



December 2, 2022

Brandon Cammarata
City of Aurora
Planning Division
15151 E. Alameda Parkway, Ste. 2300
Aurora, Colorado 80012

RE: *Town Center at Aurora Phase 2 – Letter of Introduction*
Application Number: DA-1105-17
Case Numbers: 1985-6028-27
Kimley-Horn Project # 096820009

Dear Mr. Cammarata,

Kimley-Horn and Associates, Inc. is pleased to present this letter of introduction for the Town Center at Aurora Phase 2 Redevelopment located at 14200 E Alameda Avenue, in Aurora, Colorado 80012. Kimley-Horn is representing Washington Prime Group (“Washington Prime”) with respect to this proposed development.

The proposed Town Center at Aurora Redevelopment Project consists of three proposed buildings onsite, a proposed roundabout, and a new drainage plan which consists of two underground detention water quality chamber systems.

The proposed buildings include a 119-room hotel (on the west side of Lot 2, Block 1 of the Aurora Mall Sub Filing No. 6), four new restaurants totaling approximately 25,000 square feet (attached to the west side of the existing fieldhouse - on the east side of Lot 2, Block 1 of the Aurora Mall Sub Filing No. 6), and a new 246 unit residential multi-family building (which occupies Lot 3, Block 1 of the Aurora Mall Sub Filing No. 2).

The new roundabout is proposed at the intersection of S Crystal St. and Mall Ring Road. The roundabout will greatly improve the flow of traffic at this intersection, as seen in the Town Center at Aurora Redevelopment Traffic Impact Study prepared by Kimley-Horn and Associates, Inc. in October 2021.

The project also proposes to improve the northern end of the Town Center development by implementing thoughtful pedestrian connectivity, green space, site circulation, and public art. Utilities will be improved and routed through the development to adequately serve the existing mall and the proposed buildings. This includes water, sanitary sewer, and stormwater improvements. The on-site drainage systems will be improved onsite with two separate water quality detention systems proposed to detain and treat stormwater before discharging into the existing storm sewer in Sable Boulevard and then east toward the regional stormwater facilities.

The larger of the two underground detention systems will be located within Lot 2, Block 1 of Aurora Mall Sub Filing No. 6, north of the proposed hotel. This ADS chamber system will collect flows from the roofs of the Bolt-On Restaurants and the Hotel, as well as the parking lot areas east of the mall. Stormwater

flowing into this detention system will be released into the existing storm sewer which runs under Mall Ring Road. The second and smaller detention and water quality chamber system will be located in a vault on the ground-floor of the proposed multi-family building. Stormwater from the roof of the multi-family building will be piped within the building to this detention and water quality facility. All drainage for the proposed development will connect in an existing storm sewer in Mall Ring Road and will connect to the existing public storm sewer pipe in Sable Boulevard.

The project proposes the following deviations from the City of Aurora Unified Development Ordinance (UDO):

- Restaurants/Retail:
 - Roof form per *Section 146-4.8-4.8.8(A)(2)(b) – Development Standards; Building Design Standards; Roof Design; Mixed-Use, Multifamily and Non-Residential Districts; Roof Form* to allow for uninterrupted roof in excess of 60 linear feet of façade.
 - Horizontal Articulation per *Section 146-4.8-4.8.5(B)(4) – Development Standards; Building Design Standards; Massing and Articulation; Horizontal Articulation* to allow for more than 50' without horizontal articulation
- Hotel:
 - Primary building materials per *Section 146-4.8-4.8.6(C)(3) – Development Standards; Building Design Standards; Building Materials; Primary Building Materials* to allow for the use of Exterior Insulation Finish System (“EIFS”) for approximately 40% of the exterior building skin for the hotel building.
- Site (including Multifamily):
 - Parking per *Section 146-4.6-4.6.3(C) – Development Standards; Parking, Loading, and Stacking; Required Off-Street Parking; Minimum Required Parking* to allow for a parking reduction due to Proximity to Transit per *Section 146-4.6-4.6.4(A) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Proximity to Transit* and Shared Parking per *Section 146-4.6-4.6.4(I) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Shared Parking*
- Multifamily
 - Building Setback/Landscape Buffer per *Section 146-4.2.2 – Density and Lot Standards.*

Restaurants/Retail:

Roof form per Section 146-4.8-4.8.8(A)(2)(b) – Development Standards; Building Design Standards; Roof Design; Mixed-Use, Multifamily and Non-Residential Districts; Roof Form to allow for uninterrupted roof in excess of 60 linear feet of façade.

