

August 14, 2020

Heather Lamboy
City of Aurora
15151 E Alameda Parkway, Suite 5200
Aurora, CO 80012

Re: **Metro Center #1449821**
Response to Pre-Application Comments

Dear Heather,

Thank you for your Pre-Application Comments for Metro Center, which we received on May 7, 2020. We have reviewed all the comments and have addressed them in the following pages.

Please feel free to contact me directly should you have any other comments, questions and/or special requests for additional information. We look forward to our continued collaboration with the City of Aurora, to make this new mixed-use community a success.

Sincerely,
Norris Design



Eva Mather
Principal

Key Issues:

- **Replat application:** Planning & Development Services requires that the Master Plan (reviewed as a Schedule III in 17-18-weeks) be aligned and defined in accordance with city requirements before the replat application can be reviewed and approved administratively, in a 12-13-week timeframe .
Response: Comment noted, thank you. As discussed at the pre-application meeting, we anticipate that a master plat will be submitted with the Second submittal.
- **Visioning Plan:** The city has initiated a short-term planning effort to develop a vision and development framework which includes the subject property, as well as adjacent properties. The applicant has been invited to participate as a key stakeholder in this public process. The city will lead these outreach efforts to engage the community and to further define this critical Downtown urban center. The resulting area plan will be a valuable tool in guiding future development, defining the elements required for a destination driven downtown, aligning with the adopted Urban Renewal Plan, and facilitate the city’s review of development proposals in the area.
Response: Comment noted, thank you.
- **Urban Renewal Funding:** The developer has indicated interest in exploring options for public-private cooperation and financing. Please see notes regarding the city’s recommendations on a path forward beginning on page 10.
Response: Comments are noted, thank you.
- **Retail Criteria:** At this point, the retail components of the project that have been discussed reflect the suburban strip centers that already surround the site. The applicant has outlined their desire for a more suburban format and refers to the original plan that allowed for a transition from urban to suburban to tie into the strip centers across Chambers. Please find specific notes relating to proposed uses on page 11, and notes specific to restrictions on drive-throughs, per Planning’s comments on page 16.
Response: Comment noted.
- **Street Grid:** The expectation is that the street network will at a minimum reflect the street grid layout identified in the Station Area Plan (Station Area Plan III. Development Standards.) The Master Plan proposal will need to include additional streets. In addition, the TOD zone district includes maximum block lengths and a maximum block perimeter of 1,800 linear feet.
Response: Acknowledged. The Metro Center Design Guidelines detail strategies on achieving the block length requirement at time of Site Plan. In addition, a waiver has been requested to allow the master plan to be approved with the block lengths as proposed in this application so long as the corresponding site plans follow the design strategies.
- **Parking Plan:** A conceptual parking plan for the Metro Center Station was drafted in April 2014. It calls for the eventual construction of a minimum 3-level structured parking building with the ground floor dedicated to the existing, reconfigured bus transfer facility. Please refer to parking garage options as laid out graphically in the City Center Station Area Plan.
Response: Noted, thank you. The garage facility shown in the Station Area Plan is located on RTD property. The Owner/Applicant looks forward to working with all parties on a viable parking solution.
- **Public Art Standards:** As you continue to refine the Public Art Plan for this development, please refer to the standards and concerns beginning on page 21.
Response: Comment noted.

- **Park, Recreation, and Open Space (PROS) Coordination and Standards:** There are outstanding requirements from the previously approved master plan regarding the existing trail and open space corridor on the northwest portion of the site. Additionally, the Small Urban Parks (SUP) as shown do not meet the minimum 10,000 square feet size requirement. Please review the PROS comments beginning on page 22 and work with the department to ensure the SUPs meet the city’s goal of encouraging civic engagement and outdoor recreation while incorporating unique programming elements and promoting site connectivity.
Response: Small Urban Parks shown are proposed to meet the minimum 10,000 sf minimum.
- **Storm Drainage Development Fees:** There is no record of storm drainage development fees being paid for this property. These are separate from the City Center pond fees and must be paid *prior to platting*. For a full listing of Utility Fees, please see the Aurora Water Fee Schedules.
Response: Comment noted.
- **RTD Coordination:** Coordinate with RTD regarding roadway connectivity to Alameda Parkway from the RTD parking lot. A pedestrian only connection from this RTD parking lot to Alameda Parkway is not sufficient, and vehicular connection is required per the Metro Center Station Site Plan. For these meetings with RTD, please include Public Works City Staff members. See pages 26 and 29 for more information, including contact information for the city’s liaison at RTD.
Response: Comment noted. The applicant has been in communication with RTD and we believe the road layout as shown reflects their preference per those discussions. We look forward to working with all parties on this as the master planning effort evolves.
- **Roadway Design:** The city’s Traffic Engineer has several comments regarding roadway design and pedestrian safety beginning on page 26. Please reach out to schedule meetings as necessary to work through enhanced crossing designs over Centrepont Drive, as well as modified street sections if off-street bicycle facilities continue to be proposed.
Response: Comment noted. Centrepont Drive proved a challenge for an urban development given the significant pavement section. The traffic study shows that a 2-lane collector road through this site is warranted. The application proposes a narrowed road section within the existing ROW that includes elevated bike lanes to provide connections from Tollgate Trail and the Drainage Easement trail to Metro Center Station.
- **Roadway Classification:** New roadways or existing roads that are not currently public shall be private.
Response: Metro Center proposes public roads to serve the overall public good for the City of Aurora. Significant roadway improvements are proposed within the existing oversized rights-of-way and we believe that the City shown own, maintain and be proud of these enhanced road sections.
- **Second Point of Access:** The drawings provided show a second point of emergency access from Parcel A, Lot 1 utilizing the RTD site to the south to access Centrepont Drive. Currently, the RTD site, Centrepont Sub. Fig. No. 4 does not contain a fire lane or public access easement. To formally establish this secondary emergency access, the applicant must acquire a cross access agreement in the form of a fire lane and public access easement from RTD. Please work directly with Real Property to define what is required to obtain this cross-access agreement.
Response: Comment noted. A second point of access for Parcel A, Lot 1 will be addressed at time of Site Plan. There is currently no EVA proposed through the RTD site.
- **Fire Department Access:** Please carefully review the fire lane easement and fire apparatus access requirements on pages 31-32 and ensure roadways are designed to meet these standards.
Response: Comment noted.

Planning and Development Services Department

The Planning comments are numbered. When submitting an application, please include a letter of introduction responding to each of the numbered comments, including key issues from other departments.

Key Issues:

- A Master Plan is required which addresses providing a system of coordinated streets, sidewalks, open spaces and infrastructure systems and improves and expands multi-modal connections to adjacent sites, neighborhoods, and Metro Center Station. The Master Plan must be consistent with the goals and design standards set forth by the City Center Station Area Plan and the Aurora Places Comprehensive Plan.
- A Public Improvement Plan is required and should address streets, infrastructure, and parks and open spaces, along with the required master utility, traffic and drainage plans.
Response: Comment noted. A PIP is included with this application.
- The Design Guideline comments are very general in nature and will have additional scrutiny when the Master Plan application is submitted. There are several items that should be addressed, including providing a consistent architectural theme across the development as well as more clarity on the standards and guidelines, as well as the DRB review process.
Response: Comment noted. Please see Metro Center Design Guidelines that accompany this letter.
- In addition to Planning's comments, comments have been provided by the Aurora Urban Renewal Authority, the Comprehensive Planning staff, the Retail Specialist, and the Public Art Coordinator.
Response: Comment noted, thank you.
- There is the expectation that neighborhood and urban parks are provided on site. The amount of on-site parkland will be determined as part of the review process. A sample table has been provided below that was drafted during a previous Master Plan review of the site.
Response: The Metro Center Master Plan anticipates 10.3 acres of area to be credited towards the required public land dedication. Any additional PLD required will be paid by cash-in-lieu at time of final plat.
- A Master Developer in coordination with the developers of the planning areas is needed to ensure that well-defined overall vision in accordance with Aurora Places, the city's Urban Renewal Plans and Transit Oriented Development is realized.
Response: Comment noted.
- The master developer is responsible in ensuring the Master Plan vision of creating an active urban district is implemented as individual projects are developed.
Response: Comment noted.
- Design Standards must include the Required Density by Planning Area
Response: Comment noted. Please see Metro Center Master Plan submittal that accompany this letter.
- Street Dedication must accompany any plat documents
Response: Comment noted.

