(s) for horizontal and vertical development – Depending on the scope and extent of the site plan application(s) the Project Coordinator will determine if a full Site Development Plan or a Zoning Permit with site plan will be required with each application.
- Transportation Engineering Plans (TEP) as needed based on the specific proposal and determined by staff.
- Stormwater and Sanitary Sewer Construction Plans (SSPR) as needed based on the specific proposal and determined by staff.
- Infrastructure Master Plan:
 - Adaptive Reuse of Existing buildings: Infrastructure Master Plan (IMP) not required.
 - Addition of New Buildings: IMP not anticipated. Final determination to be by the DRC at the time of Concept Review application based on the scope and magnitude of the proposal.
 - Development/Redevelopment: IMP is anticipated with the removal of existing buildings. Final determination to be by the DRC at the time of Concept Review application based on the scope and magnitude of the proposal.



IX. Development Review Process

This section establishes the development review process for this application. Table 1 shows the required applications to be submitted for review, the sequencing of the initial application submittals, where approval authority is vested, and the sequencing of final action on the application. Explanation of the terms used in the table is as follows:

- **Application Type:** The name of a required regulatory process/application or city agreement.
- **Prerequisite applications:** Applications that must be submitted prior to the subject line application being submitted.
- **Approval Authority:** The entity vested with approving a development application per adopted City regulations.
- **Final action sequencing:** Timing of final action of each application and its relationship with final action sequencing of other applications.

Table 1: Required Applications

Application Type	Prerequisite Application(s)	Approval Authority	Final Action Sequencing
Regulatory Applications and Agreements			
Zone Lot Amendment	LDR	Community Planning and Development	The Zone Lot Amendment must be approved prior to approval of Zoning Permits for the housing projects.
Rezoning	LDR	City Council	The rezoning must be approved before the Food Preparation and Sales, Commercial use may be permitted and commence on-site.
Horizontal Infrastructure Applications			
None	-	-	None required with the adaptive reuse

Vertical Site Development Applications			
Site Development Plan	None	Development Review Committee	As required based on future development proposals
Site Specific Engineering Construction Plan(s) for site infrastructure (SSPR, TEP, etc)	Concurrent with Site Development Plan	DOTI	Prior to, or concurrently with Site Development Plan
Sewer Use and Drainage Permit(s)	Prior to or concurrent with Building Permit	DOTI	After Site Development Plan approval but prior to Building Permit approval
Zoning Construction Permit(s)	Site Development Plan	Community Planning and Development / Project Coordination	After Site Development Plan approval, prior to building permit approval.
Building Permit(s)	Site Development Plan	Community Planning and Development	After Zoning Construction and Sewer Use and Drainage Permit

X. Community Information Meeting

Pursuant to the DZC, the Large Development Review process requires holding a community information meeting. This community meeting was held on September 30, 2021. A report summarizing the community information meeting is included in [Attachment 7 – Community Information Meeting Summary](#).

- Attachments (5):** Attachment 1 – Survey
 Attachment 2 – Application
 Attachment 3 – Equity Brief
 Attachment 4 – Colorado Women’s College Historic Context
 Attachment 5 – Denver Water Referral
 Attachment 6 – Xcel Energy Referral
 Attachment 7 – CIM Summary

XI. Approval

The Development Review Committee hereby approves this Large Development Framework upon finding that:

- A.** The LDF identifies the type and sequencing of regulatory and planning tools needed to implement adopted City Council Plans, and
- B.** The LDF establishes a coordinated development review process that ensures the future development of the subject area will address land use, development, infrastructure, open space, public parks, schools and other related issues, as application, in accordance with City Council adopted plans.

Adam Phipps, Executive Director Department of Transportation and Infrastructure	Date
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Allegra “Happy” Haynes, Executive Director Department of Parks and Recreation	Date
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Laura E. Aldrete, Executive Director Department of Community Planning and Development	Date
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XII. Ownership Acknowledgement

Owner hereby acknowledges the regulatory requirements specified herein for development of the Subject Property.

By: Aaron Miripol, President & CEO Urban Land Conservancy, sole member of DEP LLC	Date
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By: David Nisivoccia, Authorized Representative Denver Housing Authority	Date
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By: Jim Carpenter, Authorized Representative Denver Public Schools	Date
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