

## Project Narrative | TTRes at Commerce City at Chambers Rd

Zone Change

7/21/2025

### Introduction And Purpose

Thompson Thrift Development is a national leader in residential and retail development, construction, and management of upscale Class A Communities. Thompson Thrift is highly active in the Colorado Front Range with projects ranging from Fort Collins and Greeley south to Monument and Fountain. Their ultimate vision for this project is to develop, own and manage a multi-family development in the City of Commerce City.

The purpose of this zone change request is to change the zone district of the property from Agricultural (AG) District to Multi-Family Residential (R-3) District. The zone change request to R-3 includes the entire site, which consists of one parcel located south of E. 104th Avenue and west of Chambers Road. The current address is 10225 Chambers Road. The applicant, in a separate subdivision plat submittal, will also dedicate public right-of-way on Chambers Road and E. 102nd Avenue, and split the parcel into two lots per Land Development Code Sec. 21-6220. The following analysis examines how the project meets the zone change requirements outlined in the Land Development Code:

#### A. Land Development Code Sec. 21-3232 (5) Approval Criteria

- *Per Sec 21-3232 (5) an application may be approved if the zone change meets all of the following.*

*(i) The proposed zone district and allowed uses are consistent with the policies and goals of the comprehensive plan, any applicable adopted area plan, or community plan of the city.*

Analysis: The zone change is consistent with the policies and goals of the 2045 Comprehensive Plan adopted in November of 2024. Please see Section B of this document for analysis and alignment of the proposal with the Comprehensive Plan.

*(ii) The proposed zone district and allowed uses are compatible with proposed development, surrounding land uses and the natural environment.*

Analysis: The requested zone change will be from AG (Agricultural District) to R-3 (Multifamily Residential District). The subsequent development plan proposes multi-family residential development on a single lot, which aligns perfectly with the intent of the R-3 zone district which is stated in Section 21-4310 of the Land Development Code as, "the purpose of the multi-family residential district (R-3 district) is to provide a high-density residential district that allows one or more single-family attached dwellings or multi-family dwellings on a single lot."

- For context, the properties to the north and east of the subject site are zoned Planned Unit Development (PUD), and these lands contain both existing multi-family residential and commercial uses. The commercial uses front the arterial roads, with multi-family residential adjacent to support the commercial businesses and create a transition from higher density and more intense uses to less dense residential uses. The proposed development is in harmony with these established land uses and will continue this established growth pattern in the City. The development patterns will further the fabric of the Northern Neighborhoods Character Areas as outlined in the Comprehensive Plan, which shows more intense commercial and multi-family residential uses along arterial and collector roads, while less intense uses are placed behind to support these uses. The proposed development is a continuation of this growth pattern as envisioned in the Comprehensive Plan.
- The property directly to the west is zoned as AG(Agricultural). Chapter 8 of the Comprehensive Plan has designated that parcel for future residential development labeling it as a future Greenfield Development. The properties to the south of the subject site are zoned as R-1 (Single-Family Detached Residential District). City Council considered Resolution 2024-164, which proposed to deny Case Z24-0003 and adopt written findings. The resolution did not pass, as it failed to receive majority approval. The vote was recorded as: 4 in favor, 4 opposed, and 1 recusal. Although the resolution was not adopted, it will serve as a reference point for the Comprehensive Plan analysis discussed below, based on the City Council's deliberations during the November 25, 2024 meeting. In the resolution it was stated that:

"The proposed zone district does not meet the approval criteria in section 21-3232(5)(b)(ii) because the proposed zoning of R-3 is more dense than the single-family residential development to the south and thus is not compatible. Additionally, the immediate impacts of traffic due to the increase in density will result in adverse effects to surrounding neighbors and properties; "

Understanding that R-3 (Multi-Family Residential District) is inherently denser than R-1 (Single-Family Detached Residential District), this alone does not automatically deem the proposed multi-family development as not compatible. Rather the Land Development Code in Section 21-11200 defines compatibility as:

*"Compatible or Compatibility shall mean that the characteristics of different uses, activities, or designs allow them to be located near or adjacent to each other in harmony. Some elements affecting compatibility include height, scale, mass, and bulk of structures. Other characteristics include pedestrian or vehicular traffic, circulation, access and parking impacts. Other important characteristics that affect compatibility are color and texture of exterior finishes, landscaping, lighting, noise,*

odor, building materials, and building architecture. Compatibility does not mean the same as. Rather, compatibility refers to the sensitivity of development proposals in maintaining the character of existing development."

Commerce City Land Development Code contemplates compatibility as different uses (in this case multi-family and single-family) that are located "near or adjacent to each other in harmony." The proposed multi-family residential development is thoughtfully designed to integrate harmoniously with the surrounding single-family neighborhood to the south while enhancing overall connectivity and accessibility in the area. In alignment with Commerce City's definition of compatibility, this development demonstrates sensitivity to the existing character of the area through strategic design, landscaping, and infrastructure improvements outlined below:

- Height, scale mass, and bulk of structures. – The proposed multi-family development was thoughtfully designed to be compatible with the single-family development. Residential multi-family structures are "set back" from the property line to allow for a more gradual transition to the single-family development. Any structures proposed near the property line, closest to existing single-family homes, are designed to be single (one) story garages. The multi-family buildings are positioned in a north/south orientation to not only lessen the visual impact to the south but also to mimic the orientation of existing structures nearby to further neighborhood compatibility.
- Color and texture of exterior finishes, building materials, and building – The architectural design, exterior materials, and color palette of the multi-family residences have been selected to complement the existing single-family homes, further reinforcing a cohesive community appearance. Materials, finishes, and colors are all compliant with City code and policies. Furthermore, attention to all elevations have been intentionally selected to present "four-sided" architecture with human-scale accents and design.
- Pedestrian or vehicular traffic, circulation, infrastructure, access and parking impacts – The development also includes the construction of E. 102<sup>nd</sup> Ave as envisioned in the Commerce City Roadway Classification Plan as depicted and described in the Commerce City Transportation Plan. The extension of E. 102<sup>nd</sup> Avenue (a minor collector) means that the existing single-family lots will be further separated from the proposed multi-family lot by an additional 64-feet of public right-of-way, in addition to the landscaped buffers mentioned below on the proposed development. The construction of this new roadway will improve circulation and alleviate potential traffic concerns by helping to distribute vehicular traffic more efficiently, minimizing congestion on adjacent single-family streets. This new roadway will also provide needed sidewalks and proposed crosswalks to enhance the currently non-existent pedestrian connectivity.. The western access point to the multi-family development will be

aligned with Altura Street and feature a restricted three-quarter access. This design prevents traffic from cutting through and directly impacting the single-family neighborhood, ensuring that neighborhood roads remain quiet and free from unnecessary congestion. This traffic mitigation solution is a design change the developer is undertaking as part of a direct response to concerns from the City Council and neighbors. Parking is provided per code and is intentionally placed behind landscape buffering or on the northern property boundary away from the existing residential to further compatibility. Together, these infrastructure improvements align with the City's definition of compatibility by thoughtfully addressing traffic flow, circulation, access management, and pedestrian connectivity. By incorporating a new collector roadway, enhanced walkability, and controlled access points, this project balances growth with neighborhood stability, ensuring a well-integrated and harmonious residential environment.

- o Landscaping - A key feature ensuring compatibility is the inclusion of generous buffering between the proposed development and the existing single-family uses. Landscape buffering, which will create a natural transition between the multi-family and single-family residences is provided. This buffer will help mitigate potential differences in scale and massing while providing visual screening, potentially reducing noise impacts, and enhancing the aesthetic continuity of the neighborhood. Additionally, feedback was received from neighbors in the single-family residential neighborhood to add trees to "their side" of the road, so the developer has worked with the City to plant additional trees on the south side of the new E. 102<sup>nd</sup> Ave to give equal and adequate landscape to both sides of the right-of-way. Please note that landscape buffering is provided on all sides of the development in compliance with code and in coordination with City stakeholders and referral agencies.

The Commerce City Comprehensive Plan envisions more intense uses to front arterial roads which then transition to less intense uses. The proposed zone change will allow for a development plan that will help achieve this by creating a gradient of transitioning from established high intensity uses that front arterial roads, (intersection of E. 104th Avenue and Chambers Road) to less intense (established) residential uses. As proposed, the subsequent development plan will place residential next to existing residential while the extension of E. 102nd Ave will create an additional buffer between the existing residential uses and the proposed multi-family residential development as stated above.

The proposed R-3 zone change adheres to the goals and visions of the Comprehensive Plan and is further analyzed in Section B. The proposed zone change will support other master planning documents by helping to envision infrastructure, connectivity, housing, and economic development goals. With a mix of residential and commercial uses in the

surrounding area, the R-3 zoning, and multi-family development will promote nearby businesses, public services, improve infrastructure and connections to foster connectivity and community.

While multi-family and single-family developments are not identical, compatibility does not require them to be the same. Rather, this project has been carefully planned to respect the character of the existing neighborhood while introducing diverse housing options that support the community's evolving needs. Through landscape buffering, thoughtful architectural design, and enhanced infrastructure, this development will integrate seamlessly, providing a balanced and inclusive residential environment.

(iii) The proposed zone district will have, or future development can provide, efficient and adequate provision of public services, including but not limited to, water, sewerage, streets, and drainage;

Analysis: In Resolution 2024-164, it was stated that, "The proposed zone district does not meet the approval criteria in section 21-3232(5)(b)(iii) because the proposed zoning of R-3 does not account for other development that is already approved and there was insufficient evidence provided by the applicant to show that the proposed zone district can provide adequate provision of public services, including but not limited to, water, sewerage, streets and drainage;"

The proposed development project has been carefully planned with a comprehensive understanding of existing and future developments in Commerce City. Our team is committed to responsible growth and ensuring that our project aligns seamlessly with the City's vision for sustainable community expansion. As part of our due diligence, our project team has worked extensively with Commerce City staff to gain a thorough understanding of the infrastructure and public services necessary to support this development. We have proactively addressed critical elements, including water, sewage, streets, and drainage, to ensure that our project meets or exceeds the City's requirements. Through detailed coordination, we have incorporated infrastructure planning that not only serves our development but also complements and enhances existing public service networks.

The proposed zone district and future development will have efficient and adequate public services, including water, sewage, streets, and drainage. As stated above, the project team has worked with and will continue to work with City staff and its stakeholders to design, develop, construct, and deliver public infrastructure to the development site. A fundamental strength of this development is the availability of critical infrastructure already in place. The proposed site is surrounded by existing services along Chambers Road, including a 12" water main, 36" RCP storm sewer main, and an 8" sanitary sewer main that crosses Chambers Road. Existing services along E. 102<sup>nd</sup> Avenue include an 8" water main, and a 4"

irrigation line. Existing telecoms, power, gas, and fiber optic lines are available for connection as well. This existing network minimizes the need for extensive offsite improvements and allows for seamless integration with current municipal and partner systems, ensuring efficient delivery without straining existing resources.

Expanding further on streets, the zone change will support the enhancement of existing roads and construction of new roads as determined in the City's Roadway Classification Plan by dedicating and connecting E. 102<sup>nd</sup> Avenue not only to Chambers Road, but also a connection west to Sable Blvd via an interim condition with off-site improvements. These voluntary roadway improvements by the developer would not be possible without an approved zone change and subsequent development. The improvements will create additional vehicle access and pedestrian connectivity, eliminating gaps in the network and completing an identified need in the City of Commerce City's Transportation Plan.

Our development team has proactively engaged with and will continue to coordinate with City staff and key stakeholders throughout the planning and design phases. This ongoing collaboration ensures that the project aligns with municipal standards and best practices, facilitating the effective expansion and reinforcement of public utilities where needed. This approach guarantees that essential services will meet or exceed the City's requirements. Additionally, we have engaged with neighboring developments currently under review with the City to foster a collaborative approach to public service integration. This proactive engagement ensures that all required services are effectively allocated to serve both current residents and future community members, without disruption. Our team has worked diligently to align timelines, capacities, and infrastructure to prevent any gaps or redundancies in service provisions.