Standards and Issues:

1. Zoning and Aurora Places Placetype

1A. Zoning

The MU-TOD district is intended to foster special, sustainable and urban places near transit stations that include places to live, work, shop, and recreate, to reduce reliance on the automobile and encourage the use of public transit, encourage job creation and economic growth through proximity to transit, encourage the integration of sustainable features such as green roofs, and provide citizens with new housing and lifestyle choices with a high level of amenities and social interaction. The Metro Center site has two subdistricts of TOD, which includes “Core” illustrated in blue on the graphic, and “Edge” illustrated in green on the graphic. Each district has unique standards, with the Edge district providing for a medium to high density transition from the high intensity of the Core district.

In addition to the typical design standards in the UDO, the TOD zone district, UDO Section 2.4.8, contains numerous design standards. The TOD regulations are further informed by the City Center Station Area plan. Where there may be a conflict between zone district standards and the Station Area Plan, the Station Area Plan standards will apply. The Station Area Plan includes a robust framework to guide the development of the Metro Center.

Response: Comment noted. Please see Metro Center Design Guidelines that accompany this letter.

In Section 3 below, further analysis and information regarding TOD zone district standards will be provided.

1B. Placetype and Aurora Places

1C. Master Plan

Metro Center (as well as the Town Center at Aurora, Aurora City Plan, and the Aurora Municipal Complex) is located in an **Urban District** Placetype. Urban Districts are critical to the economic and fiscal health of the city because it is a center of employment, culture, and activity. The Placetype calls for a mix of uses in an urban fabric which has a pedestrian- and bicycle-friendly environment. Primary land uses include multi-family residential development, restaurants, commercial retail, commercial service, office, and entertainment and arts districts. Through the city’s Aurora Places adoption, it was clearly determined by the community that this site should serve as the primary location within Aurora’s Downtown.

Response: Comment noted. Please see Metro Center Master Plan and Design Guidelines that accompany this letter. Metro Center is designed as a mixed-use urban, walkable neighborhood with connected small urban plazas and parks. Ample bikeways and detached sidewalks enhance the pedestrian experience.

A Master Plan will be required in order to guide development in the Metro Center area and provide for a similar site design and architectural vocabulary across the site. The TOD zone district addresses motor vehicle parking, design standards, streets and public spaces, building form and design, site furnishings, lighting, and public art. The Master Plan will provide guidance for design development and ensure predictability as each Site Plan is proposed for development. The master developer is responsible for managing the development and disposition of sites from planning refinement to final buildout, overseeing site preparation and shared infrastructure development, design review, maintenance, asset management.

Response: Comment noted.

The required Letter of Introduction should address how the project meets the Master Plan criteria for approval. A Master Plan shall only be recommended for approval to the Planning Commission if:

- a) 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), the adopted Aurora City Center Urban Renewal Plan and all other adopted plans and policies of the City Council;

- b) It identifies a Master Developer and Master Plan that will foster future development of the property which complies with all applicable standards;
- c) It will result in a coordinated system of streets, trails, sidewalks, open spaces, and infrastructure systems that are integrated into the surrounding area and does not create significant adverse impacts on the surrounding area; and,
- d) It will improve or expand multi-modal with park and open space connections to adjacent sites, neighborhoods, and urban centers.

Response: Metro Center provides a design that stitches together the expectations of the Comprehensive Plan, provides an integrated system of streets, trails and multi-modal experiences connecting the numerous small urban parks and pedestrian plazas located around the site. To best meet market demands, several adjustments are requested to assist in the development of the 1st Generation for Metro Center.

1D. Comprehensive Planning Comments.

Chapter 4 of the *Aurora Places Comprehensive Plan* describes future development and land use in terms of “placetypes.” Placetypes generally describe the overall character of a place. Each of Aurora’s ten placetypes includes a typical land uses mix, key urban design features, the mobility network, and other physical and functional elements that define each type of neighborhood or mixed-use district. While placetypes generally share defining features, each individual place is encouraged to take on its own unique character and specific mix of uses to meet local needs and desires.

The City Center area, including the Metro Center parcels and the Town Center at Aurora parcels, is defined by the plan as the “Urban District” placetype (https://www.auroragov.org/business_services/planning/plans_and_studies/comprehensive_plan).

The comprehensive plan describes Urban Districts on pages 28-29. Key characteristics of this district include:

- Urban Districts are Aurora's signature destinations that offer a unique, vibrant urban experience.
- The Urban District is the city’s most intensely developed area with mixed-use, entertainment, institutional, retail, restaurant and multifamily residential as defining uses.
- Predominantly mixed-use developments accompanied by a small amount of stand-alone commercial and multifamily uses characterize the Urban District.
- Urban Districts are developed with a complete grid of streets creating relatively small urban blocks. Easy, short pedestrian and bicycle provide connections to surrounding districts and neighborhoods.

Furthermore, the property is within a designated “Urban Center” as defined in DRCOG’s Metro Vision plan. As noted in the *Aurora Places Comprehensive Plan* (pages 52-53):

“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. Metro Vision establishes a goal of having 25 percent of new housing and 50 percent of new employment in urban centers by 2040. By focusing growth into strategic areas, the city can capitalize on valuable development opportunities and build upon existing transportation networks and infrastructure.”

Office, institutional, retail, restaurant, services, hospitality, and/or entertainment uses should support the concentration of employment opportunities at this location, in addition to a concentration of residential density. The property’s location immediately adjacent to the Metro Center station and within convenient access to I-225 makes it a prime location for a significant employment, retail and entertainment, and residential center.

The Aurora Places Comprehensive Plan, (“A Strong Economy”, Pages 88-89), also sets goals addressing the continued support of primary employment to bolster the local economy:

- Create highly active urban districts as locations for knowledge-based businesses, desired retail, unique entertainment and local entrepreneurs and for people who desire convenient urban areas to live and work. Create these areas as intensely developed, mixed-use places to attract talented workers and higher-paying jobs.
- Work with the development community to encourage construction of high-quality office space in urban districts, innovation districts and other placetypes.
- Identify and reserve ideal locations for significant and strategic commercial and employment uses in Urban District, Innovation District, City Corridor, Commercial Hub and Industry Hub placetypes.

Additionally, as required by Aurora Places to realize the city’s designated Downtown, the city has initiated a short-term planning effort to develop a vision and development framework which includes the subject property, as well as adjacent properties. The applicant has been invited to participate as a key stakeholder in this public process. The city will lead these outreach efforts to engage the community and to further define this critical Downtown urban center. The resulting area plan will be a valuable tool in guiding future development, defining the elements required for a destination driven Downtown, aligning with the adopted Urban Renewal Plan, and facilitate the city’s review of development proposals in the area.

Response: Metro Center provides a design that stitches together the expectations of the Comprehensive Plan, provides an integrated system of streets, trails and multi-modal experiences connecting the numerous small urban parks and pedestrian plazas located around the site. To best meet market demands, several adjustments are requested to assist in the development of the 1st Generation for Metro Center.

1E. Aurora Urban Renewal Authority Comments.

The entire property is within the Aurora City Center Urban Renewal Area, which was established in 2009 in order to advance the City’s longtime vision for the area:

*“[the] transformation of Aurora City Center into a high-density, pedestrian-oriented **downtown** for Aurora, with a mix of uses including residential, government, retail, office and multimodal transit resources.”*

Since at least 1982, city plans have sought to “provide adequate open space and pedestrian access in a high-density urban environment and to further the sound economic growth of the City of Aurora.” To this end, any publicly-supported development of the property must satisfy three key goals of the urban renewal plan:

- *First, by servicing the whole city with a pedestrian-interconnected mixture of high-quality government, open space, cultural, residential, transportation and retailing resources available nowhere else.*
- *Second, by creating a strong landmark civic center...*
- *Third, by creating an attractive regional retailing center with a strong common image.*

The developer has indicated interest in exploring options for public-private cooperation and financing. Four TIF areas already exist on portions of the property: TIF 1 (northeast corner) was established in 2009 and TIFs 2-4 (northwest corner) were established in 2015. If the developer anticipates seeking assistance in an existing or future TIF area, it is essential that the development be unique, high-quality and well-matched to the public’s ambitious goals for this area.

