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December 17, 2020

Bill Parkhill  
Parkhill Development  
631 High Street  
Denver, CO 80218

**Re:                   Second Submission Review - Metro Center Master Plan - Master Plan**  
**Application Number: DA-1489-16**  
**Case Number(s):     2020-7006-00**

Dear Mr. Parkhill:

Thank you for your initial submission, which we started to process on November 19, 2020. We have reviewed your plans and attached our comments along with this cover letter. The first section of our review highlights our major comments. The following sections contain more specific comments, including those received from other city departments and community members.

Since several important issues remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before Thursday, December 31, 2020.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item. The Planning Department reserves the right to reject any resubmissions that fail to address these items. If you have made any other changes to your documents other than those requested, be sure to also specifically list them in your letter.

Your estimated Planning Commission hearing date is set for Wednesday, February 10, 2021. Please remember that all abutter notices for public hearings must be sent and the site notices must be posted at least 10 days prior to the hearing date. These notifications are your responsibility and the lack of proper notification will cause the public hearing date to be postponed. It is important that you obtain an updated list of adjacent property owners from the county before the notices are sent out. Please take all necessary steps to ensure an accurate list is obtained.

As always, if you have any comments or concerns, please let me know. I may be reached at (303) 739-7184 or [hlamboy@auroragov.org](mailto:hlamboy@auroragov.org).

Sincerely,

Heather Lamboy, Planning Supervisor  
City of Aurora Planning Department

cc:           Eva Mather, Norris Design, 1101 Bannock St, Denver CO 80204  
              Scott Campbell, Neighborhood Liaison  
              Laura Rickhoff, ODA  
              Filed: K:\SDA\1489-16rev1



## Second Submission Review

### SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Parcel PA-A1 requires secondary vehicular and pedestrian connection from Dawson Street as illustrated on Page 26 of the SAP and appears necessary to meet the long-term development goal identified in the SAP.
- Please provide the anticipated number of units; conflicting numbers have been provided. It is important to have the unit count correct for the purposes of PROS and school district reviews.
- Provide additional detail to the open space network to address the goals of planning documents and PROS requirements and clarify expectations moving forward.
- A comprehensive overview of staff recommendations on adjustment requests is provided below.
- No central plaza has been provided as a gathering space as required by the Station Area Plan and other plans and regulations. As designed, the park space that is proposed does not meet the standard for a central gathering space. It is suggested that a central plaza be located in Area C adjacent to Centrepont Drive consistent with the below comments.

### PLANNING DEPARTMENT COMMENTS

#### 1. Community Questions, Comments and Concerns

- 1A. No community comments were received this review cycle.
- 1B. *Repeat Comment:* A neighborhood meeting will be required. Please contact Scott Campbell ([scampel@auroragov.org](mailto:scampel@auroragov.org)) regarding scheduling a meeting. The meeting will be held as a virtual meeting.

#### 2. Completeness and Clarity of the Application

- 2A. Additional land use and residential density information is needed to determine the required amount for neighborhood and urban parks to be provided on site. The amount of on-site parkland must be determined as part of this review process. A sample table has been provided below that was drafted during a previous Master Plan review of the site.
- 2B. What is the proposed density for each planning area? A sample of a land use table from the Nine Mile TOD development is provided for reference purposes. Please include a similar table on the Master Plan.

PLANNING AREA*	ACRES	PROPOSED USES
A	6.6	RETAIL / COMMERCIAL
B	2.7	MIXED USE
C	3.3	MIXED USE
D	2.2	MIXED USE
E	0.9	MIXED USE
F	3.3	MIXED USE

#### Comprehensive Planning Comments

(the following Sections up to Section 4 in this letter provide an overview of the review considerations in addition to the UDO)

##### Primary Issues:

- Compliance with The Comprehensive Plan, Aurora Places, Station Area Plan and Visioning Effort (Including Community Outreach)
- Corner Property Access/ Bridge/Road Connection to Lot 1
- Compliance with Urban Renewal Goals
- Density and Urban Network
- Amount, Design, Location and Type of Retail
- Main Street Location
- Diversity of Housing/ Mixed Income or Senior
- Park Locations and Design
- Public Art and Marketing
- Street Cross Sections/ Off-Street Cycle Track



Aurora Places:

- 2C. Aurora Places Placetype Map identifies Metrocenter as an “Urban District” Placetype which is defined as follows: “Urban Districts are critical to the economic and fiscal health of the city because they will serve as the centers of employment, culture and activity. Urban District is the city’s most intensely developed area with mixed-use, entertainment, institutional, retail, restaurant and multifamily residential as defining uses. In the absence of a “Downtown Aurora,” this placetype creates a unique mix of uses in a dense urban fabric, that provides a pedestrian-friendly environment and a place to live, work, shop, dine, recreate and more. It is distinguished from other placetypes by density, scale and the prioritization of multimodal transportation.”
- 2D. The comprehensive plan further describes Urban District placetypes as an “opportunity to define Aurora’s image and aesthetic through high-quality design and architecture supporting active places and distinctive destinations.” This district can offer high-quality public spaces, a home to local or unique businesses, and a new and diverse urban neighborhood experience. New development and investment in the City Center area offers a once-in-a-generation opportunity to offer the community a new experience and destination and offers Aurora a rare opportunity to redefine itself to metro area residents, visitors, and potential investors and developers.

Designated DRCOG Urban Center

- 2E. The proposed development Metrocenter is also identified by the city (through the comprehensive plan) and DRCOG as a designated Urban Center and “DRCOG’s Metro Vision plan describes the “urban centers” as a model for healthy, livable communities. These designated centers are intended to feature a multimodal travel network within a mixed-use, urban district with diverse housing, employment and service opportunities accessible without sole reliance on automobiles.”
- 2F. These designated Urban Centers represent the city’s most advantageous and desirable locations for urban-scale concentrations of residential, commercial, and office development. Urban Centers are intended to receive significant residential and employment growth in coming years. Planned densities and building formats should exceed typical suburban scale development and enable substantial concentrations of both jobs and residents. By focusing significant new growth into these strategic areas, the city can capitalize on valuable development opportunities and build upon existing transportation networks and infrastructure investments.