In addition to coordination with City staff, the TTRes project has undergone thorough review by key public service agencies throughout its duration. South Adams County Water and Sanitation District (SACWSD), Xcel Energy, and the South Adams County Fire Department have each reviewed the Zone Change, Development Plan, and Final Plat submittals dating back to 2023. Our development team has conducted multiple coordination meetings with SACWSD and Xcel Energy to address infrastructure planning, easement requirements, and service capacity considerations. These efforts were conducted in parallel with the formal referral and stakeholder review process facilitated by City staff. At no point have any of the aforementioned agencies raised concerns or indicated a lack of capacity to serve the proposed development. Their ongoing engagement and lack of objections reflect a comprehensive and coordinated approach to ensuring that all necessary public services can be delivered effectively in support of the proposed zone change and subsequent development.

We are confident that our development will contribute positively to the community by creating a well-integrated, sustainable, and efficient addition to the area. Our collaborative efforts with City staff and neighboring developments demonstrate our commitment to responsible growth and long-term viability. This project exemplifies responsible urban development by utilizing existing infrastructure, minimizing environmental impact, and ensuring high-quality public service delivery. The commitment to collaboration with City staff and stakeholders reinforces our dedication to meeting Commerce City's growth objectives, while preserving service efficiency and quality of life for all residents. The subsequent development plan is a well-planned, strategically positioned project that capitalizes on existing infrastructure and a cooperative planning process to ensure the efficient and adequate provision of public services.

(iv) The proposed zone district will have, or future development can provide, efficient and adequate provision of public uses including but not limited to, parks, schools, and open space;

Analysis: The proposed development is committed to supporting open space, recreation, and efficient public use provisions. More than 26% of the site will be dedicated to open space, featuring common areas and gathering spaces that foster a strong sense of community and encourage outdoor activity. In alignment with the City's Comprehensive Plan, these areas will provide residents with accessible locations for recreation, relaxation, and social interaction, enhancing the overall quality of life within the development.

Additionally, the project benefits from its close proximity to the Rocky Mountain Arsenal National Wildlife Refuge, located less than three-quarters of a mile south at the intersection of Chambers Road and E. 96th Avenue. A nearby trailhead allows residents to easily access extensive established trail networks by foot or bicycle, reducing reliance on vehicles for recreational activities and promoting healthy, active lifestyles. The parcel directly to the north, owned by the Public Service Company of Colorado, is designated as an open space property and identified as a Greenways trail link in the City's *Prairieways Action Plan*. With an approved zone change and development plan, pedestrian infrastructure improvements will be implemented along the property boundary, filling in missing connections along Chambers Road and E. 102nd Avenue. These enhancements will ultimately link to planned trail networks, providing additional outdoor recreation opportunities for residents and the greater community, which aligns with the vision set forth in the Comprehensive Plan.

In alignment with this criterion and our ongoing commitment to transparency, stakeholder engagement, and coordination with the community, our development team scheduled, publicly noticed, and held a second Neighborhood Meeting on July 10, 2025. This meeting provided an additional opportunity for nearby residents and interested stakeholders to review the proposed zone change, ask questions, and offer input directly to the project team on any and all items related to the project. We remain committed to maintaining open lines of

communication throughout this process and have proactively responded to all requests for additional outreach. The successful completion of a second neighborhood meeting underscores our team's continued dedication to a collaborative and responsive planning process. A full summary of this second meeting will be provided to City staff per City requirements for review.

Resolution 2024-164 stated that, "The proposed zone district does not meet the approval criteria in section 21-3232(5)(b)(iv) because there was insufficient evidence provided by the applicant to show that the proposed zone district can provide adequate provision of public uses such as school resources;"

The project team has worked with and will continue to work with the City and 27J School District to pay all applicable Development Impact Fees in accordance with the LDC Article IX. Please note, 27J School District is a referral agency that provides comment during the zone change process. 27J School District and Planning Manager, both former Kerrie Monti and current Greg Thompson, have reviewed the full development project and 27J School District does not object to the proposed zone change nor has the District shared concerns regarding the school system's ability to take in additional students as a result of the proposed multi-family development. This referral letter is on file with the Commerce City Community Development Department. Working with the District is an important and vital part of the development process, so our team started coordinating and communicating with them early on. Our project team hosted a neighborhood meeting for this proposed project at Stuart Middle School (15955 E. 101<sup>st</sup> Way) in coordination with the District. Our team has appreciated and looks forward to continued communication, coordination, and partnership with 27J School District.

The project team has continued to work with 27J Schools collaboratively, in addition to the letter provide during the City's referral and stakeholder process, 27J Schools In a letter dated June 20, 2025, Greg Thompson, Planning Manager for School District 27J, formally confirmed the District's support for the proposed development. Mr. Thompson noted that the project "appears to present student impacts that can be absorbed by existing and planned district schools in close proximity to the site" and stated that 27J "anticipates the Thompson Thrift project will complement our current and future planning objectives." He further acknowledged the benefit of offering a variety of residential housing types—specifically apartments—as a means of providing more attainable housing for the community.

Importantly, the development team has voluntarily committed to paying both the standard cash-in-lieu fees and the Capital Facility Fee Foundation (CFFF) contribution, which supports the acquisition and construction of school sites and facilities. This goes beyond what is required under the City's Land Development Code and underscores the project's commitment to being a responsible, community-minded partner. Mr. Thompson explicitly expressed



appreciation for this early financial commitment, which reinforces that 27J has no concerns regarding school capacity, impacts, or service delivery as it relates to this development. The referral letter is on file with Commerce City's Community Development Department and stands as clear documentation that this project has proactively addressed school service needs.

(v) *There is a community need for the zoning district in the proposed location, given need to provide or maintain a proper mix of uses both within the city and the immediate area of the proposed use; and*

Analysis: In Resolution 2024-164 it was stated that, "The proposed zone district does not meet the approval criteria in section 21-3232(5)(b)(v) because there is already multi-family housing existing and planned within the immediate area so there is no community need for the proposed zoning of R-3." The assertion in Resolution 2024-164 that "there is no community need for the proposed zoning of R-3" is factually incorrect when analyzed in the context of Commerce City's existing housing stock, strategic plans, and community housing needs. The argument presented in the resolution overlooks key factors that indicate a strong demand for multi-family housing in the Northern Neighborhoods of Commerce City.

The Comprehensive Plan outlines a vision to enhance land use diversity by promoting commercial and multi-family development along arterial roads, with residential areas positioned behind. This project aims to do just that, with Chambers Road designated as a multimodal arterial road in the Transportation Master Plan. The 2045 Comprehensive Plan goes on to state that as the Northern Neighborhoods Character Area "*continues to develop, they should include a mix of housing products.*" The Northern Neighborhoods Character Areas of Commerce City is predominantly comprised of fee-simple single-family homes and townhomes. While these housing types serve an essential segment of the population, they do not constitute a truly diverse and balanced housing stock. To achieve a mix of housing products that accommodate a range of residents and income levels, multi-family housing must be an integral component of the housing landscape.

The mere presence of some existing and planned multi-family developments within the area does not negate the broader need for additional multi-family housing options. Housing markets function dynamically, and as Commerce City's population continues to grow, the supply of multi-family housing must expand to meet evolving demand. Limiting multi-family housing opportunities by denying R-3 zoning undermines efforts to ensure equitable access to diverse housing choices. Commerce City's *Strategic Housing Plan* and the *Housing Authority Housing Needs Assessment* both highlight the increasing affordability challenges within the City, including in the Northern Neighborhoods. These documents explicitly state the growing issue of housing affordability, with a rising population and a constrained supply of affordable and attainable housing options. Specifically, the *Housing Authority Housing*

*Needs Assessment* emphasizes the “importance of providing multiple types of housing serving a range of current and future residents and incomes in vibrant neighborhoods where people want to live”. The proposed R-3 zone directly aligns with these policies and goals by enabling the development of housing that meets the needs of diverse income levels that can serve young professionals, aging adults, and residents who may not be able to afford single-family homes. Furthermore, the applicant is committing to deed-restrict 10% of the total number of units within this development at the 80% Area Median Income (AMI), ensuring a meaningful share of true affordable housing is integrated within the community. This commitment strengthens the case that a multi-family development, as a more attainable housing type with on-site deed-restricted affordable units, not only aligns with the City's adopted guiding documents as stated above but also reflects the priorities expressed by City Council during recent public hearings.

The City Economic Development Department has emphasized the positive economic impact of planned multi-family development, stating,

"The planned multi-family development will result in an increase in population of Commerce City. A growing population helps in the marketing and recruitment of prospective retailers." Furthermore, the department elaborated, "New city residents will spend money at locally owned businesses resulting in an overall stronger business community. Increased retail sales from residents will grow the City's tax base and help to provide additional funding for projects, programs, and initiatives."

The economic benefits of multi-family housing extend far beyond just increasing population figures. A larger, more diverse residential base strengthens the City's overall economic vitality by expanding the consumer market for local businesses, attracting new investments, and fostering a more dynamic and resilient commercial sector. With a broader mix of housing options, Commerce City can better accommodate a workforce that fuels key industries, ensuring that businesses have access to employees who can afford to live within the community.

Additionally, increased retail activity spurred by new residents results in a stronger tax base, which directly benefits City services, infrastructure improvements, and community programs. This cyclical economic boost reinforces the argument that R-3 zoning is not only a housing necessity but a strategic economic decision that will yield long-term financial benefits for Commerce City and its residents. Adding multi-family housing near the E. 104th commercial nodes will strengthen existing businesses by introducing higher-density residential within walking distance, complementing the current single-family homes that primarily rely on vehicle access. The proximity to services, grocery stores, restaurants, and schools aligns with the multi-family use. Multi-family uses have higher densities which means an increase in demand for commercial uses and being within a short distance ensures convenience and

accessibility for residents to support the commercial uses. Commercial and residential uses coexisting in this area foster social and economic viability and create a sense of place and quality of life for both current and future residents.

The claim that "there is no community need" for R-3 zoning contradicts both empirical housing data and Commerce City's own strategic and economic goals. The Northern Neighborhoods lack a sufficient diversity of housing options, and the market demand for multi-family housing remains strong as the City experiences population growth and affordability challenges. Commerce City's *Strategic Housing Plan* and *Housing Needs Assessment* clearly articulates the necessity of expanding housing choices, making the zone change to R-3 zoning consistent with the City's stated housing priorities.

To meet the needs of a growing and diverse population, Commerce City should support policies that encourage a balanced housing mix. Allowing R-3 zoning would be a proactive step toward ensuring that residents at various income levels have viable housing opportunities, thus strengthening community stability and economic resilience.

(vi) *The area for which zone change is requested has changed or is changing to such a degree that it is in the public interest to allow a new use or density.*

Analysis: Resolution 2024-164 makes the assertion that , "the proposed zone district does not meet the approval criteria in section 21-3232(5)(b)(vi) because the area for the proposed zone change is stable and it has not changed to such a degree that it is in the public interest to allow the proposed zoning change to R-3". This is flawed when considering the broader planning framework and recent policy shifts within Commerce City.

The recent adoption of the new Commerce City Comprehensive Plan, which took effect on November 1, 2024, marks a significant shift in the City's development strategy and represents a changed condition, warranting a reassessment of zoning regulations. Specifically, the Northern Neighborhoods Character Area, historically utilized for agricultural and farming operations, has experienced sustained and accelerating transformation.