As presented, the proposed Master Plan lacks the level of specificity necessary to evaluate the need and appropriateness of public incentives. Urban renewal staff propose a series of meetings with the developer to give additional guidance and direction on what would be required to evaluate both the quality and types of development, as well as to calculate the potential level of public incentive that could be supported and warranted. Property owner

charrettes are planned as part of the larger, public visioning process that the city has undertaken for this area. However, the staff/developer discussions can begin immediately and can run in tandem with the (virtual) public outreach that Planning & Development Services staff will be conducting.

The public outreach process will be especially important if the proposed development will require an amendment to the urban renewal plan to establish new or revised TIF areas. Such an amendment would require the support of City Council and the AURA Board, as well as potentially lengthy negotiations with the taxing entities under HB 1348. The development's conformance with the outcome of the public visioning will be a key consideration by the Board. Please note that in addition to the existing list of urban renewal goals, that the Board has indicated a strong desire for the creation of primary jobs through office development, to foster local and small businesses and provide for a diversity of housing components on this site.

Response: Comment noted. We look forward to working with the Urban Renewal Authority to help achieve the vision for this site and ensure a successful viable development

1F. Bob Oliva, Retail Specialist Comments

To truly realize this site as part of the city of Aurora's Downtown, the overall adopted vision for this project should be for a unique, destination-oriented urban district that combines retail, entertainment and commercial office in an urban format. The Aurora Places description for Authentic Aurora (pages 96-99), should be considered and include practices such as:

- "Create intensively developed urban districts with a mix of residential and commercial uses, focused around great public spaces where people can live, work and come together, and;
- In urban districts, innovation districts, commercial hubs and city corridors, use coffee shops, restaurants, outdoor spaces, recreation centers, shared work spaces and community gathering places to promote natural interaction between people;
- Treat TOD areas as key entry points to the city with quality urban design, public art and innovation businesses."

Response: Comment noted. We believe we address all of the above criteria in the Metro Center Design Guidelines that accompany this letter.

This unique urban design should address walkability, store designs, traffic flow, access, density, unified site furnishings, signage, etc.

Response: Comment noted. Please see Metro District Design Guidelines that accompany this letter.

Comments addressed to Developer's proposal and description of a retail center located at Parcel B, Lot 1 (SW Corner of Alameda and Chambers) and Parcel B, Lot 3 (South along Chambers):

At this point, the retail components of this project that have been discussed reflect the suburban strip centers that already surround the site. The applicant has outlined their desire for a more suburban format and refers to the original plan that allowed for a transition from urban to suburban to tie into the strip centers across Chambers. More specifically:

- Drive-through windows: The applicant has stated numerous times that there are multiple potential users who require drive-thru windows. Drive-through windows are considered a suburban design feature; the urban version is a walk-up or pick-up area.

Response: Comment noted. While we acknowledge that drive-thrus are a conditional use, we felt it was important to provide urban design standards for drive-thrus, should one be approved through the City's process. Please see Design Guidelines for urban drive-thru building requirements in the

TOD General Area should this use be permitted at time of site plan and preliminary plat.

- Automotive Use: It was mentioned a desire to include an automotive use on the property and, although no specific information has been given as to the nature of the use, an example given was a car wash as a typical automotive use but that it would not be a dealership, gas station or repair shop. The Retail staff is concerned about a car wash on this urban site and automotive uses are not a permitted use in this TOD zone district.
Response: This use was not mentioned in the application or by the applicant at the pre-application meeting.
- Exclusives: When multiple adjacent properties are sold to different developers, there tends to be issues with shared parking, general coordination and merchandising. Either there are too many of the same uses within walking distance (6 coffee shops, 5 dry cleaners, 3 liquor stores) or one developer gives an Exclusive Use to one operator yet doesn't have any right to bind the adjacent properties to that Exclusive Use. Typically, these projects would have one Master Developer who would merchandise the whole project and ensure the uses are compatible, not direct competitors who simply divide the pie into little pieces that puts everyone below their sales projections.
Response: Comment noted. The application includes a proposal for a DRC to help ensure consistency in the long term as well as approve appropriate merchandising.
- Signage: There is no proposed signage yet, but reader-board or other auto oriented signage formats are not appropriate on the property.
Response: Comment noted.

Land Use

2A. Historic Land Use

The site is vacant and is bisected by the Arapahoe County Centrepont Plaza building. Adjacent land uses include a health care facility (Kaiser Permanente) as well as both multi-family and single-family residential development to the south, a mall to the west (Town Center at Aurora), commercial retail, multifamily residential, and government uses to the north (Parkside and the municipal complex), and commercial retail to the east.

In the past 20 years alone, over \$400 million has been invested in infrastructure improvements in City Center, including the I-225 and Alameda interchange, the new Municipal Campus, the Arapahoe County Service Center, several residential communities, Aurora City Place, the redevelopment of the Aurora Town Center, and the RTD bus transfer station constructed in June 2008. These investments have created the framework to develop City Center as a high-density, pedestrian-oriented downtown for Aurora, with mixed uses including residential, government, retail, office and multimodal transit resources. Long before an RTD light rail station was announced for this site, City Center was planned to be Aurora's intensive, mixed-use urban core, and a special zoning classification was established to ensure its implementation. The city spent many years renegotiating the location of a light rail station that deviated from its alignment with I-225 into our city core. With the recent light rail implementation and an additional 6 million-dollar (plus) city investment to resolve regional drainage issues and extend the City Center Park into this site, this vision is more viable than ever in the real estate market to serve as the community's dense urban center. All the peripheral components of a Downtown are in place surrounding this location, except the essential core, in which this site is considered to be part of that primary component.

Response: Comment noted. We believe Metro Center makes strong contextual connections between Aurora City Place, the Aurora Town Center, light rail station and the neighborhoods to the east and south. This plan stitches together all of these areas in a walkable, mixed-use neighborhood.

3. Development Standards

3A. Dimensional Standards.

The intent of the dimensional standards for Transit-Oriented Development is to create a walkable environment with connected parks, plazas, and a main street which are identifying elements with connections to surrounding neighborhoods and parks. Small block sizes provide for an attractive and convenient pedestrian experience. The range of land uses and high-quality architecture creates for a distinctive character and sense of place.

You can find detailed dimensional standards information in Section 146-4.2 of the UDO. Generally, there is no height limit and minimum densities are 60 units/acre in the TOD-Core district and 20 units in the TOD-Edge district.

Maximum setbacks from the street are 10 feet in the Core district and 18 feet in the Edge district. The side, rear, and alley setbacks are detailed in the table. While there is no maximum height, in the Core district a 3-story minimum is required. For multi-family, a 3-story minimum is required in both districts. The required density in the Core district is 60 dwelling units per acre, and to reach the required density building heights will likely be more than 3 stories.

Response: Comment noted. Please refer to the adjustments and justification in the letter of introduction. We have requested an adjustment for the 60du/ac max in parcel C. We have requested an adjustment from the setbacks adjacent to curved streets. We have requested an adjustment for the building height in parcel A, Lot 2 if it should develop as commercial retail. And we have requested an adjustment for the block dimensions. Please refer to these waivers and the development standards created to improve the site and mitigate these adjustments.

3B. Subdivision Standards

UDO Code Section defines the purpose of Subdivision as follows:

4.3.2. PURPOSE (page 180-181)

The purpose of this Section 146-4.3 is to ensure that each subdivision of land:

- A. Establishes an interconnected logical framework comprised of the streets, utilities, parks and lots that are created in a manner that allows for any development or redevelopment with a defined system of streets, blocks, and lots that front either public or private streets, or alternative layouts as defined within Section 146-4.5 (Access and Connectivity);

Response: Comment noted. Please see Master Plan that accompany this letter.

- B. Ensures that all development is served by necessary infrastructure services, including utilities, transportation, storm drainage, public safety, parks and open space and community facilities;

Response: Comment noted. Please see PIP that accompany this letter.

- C. Promotes good civic design and arrangement that improves, the layout, form, and relationship between sites, buildings, lots, natural features, parks and open space and rights-of-way;

Response: Comment noted. Please see Metro Center Design Guidelines and Master Plan that accompany this letter.

