TO:               Denver Planning Board
FROM:             Libbie Adams, AICP, Associate City Planner
DATE:             June 9, 2021
RE:               Official Zoning Map Amendment Proposal #2020I-00112 rezoning multiple properties in
                  Sloan Lake from U-SU-B, U-SU-C, and U-SU-C UO-3 to U-SU-B1, U-SU-C1, and U-SU-C1
                  UO-3 and six properties in the West Colfax neighborhood from U-SU-C to U-SU-C1.

Staff Report and Recommendation
Based on the review criteria for a map amendment stated in the Denver Zoning Code (DZC), Section 12.4.10 (Map Amendment), staff recommends approval for map amendment #2020I-00112.

Summary and Purpose
Councilmember Amanda Sandoval is sponsoring a map amendment to rezone the single-unit residential zone districts in the Sloan Lake neighborhood to allow accessory dwelling units.

- The proposed rezoning includes most the area in the Sloan Lake neighborhood that has single-unit residential zoning. This includes approximately 239 acres bounded by Sheridan Boulevard, Federal Boulevard, Street, 19th Avenue, and 29th Avenue. Six properties in the West Colfax neighborhood at 17th Avenue and Meade Street are also included in the rezoning.
- The proposed rezoning includes over 1,400 single unit residential properties. The proposed map amendment intends to rezone properties between Sheridan Boulevard and Lowell Boulevard and Irving Street and Federal Boulevard that are currently U-SU-C to U-SU-C1; properties between the alley between Lowell Boulevard and King Street and Irving Street that are currently U-SU-B to the proposed U-SU-B1; and a small section from the alley between Hooker Street and Grove Street to Federal Boulevard that are currently U-SU-C UO-3 to U-SU-C1 UO-3.
- The proposed zone districts are the same as the current districts except that they allow the accessory dwelling unit use, either within the primary structure or in a detached structure. Further details of the requested zone districts can be found in the proposed zone district section of the staff report (below), in the attached text amendment, and in Article 5 of the Denver Zoning Code (DZC).
Existing Context

The Sloan Lake neighborhood a single-unit and two-unit residential neighborhood, with an orthogonal grid in most of the neighborhood. The area contains Sloan’s Lake Park located in the southwest portion of the neighborhood and Brown Elementary School located at the intersection of Lowell Boulevard and 26th Avenue.

Six of the properties within the proposed rezoning are in the West Colfax neighborhood, just south of Sloan Lake. This area is largely multi-unit residential and mixed-use with some single and two-unit uses. Lake Middle School is located directly north of the subject properties at the edge of the West Colfax and Sloan Lake neighborhoods. Colfax Avenue bisects the West Colfax neighborhood and provides many commercial and retail options for nearby residents.

There are several bus routes in the areas. Route 28 runs along 26th Avenue with a one-hour headway from Wadsworth to 30th and Downing St. Bus Route 51 runs along Sheridan Blvd. from the Englewood light rail station to US 36 & Sheridan Blvd. with a 30-minute headway. Route 31 along Federal Blvd. runs more frequently with a 10-minute headway providing service between Evans Ave. and 106th Ave.
The following table summarizes the existing context proximate to the subject rezoning:

<table>
<thead>
<tr>
<th>Site</th>
<th>Existing Zoning</th>
<th>Existing Land Use</th>
<th>Existing Building Form/Scale</th>
<th>Existing Block, Lot, Street Pattern</th>
</tr>
</thead>
<tbody>
<tr>
<td>South</td>
<td>OS-A, PUD-G 21, G-MU-3</td>
<td>Park/Open Space, multi-unit residential</td>
<td>Sloan’s Lake Park, 6-story medical center 3-story townhomes</td>
<td></td>
</tr>
<tr>
<td>East</td>
<td>U-TU-C, G-MX-3, R-2 WVRS</td>
<td>Single-unit residential, two-unit residential, multi-unit residential, Industrial, commercial/retail</td>
<td>1- to 2-story single-unit, two-unit, and multi-unit residential; 1-story industrial and commercial buildings with parking to the side or behind the building</td>
<td></td>
</tr>
<tr>
<td>West</td>
<td>PUD 225, U-MX-3, OS-A</td>
<td>Commercial/retail, Office, and Park/Open Space</td>
<td>1-story storage facility, 1-story retail strip, and Sloan’s Lake Park</td>
<td></td>
</tr>
</tbody>
</table>
1. Existing Zoning

The proposed rezoning area is currently zoned U-SU-B, U-SU-C, and U-SU-C UO-3. All three zone districts are single-unit residential districts allowing the urban house primary building form with a maximum height of 30 to 35 feet. For U-SU-B, the minimum lot width is 35 feet wide and minimum zone lot area is 4,500 square feet. For U-SU-C and U-SU-C UO-3, the minimum lot width is 50 feet wide and minimum lot area is 5,500 square feet. The UO-3, Historic Structure Use Overlay District allows for office, art studio, or bed and breakfast lodging uses in addition to the residential uses permitted in the underlying U-SU-C zone district.