Since the 1990s, driven by the development of Denver International Airport (DIA) and E-470, this area has transitioned into a viable site for urban development. Over the past decade, a pronounced boom in housing developments and commercial growth has further cemented this shift, indicating that agricultural zoning is no longer the most suitable designation for this area. The existing built environment, characterized by major arterial roads, commercial centers, and housing, aligns with the City's strategic vision for future development, as articulated in the Comprehensive Plan. As Commerce City continues to attract residents,

industries, and employers, this growth pattern and increased housing demand is expected to continue. The character of the Northern Neighborhoods area has evolved to the point where AG zoning no longer reflects the City's vision or market trends. A rezoning to R-3 aligns more closely with both the City's goals and the area's future direction.

Moreover, the Comprehensive Plan explicitly calls for policies that encourage infill and redevelopment to enhance housing diversity and strengthen underutilized commercial corridors. The Comprehensive Plan also envisions and directs multi-family to be placed near collector and arterial roads. Specifically, the Plan states:

- "Promote high-density infill and redevelopment within established neighborhoods to provide greater housing choices."
- "Support multi-family development ... along underperforming commercial corridors to help activate the area and provide housing near corridor amenities."
- "Multi-family Residential (near collectors and arterial roads)."

The proposed zoning change represents a direct continuation of the goals established in the Comprehensive Plan by the current City Council. The zone change directly aligns with these objectives by facilitating residential development that supports existing commercial centers, enhances public infrastructure, and integrates seamlessly into the Northern Neighborhoods Character Area Map. Additionally, the proposed development is a higher-density infill project within an established neighborhood, offering expanded housing options along a designated multimodal arterial road. The introduction of multi-family housing in this location will also bridge gaps in the existing infrastructure network, ensuring a well-connected, thriving community that supports Commerce City's long-term planning goals.

Given these considerations, it is evident that the assertion of stability and unchanged conditions is inaccurate. The transformation of the Northern Neighborhoods Character Area is well-documented and a continuing process that is recognized by the City's own policy framework. Denying the proposed rezoning on the grounds of supposed stability disregards the documented evolution of the area and contradicts the City's Comprehensive Plan, which explicitly supports such a transition. As such, it is in the public interest to approve the zoning change to R-3, ensuring that Commerce City continues to grow in accordance with its established vision and strategic planning principles.

## B. Consistency with Commerce City 2045 Comprehensive Plan

- The proposed zone district (R-3) and allowed use (multi-family residential) is consistent with the Comprehensive Plan. The following analysis closely examines the *Commerce City 2045 Comprehensive Plan* to identify consistency with the proposed zone change.

### Chapter 4: Vision, Core Principles, Goals and Objectives

- Community Vision Statement (Pg 56): *Commerce City is a thriving community: economically strong, environmentally sustainable, and socially equitable. Commerce City is a healthy and safe city where fresh air, clean water, public health, and the preservation of natural open space are paramount. Commerce City is a financially sound city where businesses flourish through collaboration and innovation. Commerce City is a diverse community that celebrates its unique history, identity, and culture, where families and individuals of all ages can live, work, and play.*
  - Analysis: By providing a mix of housing options to the Northern Neighborhoods Character Area and the applicant committing to deed-restrict 10% of the total units at 80% Area Median Income (AMI) affordable housing units the development promotes social equity, ensuring that individuals and families of all income levels can afford to live in the Commerce City. This diversity strengthens the City's identity and culture while fostering inclusivity. A well-planned multi-family development supports economic strength by attracting a stable workforce, which benefits local businesses and encourages long-term financial sustainability. Affordable and attainable housing allows employees to live near their jobs, reducing commute times and boosting the local economy.  
Additionally, this development is designed with environmental sustainability in mind, incorporating energy-efficient buildings, water conservation measures, and green spaces. Thoughtful planning to integrate the development with enabled connections to nearby parks, trails, and open spaces reinforces Commerce City's commitment to preserving natural areas and promoting public health. The proposed development enhances the City's livability, economic vitality, and sustainability, directly supporting Commerce City's vision of a thriving, inclusive, and forward-thinking community.
- Core Principles (Pg 57):
  - *Safe, Healthy, and Livable City: Whether choosing a place to live, finding opportunities to be active, or simply going about a daily routine, Commerce City residents will know their community is safe, healthy, and livable. Citizens will enjoy easy access to the essential services and amenities that make a place home, including healthcare and wellness benefits, fresh foods, and an abundance of active recreational opportunities - making Commerce City a place to put down roots, not just stay for a while.*
    - Analysis: The proposed development champions this core principle by providing:
      - Safety & Stability: Affordable and attainable multi-family housing provides long-term stability for residents, reducing housing insecurity

and strengthening community ties. When families and individuals have secure housing, neighborhoods experience stronger social cohesion, creating a safer environment for everyone.

- **Health & Wellness:** This thoughtfully designed multi-family development incorporates green spaces, walking paths, and access to existing recreational facilities, encouraging active lifestyles. With nearby established public transportation, healthcare providers, grocery stores with fresh foods, open spaces, and other public amenities residents have easier access to essential health and wellness services.
  - **Livability & Community:** A well-integrated development ensures that Commerce City is not just a place where people pass through, but a place where they put down roots. Mixed-income housing, like multi-family units, fosters diverse, vibrant neighborhoods where residents of all backgrounds can engage in civic life, support local businesses, and build lasting connections.
- *Economically Thriving City: Commerce City will build a resilient tax base by supporting its businesses, from the smallest startup helmed by a first-time entrepreneur to its oldest, well-established industries. Commerce City will live up to its name, known as a place of thriving commerce and a well-rounded, sustainable local economy.*
    - **Analysis:** A multi-family development with included affordable housing (10% of total units at 80% AMI) strengthens Commerce City's economy by providing stable housing for the local workforce, attracting new residents, and increasing consumer spending. By supporting a diverse population, the development helps businesses—both new and established—thrive, reinforcing a resilient tax base and a sustainable local economy. This project directly contributes to Commerce City's reputation as a hub of opportunity and prosperity.
- **Goals and Objectives – Character Areas**
    - **Goal 1:** Strive for a balanced mix of land uses across the City as represented in the Character Areas Plan and map (Pg. 59).
      - “Provide opportunities at key nodes and intersections with land for business, retail, and industrial needs.”
      - **Analysis:** The Northern Neighborhoods Character Area supports multi-family residential near arterial roads, recognizing its role in fostering a vibrant and sustainable community. The proposed multi-family residential development on Chambers Road, just south of E. 104th Ave, aligns with this vision as both roads are classified as arterial roads in the Transportation Master Plan—. While not a retail or commercial use itself, multi-family residential directly supports these uses by increasing the local population density, which in turn enhances the customer base for nearby businesses, strengthens workforce housing options, and attracts further investment.

Additionally, the Northern Neighborhoods Character Area encourages a mix of housing products as development continues. Adding multi-family residential stock to an area predominantly composed of detached single-family homes creates a more diverse range of housing options, price points, and opportunities, ensuring a well-balanced and economically resilient community.

- Goal 2: Manage growth and annexation in a strategic, positive, and compatible way to accommodate the City's growing population. (Pg. 59)
  - "Ensure Future Growth is consistent with the Character Areas Plan and Map."
    - Analysis: The proposed multi-family development aligns with vision for the Northern Neighborhood's Character Area, which the Comprehensive Plan affirms that as the area develops, "they should include a mix of housing products."
  - "Recognize that Commerce City's population will continue to increase and positively foster the City's continued growth."
    - Analysis: Commerce City understands that growth will continue, and this development is proposed to align with and further the City's vision and goals for growth.
  - "Strategically improve roadway, water, and wastewater capacity to support future growth."
    - Analysis: This development looks to not only improve public utilities but will also enable the connection of E. 102<sup>nd</sup> Ave as depicted in City's current Transportation Master Plan, a connection that the development will enable and pay for without requesting City funds.
- Goal 6: "Prioritize infill projects as well as redevelopment within the City to minimize the need for additional infrastructure improvements" (Pg. 60).
  - Analysis: This zone change proposal is to allow a subsequent development plan which contemplates an infill multi-family residential project aligned with the goals in the *2045 Comprehensive Plan*. As an infill project, established existing public infrastructure exists nearby allowing the zone change to minimize the need for additional public infrastructure improvements adjacent to subject parcel. The parcel will dedicate necessary land to construct the extension of E. 102<sup>nd</sup> Avenue, at the expense of the developer, which benefits existing residents at no cost to the City.
- Goals and Objectives – Health and Environmental Sustainability
  - Goal 3: "Encourage water conservation efforts with drought- friendly plant material, irrigation systems, and water conservation innovations (Pg. 61)."
    - Analysis: The applicant has worked with and will continue to work with the City's Energy, Equity and Environment Division on the subsequent development plan to ensure that drought-friendly plant materials and irrigation systems are prioritized and provided. The project team has also used Colorado State University (CSU) Extension, a named partner in the Comprehensive Plan, as a reference to further develop water conscious planting palettes.

- Goal 4: Support and promote public physical and mental health programs throughout the County (Pg. 62)
  - “Work across departments, with regional partners, and with the business community to realize the vision for the Walk/ Bike/ Fit Multi-Modal Active Transportation Plan to ensure people can choose active travel with walking and bicycling as a connected, safe and healthy mode of transportation throughout the City”.
    - Analysis: Our development looks to be an advocate and a partner with the city to realize the vision for the City’s *Walk/Bike/Fit Multi-Modal Active Transportation Plan* by promoting walkability, connectivity, and active living. By incorporating pedestrian-friendly design, including a new pedestrian network, bike storage, and proximity to transit, the development encourages residents to choose walking and biking as safe, convenient transportation options. The project is designed to prioritize and integrate seamlessly into existing and planned infrastructure, enhancing access to trails, sidewalks, open space, bike lanes, and public transit. This development supports a healthier, more connected community while reducing traffic congestion and environmental impact.
- Goals and Objectives – Commerce and Employment
  - Goal 5: Cultivate unique and diverse destination-type activities within Commerce City’s centers and activity areas. (Pg. 64)
    - “Facilitate the future development of E.104th Ave and Tower Road as a regional activity center that provides a combination of retail, commercial, entertainment, service, and residential options.”
      - Analysis: Though not directly located on E. 104<sup>th</sup> Avenue the proposed project site is less than 1000 feet from E. 104<sup>th</sup> Avenue. The immediate area provides a combination of retail, commercial, entertainment, and service options. This project is looking to fully envision this goal of the Comprehensive Plan and bring additional residential options to the area aligned with this goal.
- Goals and Objectives – Housing and Neighborhoods
  - Goal 1: Promote a full range of housing options for residents of all ages, incomes, physical abilities, and lifestyles. (Pg. 65)
    - “Support greater housing choices and neighborhood amenities for all City residents.”
      - Analysis: The *2045 Comprehensive Plans*’ vision is to support greater housing choices, and a variety of housing types. The Plan looks to target the “missing-middle” housing. The zone change will support a multi-family development which adds additional housing choices and types in the Northern Neighborhoods Character Area which currently features a majority of detached single-family homes. This allows for



greater housing choices and neighborhood amenities for all City residents.

- “Promote a variety of housing types to increase affordable housing options.”
  - Analysis: Similar to the above goal, the zone change will allow the additional housing type of multi-family in an area that predominately features detached single-family homes. With the commitment of including affordable units (10% of total units at 80% AMI), this helps to create additional price points and opportunities for current and future residents.
- “Provide additional housing opportunities for seniors and special needs populations such as veterans.”
  - Analysis: A multi-family development with affordable housing (10% of total units at 80% AMI) provides critical housing opportunities for seniors and special needs populations, including veterans. By offering accessible, cost-effective living spaces, this development could ensure that aging residents and those with unique needs can live independently, while staying connected to their community. With proximity to healthcare, transportation, and social services, this housing development can foster stability, dignity, and a higher quality of life for those who need it most.
- “Consider inclusionary housing requirements as a method to provide affordable housing.”
  - Analysis: The developer is committed to providing affordable housing units (10% of total units at 80% AMI) within this development. Though Commerce City has not officially adopted any inclusionary housing requirements, the applicant understands the desire and is actively looking to be involved in creating more affordable housing units in Commerce City.
- “Increase the range of “missing middle” housing options with multiple units compatible in scale and form with detached single-family homes located in a walkable neighborhood.”
  - Analysis: Our multi-family development directly supports Commerce City’s goal of increasing “missing middle” housing by offering diverse, multi-unit housing options that blend seamlessly with surrounding single-family neighborhoods. Designed with scale and aesthetics in mind, this development provides attainable housing choices for a variety of residents—young professionals, families, seniors, and others—while maintaining the walkability and character of the community. By expanding housing diversity, we help create a more inclusive, vibrant, and sustainable neighborhood.