City Center Vision and Development Framework (in progress 2020)

- 2G. In Spring 2020, the city kicked off the development of a vision and development framework for the City Center area, which includes the Metrocenter property. Additionally, the steering committee for the project includes area property owners (including property owners for Metrocenter) as well as elected and appointed city officials and other key stakeholders and partners. The city has conducted a series of community engagement opportunities, including virtual meetings and online surveys. Based on the feedback received to date, key themes that have emerged from community input include:
  - a. Stakeholders like the accessibility and shopping/dining options available in the area, but want even more diversity and choices.
  - b. Unattractive or "cookie cutter" development with expansive parking lots were disliked. There is a desire for a cohesive and recognizable feel for Aurora's city center.
  - c. Active public spaces, including parks, plazas, and other outdoor areas should be part of the district. Safety, attractiveness, and maintenance are key.
  - d. Stakeholders desire more options for shopping, dining, and entertainment, including a strong desire for unique or local businesses. Additional mid-tier and upscale dining was a clear desire.
  - e. A "park once and walk" district is supported by stakeholders, with safe and convenient crossings at major streets and to surrounding neighborhoods being important. Stakeholders support inclusion of a variety of transportation options, including walking, biking, and public transit.
  - f. The atmosphere of the shopping district or neighborhood and convenience to a variety of stores, restaurants, and activities were cited as very important to stakeholders.
  - g. Stakeholders desire activities and destinations that attract individuals and families of all ages and types, as well as draw visitors from across the metro area.
  - h. Housing options at a variety of prices, from lower to higher, are reported by stakeholders as important. This includes support for "for sale" housing options.



2H. This input is consistent and supportive of the comprehensive plan’s overall vision, guiding principles, and the district’s description for Urban District placetypes within Aurora.

Parks and Open Space Comments (Comprehensive Planning)

2I. Urban District Placetypes require “Urban parks providing green space for residents and workers and serve as locations for community activities” with a “Defining Feature” identified as the “Utilization of civic plazas, courtyards, and parks and open space as gathering places for residents, employees and visitors.” Connectivity is defined through the “Defining Feature” to “Develop Urban Districts with a complete grid of streets creating relatively small urban blocks’ and the “Use of attractive, connected and well-designed urban streetscapes throughout the district.”

2J. It is essential that all the parks and open spaces provided, adhere to these guiding principles and that the spaces are large enough to provide active recreational options to support the significant increase in housing proposed at Metrocenter from the previous (Woodbury) Metrocenter Master Plan approvals.

2K. Based on this significant increase in housing units, there is a need to provide three distinct, useable park spaces, in addition to your proposed Small Urban Parks/Plazas. There should be one sizeable park in each Parcel Area, A, B and C. Please also continue working with PROS to ensure any crossings within Area A are consistent with their design standards and ensure that the required Transportation Improvement Project (TIP) match payments are provided. See PROS and Planning’s redlined comments.

Diversity of Housing Comments (Community Development)

2L. Aurora Places Community Principle: Housing for All

“By expanding the types of housing and neighborhoods that Aurora offers, the city can better meet the diverse preferences and needs of residents across the income spectrum.” Aurora Places “participants described the need for more high-quality housing in a range of types and prices, including affordable housing.”

2M. Aurora Places Community Principle: A Diverse and Equitable City

“The population of Aurora is diverse in every way. Aurorans want to celebrate this diversity and make sure that services are provided to the people of Aurora, regardless of background, age, income or ability.”

2N. For this district to be successful, staff understands the need for a complete mix of incomes and household types, and we highly encourage that your “heartbeat building” and other market rate rental projects will meet the needs at the higher end of the income spectrum. Additionally, a portion of “for sale” housing should be strongly considered as a complement to the multiple rental projects planned for the district.

2O. Understanding these goals that apply to the city’s Urban Districts and the broader city’s housing strategies, the city suggests the consideration of the placement of a “mixed-income” housing project in close proximity to the light rail station. A working definition: A **mixed-income housing** development can be defined as a development that is comprised of **housing units with differing levels of affordability**, typically with some market-rate housing as well as housing priced below market-rate levels made available to lower-income residents. For such a project to be eligible for state tax credits, CHFA funding now encourages this form of housing and defines it as “Income Averaging” as follows:

*The Consolidated Appropriations Act of 2018 (the Act) was signed into law on March 23, 2018, that permanently established Income Averaging (IA) as a third minimum set-aside election is intended to serve households earning as much as 80 percent of Area Median Income (AMI), provided the average income/rent limit in the property is 60 percent or less of AMI. Developments that select IA must commit to having at least 40 percent of the units in the property affordable to eligible households.*

2P. CHFA’s outlined point systems for their project awards identify the following components which also align with the defined goals for City Center through the Station Area Plan and within Aurora Places:

- a. Equitable Distribution of Unit and Affordability Mix
- b. Community and Comprehensive Plan Contribution
- c. TOD Siting
- d. Green Building
- e. Location of Amenities
- f. Marketability
- g. Walk Score & Transit Score



- 2Q. A primary component of a CHFA application is a Market Study. In order to facilitate the applicability of this site for consideration, the AURA staff is willing to explore the funding of this study requirement. City housing staff has consolidated a list of both successful housing projects and developers that have been successful in obtaining these funding sources. For a more complete list please contact Liz Fuselier, with Community Development at [efusellie@auroragov.org](mailto:efusellie@auroragov.org)