2. View Planes

The Sloan’s Lake Park View Plane from the Park at Sheridan Boulevard and 17th Avenue impacts properties within the proposed zoning. Buildings within the area detailed by the ordinance map shown below cannot exceed an elevation of 5,315 feet. This results in a building height limit ranging from approximately 16 feet immediately east of the park to approximately 61 feet near Federal Blvd. There are allowable exceptions to the height limits. The Denver Revised Municipal Code Section 10-37 allows new structures to be constructed up to 35 feet in height, which is the maximum height permitted in the proposed districts.

3. Large Development Review

The applicability of the large development review process is defined by DZC Section 12.4.12.2. There is no specific development concept for this legislative map amendment proposal, no adopted plan recommends use of the LDR process for this proposal, no infrastructure network
or system improvements are anticipated, and there is no existing general development plan that needs to be amended. Therefore, although the area of the rezoning is larger than 5 acres, large development review was found to be inapplicable.

4. Existing Land Use Map

5. Existing Building Form and Scale

All images are from Google Street View.
View facing west on King Street north of 27th Avenue – within proposed rezoning (U-SU-B)

View facing east on Grove Street south of 23rd Avenue – within proposed rezoning (U-SU-C UO-3)

View facing south on 29th Avenue between Utica and Tennyson Streets – north of proposed rezoning
View facing west on Federal Boulevard north of 23rd Avenue – east of the proposed rezoning

View facing south W. Byron Place between Xavier and Wolff Streets – south of proposed rezoning

View facing northeast on Sheridan Boulevard north of 23rd Avenue – west of proposed rezoning
Proposed Zoning

All three proposed zone districts are single-unit residential districts allowing the urban house primary building form with a maximum height of 30 to 35 feet. The three zone districts allow the accessory dwelling unit use, and the detached accessory dwelling unit building form in the rear yard. For U-SU-B1, the minimum lot width would be 35 feet, and minimum lot area would be 4,500 square feet. For U-SU-C1 and U-SU-C UO-3, the minimum lot width is 50 feet wide, and minimum lot area is 5,500 square feet. Setbacks and lot coverage standards accommodate front and side yards similar to U-SU-B and U-SU-C. Further details of the zone districts can be found in Article 5 of the Denver Zoning Code (DZC).

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

Summary of City Agency Referral Comments
As part of the DZC review process, the text amendment and rezoning proposal is referred to potentially affected city agencies and departments for comment. A summary of agency referral responses follows:

**Assessor:** Approved – No response

**Asset Management:** Approved – No comments.

**Denver Public Schools:** Approved – No response.

**Department of Public Health and Environment:** Approved – No response.

**Denver Parks and Recreation:** Approved – No response.

**Transportation & Infrastructure – R.O.W. - City Surveyor:** Approved – No comments.

**Development Services - Transportation:** Approved – See Comments.
The property owners desiring the ability to construct ADUs should be aware that although it’s a minor intensification of land use, transportation review is required during the building permit application process and looks to have the ADUs face an alley where available and repair/replacement of the sidewalk (or ped ramps in the case of corner lots) are damaged or hazardous.