○ Goal 2: Work to limit and decrease homelessness within Commerce City (Pg. 65)

- “Ensure a variety of affordable housing options are provided”
  - Analysis: By integrating affordable housing (10% of total units at 80%

AMI) within a thoughtfully designed multi-family community, the project provides opportunities for individuals and families of varying incomes to live in Commerce City. This approach fosters economic diversity, strengthens community stability, and ensures that housing remains accessible to those who need it most.

- Goal 3: Support existing neighborhoods with appropriate maintenance and infrastructure improvements. (Pg. 65)
  - “Improve lighting, walkability, and traffic flow through existing neighborhoods.”
    - Analysis: As proposed, the development will enhance lighting, walkability, and traffic flow in the surrounding neighborhoods by incorporating modern infrastructure and pedestrian-friendly design. Well-lit pathways and streets will improve safety for residents and visitors, while carefully planned sidewalks and bike lanes will encourage walkability and active transportation. Working with the City and surrounding neighbors to optimize traffic patterns and access points, this development will help reduce congestion and improve overall traffic flow, creating a safer and more efficient neighborhood for everyone.
- Goal 4: Build new neighborhoods with diverse housing, strong design, and ample open space and amenities that are welcoming to all (Pg. 66).
  - “Continue to advance high-quality design and architecture”
    - Analysis: The development prioritizes high-quality design and architecture, enhancing the aesthetic and functional character of Commerce City. The development integrates seamlessly with surrounding neighborhoods, incorporating pedestrian scale architectural elements that reflect the city’s identity while promoting long-term value and livability. By emphasizing quality craftsmanship and innovative design, this project contributes to a more attractive, resilient, and welcoming built environment.
- Goal 6: Create a sense of community in all of Commerce City’s neighborhoods (Pg. 66)
  - “Support walkable neighborhoods with access to day-to-day amenities, such as open space and recreational activities.”
    - Analysis: The development as proposed supports walkable neighborhoods by providing safe, convenient access to everyday amenities, including open spaces and recreational activities. As part of our commitment to enhancing connectivity, we are designing, building, and delivering new roadways and pedestrian facilities that previously did not exist, effectively closing critical gaps in Commerce City’s infrastructure network. These improvements will ensure residents can easily walk or bike to nearby parks, trails, essential services, schools, and retail, fostering a healthier, more active

community while reducing reliance on cars. By prioritizing pedestrian-friendly design and new infrastructure, this development enhances both mobility and quality of life.

- Goal 7: Ensure that all City residents have the opportunity to obtain safe, healthy, and affordable housing (Pg. 66).
  - Analysis: This development directly advances Commerce City's goal of ensuring that all residents have the opportunity to obtain safe, healthy, and affordable housing. By incorporating and providing a range of housing options, including select designated affordable units (10% of total units at 80% AMI), we are creating opportunities for individuals and families of varied incomes to live in a well-designed, secure, and thriving community. We, as the applicant, understand the importance of this goal as outlined in the Comprehensive Plan and value being an active partner with the City in bringing this vision to life. this multi-family development helps create a more inclusive and sustainable housing landscape for Commerce City.
- Goals and Objectives – Transportation and Mobility
  - Goal 1: Create and maintain a well-connected and safe transportation network that includes auto, bicycle, pedestrian, and transit options, maximizing mobility and supporting the City's growth. (Pg. 68)
    - "Improve multi-modal connectivity throughout the community."
      - Analysis: The development significantly improves multi-modal connectivity throughout the community by expanding transportation options for pedestrians, cyclists, and drivers alike. A key component of the project is the dedication and construction of E. 102nd Ave., which will create new multi-modal connections that currently do not exist. Additionally, we are enhancing pedestrian infrastructure along Chambers Rd., improving safety and accessibility for those who walk, bike, or use public transit. These critical infrastructure investments close existing gaps in the transportation network, making Commerce City a more connected, walkable, and accessible place for all residents.
    - "Ensure land use decisions are coordinated with transportation considerations."
      - Analysis: Our project ensures that land use decisions are coordinated with transportation considerations in mind. The project is strategically positioned along existing infrastructure while also contributing to critical new roadway improvements. A key component of the development is the construction of E. 102nd Ave., a priority in Commerce City's Transportation Master Plan, which will complete a long-identified gap in the roadway network, improving connectivity. Also, the applicant has proactively engaged with RTD, which has reviewed our plans and confirmed that existing public transit is adequate to serve the development. By aligning our project with the

City's transportation goals and enhancing regional mobility, we are creating a well-connected, accessible, and thoughtfully integrated community.

- “Work towards fewer connection impediments both east-west across the City and north-south.”
  - Analysis: As stated above, this project does the opposite - it will eliminate gaps in the infrastructure network by improving the north-south connections and plans to dedicate and construct new east-west connections.
- Goal 2: Ensure that transportation options are inclusive for people of all ages and abilities throughout the City (Pg. 68).
  - Analysis: This goal specifically goes on to say, “evaluate and implement emerging transportation technologies including EVs.” This project is designed to be EV-ready. The applicant has worked with the City’s Energy, Equity and Environment Division have EV-Ready garage spaces.
- Goal 3: Expand and improve transit services and related options throughout the community (Pg. 68).
  - “Work with the Regional Transportation District (RTD) to identify gaps expand bus routes throughout the City.”
    - Analysis: The applicant has sent the zone change and subsequent development plan to City stakeholders including the Regional Transportation District (RTD) to review and provide comments. Received comments by RTD stated that they had no comments on the applications but asked to be a future referral agency with future submittals. The applicant will continue to include City staff and RTD in future submittals. Additionally, the development plan aims to provide additional enhanced sidewalks along Chambers Road and to eliminate gaps and connectivity to transit services with the extension of E. 102nd Avenue from its current termination point.
- Goal 4: Coordinate with federal, state and local governments as well as other transportation agencies on efforts to enhance transportation in the area (Pg. 69)
  - “Adequately plan for emergency access vehicles”
    - Analysis: The applicant has designed the site to meet all spacing and access requirements for emergency vehicles.
- Goal 5: Encourage and support efforts to increase bicycle and pedestrian connectivity throughout the City. (Pg. 69)
  - “Improve pedestrian and bicycle safety along major roadways and intersections”
    - Analysis: The *2045 Comprehensive Plan* sets the goal to improve pedestrian and bicycle safety along major roadways. The zone change

will allow for development that as proposed features an enhanced detached walk along the entire eastern property boundary facing Chambers Road, a connection which currently does not exist. Additionally, the development proposes the extension of E. 102nd Avenue connecting Chambers Road to Sable Blvd. as contemplated in the *City's Roadway Classifications Plan*, this will result in the construction of new sidewalks that will directly increase bicycle and pedestrian connectivity.

- Goals and Objectives – Parks, Open Space, and Natural Environment
  - Goal 3: Focus on increased recreational opportunities for all (Pg. 70)
    - “Provide active and passive activities for residents of all ages and abilities”
      - Analysis: The project proposes additional sidewalks and connections to expand the existing pedestrian network to support the vision set forth in the *2045 Comprehensive Plan*. As proposed, the zone change supports a development plan which provides 26% open space which is above the code required minimum (15%). That open space features “year-round development-supporting” amenities that encourage community gathering and both active and passive recreational opportunities. With the subject parcel’s proximity to the Rocky Mountain Arsenal National Wildlife Refuge, the proposed use will also locate more people near nature- based passive recreational opportunities.
  - Goal 4: Grow and maintain the City’s connected system of multi-use trails and open space (Pg. 70)
    - “Encourage public access and trail connectivity to community open spaces.”
      - Analysis: Our development directly supports Commerce City’s goal of growing and maintaining a connected system of multi-use trails and open spaces by enhancing public access and trail connectivity. As part of our project, we are incorporating pedestrian-friendly infrastructure that links residents to existing and planned trail networks, ensuring seamless access to community open spaces. In addition, the project’s design encourages outdoor activity by providing safe, well-lit pathways that integrate with the broader multi-use trail system. By prioritizing connectivity and accessibility, the proposed development helps strengthen Commerce City’s vision for an active, walkable, and well-connected community.
    - “Develop more trail connections throughout the Core City between key destinations.”
      - Analysis: Though this goal is specific to the Core City, our project looks to champion this goal in the Northern Neighborhoods. Making trail connections on the property to both future trails as designated in

*Prairieways Action Plan* and to the Rocky Mountain Arsenal National Wildlife Refuge.

- “Explore the activation of the City-owned land around the perimeter of the Rocky Mountain Arsenal National Wildlife Refuge.”
  - Analysis: While our project does not share a direct property boundary with the Rocky Mountain Arsenal National Wildlife Refuge, it actively supports the city's goal of enhancing access and activating surrounding areas by improving multi-modal infrastructure. Through our sidewalk and pedestrian infrastructure enhancements along Chambers Road, we are expanding Commerce City's on-street trail network, creating safer and more convenient connections for residents to access open spaces, including those near the refuge. By investing in these infrastructure improvements, this development contributes to the city's broader vision of increasing accessibility and connectivity to its natural assets.
- Goals and Objectives – Public Facilities and Infrastructure
  - Goal 1: Support and collaborate with the City's school districts (Pg. 71)
    - “Work with the school districts in future growth decisions of the City.”
      - Analysis: Our team has been proactive in collaborating with the 27J School District throughout the planning process and remains committed to ongoing engagement throughout. We have worked closely with the district to ensure our development aligns with their long-term planning efforts and educational capacity. 27J School District has thoroughly reviewed both the Zone Change and the subsequent Development Plan. Following their review, they have not provided any comments or expressed concerns regarding growth or their ability to serve the proposed development. This confirmation underscores that our project is well-integrated into the City and District's broader planning efforts, ensuring that future residents will have access to quality education without placing undue strain on local schools. We look forward to continuing our partnership with the District to support the City's vision for smart, sustainable growth.
  - Goal 5: Ensure appropriate, high-quality infrastructure to accommodate community needs and future growth (Pg. 71)
    - The Comprehensive Plan encourages projects to, “Work with regional partners to ensure adequate regional drainage and stormwater facilities.” It also asks to “ensure new drainage facilities are aesthetically pleasing and consider passive recreation in addition to functionality...” while looking to “provide the necessary infrastructure to maintain and improve older neighborhoods.” The Comprehensive Plan directs the City to “encourage development in areas

where adequate public facilities are already in place.”