### **3. Station Area Plan**

- 3A. The City Center Station Area Plan, adopted by reference as part of the Aurora Places Plan, serves as the design guidance for the Metro Center Station.
- 3B. Central spaces give identity to TODs. Public spaces are very important in TODs; parks, plazas and main streets that are beautiful and useful can become important identifying elements with the city of Aurora's Small Urban Parks (SUP) standards serving as an implementation tool. The proposed open space network needs refinement in terms of quantity, location, classification, and proposed use. More detailed comments are provided below.
- 3C. The Station Area Plan also requires a defined Main Street. It is important that a defined main street be developed with buildings and public opens spaces fronting the street with minimal building setbacks. The desired building forms along this street shall have active ground floor uses with on-street parking. Building forms should be related to the width and activity on the street that fronts them, so that a sense of enclosure is created. While the proposed Main Street has many desirable qualities it does not, by itself, meet the main street requirements in terms of setbacks or enclosure. Staff recommends consideration of an alternative or additional main street area as previously discussed.
- 3D. While the regional drainage corridor that leads from the Municipal Building to Metro Center station serves a utilitarian function, it is also envisioned as a park space that provides for passive recreation. Please address this as a project amenity; furthermore, a concept landscape plan should be provided to illustrate compliance with the grant match obligation for this project (\$234,000). Design elements from the guidelines should continue through this park space, and there are opportunities for public art installations along this corridor. (Previous sketches provided below for review)
- 3E. The zoning guidance in the plan has specific standards regarding TOD-Core and TOD-Edge subdistricts and should be included as an exhibit in the plan.

### **4. Zoning and Land Use Comments**

- 4A. The Master Plan approval criteria are as follows (Section 146-5.4.1E3):
- A Master Plan shall only be recommended for approval, and shall only be approved, if:
    - It is consistent with the Comprehensive Plan, the purpose statement for the zone district(s) where the property is located, the use regulations in Article 146-3 for the zone district(s) where the property is located, and all other adopted plans and policies of the City Council; *This criterion is not met*
    - It will allow future development of the property to comply with all applicable standards in this UDO; *This criterion is met*
    - It will result in a coordinated system of streets, trails, sidewalks, open spaces, and infrastructure systems that do not create significant adverse impacts on the surrounding area, or any significant adverse impacts have been mitigated to the degree practicable; and, *This criterion is not met (coordinated system of streets, which includes the need for a bridge)*
    - It will improve or expand multi-modal connections with adjacent sites, neighborhoods, and urban centers. *This criterion is met.*
- 4B. The Adjustment approval criteria are as follows (Section 146-5.4.4.D.3)
- 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; and
  - 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; and
  - At least one of the following criteria have been met:



- i. 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. *This criterion may not be met with surface parking. Additional standards should be provided about where surface parking may be permitted and how it meets the overall intent of the parking screening requirements in the TOD zone district standards.*
- ii. 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. *If a setback adjustment request is to be considered for approval, it will be required that this criterion be more fully addressed in the design guidelines.*
- iii. 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.
- iv. 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; and
- v. 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.

4C. Further discussion on Adjustments: In the first master plan submittal the applicant requested 6 adjustments. In the second master plan submittal the number of adjustment requests was reduced to 2. The applicant maintains that several of the initial adjustments are no longer required. Staff responses, and clarifications regarding applicable standards, for all of these requests is provided below in bold, italicized text.

Code Section 146-2.4.6 H - Streets and Public Space

This request is for an adjustment from block length requirements of 300 and 500 feet in length and no more than 1,800 feet around the perimeter at time of master plan.

***In the applicant’s response letter dated Nov. 19, 2020, the applicant indicates the SAP takes precedence and this adjustment is no longer required and cites Figure 12 in the SAP as the controlling document. Figure 12 in the SAP is a Concept Plan. The block length and perimeter standards in the UDO further define required block size and are not in conflict with the SAP Concept Plan. If the UDO standards are not met an adjustment is required. Staff does not support an adjustment for block length at the master plan stage. Block length and perimeter can be reduced at time of site plan through the use of alleys, private drives, public realm, and building articulation. If still required, an adjustment to block standards can be considered at the site plan stage. This requirement is written into the Master Plan and the Design Guidelines.***

Code Section 146-2.4.6.F Motor Vehicle Parking

This request is for an adjustment to the 80% structured parking requirement in Parcel C to 50%.

***To support this adjustment, a centrally located, high quality open space should be provided in Parcel C. In addition, a minimum of 50% of the parking in Parcel C shall be structured, providing a transition from the Edge District in Parcel B, to the higher density in Parcel A, Lot 3. Parcel A within the Core District will maintain the 80% structured parking requirement.***

Code Section 146-4.3.C

This request is for an adjustment from the maximum permitted parking in Parcel B should it develop as office uses. The adjustment allows up to 4.0 spaces per 1,000 GFA in Parcel B for office developments.

***Staff does not support this adjustment at the master plan stage. If still required, an adjustment to parking can be considered at the site plan stage.***

Section 146-4 (Table 4.2-3)

This request is from minimum residential densities of 60 DUA in Parcel C of the TOD-Core Subdistrict. This adjustment allows minimum densities of 40 DUA for residential development in Parcel C.

***In the applicant's response letter dated Nov. 19, 2020 the applicant indicates the SAP takes precedence regarding minimum densities. Staff agrees with this interpretation, however, the minimum height standards of the SAP or UDO, as applicable, must be met and minimum proposed densities must be specified on the master plan.***

UDO Table 4.2-3

This request is for an adjustment from minimum 3-story building height in Core Subdistrict Parcel A, Lot 2. This adjustment allows a minimum building height of 20 feet on Parcel A, Lot 2.

***Staff does not support this adjustment.***

UDO Table 4.2-3

This request is for an adjustment on the maximum build-to requirements of 10' in Core Subdistrict and 18' in General Subdistrict for curved streets.