**Development Services – Wastewater:** Approved – No response.

**Development Services – Project Coordination:** Approved – No comments.

**Development Services – Fire Prevention:** Approved – No response.
## Public Review Process

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
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<tbody>
<tr>
<td>Property owner mailers and flyers (by Councilwoman Sandoval)</td>
<td>Fall 2020</td>
</tr>
<tr>
<td>Two virtual town halls (Hosted by Councilwoman Sandoval; 61 total attendees)</td>
<td>9/30/2020, 10/4/2020</td>
</tr>
<tr>
<td>Online survey (by Councilwoman Sandoval)</td>
<td>8/8/2020-1/8/2021</td>
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<tr>
<td>CPD informational notice of receipt of the rezoning application to all affected members of City Council, registered neighborhood organizations, and property owners:</td>
<td>3/25/2021</td>
</tr>
<tr>
<td>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:</td>
<td>6/1/2021</td>
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<tr>
<td>Planning Board public hearing:</td>
<td>6/16/2021</td>
</tr>
<tr>
<td>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:</td>
<td>6/15/2021 (tentative)</td>
</tr>
<tr>
<td>Land Use, Transportation and Infrastructure Committee of the City Council:</td>
<td>6/29/2021 (tentative)</td>
</tr>
<tr>
<td>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:</td>
<td>7/19/21 (tentative)</td>
</tr>
<tr>
<td>City Council Public Hearing:</td>
<td>8/9/2021 (tentative)</td>
</tr>
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</table>

- **Registered Neighborhood Organizations (RNOs)**
  
  To date, staff has not received any comments from Registered Neighborhood Organizations.
• **General Public Comment**
  As of the date of this report, staff has received six letters in support, citing a desire and appropriateness for a slight increase in density. Additionally, Councilwoman Sandoval provided 30 letters of support with the submission of the application. Staff received five letters in opposition to this rezoning, citing concerns of increased traffic, increased density, parking issues, ADU heights, and that this would encourage existing homes to be replaced with triplexes, quadraplexes, or commercial retail. However, this rezoning only permits one accessory unit in addition to a single-unit home and does not permit a duplex, triplex, quadraplex, or commercial retail uses.

**Criteria for Review / Staff Evaluation**

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

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

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

1. **Consistency with Adopted Plans**

   The following adopted plans apply this text amendment and map amendment:
   - *Blueprint Denver* (2019)
   - *Housing an Inclusive Denver* (2018)
   - *West Colfax Plan (2006)* – only applicable to six properties located in the West Colfax neighborhood

**Denver Comprehensive Plan 2040**

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

This map amendment enables ADUs in an entire neighborhood within Denver. ADUs can provide additional housing options, including for seniors and families, and they can provide residents more flexibility to remain in their houses. Therefore, the map amendment is consistent with the following Equitable, Affordable and Inclusive strategies:

- Equitable, Affordable and Inclusive Goal 2, Strategy A – *Create a greater mix of housing options in every neighborhood for all individuals and families* (p. 28).
• Equitable, Affordable and Inclusive Goal 2, Strategy D – *Increase the development of senior-friendly and family-friendly housing, including units with multiple bedrooms in multifamily developments* (p. 28).

Because ADUs are not currently allowed on the single-unit properties in the Sloan Lake neighborhood and other nearby properties in West Colfax, the map amendment would provide an additional housing type and are therefore consistent with the following Strong and Authentic Neighborhoods strategy:

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

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

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

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

**Blueprint Denver Future Neighborhood Context**

The proposed rezoning is within the Urban neighborhood context, which predominantly contains “small multi-unit residential and mixed-use areas are typically embedded in 1-unit and 2-unit residential areas” with “a high degree of walkability, bikeability, and good access to transit with less reliance on cars” (p. 136).

The U-SU-B1, U-SU-C1, and U-SU-C1 UO-3 zone districts are within the Urban neighborhood context and are “intended to promote and protect residential neighborhoods within the character of the Urban Neighborhood Context,” further clarifying that “the building form standards, design standards and uses work together to promote desirable residential areas” (DZC 5.2.2.1). The proposed districts are consistent with the Blueprint future neighborhood context of Urban because they will promote the residential character by allowing single-unit residential uses with low-scale accessory dwelling units that will be compatible within the existing residential area.
The proposed rezoning is within the Residential Low future place, which is “predominately single- and two-unit uses on smaller lots. Accessory dwelling units and duplexes are appropriate and can be thoughtfully integrated where compatible,” and “buildings are generally up to 2.5 stories in height” (p. 230). U-SU-B1, U-SU-C1, and U-SU-C1 UO-3 are single unit residential districts that allow an additional dwelling unit accessory to an established single-unit home, consistent with the Low Residential future place types description. All proposed districts allow the Urban House primary building form, which has a maximum height so 2.5 stories, also consistent with the future place type.
Because the subject property is designated Residential Low in the Future Places map, the Blueprint Denver Growth Strategy categorizes it as “All other areas of the city.” These areas are anticipated to experience approximately 20% of new housing growth and 10% of new employment growth by 2040 (p. 51). The map amendment to allow accessory dwelling units is consistent with this growth strategy because it will allow low-intensity residential growth in this area, which is consistent with the growth strategy.
Blueprint Denver Street Types