As noted above, Washington Prime Group (“the Owner” or “WPG”) requests a Major Adjustment from requirements of Section 146-4.8-4.8.8(A)(2)(b) of the UDO that requires flat roofs to include at least one change in setback or height of at least three feet along each 60 linear feet of façade. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning

Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

Allowing a flat roof with uninterrupted roof in excess of 60 linear feet of façade will have no material adverse impacts on any abutting lot. As noted above in Section II, allowing a flat roof will enhance the look of the restaurant/retail building to help it feel like more of a main street atmosphere while encouraging tenants to have their own defined storefront area. This ensures design compatibility with the rest of the shopping center. Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture. Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because it encourages tenants to have their own defined storefront area, while still maintaining a cohesive frontage.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. *The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. Allowing a flat roof with uninterrupted roof in excess of 60 linear feet of façade will not increase parking or congestion.

- e. *For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria. Therefore, the Project meets the criteria for a Major Adjustment to the Roof Form requirements in the UDO.

Horizontal Articulation per Section 146-4.8-4.8.5(B)(4) – Development Standards; Building Design Standards; Massing and Articulation; Horizontal Articulation to allow for more than 50' without horizontal articulation.

As noted above, WPG requests a Major Adjustment from requirements of Section 146-4.8.5(B)(4) of the UDO that requires two methods of horizontal articulation every 50 linear feet for a mixed-use and multifamily development for the restaurant/retail portion of the project. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

Allowing a façade without horizontal articulation every 50 feet will have no material adverse impacts on any abutting lot. As noted above in Section II, allowing a horizontal façade without any articulation for 50 linear feet will enhance the look of the restaurant/retail building to help it feel like more of a main street atmosphere while encouraging tenants to have their own defined storefront area. This ensures design compatibility with the rest of the shopping center. It's also important to note that horizontal articulation will be employed where possible between tenant spaces. Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture. Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because it encourages tenants to have their own defined storefront area, while still maintaining a cohesive frontage.

- b. The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. Allowing a horizontal façade without articulation every 50 linear feet will not increase parking or congestion.

- e. For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the Horizontal Articulation requirements in the UDO.

Hotel Building:

Primary building materials per Section 146-4.8-4.8.6(C)(3) – Development Standards; Building Design Standards; Building Materials; Primary Building Materials to allow for the use of Exterior Insulation Finish System (“EIFS”) for approximately 40% of the exterior building skin for the hotel building.

As noted above, WPG requests a Major Adjustment from requirements of Section 146-4.8.6(C)(3) of the UDO that prohibits the use of EIFS in the building façade for the hotel portion of the project. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

- 1. The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

The use of EIFS for the building façade will have no material adverse impacts on any abutting lot. As noted above in Section II, the use of EIFS will enhance the hotel because EIFS is compatible with the look and feel of the existing shopping center.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture. Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*
 - a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is equal to or better than what would have been required without the Major Adjustment because EIFS is used in neighboring structures and its use in the Project will enhance the compatibility of the Hotel with the Town Center at Aurora. Additionally, modern EIFS products offer a variety of benefits including improved drainage systems, reduced maintenance, increased flexibility with color and texture, the ability to easily refresh/refurbish via fresh coats of paint, etc.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. *The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. The use of EIFS will not increase parking or congestion.

- e. *For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the requirements for primary exterior building materials in the UDO.