- D. Avoids premature division of land that by its permanence may negatively impact the long-term development patterns or adjacent land areas;

Response: Comment noted. Please see Metro Center Plat that accompany this letter.

- E. Encourages the most efficient development of land by analyzing adjacencies and identifying both on and off-site infrastructure improvements;

Response: Comment noted. Please see Metro Center PIP that accompany this letter.

- F. Ensures that each parcel of land sold for development has sufficient size, shape, and utilities with access to public streets to function for its intended purpose;

Response: N Comment noted. Please see Metro Center PIP that accompany this letter.

- G. Provides healthy options for physical activity and clearly defines multi-modal connections for economic and employment viability; and

Response: Comment noted. Please see Metro Center Master Plan and Design Guidelines that accompany this letter. Metro Center is designed as an urban, mixed-use walkable neighborhood that offers a variety of transportation options for future residents and visitors.

- H. Promotes human health, economic vitality, safety, and welfare of the community both within larger developments and on individual lots through the careful organization of land, infrastructure, parks and open space that respect and are integrated into their context. Subdivision standards provide guidance regarding providing for a well-connected system of streets and blocks which provides for safe vehicular, transit, pedestrian, and bicycle circulation which minimizes conflicts between the modes of transportation.

Response: The Metro Center Master Plan and Design Guidelines promotes the health, safety and welfare of the community by conforming with the Aurora Places Comprehensive Plan, the City Center Station Area Plan and TOD guidelines.

3C. *Access and Connectivity* Vehicular, pedestrian, and bicycle access and connectivity are required in the MU-TOD districts. Care must be taken to minimize conflicts between the modes of travel. There are bus stops on the site; ensure that bus shelters and benches comply with the overall architectural character of the development.

Response: Comment noted.

The graphic below provides guidance for TOD vehicular access: In order to clearly demarcate pedestrian crossings at streets, a change in paving color or material is required.

Response: Comment noted. All pedestrian crossings will meet City standards.

The expectation is the street network will at a minimum reflect the street grid layout identified in the Station Area Plan (Station Area Plan III. Development Standards.) The Master Plan proposal will need to include additional streets. In addition, the TOD zone district includes maximum block lengths and a maximum block perimeter of 1,800 linear feet.

All streets must use the street specifications for Urban Centers and TOD's in the Roadway Design and Street Specifications. All streets are required to use urban sections, which includes a minimum of a 16-foot sidewalk with tree cutouts. Bike lanes should be included where appropriate.

Response: Comment noted. The street grid presented meets the layout shown in the station area plan. Additional streets will be designed at time of preliminary plat and site plan. Significant street improvements are planned to enhance the roadways and pedestrian realm experience. Please see Metro Center Master Plan and Design Guidelines for street sections and bike lane locations.

As discussed in the pre-application meeting, Centrepont Avenue has a large street cross-section and vehicles tend to travel at higher speeds. A traffic calming approach for Centrepont Ave should be identified, which can include narrowing the street section and/or the installation of a median.

Response: Centerpoint designs include reduced pavement width, on-street parking and bump-outs to aid with traffic calming and create a more urban street presence. Please see Metro Center Design Guidelines to see specific street section and refer to the Letter of Introduction for a narrative description of the goals and intent.

The Master Plan area shall include an interconnected system of sidewalks that directly connect all lots, commercial centers, employment areas, Metro Center Station and transit stops, parks and open space and other uses. A Public Improvement Plan will be required and should address all public improvements including streets, utilities, drainage, and dedicated parks and open space. Stormwater management shall be designed to integrate with required outdoor common areas, designated parkland and open space areas, green space and landscaped areas to promote the use of natural systems to manage stormwater and to reduce the cost of construction and maintenance of pipes, culverts, and other hard infrastructure to the maximum extent practicable. Parks and open space shall be integrated into and throughout the development, connected with one another through pedestrian and bicycle circulation as well as connections to regional city trails.

Response: Comment noted. Please see Metro Center Master Plan that accompany this letter.

3D. *Common Space and Amenities* According to the City Center Station Area Plan, the Metro Center development should provide for a network of open space, parks, and other amenities. The Station Area plan also requires a Main Street with buildings and public open spaces fronting the street within minimal building setbacks. The public realm components should be unified in a common design theme. Dedication of land for “neighborhood park” purposes is required. Cash-in-lieu may not be used to satisfy the entire requirement. The Master Plan should list minimum dedication per planning area, and the tracts to be dedicated will be refined with the preliminary plat.

Response: Comment noted. Please see Metro Center Master Plan and Design Guidelines that accompany this letter.

The Master Plan proposal needs to identify the approach for locating, dedicating and designing areas for neighborhood park purposes. In addition, the Master Plan needs to identify a variety of common outdoor spaces types ranging from greens to plazas and courtyards and the Master Plan should also provide guidance as to when to incorporate the various features for a variety of land uses. The Master Plan or Design Handbook should provide size ranges for the various outdoor common areas as well as service area guidance. There will be an expectation that there will be a minimum number of parks (which will be fleshed out in the Master Plan review process) and that not all required parkland will be permitted to utilize the cash-in-lieu option. Below is a table that was produced as part of the Master Plan process for the previous Metro Center Master Plan proposal.

Response: Comment noted. Please see Metro Center Master Plan and Design Guidelines that accompany this letter.

3E. *Public Art*

Public art is required per UDO Section 146-2.4.6.K. Roberta Bloom, the City’s Public Art Coordinator, has provided comments in a separate section below.

Response: Comment noted. A public art plan is included in the Metro Center Design Guidelines.

3F. *Parking, Loading, and Stacking*

Off-street parking is required by Section 146-4.6. Reduction of minimum parking requirements can be considered for several alternatives, including proximity to transit and on-street parking (Section 146-4.6.4). You may consider meeting with Scott Bauman, the City’s Parking Manager, to develop a parking management plan. A shared parking strategy must be employed and include plans for parking garages that can support higher density as the project develops overtime. If land areas are parceled, then shared streets, cross access and shared parking and maintenance agreements must be clearly defined.

Response: Comment noted.

Any surface parking is required to be screened by a low masonry wall. In the TOD-Core district a minimum of 80% parking must be provided in parking structures.

Response: Comment noted. An adjustment has been requested for the parking requirement in Parcel C to allow this parcel to develop with 50% structured parking. Please refer to the letter of introduction for the

waiver request and support.

Section 146-4.6.5 details requirements for the design and placement of parking areas. Generally, parking areas should be located and designed to provide for adequate vehicle circulation, safe pedestrian connections, screening from adjacent sites and streets, and to avoid abutting significant stretches of adjacent streets.

Response: Comment noted.

No drive-throughs are permitted in the Core district, and only drive-throughs associated with a grocery store or a bank are permitted in the Edge district. No drive-through lane or vehicle stacking area may extend beyond the front of the building and the front lot line. Permitted drive-throughs are subject to supplemental design criteria and require a Conditional Use, which must be reviewed and approved by the Planning Commission at a public hearing.

Response: Comment noted. Drive-through parking design standards are included in the Master Plan should this be an approved use at time of preliminary plat/site plan.

Consideration also must be given to the design and location of off-street loading areas.

Response: Comment noted.

In addition to vehicle parking, the development is required to provide bicycle parking spaces. Bicycle spaces must comply with Section 146-4.6.3.F.2 including providing a design that includes 2 points of contact with each bicycle. Each inverted “U” rack counts as two bicycle parking spaces. Place any bicycle parking in a convenient, paved, and well-lit location.

Response: Comment noted. Bicycle parking is included in all public parks and plazas. Developers will be required to install bicycle racks as part of individual site plans.

Parking structures must be screened utilizing storefront active uses, public art installments, display cases, or landscape walls per the UDO. The ground floor shall be designed with a minimum floor-to-ceiling height of 11 feet and have a depth of at least 20 feet to allow for future conversion to retail uses.

Response: Comment noted.

Section 146-4.6.5 details requirements for the design and placement of parking areas. Generally, parking areas should be located and designed to provide for adequate vehicle circulation, safe pedestrian connections, screening from adjacent sites and streets, and to avoid abutting significant stretches of adjacent streets.

Response: Comment noted.