***Staff can support this adjustment for the Dawson Street Urban Plaza if a centrally located, high quality open space is provided in Parcel C. Staff does not support this request for other curved streets.***

- 4D. Main Street: The main street here is envisioned as a destination and part of Aurora's downtown. A walkable place with high-quality urban design features, building design creating a sense of enclosure with sufficient retail space to create a destination within this market. Additional discussion regarding the Main Street and retail has been provided in the Economic Development and Retail comments below.
- 4E. Two-sided Main Street: Based on the continuing dialogue regarding the location of the main street, the need for a unified central gathering space, and other design issues changes will be required. Staff recommends consideration of an alternative or additional main street area as previously discussed.
- 4F. Building relationship to the street. In conjunction with the clarifications and discussions on the public spaces, we would like to prioritize building street frontage in various planning areas. For example, the north/south drive through Planning Area B shows building oriented to this street instead of other streets in the planning area. When development is proposed, there should be clear expectations in this regard. An approach may be to utilize the conceptual rendering to set those priorities across the master plan area.
- 4G. In the Design Guidelines, (7.2.2.3) Replace "Building Department" with "Planning and Development Services"
- 4H. In the Design Guidelines, (7.3) Remove language about the DRC amending text in the guidelines.
- 4I. Planning Area A-1 – The Bridge: A public vehicular connection between Parcel A, Lot 1 and the remainder of the project is important to realize the vision for this site identified in the City Center Station Area Plan. The Station Area Plan notes that the intersection of Sable Boulevard and Alameda Avenue is considered to be the gateway to the station area and should serve as the primary architectural highlight of the district. Without this connection total development on the parcel will be limited to approximately 124,000 square feet and buildings will be limited to 30 feet in height. In addition, challenging access from the east could negatively impact market interest and future land uses for this site. Staff is open to discussing options to achieve access between Parcel A, Lot 1 and the remainder of the project but additional analysis of the feasibility of a vehicular connection is needed. With your next submittal please provide a preliminary analysis of a bridge and at-grade connection to allow staff to understand the feasibility, and cost of providing a connection and provide a proposed approach for maintenance. Staff is also available to meet and discuss this issue if needed.

**5. Economic Development and Retail Comments (Bob Oliva / (303) 739-7616 / [roliva@auroragov.org](mailto:roliva@auroragov.org))**

- 5A. The question most often asked and reflected in the city's newly adopted Aurora Places Comprehensive Plan, is "Where is Aurora's downtown?" Prior to the construction of the I-225 interchange at Alameda Avenue, the Aurora Mall and the construction of Aurora's Municipal Center, the city of Aurora has identified this vacant land area now known as Metrocenter to be part of the city's downtown serving as a primary center of activity and even



had designated the area for a specialized zoning categorization of City Center. To realize this vision, a downtown should include a mix of residential, office, retail, restaurants, entertainment and other amenities. Based on data within the local Economic Development community, the goal is to create both; 1) a unique, walkable place to live/work/recreate/relax; and 2) a regional destination for residents and visitors to travel to and enjoy an overall mix of parks, exceptional restaurants, retailers and personal services occupying up to 100,00 square feet of area. In order to create a successful “park once and walk” known more commonly “walkable urbanism”, there needs to be a critical mass of both residential and office space serving as an anchor forming a base of customers that can enjoy flexible spaces which facilitates the spending money within an eclectic mix of retail/restaurants/entertainment. If this critical mass is reached, customers will travel from an average of 5-7 miles to experience this project, with average “stays” of between 1.5 - 3 hours. This is referred to as a “Destination mix” of retail/restaurants (aka Leisure and Lifestyle mix), which occupies the opposite end of the retail spectrum from a “Convenience mix” of retail/restaurants (5-15 minute “stays”).

- 5B. Downtown destination restaurants are typically sit-down restaurants with lots of outdoor spaces and seating, unique design, eclectic menus, some form of entertainment in the later hours, and a sense of activity, energy and excitement. Please note that as per the adopted Station Area Plan, franchise architecture is not permitted with the intent of creating unique, new to market destinations. The overall mix of restaurants should be more than twice the typical restaurant mix (psf) of a retail project, meaning 100,000 square foot project could have 4-5 restaurants, plus at least two focused concepts (coffee, ice cream, etc) and may occupy up to half the total retail space.
- 5C. In particular on Parcel A, Lot 1, whether or not this prominent corner property is limited due to its access challenges, the use there should be a unique destination reflective of its prominent location and serve as a “gateway landmark” for the entire development and should be unique destination use and could possibly be a music venue similar to a Soiled Dove, Ophelia’s or Golden’s Buffalo Rose.
- 5D. The other half of the retail space would be home to unique retailers selling a full variety of products that set themselves apart from the national retailers. These are not ‘Value’ retailers, these are full-price retailers selling items not found at Department stores or Target/Wal-Mart. Belmar in Lakewood, Downtown Arvada, Pearl St in Boulder and South Pearl St in Denver are examples of this type of Retail/Restaurant mix.

**6. Aurora Urban Renewal Authority Comments** (Jennifer Orozco / (303) 739-7483 / [jorozco@auroragov.org](mailto:jorozco@auroragov.org) and Melissa Rogers / [mrogers@auroragov.org](mailto:mrogers@auroragov.org))

- 6A. The developer has indicated interest in exploring options for public- private cooperation and financing. For this to occur there will be a requirement for alignment of this Master Plan document with the adopted Urban Renewal Plan and the Visioning Plan. To determine compliance and to identify gap financing, additional land use, density and infrastructure expenditures will need further definition. Please continue meeting with the Urban Renewal Staff with Jennifer Orozco at [jorozco@auroragov.org](mailto:jorozco@auroragov.org) as the primary point of contact.