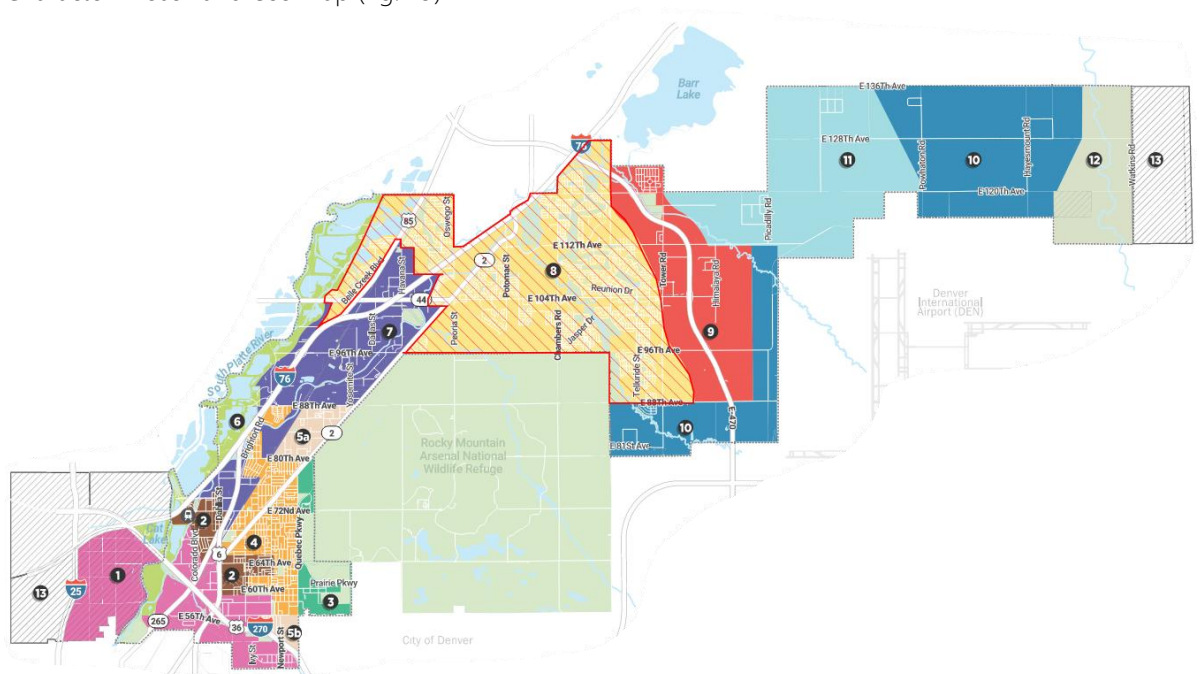
- Analysis: Our development aligns with Commerce City’s Comprehensive Plan by prioritizing regional drainage, stormwater management, infrastructure improvements, and strategic growth. We have worked closely with regional partners to ensure that our project integrates seamlessly with existing regional drainage and stormwater facilities, enhancing long-term sustainability and resilience. In addition to functionality, our drainage solutions are designed to be aesthetically pleasing, incorporating landscaping and passive recreation opportunities, where feasible. This approach not only meets engineering standards but also enhances the overall community experience. Furthermore, our project supports the City’s goal of maintaining and improving older neighborhoods by investing in critical infrastructure upgrades, including new roads, pedestrian pathways, and utility improvements that benefit both new and existing residents. Importantly, our development is strategically located in an area with existing public facilities, reducing the need for extensive new infrastructure investments while promoting responsible, well-planned growth. By aligning with these key Comprehensive Plan directives, our project contributes to a more sustainable, connected, and thriving Commerce City.
- Goal 7: Coordinate with water and wastewater agencies to ensure adequate water and wastewater supply and infrastructure capacity before development occurs (Pg. 72)
  - “Continue to coordinate with the South Adams County Water and Sanitation District, and other districts, as necessary.”
    - Analysis: Our project has worked with and will continue to work with South Adams County Water and Sanitation District and all City stakeholders to ensure that adequate water and wastewater supply and infrastructure capacity is in place. To date all stakeholders, including South Adams County Water and Sanitation District, have not provided any comments or concerns with regard to their ability to supply this project with services.

## Chapter 5: Character Areas

- How do character areas work with the rest of the Comprehensive Plan? (Pg. 78)
  - Character areas are not specific to individual parcels and do not regulate development. They provide a broad, community-wide view of how land use should be dispersed across the City, while the core elements detail the steps required for Commerce City to grow these unique places over time.
    - Analysis: Our project should be viewed within the broader, community-wide framework as outlined in Commerce City’s Comprehensive Plan, rather than being evaluated at the individual parcel level. As the plan states, “Character areas are not specific to individual parcels and do not regulate development,”

but rather provide a high-level vision for how land uses should be dispersed across the city. Contextually, our project aligns with the goals and vision set forth in the City's guiding documents by delivering much-needed housing options in a strategically located area with existing infrastructure. Additionally, the project supports the city's long-term objectives by promoting walkability, multi-modal connectivity, economic vitality, and sustainable growth. By taking a zoomed-out, community-wide approach, it is clear that our development fits within Commerce City's vision for balanced, thoughtful land use planning—ensuring that growth happens in a way that strengthens the entire city over time.

- Character Areas Land Use Map (Pg. 79)





- Analysis: The zone change subject parcel is located in the Northern Neighborhoods Character Area (number 8, above).



- Character Areas and Land Uses (Pg. 81)

**LAND USES**  
Corresponding land use descriptions are defined on page 80.

CHARACTER AREA	Agricultural Uses	Attached Homes/Duplexes/Townhomes	Single Family Homes	Multifamily Residential	Large Lot Residential	Commercial (Retail, Entertainment and Services)	Primary Employment Areas	Flex Spaces	Technology and Research	Airport Logistics	Industrial	Warehousing and Distribution	Logistics	Public Gathering Spaces	Parks and Open Spaces
1 270 Industrial District															
2 Community Connection District															
3 Stadium District															
4 Central Neighborhoods															
5a 5b Fusion District															
6 South Platte District															
7 Northern Business District															
8 Northern Neighborhoods															
9 E-470 Expressway Corridor District															
10 DIA Gateway District															
11 Innovation District															
12 North Airport District															

 Primary Land Uses are more prominent and play a pivotal role in characterizing that placetype.  
 Secondary Land Uses are less prevalent and serve to support the primary land use.

- Analysis: While our project is classified as a secondary use within the Northern Neighborhood Character Area, it is essential to recognize that the Comprehensive Plan explicitly states that secondary uses "serve to support the primary land uses." This multi-family development does exactly that by fueling nearby commercial activity, providing needed housing options and affordability, and enhancing connectivity through critical infrastructure improvements. By delivering diverse housing choices, our project will support the local workforce, attracting residents who will patronize nearby businesses and strengthen the area's economic vitality. Additionally, through roadway and pedestrian enhancements, we are improving overall accessibility, making the entire character area more functional and connected. Each development proposal should be evaluated on its own merits, and in this case, our project directly reinforces the intent and long-term vision of the Northern Neighborhood Character Area, ensuring balanced and sustainable growth in Commerce City.
- Northern Neighborhoods Character Area (Pg. 89)
  - The Northern Neighborhoods include residential areas principally located in Commerce City's Northern range. As Northern Neighborhoods continue to develop, they should include a mix of*

housing products. *Neighborhoods should be distinct places with unique local character and include cross-neighborhood trail connectivity integrated green space, and access to public parks and gathering spaces. Pedestrian connectivity, residential-scaled neighborhood commercial uses at perimeter locations.*

- Analysis: Our project contextually aligns with the Commerce City Comprehensive Plan and the vision for the Northern Neighborhoods Character Area by delivering a thoughtfully designed, multi-family development that supports the city's long-term growth strategy. The Comprehensive Plan specifically states that as the Northern Neighborhoods continue to develop, they should include a mix of housing products. Our project directly fulfills this objective by introducing diverse, high-quality housing options that complement the area's existing residential fabric while addressing the city's growing demand for attainable housing. Additionally, the plan emphasizes the importance of distinct neighborhoods with unique local character, as well as cross-neighborhood trail connectivity, integrated green space, and access to public parks and gathering spaces. This development promotes these goals by:
  - Enhancing multi-modal connectivity through new pedestrian and infrastructure improvements, including new roadways and pedestrian facilities that close gaps in the transportation network.
  - Incorporating an internal common green space area and recreational amenities, ensuring residents enjoy an active and vibrant community environment.
  - Supporting local businesses by increasing the area's residential base, which will drive demand for neighborhood-scaled commercial uses at perimeter locations and support established commercial uses.

By aligning with the guiding principles of the Comprehensive Plan, our project ensures that the Northern Neighborhoods evolve in a way that is balanced, sustainable, and in harmony with the City's broader vision. It is a natural and logical extension of Commerce City's planning framework, providing needed housing, enhancing infrastructure, and reinforcing the long-term success of the area.

## Chapter 8: Housing and Neighborhoods

- Greenfield Development should: *Ensure future neighborhoods roads connect to existing neighborhoods. Promote higher density residential near commercial corridors and nodes for a desirable transition* (Pg. 139).
  - Analysis: This project directly aligns with Commerce City's Greenfield Development principles by ensuring connectivity, smart growth, and efficient land use planning:
    - The extension of E. 102nd Ave., a critical infrastructure improvement that is aligned with the Transportation Master Plan connects future neighborhoods with existing ones, strengthening mobility and accessibility throughout the area.
    - The project is located on Chambers Road, a designated arterial roadway in The Transportation Master Plan, making it an ideal location for higher-density

The proposed multi-family housing provides a strategic transition to the nearby commercial corridor, reinforcing walkability, multimodal access, and economic vitality. In line with the Comprehensive Plan's guidance to locate higher-density housing near commercial areas, the E. 104th Avenue corridor is situated less than 1,000 feet north of the site. This approach not only enhances neighborhood connectivity but also supports the city's vision for sustainable, well-integrated growth. Our project is a model for smart Greenfield Development, balancing infrastructure expansion, residential density, and commercial accessibility to benefit Commerce City as a whole.

- Housing Authority's Balanced Housing Plan and Affordability Housing Implementation Plan (Pg.139)
  - In 2018, The Housing Authority *identified the need for more housing options in multifamily units, senior housing, affordable housing, disability-accessible units, high income housing, desirable rental properties, and housing solutions for people experiencing homelessness.*
    - Analysis: This project directly addresses the housing needs identified by the Commerce City Housing Authority in 2018, which called for an increase in multi-family units, senior housing, affordable housing, and disability-accessible units. By delivering a variety of housing solutions including deed-restricted affordable housing (10% of total units at 80% AMI) our project is not only aligned with Commerce City's housing goals but also plays a key role in ensuring the city remains a welcoming, livable, and economically thriving community for all.
- Mix of Housing – The City should encourage a diverse mix of housing choices, including type, tenure, price point, and size (Pg. 141).
  - "Providing a diverse housing stock will be critical in insuring Commerce City remains equitable and welcoming to people of all backgrounds and stages of life. According to the 2018 Housing Need Assessment (HNA), 76 percent of the City's homes are single-family homes detached (86 percent in the Northern Range and 64 percent in the Historic City). Promoting a wider variety of housing types can help create accessible options for individuals and families that meet their budget, space, tenure, location, and lifestyle needs. Additional multifamily housing and desirable rental properties should also be promoted, which was identified as a need in the HNA."
    - Analysis: The proposed project directly supports Commerce City's goal of providing a diverse housing stock to ensure the city remains equitable and welcoming to people of all backgrounds and life stages. With 76% of the city's housing stock being single-family detached homes, there is a clear need for greater housing variety, as identified in the 2018 Housing Needs Assessment (HNA). By introducing multi-family housing and desirable rental options, our development helps balance the housing market by offering attainable, well-designed living spaces that accommodate different budgets, space needs, and lifestyles. Additionally, by strategically locating higher-density housing near key infrastructure and commercial areas, our project aligns with the City's vision for sustainable, inclusive growth. This development is not just about adding housing—it's about expanding opportunities, ensuring that Commerce City continues to

thrive as a diverse, accessible, and forward-thinking community.