Consideration also must be given to the design and location of off-street loading areas. A conceptual parking plan for the Metro Center Station was drafted in April 2014. It calls for the eventual construction of a minimum 3-level structured parking building with the ground floor dedicated to the existing, reconfigured bus transfer facility. It is possible that the eastern portion of the garage can contain commercial retail tenant space that fronts the Metro Center Main Street. The graphic illustrates the parking garage options that were identified with the City Center Station Area Plan.

Response: Comment noted.

3G. Landscape, Water Conservation, Stormwater Management

For further information, please feel free to contact our Senior Landscape Architect, Kelly K. Bish, PLA, LEED AP. The general landscape comments on your proposal are listed below:

General Landscape Plan Comments. The following bullet points are provided as preliminary comments for the draft Metro Center Design Standards and Guidelines document. These should be reflected in the actual document once a formal application is made. A comprehensive review will occur once the document is more complete.

1. The landscape design and site furnishings should be in an urban format and utilize the Urban Street Cross Sections and traffic calming measures to enhance the required pedestrian orientation.
Response: Comment noted.
2. Any references to waivers should be changed to adjustments and any references to tree lawns should be changed to curbside landscapes to reflect the current code nomenclature.
Response: Comment noted.
3. Surface parking should not be permitted between the building and public street facing façade in any of the parcels not just the TOD Core area. If permitted, significant measures shall be taken to screen the parking frontage with low walls and landscaping along the exterior.
Response: Comment noted.
4. The graphic provided in connection with the Street Hierarchy and Streetscapes description should either label the streets in the graphic so they correspond with the text that is provided or add the color coding associated with the graphic for the streets, adjacent to the street descriptions.
Response: Comment noted. Please see street sections and hierarchy in Metro Center Design Guidelines.
5. *The description for the tree openings in urban conditions should reflect the current city standard of 5'x15' not 5'x10'.* If possible, provide larger openings for tree health and viability or specify the use of other planting options such as suspended pavements or structural cells.
Response: Comment noted, this has been updated in our initial application.
6. Public art shall not be permitted to replace street trees.
Response: Comment noted.
7. All references to E. Center Drive should be E. Center Avenue.
Response: Comment noted, this has been revised.
8. Any references to Navona should be changed to Metro Center.
Response: Comment noted, this has been revised.
9. The E. Center Drive description does not account for the sidewalk and street trees.
Response: Comment noted, this has been revised.
10. Add the following statement within the context of the over document “*should a conflict exist between the Unified Development Ordinance (UDO) and these design standards and guidelines document, the most restrictive shall take precedence.*”
11. The language regarding the location of the trash and service areas should be changed to reflect that they may not be located along street frontages.
Response: Comment noted.
12. For parking lot design, if the intent is to follow the UDO, then words like “an effort will be made” and “may be used” should be removed from the text.
Response: Comment noted.

Section 146-4.8 of the UDO contains specific standards for the design of buildings. These standards include requirements for building orientation and spacing, breaking up the massing of building facades with articulation

elements, four-sided building design, and permitted materials, among other things. While there are architectural design standards in the UDO, it is expected that the Master Plan architectural standards go above and beyond minimum standards to create a distinctive character and sense of place.

Response: Comment noted.

3H. Building Design Standards

Code requires that you incorporate material changes and architectural features such as glazing, textured surfaces, projections, color, overhangs, and changes in parapet height to improve the façade and create an inviting and attractive street presence. Buildings must be designed to create a clear base, middle, and cap, with specific instructions and tips for how this can be achieved in Section 146-4.8.5.C. Ground floor designs shall support a pedestrian-friendly environment, provide visual interest, and help to create an atmosphere that promotes foot traffic. Code also requires that you use changes in the wall planes, both horizontally and vertically, at specific intervals and provide a variety of durable materials to create visually interesting buildings. Durable materials can include architectural glass, corrugated metal, detailed cast concrete, masonry, decorative metal and concrete panels, and three-coat stucco. Architectural details shall be continued on all four sides of the buildings to prevent the back of house appearance.

Response: Comment noted. Please see architectural standards in the Metro Center Design Guidelines.

The maximum length of a multi-family or mixed-use building shall be 200 feet, or 250 feet for an affordable housing structure. In the TOD-Edge district, buildings must have a minimum height of 20 feet. The zone district has specific standards in addition to 4.8. These standards include specific standards related to facades and ground floors facing street including, minimum window requirements, build to parameters, minimum ground floor heights and building entrances to the streets.

Response: Comment noted.

3I. Design Guideline Comments.

The structure of the guideline package is well thought-out and logical in sequence. To ensure high quality development throughout the Master Plan area, a Design Review Committee (DRB) is proposed. Staff supports the proposed DRB for consistent architecture and site design throughout Metro Center, especially if there will be different developers on the different tracts of the Metro Center development. However, the DRB review should be a contributing review and not replace or supersede planning staff and interdepartmental reviews or compliance with the UDO. The design standards need to be clearer to the users of the handbook that these are not the full set of requirements to be followed. The expectation is each proposal will follow requirements in the design handbook in addition to UDO requirements. Additional discussion may be needed regarding amending this document. Amendments may not reduce City Code requirements without going through the process as defined in the UDO.

Response: Comment noted.

Please clearly identify Planning Areas and land area (acres) and include a table of the proposed uses, minimum (required) and maximum (if desired) densities, area of proposed parks and open space (minimums), and total areas of detention and streets.

Response: Comment noted. Please see Planning Areas and land area calculations on the Master Plan coversheet.

Standards for exterior lighting are found in Section 146-4.9. Show typical details of lighting on the plan and on building elevations.

Response: Comment noted.

Describe how your proposed Master Plan will create a unique community with a definable character and special “sense of place”. What facilities, amenities and special design features will set it apart in the marketplace from similar developments in your area?

Response: Please see *Metro Center Design Guidelines* for more details about special design features and amenities.

If there are any existing or potential conflicts between Master Plan design requirements and City Code, the Master Plan will apply. The document has many design guidelines, and less design standards. With a detailed review of the design guidelines, it is likely that some of the guidelines be made as standards. There may also be some changes requested to ensure consistency and compliance with the intent of the TOD design standards found in City Code (such as stepping of buildings or other elements).

Response: *Comment noted.*

The public spaces section of the design standards should give more guidance with regard to the scale or size of these design features with a range of square footages. Special standards for interior oriented services areas would help clarify expectations within the various planning areas.

Response: *Comment noted.*

3J. Exterior Lighting.

3K Signs

As part of the master plan, a master sign plan and program will be required. The sign program should address the overall signage character and a common architectural theme should be utilized. For instance, monument signs shall include a base constructed from the same primary materials as used on the main buildings, and all letters and message content on signs shall be individual 3-D, engraved, or projecting can type. Cabinet signs are prohibited. See Section 146-4.10.10A for additional details.

Response: *Comment noted.*

4. Adjustments

Section 146-5.4.4 details the definitions, applicability, procedures, and criteria of approval for all adjustments to development standards. If any adjustments are requested, they must clearly be listed and justified in the Letter of Introduction. They must also be listed on the cover sheet of the Master Plan and any other sheets on which they are applicable. Approvals of adjustment requests are not guaranteed. Adjustment requests should identify the reason for the adjustment, efforts to minimize the adjustment, and design elements proposed to mitigate the standards proposed for reduction. Typically, mitigation techniques should go *above and beyond* requirements from other code sections. If an adjustment does not meet the limits for administrative approval under Section 146-5.4.4.F, then the adjustment will require approval from the Planning and Zoning Commission

Response: *Comment noted.*

5. Submittal Reminders

5A. CAD Data Submittal Standards

The city has developed CAD Data Submittal Standards for internal and external use to streamline the process of importing AutoCAD information into the City's Enterprise GIS. A digital submission meeting the CAD Data Submittal Standards is required before final mylars can be routed for signatures or recorded for all applications. Please review these standards and ensure that files are in the correct format to avoid future delays.

5B. PDF Requirements

Response: *Comment noted.*

The application will be uploaded through the city's development review website as separate PDFs. Please ensure that all AutoCAD SHX text items are removed from the "Comment" section during the PDF creation process and that the sheets are flattened to reduce ability to select items. PDFs will be rejected during pre-acceptance reviews if they

do not comply with this requirement, which could result in delays.