***City Center District:***

- 6B. The 2015 City Center Station Area Plan envisioned a distinctive, transit-supportive area at the Metro Center station. The extensive infrastructure improvements that have been invested in the City Center “district” over the last 15 years, sets the framework to develop City Center as a Transit Oriented District providing a dense and diverse mix of uses, parks and public gathering places, that are interconnected and pedestrian accessible. The Metro Center property provides a unique opportunity to achieve this vision, while leveraging the light rail station location and creating a connection and linkage to the “four corners” districts and existing and future neighborhoods within City Center.
- 6C. The undeveloped Metro Center property, located within a TOD Core zoning district, has long been viewed with expectations of a high-density, pedestrian-oriented destination that will serve as Aurora’s downtown. To assist on-going inquires within the larger City Center district, Planning Staff initiated a public visioning exercise to confirm the public’s vision for the area, and inform the City Center and four corners districts, including the development of the Metro Center property.
- 6D. Implementation of a process for public feedback is also considered an essential step by City Council and the AURA Board associated with any financial assistance. As it pertains to the Metro Center project, the Master Plan



document must align with and meet the goals of the Aurora City Center II Urban Renewal Plan, the City Center Station Area Plan and the visioning plan.

*Proposed Metro Center Plan:*

- 6E. While the planned Metro Center retail component is still somewhat in flux, the 10,000 SF of retail located in two separate locations, as shown in the Plan, is lacking in scale and design format to fulfill the goals of creating a unique and inviting “destination”. A retail component approaching 70 to 100 thousand square feet in scale would allow implementation of a substantial main street or town square destination, and better facilitate a mix of retailers that could create a synergy of activity, interest and excitement.
- 6F. In addition, the project should address the strong public desire for some type of unique entertainment use, whether it be “live music, cultural, arts, special events or other indoor or outdoor entertainment.”
- 6G. A vehicular connection from Parcel A, Lot 1 to the remainder of the site would greatly enhance the connectivity and cohesion within the development, as well as to provide the second point of access required from the corner parcel, in order to develop a use that is higher than the approximately 130,000 square feet and 30-foot height limitation set by Life Safety codes. The City Center Station Area Plan specifies that “this high visibility intersection is considered to be the gateway to the station area and should serve as the primary architectural highlight of the District”. In addition, Parcel A, Lot 1’s location as one of the key “four corners” of the City Center Districts, places significance on what is developed on the site. The future use should be a unique and architecturally significant development (non-franchise architecture).
- 6H. The guiding underlying documents also place an emphasis on the creation of an active and well-designed presence, beginning first at the RTD station. Staff suggests a phased approach, leading with an initial focus centered around the light rail station within Parcel Areas A and C, developing both the destination retail focus along with its residential base.
- 6I. The approved Urban Renewal goals with regards to housing, specify the goal of “maintaining affordable units while creating a diversity of new units”. See the more detailed housing discussion below, but this would include offering a variety of housing choices and prices, with strong support to include medium density mixed-income and for-sale housing product in locations A and/or C, closest to the Station.

**7. Public Art Comments (Roberta Bloom / (303) 739-6747 / [rbloom@auroragov.org](mailto:rbloom@auroragov.org))**

- 7A. The Public Art Plan will require approval and payment of fees in conjunction with the Master Plan approval.
- 7B. The narrative elements about the goals for public art at the Metro Center, the prescient images, and the maps indicating what types of art opportunities might occur at specific locations are very strong and powerful.
- 7C. I did not notice a budget for the public art plan. For Metro districts, public art budgets are developed using a specific formulary that is updated annually based on acreage and land use. The version we are currently using is below.

Current Rates for Calculating the Public Art Requirement

Residential = \$330.77 per acre

Mixed Use = \$508.88 per acre

Non-Residential = \$540 per acre

- 7D. This will give the total Public art requirement. Is the development at a point where there is a sense of how the land use is going to break out? It seems like it probably is, so this would be a good time to start looking at the budget ramifications.
- 7E. Then, typically, it is recommended that 75% is set aside for the actual Professional Artist Budget, and 25% is set aside for administrative and maintenance costs as outlined below.
  - Example Project: Total Budget of \$100,000
  - 75% Professional Artist Budget \$75,000
  - 5% Public Art Plan Application Fee (paid to City) \$ 5,000
  - 10% Future Maintenance & Repairs (set aside) \$ 10,000
  - 10% Project Coordination (up to 10%) \$ 10,000
- 7F. The other element that is missing is some sort of timeline. Which areas will be developed first, and approximately when is it anticipated that will that begin? How will the public art process overlap with that development on-site? We are not looking for dates like mid-September 2022, but it could be broader like "third quarter of 2022."



## **8. Streets, Light Rail and Pedestrian Issues**

- 8A. Street Dedication must be addressed as part of the development of each planning area through a plat.
- 8B. Safe pedestrian connections to the Metro Center Light Rail stations are important. Those connections should be provided outside of the current bus circulation area as well as the parking lot so that if that area is redeveloped, sufficient connections from this development to the station will be provided.

## **9. Parking Issues**

### *Design Guidelines*

- 9A. (1.3.9) The commentary about visible parking is not understandable and it is not clear what you mean - visible as in surface parking? This appears contrary to much of the intent of code to minimize the visual impact of surface parking.
- 9B. (4.17) Two of these standards on the parking structures conflict with code requirements, relating to the maximum height of lighting on the top floor of the parking structure code limits this to 12' and code also has a minimum height of ground floor clearance. Please remove these or clarify.
- 9C. (7.2) there is a duplicate Section 7.2
- 9D. Except on a very limited basis, surface parking is not permitted. Shared parking is encouraged. Section 146-2.4.6.F states, "For properties located in the MU-TOD Core subdistrict, at least 80 percent of provided parking shall be located in parking garages or alternate parking facilities, such as elevated parking lifts, rather than surface parking lots, Please be aware that the only manner in which you can exceed the maximum parking in the zone district is through structured parking." Planning Areas B-1, B-2, C-2 and C-3 do not meet this criterion.
- 9E. Section 146-4.6.5.A.2.a states that no more than 25% of the lot frontage on arterial or collector streets to a depth of 60 feet shall be occupied by surface parking. *This criterion is not being met, especially with the parcels in Planning Area B. The illustrative plans should not show circumstance of exceeding the 25% limitation.*