- Recommendations:
  - “Promote higher density infill and redevelopment within established neighborhoods to provide greater housing choices while matching the scale and character of existing properties.”
    - Analysis: As stated above, as the proposed project is a higher density infill development in an established neighborhood, which provides greater housing choices, while complementing the scale and character of the existing neighborhood.
  - “Support multifamily development and vertically mixed buildings (with upper floor residential and ground floor commercial) along underperforming commercial corridors to help activate the area and provide housing near corridor amenities.”
    - Analysis: The Comprehensive Plan directly recommends supporting multi-family to help activate the area and provide housing near corridor amenities. This multi-family development intends to provide additional housing that will help activate the E. 104<sup>th</sup> Ave corridor.
- Walkable Neighborhoods (Pg. 144)
  - “Highly walkable and bikeable streets are essential to thriving, healthy, and complete neighborhoods. This means providing a well-connected and safe pedestrian and bike network that allows residents to easily move within their neighborhood and access outside community destinations-without relying on a personal car. Promoting safe and comfortable multimodal environments can also support active lifestyles and improved physical health. All of Commerce City’s neighborhoods should prioritize pedestrian access and implement well-designed multimodal infrastructure so residents are no more than a 10- to 15-minute walk or bike ride from parks, recreation, transit, shopping options and other amenities.”
    - Analysis: This project is designed to enhance the ability for people to walk and bike, directly supporting Commerce City’s goal of creating thriving, healthy, and complete neighborhoods. We are incorporating well-connected pedestrian pathways and bike-friendly infrastructure, ensuring that residents can easily navigate the neighborhood and access key destinations such as parks, recreation areas, transit, and shopping without the need for a car. By focusing on safe and comfortable multimodal environments, we are not only improving connectivity but also encouraging active lifestyles, fostering better physical health for residents. Key infrastructure improvements, such as the development of new roadways and pedestrian facilities along Chambers Road and E. 102nd Ave, close gaps in the existing network, making it easier for residents to enjoy a walkable, bikeable community that prioritizes access to all amenities within a 10- to 15-minute radius. This development is a step forward in ensuring Commerce City’s neighborhoods are connected, sustainable, and truly complete.

- Recommendations (Pg. 170):
  - "Continue to close gaps in the sidewalk network on local streets to promote walking for short trips."
    - Analysis: This project fully aligns with Commerce City's goal of closing gaps in the sidewalk network to promote walking for short trips. As part of the development, we will dedicate and construct E. 102nd Ave, introducing new sidewalk connections where none previously existed. Additionally, pedestrian infrastructure will be enhanced along Chambers Road with a multi-modal walkway, seamlessly integrating with internal sidewalks to ensure safe and convenient connectivity for residents. These improvements will create a more walkable environment, supporting active transportation and community accessibility.
  - Increase comfortable and low-stress crossing opportunities for people walking and bicycling, including by implementing treatments like high-visibility crosswalks, rectangular rapid-flashing beacons (RRFBs), and leading pedestrian intervals.
    - Analysis: This project is committed to enhancing pedestrian and bicycle safety by incorporating multiple crosswalks designed with pedestrian safety in mind. These crossings will improve connectivity and provide comfortable, low-stress passage for walkers and cyclists. Our design prioritizes visibility and accessibility, aligning with Commerce City's goal of increasing safe crossing opportunities. By integrating these critical infrastructure elements, our project will contribute to a safer, more walkable community.
- Complete Streets, Complete Networks
  - "Commerce City should focus on improving safety on large arterial roadways and at-grade highways, especially for people bicycling and walking, to improve connectivity between different parts of the City". (Pg. 171)
    - Analysis: The proposed multi-family project directly supports Commerce City's goal of improving safety and connectivity on large arterial roadways. Located along Chambers Road, an existing arterial that currently lacks pedestrian infrastructure, this development will introduce an enhanced detached walkway, significantly improving pedestrian and bicycle access. Additionally, we will dedicate and construct E. 102nd Ave, creating a vital connection between Chambers Road and Sable Blvd. This new roadway will dramatically enhance circulation in the area while effectively directing traffic toward collector and arterial roadways, aligning with the objectives outlined in the Transportation Master Plan. These improvements will contribute to a safer, more connected community for all users.
  - "Improve multimodal connectivity between northern and southern Commerce City to better unify different geographies of the community." The Comprehensive Plan also recommends to, "expand high-comfort and separated walking and bicycling facilities with landscaped buffers and high-quality lighting to enhance the environment."
    - Analysis: This project directly supports the Comprehensive Plan's goal of improving multimodal connectivity between northern and southern Commerce City. By enhancing pedestrian and bicycle infrastructure along Chambers Road, a key north-south arterial, the project will provide much-needed safe and high-

comfort multimodal options for current and future residents. The improvements will establish vital connections north to the E. 104th Ave commercial corridor and south to the Rocky Mountain Arsenal, ensuring better access to jobs, services, and recreational opportunities. Our project also prioritizes high-quality, separated walking and bicycling facilities with landscaped buffers, creating a safer and more inviting environment that aligns with Commerce City's long-term vision for a well-connected and accessible community.

### Chapter 11: Parks, Open Space and the Environment

- Diverse Recreation Options for All (Pg. 198)
  - Recommendations
    - "Provide Parks and recreational areas with adequate site furnishings such as benches, picnic tables, trash bins, bicycle racks, and shady areas that are accessible to all."
      - Analysis: This project fully aligns with Commerce City's goal of providing well-equipped parks and recreational areas by incorporating thoughtfully designed common spaces that enhance community gathering and accessibility. Internal common areas will feature benches, picnic tables, trash bins, bicycle racks, and shaded areas, ensuring comfort and convenience for all users. Beyond these amenities, our design emphasizes inclusive, accessible spaces that foster community interaction and recreation, creating a welcoming environment for residents of all ages and abilities.
    - "Ensure Americans with Disabilities Act (ADA) compliant accessibility and universal design for all path and walkways."
      - Analysis: This project prioritizes accessibility by ensuring that all paths and walkways are designed in full compliance with the Americans with Disabilities Act (ADA) and universal design principles, providing safe and inclusive mobility for all users.
- Connected Parks and Open Space (Pg. 198)
  - Recommendations
    - "Prioritize neighborhoods for infrastructure investment that lack sidewalks when the City programs capital improvements. This should include identifying opportunities to restripe surface streets to accommodate bike lanes, especially on routes that could potentially link parks and greenways."
      - Analysis: This project directly supports the Comprehensive Plan's recommendation to prioritize infrastructure investment in areas lacking sidewalks. Chambers Road, a key arterial roadway currently without pedestrian infrastructure, will see significant improvements through developing this project, including the addition of an enhanced detached walkway that provides safe, high-comfort multimodal connectivity. Additionally, we will dedicate and construct E. 102nd Ave, introducing new sidewalk connections that previously did not exist and linking residents to major corridors, parks, and

greenways. These enhancements align with Commerce City's vision for improved pedestrian and bicycle accessibility while supporting future infrastructure investments in multimodal connectivity.

- Preserving Tree Canopy (Pg. 200)
  - Recommendations
    - "Require trees along the right-of-way in subdivisions" and to, "Require more drought-tolerant species, either on the City's approved plant list, or recommended to be added by the City's arborists to be planted in subdivisions, parks, and open space areas."
      - Analysis: The development is not only adding street trees along all right-of-way both existing and new, but all tree plantings are also taken directly from the City's approved plant list and cross referenced with CSU Extension program.
- Public Access to Parks (Pg. 201)
  - Recommendations
    - The Comprehensive Plan recommends to, "require rights-of-way for new sidewalks and trails in new subdivisions to be integrated with existing pedestrian infrastructure..." the Plan goes on to recommend that, "Design and site neighborhood parks to occupy central locations and act as focal points for recreational and community activities."
      - Analysis: The development as proposed not only dedicates and enhances the rights-of-way along Chambers Road but is dedicating and fully constructing a new roadway with pedestrian infrastructure for E. 102<sup>nd</sup> Ave. These enhanced and new pedestrian rights-of-ways then connect users to centrally located common areas for active and passive recreation.

### Chapter 13 Implementation

The final chapter of the Comprehensive Plan lays out a clear roadmap—the Action Matrix—to turn the community's vision into reality and guide sustainable growth over the next 20 years. As the Plan itself emphasizes, achieving this vision will take the collaboration of elected and appointed officials, City staff, partner organizations, local businesses, property owners, developers, and residents. The proposed development is not just aligned with this vision— it actively advances it. Below, we have outlined every specific Action Matrix item that our project directly supports, ensuring real, tangible progress toward the community's long-term goals.

As applicants, developers, and property owners, we are deeply committed to being active partners in Commerce City's future. We ask the City Council and its decision-makers to join us in this effort by approving the zone change from AG to R-3, allowing us to contribute meaningfully to the city's growth and prosperity.

- Meets or Exceeds

- 8-1.1 – Promote higher density infill and redevelopment in established neighborhoods to provide greater housing choices while matching the scale and character of existing properties
- 8-1.2 – support multi-family development and vertically mixed buildings along underperforming commercial corridors to help activate the area and provide housing near corridor amenities.
- 8-1.5 – Promote higher density housing along key corridors and surrounding activity centers and industrial areas.
- 8-4.1 – Continue to support existing affordable housing options, partnerships, and programs to address the continued maintenance of the City's affordable stock.
- 8-5.4 – Reconfigure roads in older neighborhoods to have wider sidewalks and a landscaped buffer with trees to enhance the pedestrian environment
- 8-5.5 – Work with neighborhoods and residents to implement desirable traffic calming measure where unsafe conditions exist.
- 8-5.6- Continue to upgrade sidewalks to be continuous with curb, gutter, and ADA accessible ramps along all neighborhood streets.
- 8-8.1 – Work with Parks, Recreation, and Golf Department to ensure all residents are within walking distance of a park.
- 8-8.2 – Continue to upgrade roadway pavement and sidewalk conditions in older neighborhoods.
- 8-8.4 – Beautify older neighborhoods with street trees, corner landscaping, and streetscaping elements like benches and decorative streetlights.
- 8-8.7 – Discourage incompatible uses like commercial and industrial development within residential area.

Action Matrix # 9 – Community Character, Culture, and Tourism

- Meets or Exceeds

- 9-1.3 – Work with private developers to improve development quality surrounding key gateway points and corridors.
- 9-1.4 – Develop plans to address cost-effective streetscaping enhancements, including tree planting and xeriscape, to increase landscaped medians, gateway points, and key intersections.
- 9-1.5 – Improve roadway infrastructure along key gateway routes to enhance their character and multimodal connectivity.

Action Matrix # 10 – Transportation and Mobility

- Meets or Exceeds

- 10-1.3 – Expand high-comfort and separated walking and bicycling facilities with landscaped buffers and high-quality lighting to enhance the environment.
- 10-2.1 – Continue to close gaps in the sidewalk network, especially in older neighborhoods around historic core, and on local streets, to promote walking for short trips.
- 10-2.2 – Widen sidewalks along key corridors in the historic central neighborhoods.



- 10-2.3 – Increase comfortable and low-stress crossing opportunities for people walking and bicycling, including by implementing treatments like high-visibility crosswalks, rectangular rapid-flashing beacons, and leading pedestrian intervals.
- 10-2.5 – Increase connections to the regional trail network, including South Platte River Trail, Rocky Mountain Arsenal National Wildlife Refuge, and the Sand Creek Greenway.
- 10-2.6 – Continue to add well designed lighting in neighborhoods to increase visibility and safety for pedestrians and bicyclists at night.