Response: Comment noted.

5C. Mineral Rights Notification

Please fill out the Mineral Rights Affidavit and supply this document to your Case Manager with the application submittal.

Response: Comment noted. A mineral rights affidavit has been included with the submittal as requested.

Pre-Submittal Meeting:

Contact the assigned Case Manager to schedule a pre-submittal meeting at least one week prior to submitting an application. At the pre-submittal meeting, staff will review the submittal requirements, discuss the review timeline, provide a fee estimate, and review the process for uploading files and inputting adjacent property owners.

Please note that a separate pre-submittal meeting is required with Real Property for the Subdivision Plat prior to application submittal. Please contact Real Property directly to schedule this meeting.

Response: Comment noted.

Community Participation:

Please work proactively with registered neighborhood organizations and adjacent property owners. Registered neighborhood organizations within a one-mile radius and adjacent property owners will formally be notified of the application when a submittal has been made to the Planning and Development Services Department.

Response: Comment noted.

Neighborhood Services Liaison:

- Meg Allen is the neighborhood liaison for the project. She has put together a report attached to these notes listing the registered neighborhood organizations within one-mile of your proposed project and can assist in scheduling and facilitating meetings with community members. Please work with the organizations that express interest in your project to address comments and mitigate concerns
- All meetings with registered neighborhood organizations should also include the Planning and Development Services Department Case Manager so that questions concerning the UDO and procedures can be properly addressed. The Case Manager will record any project-related commitments that are made to the community at these meetings.
- Additional information about the Neighborhood Liaison Program can be found on the Neighborhood Services page of the city website.

Response: Comment noted.

Library & Cultural Services - Public Art

It is clear that significant time, space, and visioning has been allocated to public art and the role that it will play in defining the human experience, serving to attract your target audience, and creating a desirable place to return to, again and again. 9 Dot Arts will be a good partner through this process.

Response: Comment noted.

There are a few concerns with the plan as written that need to be addressed.

The Inclusion of Public Art and Signage Under a Single Heading:

Bundling signage and art together under one heading is problematic for a public art plan. The funds allocated for public art cannot be used for signage as per the guidelines provided last year. The recommendation is to provide a separate section for public art to avoid confusion, as there several areas where the city draws distinctions between

public art and signage and some of the language used in this section of the design standards can have multiple meanings or interpretations, blurring those distinctions.

- The word “monumental” can refer to signage monuments as well as to the scale of sculptures. Informational monuments are a form of signage and are therefore not an acceptable expenditure of public art funds.

Response: Understood. Signage and artwork are different. Artwork funds will only be used on non-signage. We will include a specific note about distinguishing art from signage.

- Murals are another area where the city draws distinctions between what is a mural (art) and what is signage (not art.) Logos are excluded from murals, and text within murals is limited.

Response: Understood. Signage and artwork are different. Artwork funds will only be used on non-signage. We will include a specific note about distinguishing art from signage.

The Meaning of “Monumental” and the Expectations Set:

Large scale sculpture would be an appropriate expenditure of public art funds, as would smaller scale sculpture, in the right context. The Design Guidelines Draft uses the word “monumental” to refer to sculptures 7’ tall sculpture or larger. Sculptures in the 7’ range would more likely be described as “life size” or human scale rather than monumental. The design guidelines draft uses language like grand, imposing, visible from a distance and creating awe due to scale as qualities of monumental sculpture. This sets expectations that are likely unrealistic for a 7’ tall sculpture and could result in a sense of being underwhelmed with the end-product. Can you clarify the scale of the works you anticipate seeking and/or some of the attributes?

Response: Comment noted.

The Use of Public Art to Support the Concept of a Metro Center:

Consistent with the COA’s concept of a “Metro Center,” the public art should serve as a unifying element, connecting the different areas of the district visually and conceptually. The artwork should be visually dynamic, of high quality, and convey to visitors and tenants that this is a special place. This development is situated within an exciting hub of strong public art including 3 works at the light rail station (a kinetic sculpture at the station, a large mural at street level, and hand-painted glass windscreen benches on the station platform); a large number of city owned works located on the AMC Campus including the 7/20 Memorial (“Ascentiate”) and the iconic “Dawn Fountain,” and several new, highly anticipated pieces at the Parkside at City Center scheduled to open later this year. To achieve these aesthetic and conceptual goals, we recommend that there is central and consistent management of the entire public art program, rather than distributing a portion of funds to individual builders as the design guidelines seem to imply.

Response: Agreed. There will be a holistic approach to the artwork and all artwork must adhere to the guiding principles, art goal and criteria. Additionally, artwork will have to be approved by a governing committee to ensure it fits within the program.

This will also help address two related concerns.

- In choosing locations and types of art, we recommend that maximizing the impact is well considered. Identifying prominent sites, highly trafficked locations, and places where people will gather will help in terms of prioritizing sites and distributing the budget appropriately. This will require a holistic approach to the entire site, rather than a parcel by parcel distribution

Response: Agreed. The artwork site plan will reflect this.

- The public art will require maintenance over time, and the guidelines require setting aside a portion of the funds for maintenance. Long after individual builders are gone, the need for maintaining the artwork will continue and must be planned for. Without central and ongoing management, who will be responsible for overseeing maintenance now and into the future? Is there a role for the Metro District to play in managing these funds and inclusion of a long-term funding plan for ongoing maintenance, after the initial set aside is

spent?

Response: 9DA

Looking Ahead:

While this plan is in a preliminary stage, please note that a fully completed transit-oriented development public art plan that is ready for final review and approval will also include:

- 1) A total budget formulated based on anticipated construction costs

- 2) A budget breakdown into these specific categories
 - a. 75% - Allocated for Professional Artists Budgets/Art Acquisitions
 - b. 25% - Available for administrative expenses as defined below
 - i. Up to 10% for maintenance
 - ii. Up to 10% Program/project management
 - iii. 5% Public Art Fee due to COA

- 3) A map of potential sites for artworks and thoughts about how they will be prioritized. Considering potential budgets for each site can be a helpful exercise in prioritizing.

- 4) A timeline of implementation based upon anticipated construction of different sites.

Response: Comment noted.

Parks, Recreation & Open Space Department (PROS)

Project Characterization:

Based on your proposal, the following information has relevance to the determination of PROS' requirements for this project:

- There are outstanding requirements from the previously approved master plan for the site regarding the existing trail and open space corridor on the northwest portion of your site.

Response: Understood.

- Your site is within the boundaries for a Transit Oriented Development and therefore no open space land dedication is required.

Response: Comment noted, thank you.

- Your proposal is showing Small Urban Parks which do not meet the minimum 10,000 square feet requirement for Neighborhood Park credit.

Response: We would like to amend the requirement for Metro Center to be a minimum of 7,500 square feet. We feel that this scale is more appropriate for urban parks/plazas.

Metro Center Trail and Open Space:

Design

Your proposal no longer shows a bridge over this open space. Please ensure there are connections from the trail corridor to the roadway and commercial site at the corner which are similar to those in the previous landscape plan for this area, as the main trail is already constructed. The previous design also included activation pockets as this area was agreed to receive community park land dedication. Please work with PROS on the future design for activation.

Response: Comment noted. There will be trail access on both sides of the drainage corridor, in addition to a small amenity area on the east side of the drainage area that will connect with a series of linear public

plazas.

Outstanding Issues

The previous master plan set the foundation for the trail and open space which connects the RTD station and City Center Park across Alameda Parkway. There are still outstanding requirements for this open space which must be addressed with the master plan submittal. These include:

- Finishing construction of the trail corridor, namely the landscaping and irrigation. I've sent over the previous Infrastructure Site Plan that was not approved but can guide on you on the intent for this corridor. You will need to submit a new landscape plan for this tract or provide the landscape details within an ISP. Because this site is receiving community park land dedication credit, PROS will be looking for an inviting and activated space with a variety of plants, colors, and seating/resting areas.

Response: Comment noted.

- Please note there is still an outstanding payment for the local share of the TIP grant that was approved to fund the trail and open space corridor which connects the RTD station to City Center Park and the Aurora Municipal Center. The grant awarded \$1.8 million in federal funds and identified the local match for these improvements to be \$459,000. The share of the overall cost for the TIP project for your site is estimated to be \$1.17 million with your outstanding local share being \$234,300. Please reach out to Curt Bish at cbish@auroragov.org with any questions regarding the payment.