## **10. Architectural and Urban Design Issues**

- 10A. The area defined as a "Drainage Easement" on your plans was part of Transportation Improvement Grant and requires significant landscaping and urban design enhancements to function as an activated park space also serving as the pedestrian primary connection to the light rail platform. Internal connections should traverse through this space connecting both to E. Alameda Drive and Parcel A, Lot 1.
- 10B. Please refer to the design guidelines for redlines.
- 10C. Planning Area C Park Space and related issues. An emphasis with the next submittal is to locate the primary "park" space for Planning Area C in a more central location within the residential area with design elements consistent with the Station Area Plan (SAP) and other details identified within PROS comments. The Station Area Plan emphasizes the importance of open space in terms of key TOD Principles and fundamental concepts of the plan. The current master plan submittal provides some parks, plazas or open space features which are not centrally located, are not well connected, appear to be remnants surrounding building sites, or do not meet PROS standards.
- 10D. While the Dawson Street urban plaza is a desirable design element it is some distance from the residential core of the project in Parcel C. Planning staff maintain a centrally located park or plaza is needed in the southern portion of Parcel C to serve the substantial population in that area, create a clearer identity for the area and connect with other parks and plazas.
- 10E. 4B. Clarify which spaces are anticipated to qualify as SUPs. You have proposed a variety of amenity spaces ranging from usable green spaces and plazas that, according to PROS, do not qualify as SUPs. You have also identified a number of Small Urban Parks (SUPs). It is a little unclear which amenity spaces you anticipate to qualify as SUPs as defined by PROS and which spaces are development expectations for the planning areas. We would like to coordinate with you and PROS to clarify this differentiation. Once we identify any non-SUP public spaces, we will work with you to have clear expectations for future development.



## **11. Signage Issues**

- 11A. It is important to locate proposed multi-tenant monument signs so as to minimize the number of signs along the E Alameda Parkway and South Chambers Road streetscapes.

## **12. Landscaping Issues (Chad Giron / 303-739-7185 / [cgiron@auroragov.org](mailto:cgiron@auroragov.org) / Comments in bright teal)**

### **Design Guidelines**

#### Page 2

- Change the footer on all sheets to “Metro Center Design Standards and Guidelines”.

#### Page 12

- Add the circles with description to the map legend.
- Show potential future street crossing and add to the legend. This should be shown on all maps throughout these submittal documents.
- Add light rail to the legend.
- Add the street names to the maps for easier reference.
- The street legend lines should be dashed to match the plan.

#### Page 13

- The MU-TOD standards defer to the UDO Parking, Loading and Stacking standards. Off-street parking facilities shall be located to the rear of the primary building, within the principal building, within a garage structure or entirely below grade, but may not be located between the building and public street facing facade. Section 146-4.6.5.A.2.
- Drive-thru businesses are not permitted within a TOD.
- Include street names for easier reference.

#### Page 14

- Show potential future street crossing and add to the legend.
- Extend the elevated bike lanes to Sable Blvd.

#### Page 16

- Move the highlighted guideline to the Design Standard.
- All illustrative graphics must indicate the possible future street connection with at least a dashed line.
- Add the Urban Streetscape Standard is a minimum of 16’ wide and shall be used throughout the Metro Center.

#### Page 17

- Show potential future street crossing and add to the legend.
- Add internal street names to the map.

#### Page 18

- Add description of how the elevated bikeway will be vertically separated.
- The Urban Streetscape Cross-Section is 16’ wide. Please modify the proposed plans and graphics to reflect this standard.
- Add internal street names. Enlarge map on page if necessary.
- Please extend the dimension lines down from the cross-section to the plan view to confirm dimensions.
- The graphic does not accurately reflect the urban streetscape standard. Please show trees in a 5’x15’ tree opening and hardscape.
- Extend the elevated bike lands to Sable Blvd. Add this to all graphics shows the proposed elevated bike lanes.

#### Page 19

- Show the potential future street crossing and add to the legend.
- Add Virginia Ave. to the map. Enlarge the map if necessary.

#### Page 20

- Show the potential future street crossing and add to the legend.

#### Page 21

- The highlighted text is barely legible at this scale. Either enlarge the graphic, enlarge the text, or don’t rasterize the text on any cross-sections.
- Change all references of a tree lawn to Curbside Landscaping within this document.



- Extend the dimension lines from the cross-section or add new dimension lines to the plan view for clarification.
- Add another dimension line that combines the sidewalk with amenity zone on all graphics to show compliance with the 16' minimum width of the Urban Streetscape standard.
- The legend information is difficult to see at this scale. Please enlarge the map.
- Please show the direction of the numbered section views, street names and north arrows on all Key Maps for clarification.
- Trees should be in 5'x15' openings.

Page 22

- Add "Deciduous Shade Trees...". Add this description for all street trees.
- Add "...Curbside Landscaping that meets or exceeds current City Urban Streetscape Standards."
- Show trees in 5'x15' openings.

Page 23

- Since Sable Blvd. has an existing 10' multipurpose path, please extend the elevated bike lane to Sable Blvd. to better connect these valuable multipurpose pathways.

Page 24

- 16' minimum Urban Streetscape standard.
- Label the widths of the planting area and sidewalk when not specifically dimensioned above in all plan view cross-section graphics within this document.
- Add "...that meets or exceeds current City Urban Streetscape Standards."

Page 25

- Add "...that meets or exceeds current City Urban Streetscape Standards."

Page 27

- Add 5. Landscape: Urban Landscape Character

Page 33

- The master plan should have a large, usable park space that is more central to support the residential development with surrounding activated ground floor uses.
- It is preferred that one of these green space areas around this intersection be enlarged to create a larger and more usable active park area for the residents and office users on the east side of the development.
- The Master Plan Graphic calls this a Pedestrian Plaza. Please clarify the difference or use consistent language throughout the proposal.

Page 34

- Add "...that consists of plant specimens having a high degree of visual interest during all seasons."
- Please add a cross-section like what is shown on page 51, but include some of the RTD parking to the west and the full width of the plaza to the east.

Page 38

- Add "...meet or exceed the City's current Landscape Standards."
- Move the highlighted Guidelines to Standards.