Street types help inform the appropriate intensity of the adjacent development (p. 67). Blueprint Denver classifies Sheridan Blvd., Federal Blvd., and W 29th Ave. as Residential and Mixed-Use Arterials, which are “designed for the highest amount of through movement and the lowest degree of property access” (p. 154). Blueprint Denver classifies 17th Ave., 23rd Ave., 26th Ave., Tennyson St., Meade St., and Irving St. as Residential Collectors. “Collector streets are in between a local street and an arterial street; they collect movement from local streets and convey it to arterial streets” (p.159). The remaining streets in the proposed rezoning are undesignated local streets, which are “most often characterized by residential uses [and] provide the lowest degree of through travel but the highest degree of property access” (p. 154). U-SU-B1, U-SU-C1, and U-SU-C1 UO-3 are all residential districts within the Urban context, which include regulations intended to “reinforce desired development patterns in existing neighborhoods while accommodating reinvestment” (DZC Section 5.2.2.1.D). Therefore, the proposed text and map amendments will result in an intensity that is appropriate for the network of street types in the area.
Blueprint Denver Strategies

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

Land Use & Built Form, Housing, Policy 4:
- This policy recommends “Diversify[ing] housing choice through the expansion of accessory dwelling units throughout all residential areas” (p. 84), which is consistent with both the text and map amendments.
- The policy includes several strategies for integrating accessory dwelling units, including using “an inclusive community input process to respond to unique considerations in different parts of the city” and “identify[ing] strategies to reduce involuntary displacement” (p. 84). The map amendment process was community-driven and included extensive outreach to the Sloan Lake neighborhood.
- Strategy E states that a “citywide approach to enable ADUs is preferred.” The Land Use & Built Form, General, Policy 11 Strategy A explains why this plan direction is not relevant for the map amendment, detailed below.

Land Use & Built Form, General, Policy 11:
- This policy is to “Implement plan recommendations through city-led legislative rezonings and text amendments” (p. 79).
- **Strategy A** recommends “prioritiz[ing] larger-scale, legislative rezonings over site-by-site rezonings to implement plan recommendations and to achieve citywide goals, including equity goals” (p. 79). Given broad interest in rezoning to allow ADUs on single properties in Sloan Lake, a legislative rezoning for the entire area is consistent with this strategy.
- **Strategy B** states, “Use text amendments combined with map amendments to apply strategies recommended by Blueprint Denver at the effective, area appropriate scale. Text amendments and large legislative rezonings should be guided by the equity concepts and maps in Chapter 2” (p. 79). This proposed text amendment creates a zone district to implement Land Use & Built Form, Housing, Policy 4, detailed above. Discussion of the equity concepts is included below.
- **Strategy C** directs text amendments and city-led rezonings to utilize “a robust and inclusive community input process.” The effort to seek zoning that allows ADUs in Sloan Lake was community-initiated and community-driven. A months-long public outreach process included: mailers to all affected property owners; an online survey with 334 responses showing majority support for the rezoning; two community town halls; and door-to-door flyers delivered twice (see the full proposal in Attachment 2 for data).

Land Use and Built Form: General, Policy 5:
- This policy is to “Integrate mitigation of involuntary displacement of residents and/or businesses into major city projects” (p. 75).
- **Strategy B** recommends “For major city investments and projects—including regulatory changes and legislative rezonings— analyze the potential for the involuntary displacement of lower-income residents and local businesses.” Discussion of impacts on involuntary displacement is included below Blueprint Denver equity concepts.
Blueprint Denver Equity Concepts

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

I. Access to Opportunity

The access to opportunity score is a composite of the neighborhood equity index developed by Denver’s Department of Public Health and Environment, proximity to high-capacity and frequent transit, and access to centers and corridors. This equity concept helps the city consider if it’s making progress towards achieving the vision for complete neighborhoods citywide.

The subject property is in an area with average access to opportunity. Sloan Lake and West Colfax are somewhat equitable on the neighborhood equity index measurement (social determinants of health, access to healthcare, child obesity, and built environment subjects). The neighborhood scores lower regarding access to transit because it is not located with a ½ mile of a light-rail transit station. However, the neighborhood has access to several bus lines, including along Federal Boulevard (Route 31), Sheridan Boulevard (Route 51), and 26th Avenue (Route 28). The access to centers and corridors indicator varies throughout the neighborhood. The portions of the neighborhood covered by a walk, bike, or driveshed to a center or corridor ranges from 0% to 74%. The proposed rezoning to allow ADUs throughout the neighborhood will bring more residents to an area that has greater access to healthcare and a park. It will also allow more residents to have access to the centers and corridors along Sheridan and Federal Boulevards. The proposed rezoning will not have a direct impact on increasing
neighborhood access to amenities or transit as it will only allow residential and limited civic/public/institutional uses that are already allowed by existing zoning.