Response: Comment noted.

- This site, which is unique in that it provides connectivity to a *regional* transportation network, was previously approved to receive community park land dedication credit. If impacts are not made to reduce the size of the site, you will be credited 1.5 acres of community park.

Response: Comment noted. Please see Public Land Dedication table on the cover sheet of the Metro Center Master Plan. We look forward to working together to understand and resolve this requirement.

Small Urban Park Design Criteria:

Small Urban Parks are utilized within Transit Oriented Developments to encourage civic engagement and outdoor recreation. The following are criteria for small urban parks:

- Each individual site must be a minimum size of 10,000 sf.

Response: Comment noted, this has been revised.

- SUPs be designed as a green, commons, square, plaza, promenade or other space that meets the intent of providing social interaction and leisure opportunities.

Response: Comment noted, thank you.

- The first 15' from all building faces may not be credited or counted toward the 10,000 sf minimum.

Response: In a TOD, the areas around a building become a part of the living breathing space that is part of these Small Urban Parks. We have included in the master plan the allowance that the 10,000sf minimum is measured from the building face.

- Must include seating, landscaping, site furniture, bike racks, lighting, signage.

Response: Comment noted.

- Must include at least one specialty feature such as public art, special pavement, ornamental lighting, gardens, open turf area, shade structures, play equipment, spray-grounds, amphitheater, etc.

Response: Comment noted.

- All small urban parks should be well connected, highly visible, publicly accessible and must provide continuous access and corridors for pedestrian movement

Response: Comment noted.

Specific Design Comments:

PROS would like to encourage programming of each SUP to be different and unique to the land use which surrounds it. Consider having one core event space and utilizing gardens, open turf areas, and incorporating more passive elements within small urban parks adjacent to the residential areas to encourage outdoor play.

- Please consider incorporating additional small urban parks adjacent to the trail and open space corridor on the northwest portion of your site to further activate the transit corridor. Outside of the 1.5 acres currently dedicated within the corridor for community park land, previous plans identified adjacent nodes which may get neighborhood park credit.

Response: Comment noted. We look forward to working with Staff to better understand this provision and how to apply it to the design and public land dedication.

- The current location for the Public Realm Plaza adjacent to the RTD station and parking lot may be problematic to program and will require a strong design to transition from parking lot to an amenity space. Please work with PROS on how these relationships for these sites will work.

Response: Comment noted. We look forward to working with PROS on the Metro Center master plan and SUP sites.

- Please note that the park land dedication requirements (i.e. Small Urban Parks and the trail corridor enhancements) for this site differ from Planning's requirements for common open space. Although no 'open space' land dedication is required for PROS, common open space and other amenities may be required per code from Planning. Please see Planning's comments for details.

Response: Comment noted.

Population Impact:

For transit-oriented developments, population calculations for the project are based on an average household size multiplier of 2.02 persons per unit. Please utilize this multiplier when identifying your proposed residential population within the Land Use Matrix in your FDP Submittal.

Response: Comment noted. Please see PLD table on coversheet of the Metro Center Master Plan.

Land Dedication:

To ensure that adequate park land and open space areas are available to meet the needs of the population introduced into the city by the new dwelling units, Section 147-48(b) of City Code specifies that land shall either be dedicated on-site within the project's limits or a cash payment in-lieu of land dedication shall be paid. The required dedication acreage is computed by applying the following standards to the projected population for the project:

- 3.0 acres for neighborhood park purposes per 1,000 persons
- 1.1 acres for community park purposes per 1,000 persons

Response: Comment noted. Please refer to the PLD chart on the cover sheet of the Master Plan.

Form J:

Please utilize the formulas above to identify the amount of neighborhood and community park land that is required for this site. Please identify the small urban parks and existing trail corridor within Form J of your FDP Submittal. You

must include dedicated acreage, programming specific to each site, and ownership and maintenance (which will be privately owned and maintained unless over 5 acres in size).

Response: Comment noted.

Forestry Division

There are trees that will be impacted by this development, particularly on the Sable side of the project within Parcel A Lot 1 and Parcel C Lot 1. The city is not sure of the health of the trees that will be impacted, but they will require mitigation if they are in good condition.

Response: Comment noted. A tree mitigation plan will be provided at time of Preliminary Plat.

Tree Mitigation Requirements:

Trees on site that are 4" or greater in caliper that will be impacted by development require tree preservation or mitigation. The intention of the Tree Preservation Policy is to preserve trees that are in good condition and of high value during the process of development. Mitigation for trees removed from the property can be accomplished by trees being planted back onto the site through the landscape plan, payment made into the Tree Planting Fund, or a combination of the two. If trees are planted on the site, the mitigation requirement is an inch-for-inch replacement. This is in addition to the regular landscape requirements. For example, if a 10" tree is removed, 10 caliper inches must be replaced back onto the site. The use of tree equivalents are not acceptable for tree mitigation.

Response: Comment noted. A tree mitigation plan will be provided at time of Preliminary Plat.

Forestry's Role in Site Plan Review:

- When the site plan is submitted, please show and label all existing trees on a separate sheet called Tree Mitigation Plan and indicate which existing trees will be preserved or removed. Please include grading on this sheet as well. Forestry Division staff will conduct a tree assessment after the initial submittal, which includes species, size, condition, and location factors.

Response: Comment noted.

- Once Forestry Staff conducts the tree assessment, a spreadsheet will be provided showing the dollar value of the trees that will be removed as well as the number of inches required for replacement back onto the site. In most cases, the mitigation inches can be replaced on the site through upgrades to the landscape plan. If there is not room to replace the number of inches that will be lost, payment can be made into the Tree Planting Fund based on the dollar value associated with tree loss.

Response: Comment noted.

- Any trees that are preserved on the site during construction activities shall follow the standard details for Tree Protection per the current Parks, Recreation & Open Space Dedication and Development Criteria manual. The Tree Protection notes shall be included on the plan. The link for the manual can be found at Parks, Recreation & Open Space Dedication and Development Criteria manual.

Response: Comment noted.

Ash Trees Prohibited:

Due to the invasive Emerald Ash Borer that has been infesting trees along the Front Range, all species of Ash are prohibited from planting within the City of Aurora – please be sure that your Landscape Architect is aware of this new requirement.

Response: Comment noted. Ash trees will not be specified or planted at Metro Center.

Aurora Public Schools

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 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.

Response: Comment noted.

Aurora Water

Aurora Water will receive a referral of the Site Plan and Subdivision Plat for review and comment. Please respond to all Water Department comments with your initial submittal.

Key Issues:

- A master utility study is needed for this development. The utility study must include anticipated residential units.
Response: Comment noted.
- Any bridge crossing of utility easements is to span the easement entirely. No abutments, wing walls, or other structural aspects are to be grounded within the easement. A license agreement is also required for any crossing of the existing easement.
Response: Comment noted. No bridge crossing is planned with Metro Center.
- No standing water features are allowed within utility easements. This applies to features such as ponds, lagoons, lakes, etc.
Response: Comment noted.
- A license agreement is required for any private feature or unique roadway within a utility easement. Unique roadway treatments include stamped or colored concrete, concrete pavers, grass-crete, etc.
Response: Comment noted.
- Any area draining to the City Center detention pond must pay the appropriate City Center Pond fee.
Response: Comment noted.
- There is no record of storm drainage development fees being paid for this area. These are separate from the City Center pond fees and must be paid prior to platting.
Response: Comment noted.
- Townhomes and single family detached/attached are to be individually served by water and sewer.
Response: Comment noted. No single-family detached product is being proposed.
- Water meters are to be in landscaped areas and if outside of public ROW, in a pocket utility easement. No trees are allowed within these easements. For further information on easement dimensions and requirements see Section 5.04 of the utility standards, linked below. For information on meter placement see Section 17.08 and 17.02. For information on sanitary sewer service see Section 23.03.
Response: Comment noted.
- A domestic allocation agreement will be required for connections 2" and larger.
Response: Comment noted.

Utility Services Available:

- Water service may be provided from Sable Boulevard, Alameda Parkway, Chambers Road, and on-site mains.
Response: Comment noted.
- Sanitary sewer service may be provided from the on-site mains.
Response: Comment noted.
- The project is located on Map Page 09H.
Response: Comment noted.