Page 39

- Specify the screening method where highlighted.
- The London Planetree have not proven to perform well in Aurora.
- Add "... and what is allowed in the UDO."

Page 40

- Please be advised that the MU-TOD standards defer to the UDO Parking, Loading and Stacking standards. Off-street parking facilities shall be located to the rear of the primary building, within the principal building, within a garage structure or entirely below grade, but may not be located between the building and public street facing facade. Section 146-4.6.5.A.2.
- What is parking right-of-way? Is this trying to state that parking will not front along a right of way?

Page 46

- Primary buildings entrances should face the street.
- Move the Guideline highlighted to the Standard.

Page 65

- Add "... Plans, Documents and Criteria."
- Add "... and Documents."
- Add "Unified Development Code"
- Change Building Department to Planning and Development Services Department.

Page 66

- Change waiver to adjustment.
- Change builder to applicant.
- Remove the highlighted text.

**Master Plan**Page 2

- Use consistent language throughout the Master Plan document. The highlighted callout and legend text should reference a potential future vehicular and pedestrian connection.
- Reference to this future vehicular connection must be indicated on all graphics throughout the Master Plan and supporting documents. All proposed improvements must not prohibit the possibility of a future vehicular at-grade or bridge crossing in this location.
- The master plan should have a large, usable park space that is more central to directly support the residential development with surrounding activated ground floor uses.
- Extend the Elevated Bike Lanes to Sable Blvd.
- It is preferred that one of these green space areas around this intersection be enlarged to create a larger and more usable active park area for the residents and office users on the east side of the development.

Page 3

- All illustrative graphics must indicate the possible future street connection of the two planning areas with at least a dashed line.
- Why does the highlighted section of the elevated bike lane look different than the other sections that are colored green?

Page 5

- Add the view direction lines to match the previous sheet graphics for clarification.

Page 6

- The Plazas and Promenades labels do not match the Master Plan that calls out a Pedestrian Plaza in the same locations. Please use consistent labels throughout the proposed documents to avoid confusion.

Page 7

- The Urban Streetscape Cross-Section standard is 16' wide.
- Extend the dimension lines down to match the plan view.
- Please show a more accurate representation in all plan views to what may be installed and not just a hatch pattern in two different areas that will not have the same surface treatment.
- Show trees in 5'x15' tree openings.
- Extend the Elevated Bike Lanes to Sable Blvd.

**13. Addressing** (Phil Turner / 303-739-7357 / [pturner@auroragov.org](mailto:pturner@auroragov.org))

- 13A. Please provide a digital .shp or .dwg file for addressing and other GIS mapping purposes. Include the parcel, street line, easement and building footprint layers at a minimum. Please ensure that the digital file provided in a NAD 83 feet, Stateplane, Central Colorado projection so it will display correctly within our GIS system. Please eliminate any line work outside of the target area. Please contact me if you need additional information about this digital file.



## **REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES**

### **14. Civil Engineering** (Kristin Tanabe / 303-739-7306 / [KTanabe@auroragov.org](mailto:KTanabe@auroragov.org) / Comments in green)

#### Public Improvement Plan

- 14A. An at-grade crossing to PA-A1, even for emergency access only, will require an evaluation of drainage characteristics, and specifically depth of flow, across the trail/secondary accessway. Even a small depth of flow could prohibit an at-grade crossing. (Haley B. Johansen)
- 14B. The Master Plan will not be approved until the Master Drainage Study is approved.
- 14C. Add that improvements outside the described planning area may be required to meet these demands (page 3)
- 14D. Is there a reason why each planning area was not separated? The descriptions were separated as far as improvements. Page 4
- 14E. These elements are discussed in the following sections (typical all planning area descriptions) page 4
- 14F. The exhibit implies full sections will be constructed. Please clarify, typical
- 14G. Existing Fraser Court is currently private. In order to be public, the existing pavement and improvements will need to be analyzed and verified they meet current standards. Additional repairs or mill and overlay may be required
- 14H. Could this exhibit not fit on this page at a 1:100 scale? the details for the utilities are difficult to see, typical.
- 14I. Park area is usually identified. A reference to the small urban park is in note 4, but not clearly identified on the exhibit
- 14J. The different sections are not identified on the exhibit. Also, Centrepoint is an existing roadway. Portions of it also have existing sidewalk and landscaping. Please clarify the sections
- 14K. Alameda Drive is existing with existing improvements on the east side. Please clarify
- 14L. Existing Fraser Court is private. There is also existing sidewalk and landscaping on the west side
- 14M. There is no designation on the exhibits identifying the different sections

### **15. Transportation Planning**(Tom Worker-Braddock / 303-739-7430 / [tworker@auroragov.org](mailto:tworker@auroragov.org))

- 15A. No comments yet as of 12-17-20.

### **16. Traffic Engineering** (Brianna Medema / 303-739-7336 / [bmedema@auroragov.org](mailto:bmedema@auroragov.org) / Comments in amber)

- 16A. No comments yet as of 12-17-20.

### **17. Fire / Life Safety** (John Van Essen / 303-739-7489 / [jvanesse@auroragov.org](mailto:jvanesse@auroragov.org) / Comments in blue)

#### Public Improvement Plan & Sheet 3 of Master Plan

- 17A. No additional comments.

### **18. Aurora Water** (Tony Tran / 303-739-7376 / [atran@auroragov.org](mailto:atran@auroragov.org) / Comments in red)

#### Master Utility Study

- 18A. Address minor technical comments.

### **19. PROS** (Michelle Teller / 303-739-7437 / [mteller@auroragov.org](mailto:mteller@auroragov.org) / Comments in mauve)

#### General

- 19A. Based on the proposed density of 1094 TOD units, the total park land dedication requirements are as follows:
- 6.63 acres of Neighborhood Park
  - 2.43 acres of Community Park
  - No open space land dedication is required since this is a TOD site.
- 19B. Any park land which is not met on site must be paid via cash-in-lieu with the residential plat.
- 19C. Other reports such as the Master Utility study and correspondence with the Aurora Urban Renewal Authority show significantly higher counts. These unit counts should be consistent.