#### Action Matix # 11 – Parks, Open Space, and the Natural Environment

##### - Meets or Exceeds

- 11-2.1 – Provide parks and recreational areas with adequate site furnishings such as benches, picnic tables, trash bins, bicycle racks, and shady areas that are accessible to all.
- 11-2.2 – Ensure Americans with Disabilities Act (ADA) compliant and universal design for all parks and walkways.
- 11-2.6 – Provide opportunities for both passive and active recreation.
- 11-2.8 – Provide sufficient lighting to avoid isolated dark areas in parks and recreation areas.
- 11-3.3 – Prioritize neighborhoods for infrastructure investment that lack sidewalks when the City programs capital improvements.
- 11-3.9 – Work with public works department to identify gaps in the sidewalk systems that are not connected.
- 11-3.11 – Partner with utility and service providers to allow “utility trails” along utility rights-of-way and around water storage facilities, and along the South Platte River.
- 11-4.8 – Require trees along the right-of-way in subdivisions
- 11-4.9 – Require more drought-tolerant species, either on the City’s approved plant list, or recommended to be added by the City’s arborists to be planted in subdivisions, parks, and open space areas.
- 11-6.3 – Require right-of-way for sidewalks and trails in new subdivisions to be integrated with existing pedestrian infrastructure in the surrounding area through amendments to the City’s Land Development Code or specialized review process.
- 11-6.4 – Design and site neighborhood parks to occupy central locations and act as focal points for recreational and community activities.

#### Action Matix # 12 – Public Facilities and Infrastructure

##### - Meets or Exceeds

- 12-2.1 – Engage the two school districts to determine their capacities and identify any ongoing issues or opportunities to improve the quality of education.
- 12-6.1 – Work with each City department to identify needs for infrastructure upgrades or additional staff to ensure continued provision of quality municipal services.
- 12-7.2 – Improve coordination with South Adams County Water and Sanitation District on monitoring water quality and wastewater capacity.



## C. Commerce City Economic Profile Analysis | TTRes at Commerce City at Chambers Rd

Zone Change

5/15/2025

The analysis below evaluates the proposed Thompson Thrift multifamily development in relation to the Commerce City *2024 Economic Profile*. This analysis below examines key concepts such as: population growth & business vitality, as well as livability as described in the City's guiding document stated above. The purpose of this analysis is to determine the proposed development's alignment with the identified current and future economic landscape in the City's 2024 Economic Profile.

### Commerce City Economic Profile (2024)

The 2024 Economic Profile of Commerce City highlights its rapid growth and diverse community, with a population of 68,245 and a projected growth to 82,236 by 2035. The City is strategically located near major highways, railroads, and Denver International Airport, aiding in industry and an advantage for those who travel. It offers affordable housing, ample parks, recreational spaces, and a high quality of life. Commerce City embodies economic vitality with nearly 1,900 businesses with 33,065 jobs across various sectors, with a supportive environment for development. The city focuses on a variety of employment and residential opportunities to ensure the City grows thoughtfully.

Applicable key findings and analysis:

- Population Growth & Business Vitality:

The 2024 Economic Profile projects a 20% increase in the population over the next 11 years. The profile states that currently there are 33,065 jobs in Commerce City and 20,602 households, generally meaning that there are likely people commuting from other communities to work in Commerce City. The population and job opportunities are slated to increase over time.

- ✓ This multifamily development project is proposing 283 units, with a commitment to adding deed-restricted affordable housing units (10% of total units at 80% AMI), which helps address population growth by providing needed residential units to accommodate the future population. This also aligns with Commerce City's economic profile by providing more diverse and affordable housing options for residents, which ensures that more people can live and work within the City.
- ✓ This development fosters employment opportunities by adding to the overall household numbers, which are disproportionate to the number of jobs. By having more households in the community, it will attract diverse industries and create potential housing for local workers to live in the community where they work.
- ✓ Additionally, by adding to the housing stock in the community, it directly supports business vitality. The multifamily development contributes to business vitality by attracting residents,



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which in turn drives demand for local services, retailers, and job opportunities. This fosters economic growth, helping the area continue to thrive with a robust economy.

- Livability:

The 2024 Economic Profile highlights Commerce City's livability, offering affordable housing, extensive parks, and 840 acres of open space. Commerce City features recreational amenities like a championship golf course, a large soccer complex, and the nation's largest urban wildlife refuge. The City emphasizes healthy living through its network of trails and active lifestyle facilities, including two recreation centers. With a strong community focus, Commerce City provides a high quality of life for its residents.

- ✓ This proposed multifamily project supports the city's commitment to quality of life, offering accessible living spaces for varying income levels in the community.
- ✓ With this project providing more housing for people in the community, it will automatically strengthen local infrastructure and transportation by upgrading the adjacent infrastructure to City standards, enhancing connectivity and the multimodal network in the area. This aligns with City goals of having a connected system of sidewalks and roads for residents now and into the future. Housing also strengthens the use of the transit system, and this site specifically allows people to live near transportation options to easily access other areas of the community.
- ✓ Proposing a multifamily development near The Rocky Mountain Arsenal Wildlife Refuge (south) and future greenway link (north) enhances livability by providing more residents with easy access to outdoor recreational spaces, fostering physical activity and well-being. Proximity to the wildlife refuge offers a peaceful, natural environment, while the future greenway link will further connect the community, improving walkability and cycling opportunities. These features support an active, healthy lifestyle, enhancing the overall quality of life for residents while promoting community integration.
- ✓ Placing multifamily residential units near grocery stores, retail, restaurants, and services enhances convenience for residents and supports the City's development goals by promoting mixed-use neighborhoods. It encourages walkability, reduces car dependency, and fosters a vibrant, sustainable community. This alignment with livability goals ensures that residents have easy access to essential amenities, improving quality of life and in turn, making the area more attractive to potential businesses.



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## D. Housing Needs Analysis | TTRes at Commerce City at Chambers Rd

Zone Change

5/15/2025

The analysis below evaluates the proposed Thompson Thrift development in relation to the many of the City of Commerce City's Housing Guiding documents including the 2018 *Housing Authority Housing Needs Assessment*, the *Housing Authority Balanced Housing Plan & Affordable Housing Implementation* and the City's 2011 *Commerce City Housing Authority Strategic Plan*. This analysis below examines key factors such as housing demand, affordability, and community needs as outlined in three of the City's guiding documents stated above. This analysis aims to determine the proposed development's alignment with the identified priorities and objectives in the City's housing guiding documents.

### Housing Authority Housing Needs Assessment (2018)

Applicable key findings and analysis:

- Housing Affordability:

The Housing Authority Housing Needs Assessment highlights the growing issue of housing affordability, with an increasing population and limited affordable housing options in Commerce City. This theme is evident in the discussion of the affordability gap, the lack of rental options, and the rising costs of housing. Additionally, the document describes the historical challenges of providing affordable housing throughout the community and the need to provide housing for various income levels throughout the City in an effort to avoid pockets of low-income housing.

- ✓ The Housing/Neighborhoods section of the vision plan states the importance of providing "multiple types of housing serving a range of current and future residents and incomes in vibrant neighborhoods where people want to live." This multifamily project would help fill the housing affordability and supply gap by providing more attainable units and contributing to the goal of having a variety of housing types and prices. The Northern Neighborhoods Character Area, as identified in the Comprehensive Plan, has a housing stock that is mainly made up of single-family detached units. By providing an alternative to single-family-detached homes, especially with an affordable component (applicant is committed to deed-restricting 10% of total units at 80% AMI), it will enhance the community by making it more inclusive and equitable, particularly for renters and lower income families.
- ✓ This project proposes adding 283 additional multifamily dwelling units, with a commitment to providing some deed restricted affordable housing units (10% of total units at 80% AMI), which aids in meeting the City's need for more than 3,000 new housing units every five years, as



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outlined in the assessment. A higher density development helps increase the housing stock at a faster rate and adds an affordable/attainable housing option to the area.

- Limited Housing Diversity:

A significant concern identified in the document is the lack of diversity in the city's housing stock. Commerce City has a predominance of single-family homes, with few options for multi-family units, rental properties, or housing types suited for diverse populations. The assessment suggests that more varied housing options, including high-density housing and mixed-use neighborhoods, are needed to cater to a broader range of residents and to ensure that the community is inclusive and adaptable to different life stages.

- ✓ The housing needs assessment has some surprising statistics, including the fact that the number of multifamily building permits between 2010 and 2016 was only for 55 total units. Although the number has probably increased since 2016, this emphasizes that multifamily housing in Commerce City needs to catch up with the demand. With this proposed 283-unit multifamily development, it will make a noticeable impact in the number of multifamily permits issued, aiding in the diversification of housing types in a single-family dominated community.

- Workforce, Commuting, and Transportation:

The assessment stresses the challenge of providing housing for local workers, especially those in service roles. As the city experiences job growth, many of these essential workers cannot afford to live in Commerce City due to the lack of affordable and/or attainable housing options. This leads to an over-reliance on commuting, where most workers live outside the city, further exacerbating issues related to transportation and community cohesion. Another related aspect of the assessment is ensuring there is access to transit, trails and access to commercial developments that support employment and leisure.

- ✓ The Land Use and Growth section of the vision plan highlights the importance of residents having "access to employment, services, and shopping". Related to the vision plan, the Comp Plan in Chapter 4 envisions an Economically thriving City. New multifamily housing close to employment centers and the inclusion of deed-restricted affordable units ((10% of total units at 80% AMI) will help alleviate the housing challenges faced by workers who cannot afford to live where they work. Providing affordable and convenient housing options supports the City's goal of creating a jobs/housing balance, making it easier for workers to live closer to their jobs, and reducing the stress of long commutes.
- ✓ The Transportation section within the vision plan is intended to "ensure a quality community by providing efficient, effective, and varied modes of transportation..." and the Parks, Open Space/ Recreation section talks about providing a "connected system of trails and open space..." This project is proposing to positively contribute to community connections and the transportation system in several ways. First, the extension E 102<sup>nd</sup> Ave to the west and east will



provide multi-modal connections to Sable Blvd as well as Chambers Rd. Next, the addition of 8-foot sidewalks on the west side of Chambers Rd will allow an accessible route for residents to make their way north to the commercial spaces and future greenways trail, and south to outdoor recreation/open space at the Rocky Mountain Arsenal Wildlife Refuge. Additionally, the site is within walking distance of established transit, with bus stops located just to the north on E. 104<sup>th</sup> Ave.

- ✓ Related to the point above, the adjacent sidewalks and the construction of E. 102<sup>nd</sup> Ave will be built to current standards (including accessibility), which aligns with the Facilities and Infrastructure section of the vision plan which is intended to “ensure adequate and efficient public facilities and infrastructure for current and future residents and businesses.”

### Housing Authority Balanced Housing Plan & Affordable Housing Implementation

Applicable key findings and analysis:

- Strategy #1 – Explore Policies for Creative Housing Solutions; Recommendation #1 – Explore Ways to Increase Housing Stock Diversification:

The need for affordable/attainable housing options paired with the need for diversification in the housing stock is a central theme throughout the document. It highlights a shortage of affordable housing, the growing issue of homelessness, and the lack of housing for specific populations, including low-income households, seniors, and those with disabilities. The narrative stresses the importance of proactively addressing these needs through both the preservation of existing affordable housing and the development of new affordable housing projects for rent and homeownership. Strategies such as increasing housing stock diversity and expanding housing options are key to addressing these needs. The document suggests updating policies and zoning codes to encourage density and diversity, including options for affordable, walkable, and transit-accessible housing. The theme reflects the goal of creating a variety of housing types to ensure that residents from all demographics have access to appropriate housing.

- ✓ This proposed multifamily project will provide not only deed-restricted affordable units ((10% of total units at 80% AMI) but also more attainable housing options (multi-family) for low-and moderate-income individuals/families, which may include seniors and people with disabilities. This project is designed to include deed restricted affordable units as part of the overall project, helping to meet the growing demand for such housing in Commerce City.
- ✓ This project will meet the needs of diverse populations by offering a mix of unit sizes and types, which will offer housing options to different household types, such as families, seniors, and individuals with special needs, and will assist in ensuring that all residents have access to affordable, quality housing.
- ✓ The project provides an alternative to the predominance of single-family homes in Commerce City. By including deed restricted affordable units (10% of total units at 80% AMI) within the





multifamily development, the project can offer varied housing options for people across different income levels and life stages.

