



Commerce City Urban Renewal Authority
7887 E. 60th Avenue
Commerce City, Colorado 80022

April 5, 2024

City of Commerce City, Colorado
c/o Department of Community Development, Mile High Greyhound Park Planner
7887 E. 60th Avenue
Commerce City, Colorado 80022

RE: Approval Criteria for Second Amendment to the Mile High Greyhound Park PUD

Mile High Greyhound Park Planner:

The following narrative in response to the City of Commerce City's adopted approval criteria for Planned Unit Development (PUD) zoning districts is provided on behalf of the Commerce City Urban Renewal Authority as owner of Tract A and Tract B at Mile High Greyhound Park. The owner has formally applied to amend the Mile High Greyhound Park Planned Unit Development (PUD) to support the redevelopment of publically owned land consistent with the implementation of the adopted Urban Renewal Plan. The requested Amendment 2 is based on market realities for retail and institutional development at Mile High Greyhound Park.

- a) The PUD zone document is consistent with the policies and goals of the comprehensive plan, any applicable adopted area plan, or community plan of the city, or reflects conditions that have changed since the adoption of the comprehensive plan.

Response: The proposed amendment is consistent with the policies and goals of the comprehensive plan, the Mile High Greyhound Park Urban Renewal Plan, and reflects market conditions that have been permanently exacerbated post-COVID.

The Comprehensive Plan designates the former racetrack property as a mixed-use zone with aspirations of becoming a regional center, serving the local area as well as a broader reach. This proposed amendment to the PUD allows for a diverse mix of commercial enterprises. By approving this amendment to the PUD, the following Comprehensive Plan:

- This amendment will assist the City in attracting and recruiting new businesses that contribute positively to City revenues.
- The C3 Vision recognizes the benefits of infill and redevelopment for the City's sustainable future. This Amendment identifies marketable redevelopment plan within a targeted redevelopment location.
- The C3 Vision identified neighborhoods that could benefit from infrastructure improvements and nearby redevelopment. The redevelopment of this property helps achieve this objective by strengthening existing neighborhoods through renewal efforts.

Furthermore, the purpose of the Mile High Greyhound Park Urban Renewal Plan is to reduce, eliminate, and prevent the spread of blight within the Area and to stimulate growth and investment within the Area boundaries. Approving this Amendment will allow the Urban Renewal Authority to market their property to a diverse mix of commercial enterprises and cause redevelopment and reinvestment to occur on land that is vacant and has been classified as blighted in its current state.

- b) The PUD zone document is consistent with any previously reviewed PUD concept schematic.

Response: The spirit, intent, and continued development of the existing PUD are not impacted by the proposed Amendment. Therefore, the proposed Amendment is consistent with the previously approved PUD and prior concept schematics.

- c) The PUD addresses a unique situation, confers a substantial benefit to the city, or incorporates creative site design such that it achieves the purposes set out in section 21-4370 (PUD Zone District) and represents an improvement in quality over what could have been accomplished through strict applications of the otherwise applicable district or development standards. This may include but is not limited to improvements in open space; environmental protection; tree/vegetation preservation; efficient provision of streets, roads, and other utilities and services; unique architecture or design, or increased choice of living and housing environments.

Response: This Amendment addresses a unique situation, confers a substantial benefit to the city, and incorporates creative site design in furtherance of the Mile High Greyhound Park Urban Renewal Plan. By allowing single-tenant drive-thru uses along this heavy automobile-dependent section of Commerce City, the Urban Renewal Authority will be able to market the property to commercial tenants and increase the likelihood that private enterprises are willing to invest in the redevelopment of the project, creating a substantial benefit to the current and future inhabitants of the area. Furthermore, the request to allow the flexibility for single-tenant commercial uses to incorporate a drive-thru, a right that is already allowed for some multi-tenant buildings on Tract B in its current zoning, is not expected to impact the creative site design already adopted by the City through the approved design guidelines.

- d) The PUD complies with all applicable city standards not otherwise modified or waived by the city.

Response: Yes, the PUD complies with all applicable city standards not otherwise modified or waived by the city.

- e) The PUD is integrated and connected with adjacent development through street connections, sidewalks, trails, and similar features.

Response: Yes, the PUD is integrated and connected with adjacent developments through street connections, sidewalks, trails, and similar features.

- f) To the maximum extent feasible, the proposal mitigates any potential significant adverse impacts on adjacent properties or on the general community.

Response: The proposal addresses market conditions to allow a retail development and institutional anchor to be built consistent with the adopted Mile High Greyhound Park Urban Renewal Plan.

- g) Sufficient public safety, transportation, and utility facilities and services are available to serve the subject property while maintaining sufficient levels of service to existing development.

Response: Yes, sufficient public safety, transportation, and utility facilities and services are available to serve the subject property while maintaining sufficient levels of service to existing development. An addendum to the transportation study has been completed and submitted as part of this application.

- h) As applicable, the proposed phasing plan for the development of the PUD is rational in terms of available infrastructure, capacity, and financing.

Response: The proposed development is served by adequate infrastructure and capacity. The developer will be able to secure financing after the amendment is approved, making the retail development feasible.

- i) The same development could not be accomplished through the use of other techniques, such as height exceptions, variances, or minor modifications.

Response: No, the proposed amendment does not require any bulk or area regulation adjustments, exceptions, variances, etc. and the requested land use modification cannot be accomplished administratively via a minor modification.

Please do not hesitate to contact me directly should you or your team have any questions about the requested Second Amendment to the Mile High Greyhound Park PUD.

Sincerely,



Bill Aiken, AICP
Director of Urban Renewal