II. Vulnerability to Involuntary Displacement

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

![Blueprint Denver Vulnerability to Displacement Map](image)

The subject property is in an area that is largely less vulnerable to involuntary displacement. Sloan Lake does not score as vulnerable on any of the three indicators (percent of population with less than a college degree, renter occupied units, and median household income). The West Colfax neighborhood, which includes six properties in the proposed rezoning, scores as more vulnerable to involuntary displacement. It scores as vulnerable on all three indicators. This proposed map amendment will provide opportunities for existing homeowners to supplement their income while also increasing housing options in the neighborhood. Even though much of the area is less vulnerable to involuntary displacement, allowing ADUs throughout Sloan Lake will help residents at a range of income levels continue to live in the neighborhood and may prevent future involuntary displacement of residents.
III. Expanding Housing and Jobs Diversity

The housing diversity map combines census tract-level data measuring the percentage of middle-density housing (housing with 2-19 units), home size diversity, ownership versus rental, housing costs, and the number of income-restricted units.

A portion of the subject property is in an area that has greater housing diversity while the remaining area has low housing diversity. The western portion of Sloan Lake and the properties in West Colfax are considered not diverse for four of the measurements - percentage of middle-density housing, home ownership compared to rental, housing costs, and number of income restricted units. Whereas the eastern portion of Sloan Lake is considered diverse for all but one of the measurements (percentage of middle-density housing). The map amendment to allow ADUs will introduce a new housing type and provide rental housing opportunities in areas currently largely comprised of owner-occupied single-units, while helping to maintain the diversity in the eastern portion.
The map above shows the mix of jobs in areas of the city (dominant industry depicted by color). With a greater emphasis on retail jobs in the northern portion of the proposed rezoning area, the subject property is located has a mix of jobs that is dissimilar to the city’s overall mix of job types. However, there is not enough data to classify the type of jobs for most of the Sloan Lake and West Colfax neighborhoods because there are less than 100 jobs per acre. The existing and proposed zone districts do not allow for commercial uses so the rezoning will not impact jobs diversity.

**Housing an Inclusive Denver**

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

- **Legislative and Regulatory Priorities, Recommendation 2:** Expand and strengthen land-use regulations for affordable and mixed income housing. Through Blueprint Denver and supplemental implementation actions such as zoning modifications, the City should support land-use regulations that incentivize affordable and mixed-use housing, including expanding the development of accessory dwelling units (p. 9)

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

City Council adopted the West Colfax Plan in September 2006, and it applies to the six properties at Meade and 17th Avenue. The format of the West Colfax Plan includes framework plan recommendations that apply throughout the planning area and district recommendations that apply in smaller subareas. Key components of the framework plan include urban design, land use, mobility, and economic development.

Within the West Colfax Plan, the subject property is located in the Urban Neighborhood area. These areas have a range of development intensities. “Housing options are appropriate for a central city location including single-family houses, carriage houses, duplexes, apartments, townhomes, row houses and condominiums” (p. 84) with heights of one to four stories. The ADU districts proposed will allow a maximum height of two and a half stories with an additional dwelling unit, consistent with the Urban Neighborhood guidance.

In additional to the framework plan, the West Colfax Plan includes district plans. These plan “provide guidance regarding the appropriate character and scale of an area. The district plans augment the prevailing goals and recommendations contained in the framework plan” (p. 120). The subject property is within the Tuxedo Park East district. The goals in this area include “discreet increases in residential
The proposed rezoning will allow a small increase in density, and the associated design standards will ensure any new ADU development is compatible with the character of the existing neighborhood consistent with the goal of the Tuxedo Park East district.

2. Uniformity of District Regulations and Restrictions

The proposed rezoning to U-SU-B1, U-SU-C1, U-SU-C1 UO-3 will result in the uniform application of zone district building form, use and design regulations within each zone district.

3. Public Health, Safety and General Welfare

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

**CPD Recommendation**

Based on the review criteria for a map amendment stated in the Denver Zoning Code (DZC), Section 12.4.10 (Map Amendment), staff recommends approval for Map Amendment #2020I-00112.

**Attachments**

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