- ✓ Multifamily is denser than single-family housing, which in turn provides more units within a smaller land area, thus aligning with the housing plan's goal to "encourage density and diversity in housing."
  - ✓ The site is located within walking distance of the E. 104<sup>th</sup> Ave and Chambers Rd intersection is strategically located near transit, parks, trails, schools, and services, encouraging walkable living and provides residents with convenient access to public transportation, jobs, and amenities. This aligns with the City's goals for transit-oriented development that states, "New housing should offer residents a variety of transportation options...it should also be located near jobs and services. Neighborhoods should be walkable to support a healthier lifestyle."
- Strategy #2 – Explore Options to fund housing development; Recommendation #1 – consider fee and tax incentives and other approaches to balance Commerce City's housing stock.  
To address the housing challenges in Commerce City, the plan outlines various funding strategies and incentives that could be used to support the development of affordable housing. These include federal tax credits, state funds, housing trust funds, private investment, and public contributions. Additionally, developer incentives, such as offering benefits in exchange for including affordable units in new developments, are highlighted as a way to increase the availability of affordable rental housing for lower-income families, particularly those in the workforce who provide essential services. The strategy reflects the importance of strategic funding mechanisms and incentives to balance the housing market.
    - ✓ With a commitment from the developer to provide affordable units (10% of total units at 80% AMI), this will help balance Commerce City's housing stock by adding affordable housing options in an area where they are currently underrepresented. This helps address the city's housing shortage and ensures that residents across income levels have access to housing.
    - ✓ Currently Thompson Thrift, the developer, is proposing a privately funded development and is not seeking available funding sources such as federal tax credits, housing trust funds, or state programs aimed at supporting affordable housing. Allowing these funds to be available for other developments to hopefully encourage additional affordable housing opportunities in an effort to meet the City's housing needs.

### Commerce City Housing Authority Strategic Plan (2011)

Applicable key findings and analysis:

- Goal #2 – Examine Opportunities for New Affordable Housing Developments in All Areas of the City:  
Population growth has grown exponentially over the last 50 years, with the overall increase in population expected to continue in the coming years. Nearly 48% of the city's land remains vacant or undeveloped, providing a prime opportunity for the development of attainable and affordable housing. The Comprehensive Plan highlights substantial potential for new residential development, particularly in



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the Northern Range and DIA North Areas, where the majority of new units are expected to be built. The Housing Authority Strategic Plan has a purpose of providing direction on how to create and sustain affordable housing for low-income residents.

- ✓ This multifamily project offering deed restricted affordable housing units (10% of total units at 80% AMI) directly aligns with this goal by providing higher-density housing and new affordable housing, addressing the growing demand for diverse, quality housing in the community. Multifamily housing in this location is also particularly aligned in providing compact developments that expand the mix of uses in the area, both of which are highlighted as priorities in the plan.
- Objective 2-A – “Explore new opportunities for affordable housing throughout the city by considering redevelopment, new purchases, new construction, and partnerships with other affordable housing agencies.”
  - ✓ This specific multifamily development is a good example of meeting this objective with the opportunity to provide attainable and deed-restricted affordable housing through new construction on a piece of vacant land that is being underutilized.
- Objective 2-C – “Evaluate potential affordable housing developments to ensure that all segments of the population are adequately served.”
  - ✓ The proposed multifamily development with affordable units (10% of total units at 80% AMI) aligns with this objective by providing housing that will be available for a wide range of household types, including families, seniors, and individuals with low to moderate incomes. By offering unit options with a varying number of bedrooms and layouts, the project can adequately serve all segments of the population as identified in the city's objectives.
- Objective 2-E – “Work to achieve a fully balanced affordable housing community, through a complete variety of housing types (single-family detached, single-family attached, patio home, condo, apartment, etc.) and locations dispersed throughout the entire community.”
  - ✓ This project contributes to a balanced housing community by offering a much-needed housing type that supports higher density (multifamily), ensuring that the city has a wide range of more attainable and affordable units, thus fulfilling the goal of having various housing types that cater to different income levels and household needs. Expanding the multifamily and affordable housing stock in the Northern Range allows there to be a variety of housing options, types, and price points, all while avoiding concentrating affordable housing in one area, which is important for achieving community-wide equity.
- Action Item 2-2 – “Consider the following priority rankings, as identified through the strategic plan process, when evaluating future Housing Authority opportunities...” #4 out of 7: Affordable Multi-Family Units in Northern Range.



- ✓ The Northern Range is identified as an area where more affordable multifamily housing should be prioritized. This multifamily project with the inclusion of affordable units (10% of total units at 80% AMI) in this particular area directly addresses this action item, contributing to the goal of increasing housing availability in targeted areas of the city.
- Action Item 2-6 – “Be knowledgeable of, and prevent placement of, new affordable developments near conflicting land use locations within the city (near high noise areas, truck and train routes, heavy industrial activity, etc.).”
  - ✓ The site of the proposed multifamily development is located in an area with access to amenities, a future greenways trail, and away from harmful land uses. The project aligns with this action item and will contribute to creating safe, livable environments for all residents.



## E. Prairieways Action Plan Analysis | TTRes at Commerce City at Chambers Rd

Zone Change

5/15/2025

The analysis below evaluates the proposed Thompson Thrift development in relation to the *Prairieways Action Plan (1999)*. This analysis below examines key concepts such as: buffering/integration with natural spaces, community access to parks, trails, and open space, and ecological/watershed preservation as outlined in the City's guiding document stated above. The purpose of this analysis is to determine the proposed development's alignment with the guidelines identified in the City's action plan.

### Prairieways Action Plan (1999)

The Commerce City Prairieways Action Plan is intended to guide the preservation and enhancement of the natural and public resources in the region. Its purpose is to promote sustainable land management, protect wildlife habitats, and provide recreational opportunities while balancing development and conservation. The plan outlines strategies to improve ecological health, engage the community, and foster long-term stewardship of the area's open space for future generations. It serves as a guide for city officials, stakeholders, and residents to ensure the region's growth aligns with environmental and community values.

Applicable key findings and analysis:

- Buffering & Integration with Natural Spaces:  
The Prairieways Action Plan emphasizes the integration of natural spaces with urban development by promoting a seamless connection between developed areas and surrounding open spaces. Key strategies include designing parks, trails, and open spaces to interface with urban environments in a way that preserves ecological integrity while enhancing public access. The plan advocates for buffered landscaping and greenway links to create natural transitions between urban and undeveloped areas, protecting wildlife habitats and ensuring privacy for adjacent properties. It also highlights the importance of providing inviting access to parks and open spaces, fostering recreational opportunities, and encouraging sustainable growth that respects and preserves the natural landscape. By connecting neighborhoods to greenways, open spaces, and parks, the plan ensures that development supports environmental conservation and community well-being.
  - ✓ This multifamily residential development aligns with the Plan's vision for parks, trails, and open spaces by being located in close proximity to the future greenway link to the north, the Rocky Mountain Arsenal Wildlife Refuge to the south and two neighborhood parks within walking/biking distance (Fronterra Park & Harvest Meadows Park).
  - ✓ Policy Mechanism #4 in the Plan talks about buffer zones along the edge of developments and open spaces. The project is required to provide a formal quantified buffer zone on site. To meet this requirement, the developer is providing multiple buffers to help provide privacy for neighbors and buffering of vehicles with the open space area to the north:



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1. Enhanced trees and landscaping to the south to create a smooth transition to the existing neighborhood, helping to provide privacy and a natural feel along the street. This buffering is not only included along the southern property boundary of the proposed project, but the developer is also proposing additional trees across the right-of-way of E. 102<sup>nd</sup> Ave, after meeting and working with existing residents.
  2. Buffering on both the east and west sides. On the west, a landscaped buffer creates a naturalistic transition to any future development. On the east side, landscape buffering with enhanced walks to buffer residents from Chambers Rd and future development to the east, while creating enhanced connectivity.
  3. Heavily landscaped, naturalistic buffer on the north edge of the site where parking is proposed, abutting the future greenways link. This will help create a transition between the uses by "ensuring that the public and private spaces do not encroach on one another."
- Community Access to Parks, Trails, and Open space

The Prairieways Action Plan emphasizes the importance of ensuring community access to parks, trails, and open spaces by integrating these spaces into private developments. The plan encourages creating neighborhood parks within walking distance (approximately ½ mile radius) to serve as community focal points, providing essential recreational amenities like playfields, playgrounds, and walking paths. It also highlights the creation of greenway links and local service trails to connect neighborhoods to regional trails and other community destinations. These connections ensure easy access for residents to parks, schools, and open spaces, promoting a walkable and active community. The plan stresses that public spaces should be inviting and well-connected, making parks and trails accessible to all members of the community.

- ✓ Policy Mechanism #1 "requires developers to submit plans for review and approval. The plans must meet certain engineering criteria as stipulated in the City zoning ordinance and municipal codes.... the developer is also required to make certain street and sidewalk improvements." Aligning with this policy, this development is proposing to make improvements to both Chambers Rd and construct E 102<sup>nd</sup> Ave between Chambers Rd to Sable Blvd. Currently both Chambers Road on the west side and all of E. 102<sup>nd</sup> Ave do not provide any pedestrian amenities or walkways, the project will provide pedestrian walkways and connectivity to both roads. The development is also providing cross-sections and streetscapes that will enhance the community with multi-modal connections and visually appealing and landscaping along the routes that take people to local parks, trails, and open spaces.
- ✓ Policy Mechanism #3 is related to the policy above in that it outlines the requirements and standards for sidewalks and bike paths along arterial, collector, and local streets. A key component of this development is the commitment to improving pedestrian and cyclist accessibility throughout the area. This initiative aligns with the city's broader vision for safe, connected, and accessible streets. As part of this effort, the project will adhere to current



engineering standards while enhancing the network of sidewalks and bike lanes. The development will introduce new sidewalks and bike lanes along E 102nd Ave, fostering greater mobility for residents and visitors. Additionally, an 8-foot detached sidewalk along Chambers Rd will create a safer, more accessible route for pedestrians. Currently, the west side of Chambers Rd experiences a break in sidewalk connectivity—this project takes a crucial step in bridging that gap, reinforcing the city's long-term vision for a well-connected urban framework.

- ✓ With two neighborhood parks located within a ½ mile radius (Fronterra Park & Harvest Meadows Park), the development meets the Prairieways Action Plan's intent to increase community access to recreational amenities. This ensures that new community members and residents will have convenient access to diverse outdoor activities and spaces.

- Ecological/Watershed Preservation

The Prairieways plan outlines ecological and watershed preservation as a means to manage stormwater runoff and protect natural resources. Along with developments providing stormwater mitigation, fees are assessed to developers, which are then allocated to the development of storm drainage facilities, including the acquisition of open space for stormwater storage and conveyance, as well as the protection of stream corridors, wetlands, and ponds. This approach ensures that new developments contribute to stormwater management, mitigating potential environmental impacts and enhancing watershed protection.

- ✓ Policy Mechanism #6 requires an impact fee be paid by developers that, "provides a way to equitably fund the acquisition of open space for regional detention facilities." The fees are based on the square footage of impervious surfaces, such as roads and rooftops, which contribute to increased runoff. The project will pay all applicable City storm drainage impact fees, which would contribute to the city's broader efforts in managing stormwater and protecting natural resources.
- ✓ The inclusion of a detention pond in the proposed development plan addresses the stormwater runoff concerns outlined in the Plan. This detention pond facility designed to city specifications will help manage and control stormwater, reducing the potential for flooding and runoff into nearby streets, open spaces, and ecosystems.
- ✓ In addition to managing and controlling stormwater, the detention pond proposed in the northeast corner of the project site can be considered part of the development's "Infrastructure Open Space", which fulfills a community safety and welfare purpose by managing water runoff, enhancing the site's resilience to flooding, and protecting water quality. It also provides the aesthetic and feeling of open space for pedestrians and vehicles travelling along Chambers Rd.



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