Master Plan

19D. Page 1:

Add a note to the front of the Master Plan which references the following:

- “The \$234,300 development contribution to matching funds for a federal grant is due at time of 1st plat (residential or commercial). This payment and the costs incurred to install landscaping, irrigation or other recreation amenities within the trail easement will be credited toward satisfying Community Park Development fees for the entire Metro Center Project.”

19E. Page 2:

- This location of Park C1 does not meet the requirement of being ‘highly visible and inviting’. Please relocate or shift to be more centrally located.
- Provide a formal proposed unit count table with totals. Based on density it looks like 1094 MF units are proposed.
- What difference is there between the asterisk for the plaza/pocket park and the green boxes denoted as park. Please make a clear identification between Small Urban Parks and all other non-PROS related plazas?

19F. Page 3:

- This area does not meet the SUP criteria for high visibility, please relocate.

19G. Page 5:

- You have this labeled as park but per this graphic it seems to be outdoor seating that is private to the adjacent commercial. Note that if this location is retained, at time of site plan please coordinate with PROS on keeping everything publicly accessible and meeting SUP criteria.

19H. Page 6:

- Update the triggers to say completed at 50% CO of surrounding planning area.
- Why are the spaces within C1 separated out? If they are all contiguous please combine into one. It’s also unclear that there is a SUP in C1 separate from the Park that’s shown?
- Provide a line for the total NP credit and CP credit (drainageway) that’s being proposed for tracking purposes.
- The trigger for the bikeway should be noted and consistent with the PIP. Remove this from Form J.
- The standalone bikeway is not eligible for SUP credit. You may include sections that *directly* abut a SUP but the bike lane alone does not meet the requirements outlined in the PROS dedication manual for all the elements required. See areas outlines in the adjacent map for what PROS will accept for credit.
- Remove land dedication number 3; so long as minimum size requirements and totals are met, shifting acreage at time of site plan/plat is not an issue.
- Remove land dedication notes 4 & 5.
- Per the agreement, the trail corridor improvements total 2.42 acres; the additional your proposing should be outside of PROS property boundary and included within the SUP below.
- Note the separated 0.89 CP credit and 1.32 NP credit here for tracking.

19I. Page 8:

- Why is this separate from the ped plaza when the whole plaza is requested for credit? Please create a consistent notation.

Public Improvement Plan

19J. Specifically note the improvements to the drainageway in accordance with the approved landscape plan set.

Include the trigger consistent with Form J.

19K. Note that the drainage/trail corridor is PROS property and all work within the corridor needs to be coordinated with PROS and covered by a license agreement.



Design Guidelines

- 19L. Please note that you have language that is not consistent with PROS requirements regarding small urban parks. Update all minimum sizes to state 10,000 which is the approved minimum for any small urban park. Smaller parks will not be accepted for neighborhood park land dedication. As a TOD site, you receive an incentive which removes any requirements for open space, so therefore sites under 10,000 are not required on site.
- 19M. Formalize the map as an open space and circulation map within the Master Plan document, including the planning labels for every small urban park.

**20. Real Property** (Maurice Brooks / 303-739-7294 / [mbrooks@auroragov.org](mailto:mbrooks@auroragov.org) / Comments in magenta)

- 20A. Add the standard site plan notes to the general Notes.
- 20B. Any easements being released (vacated) and/or dedicated must be done by separate document or they may be dedicated on the proposed subdivision plat. Any new R.O.W. may be dedicated by the proposed Subdivision Plat also.

**21. Mile High Flood District** (Mark Schutte / 303-455-6277 / [submittals@udfcd.org](mailto:submittals@udfcd.org))

- 21A. Project is maintenance ineligible. Please see attached letter for additional detail.

**26. Aurora Public Schools** (Josh Hensley / (303) 365-7812 / [jd hensley@aurorak12.org](mailto:jd hensley@aurorak12.org))

- 26.A In accordance with Section 4.3.18 of the Unified Development Ordinance there will be a school land dedication obligation for residential units approved as part of the Metro Center project. The amount of the obligation will be based on the number and type of units approved. Aurora Public Schools will likely accept cash-in-lieu of land for this obligation valued at market value of zoned land with infrastructure in place. Cash-in-lieu is due at the time of first plat recording. *This calculation will have to be updated once staff gets a clarification on the number of units.*

**MAINTENANCE ELIGIBILITY PROGRAM (MEP)**  
**MHFD Referral Review Comments**

For Internal MHFD Use Only.	
MEP ID:	106325
Submittal ID:	10005491
MEP Phase:	Referral

**Date:** December 2, 2020  
**To:** **Heather Lamboy**  
*Via Aurora Website*  
**RE:** MHFD Referral Review Comments

<b>Project Name:</b>	Metro Center (RSN 1478635)
<b>Location:</b>	Southeast of Alameda Ave and Sable Blvd
<b>Drainageway:</b>	Aurora Mall Drainage

This letter is in response to the request for our comments concerning the referenced project. We have reviewed this proposal only as it relates to maintenance eligibility of major drainage features, in this case:

- It is our understanding that the stream through this project, the Aurora Mall Drainage, was piped through the property as the result of a previous project. If the stream is to remain in a pipe, the project is Maintenance Ineligible.
- Based on the documentation provided, it does not appear that there are any proposed changes to the pipe section of the Aurora Mall Drainage. At this time, we have no comments on this project.
- If this project intends to change this piped section to open channel, then it would become Maintenance Eligible and the District would want to review future submittals at that time. If no changes occur, we do not need to see future submittals.

We appreciate the opportunity to review this proposal. Please feel free to contact me with any questions.

Sincerely,



**Mark Schutte, P.E., CFM**  
Project Engineer, Watershed Services  
Mile High Flood District