Site (including Multifamily):

Parking per Section 146-4.6-4.6.3(C) – Development Standards; Parking, Loading, and Stacking; Required Off-Street Parking; Minimum Required Parking to allow for a parking reduction due to Proximity to Transit per Section 146-4.6-4.6.4(A) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Proximity to Transit and Shared Parking per Section 146-4.6-4.6.4(I) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Shared Parking

As noted above, WPG requests a Major Adjustment from the parking requirements of Section 146-4.6-4.6.3(C) supported by Proximity to Transit per Section 146-4.6-4.6.4(A) and Shared Parking per Section 146-4.6-4.6.4(I). A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

As proven by the Parking Needs Study conducted by Kimley Horn and included in this submittal, the existing parking at Town Center at Aurora is sufficient to meet the parking demands of all the new components of the redevelopment as well as anticipated future demands at the site.

The redevelopment removes 281 existing parking spots for the multifamily component and 393 existing parking spots for the hotel and restaurant/retail component. Pursuant to the required parking requirements detailed in Section 146-4.6-4.6.3(C), the multifamily component is required to have 269 parking spots (assuming a TOD reduction is applied) and the hotel and restaurant/retail component is required to have 239 parking spots. The redevelopment provides a total of 247 new parking spots for the multifamily component and 230 new parking spots for the hotel and restaurant/retail component.

Any parking shortfall within any component of the redevelopment will be adequately satisfied due to the Project proximity to the RTD station (i.e. TOD development) and shared parking via cross-parking easements with the current mall site (which is currently underutilized as noted in the submitted Parking Needs Study).

As noted above in Section II, a reduction in the required parking will benefit the Town Center at Aurora property so development can be further densified as a more walkable mixed-use development.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture. Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because the Town Center at Aurora will better utilize the existing parking lots resulting in less vacant parking lots and a greater mix of uses and development activity.

- b. The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will allow for more development activity to occur, resulting in a more walkable site with better connectivity within the site. The proposed density within this plan is also in keeping with the Station Area Plan for Metro Center and City Center Vision.

- c. The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. This Major Adjustment will not impact on-street parking or traffic congestion on any local street in any Residential zone district with 200 feet of the site.

- e. For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood, and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the requirements for primary exterior building materials in the UDO.

Multifamily Building:

Building Setback/Landscape Buffer per *Section 146-4.2.2 – Density and Lot Standards*.

As discussed, the building is currently setback 10 feet, but have provided 10 feet of landscape buffer and a 10-foot sidewalk with strategically placed tree wells and trees at the sidewalk along Sable Boulevard to create a sense of pedestrian protection, comfort, and scale.

- 1. The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

The building faces Sable Boulevard and the transit station therefore it will not negatively impact adjacent lots. The provided landscape and enhanced sidewalks will minimize the visual impact of the building as well as provide a comfortable pedestrian experience.

- 2. The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because it replaces the dead vegetation and utility equipment with an enhanced landscape and pedestrian experience along Sable Boulevard. The landscaping will be professionally maintained and will provide a varied planting environment in lieu of just grass.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will enhance the pedestrian experience along Sable Boulevard and improve walkability to the light rail station across the street.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major Adjustment will create a better visual screening and comfort to Sable Boulevard, the light rail station, Town Center at Aurora, and along Centerpoint Drive.

Property Owner: Town Center at Aurora II LLC
111 Monument Circle, Suite 3500
Indianapolis, IN 46204
Attention: Matt Jurkowitz
Phone: (317) 986-8540

Applicant: Washington Prime Group
111 Monument Circle, Suite 3500
Indianapolis, IN 46204
Attention: Matt Jurkowitz
Phone: (317) 986-8540

Consultant: Kimley-Horn and Associates, Inc.
4582 South Ulster Street, Suite 1500
Denver, CO 80237
Attention: Bryce Christensen
Phone: (303) 228-2339

We appreciate your review and approval of these plans. Please contact me at 303-228-2339 or bryce.christensen@kimley-horn.com should you have any questions.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.

A handwritten signature in blue ink, appearing to read 'B. Christensen', with a stylized flourish at the end.

Bryce Christensen, PE
Project Manager