Utility Service Requirements:

- A Site Plan is required for this project and must show existing and proposed utilities including:
 - Public/Private Mains
 - Service Lines
 - Water Meters
 - Fire Suppression Lines
 - Fire Hydrants necessary to service your development
 - Grease/Interceptors are required for commercial kitchens
 - Sand/Oil Interceptors are required for vehicle maintenance facilities
 - All utility connections in the arterial roadway are required to be bores**Response: Comment noted.**
- General utility design criteria can be found in Section 5 of the Standards and Specifications Regarding Water, Sanitary Sewer and Storm Drainage Infrastructure (Utility Manual).
Response: Comment noted.

Utility Development Fees:

- A partial Storm Drainage Development fee is required prior to the recording of the Subdivision Plat or at the time of building permit approval if a Plat is not required. Additional Storm Drainage fees may be charged and are based on the amount of impervious surface created by this project.
Response: Comment noted.
- The Water Transmission Development Fee and the Sanitary Sewer Interceptor Fee have been combined into the water connection fee and are required to be paid after issuance of building permit and prior to issuance of the Certificate of Occupancy.
Response: Comment noted.
- For a full listing of Utility Fees, please see the Aurora Water Fee Schedules.
Response: Comment noted.

Public Works Department

Traffic Engineering will receive a referral of the Site Plan, Subdivision Plat, and Civils for review and comment.

Key Issues:

- A detailed Master Traffic Impact Study, with detailed interior intersection analysis, will be required. See below for additional information. The requirement of a detailed Master Study will allow future developments

internal to the site to provide a Letter of Conformance vs a Detailed Traffic Impact Study when they develop.

Response: Comment noted.

- Traffic Signal Escrow will be required. In 2011, a Public Improvement Phasing Agreement was drafted but never signed (for both Alameda Avenue & Civic Center Court and Chambers Road & Metropolitan Avenue), so the City's Traffic Signal Escrow Ordinance, passed in 2015, will apply. See below for additional information.

Response: Comment noted.

- Coordinate with RTD for roadway connectivity to Alameda Parkway from the RTD parking lot. Pedestrian only connection from this RTD parking lot to Alameda Parkway may not be sufficient, and vehicular connection may be required. For these meetings with RTD, please include Public Works City Staff members.

Response: Comment noted.

- There has been a previous Department of Regulatory Agencies, Public Utilities Commission (PUC) process for the light rail interaction regarding the intersection of Sable Boulevard & Centrepoint Drive. Review the PUC document and coordinate with Pam (contact information below) to determine if a new PUC process would be required with this development or if the existing crossing condition is suitable.

Response: Comment noted.

- Concerns have been identified for a protected/enhanced pedestrian crossing of Centrepoint Drive either at Alameda Drive/ Fraser Drive/ Center Avenue. Visibility of this crossing has been a concern given the geometry of Centrepoint Drive.

Response: Comment noted. Please see intersection details in Chapter 3 of the Metro Center Design Guidelines. With reduced pavement widths, we believe we have provided safe pedestrian crossings along Centrepoint Drive intersections.

- Concerns have been identified that proposed bike facilities are not shown on the roadway sections. If off-street bicycle facilities are proposed, then they need to be updated in the modified roadway section.
- Show all adjacent and opposing access points on the Site Plan.

Response: Comment noted. Please see street sections with dedicated bicycle lanes that are included in the Metro Center Master Plan and Design Guidelines.

- Traffic is concerned with potential conflicts from stacking vehicles and recommends a minimum offset of 300-feet from the adjacent street to the first internal access drive or head-in parking from adjacent arterials.
- Label the access movements on the Site Plan.

Response: Comment noted.

- Objects and structures shall not impede vision within the sight triangles. Landscaping shall be restricted to less than 26-inches in the sight triangles. Show sight triangles on the site plan and landscaping plan at all access points in accordance with City of Aurora Standard Traffic **Detail TE-13** In addition, street trees shall be set back from Stop signs and other Regulatory signs as detailed in City of Aurora Standard Traffic Detail TE-13.3.

Response: Comment noted.

- **Add the following note landscape plans:** 'All proposed landscaping within the sight triangle shall be in compliance with COA Roadway Specifications, Section 4.04.2.10'

Response: Comment noted.

ROW/Plat:

- Designate a Public Access Easement along private roadways & alleys.
Response: Comment noted.

A private cross-access agreement is recommended for maintenance and snow removal. The developer is responsible for establishing this agreement with the adjacent property owner.

Response: Comment noted. These cross-access easements will be provided at time of Site Plan.

- A traffic signal easement shall be required at all existing and potential signalized intersections to accommodate the proposed traffic signal pole, underground conduits, pull boxes and signal control cabinet.
Response: Comment noted.

Improvements:

- The developer is required to construct a left turn bay on Alameda Avenue (if additional movements are allowed). Coordinate with the Parks Department for relocating/removing median landscaping.
Response: Comment noted.

- A deceleration lane/right turn lane may be required on surrounding roadways, as determined by the Master Traffic Impact Study and City of Aurora Traffic Engineer's review.
Response: Comment noted.

- Show existing stop signs and street name signs or the installation of new stop signs and street name signs by developer at the site access points onto public streets. Add the following note to the Site Plan: o The developer is responsible for signing and striping all public streets. The developer is required to place traffic control, street name, and guide signs on all public streets and private streets approaching an intersection with a public street. Signs shall be furnished and installed per the most current editions of The Manual on Uniform Traffic Control Devices (MUTCD) and City Standards and shown on the signing and striping plan for the development.
Response: Comment noted.

- Show the installation, by developer, "Right Turn Only"/"Do Not Enter" signs at appropriate location(s). Signs shall be installed per the most current editions of The Manual on Uniform Traffic Control Devices (MUTCD) and City Standards
Response: Comment noted.

- Multiple intersection locations are a potential candidate for a future traffic signal if and when signal warrants are met. As an adjacent land owner/developer, you must participate in the cost of the traffic signal installation. Add the following note to the master plan (and Site Plan adjacent to future signalized intersections), adding a separate note for each location:
Response: Comment noted.

- **(Applicant/owner name, address, phone)** shall be responsible for payment of ____100% of the traffic signalization costs for the intersection of _____ and _____, if and when traffic signal warrants are satisfied. Traffic signal warrants to consider shall be as described in the most recently adopted version of Manual on Uniform Traffic Control Devices, as of the date or dates of any such warrant studies. For warrant purposes, the minor street approach traffic shall typically be comprised of all through and left-turn movement and 50% of right turn movements unless otherwise determined by the traffic engineer. **Pursuant**

to 147-37.5 of city code, the percentage of the traffic signalization costs identified above shall be paid to the city by the applicant / owner, to be held in escrow for such purpose, prior to the issuance of a building permit for the related development or as otherwise required by city code. The percentage above will be applied to the entire traffic signalization cost as estimated at the time of the escrow deposit to calculate specific dollar funding requirement.

Response: Comment noted.

- A Detailed Master Traffic Impact Study will be required for this site which will include addressing the following specific items:
 - 1) Existing, buildout and 2040 average daily traffic counts.
Response: Existing traffic counts were collected in September 2019 and will be used for this study. These counts will be factored up to approximate 2020 conditions.
 - 2) Figure with ADT & roadway classifications including laneage.
Response: Comment noted.
 - 3) Include detailed analysis of (LOS, queuing, CDOT SHAC auxiliary lane analysis for all Collector or Arterial roadways):
 - a. All site access points
 - b. All interior intersections
 - i. Roundabout analysis shall be conducted in one of the following, per the TIS Guidelines, Highway Capacity Software (HCS) version 6.3 or later or ARCADY version 8 or Arcady Lite.
 - c. Intersection of Alameda Avenue at Sable Boulevard
 - d. Intersection of Alameda Avenue at Justice Center Access
 - e. Intersection of Alameda Avenue at Alameda Drive
 - f. Intersection of Alameda Parkway at Chambers Road
 - g. Intersection of Sable Boulevard at Centrepoint Drive
 - h. Intersection of Sable Boulevard at Exposition Avenue
 - i. Intersection of Exposition Avenue at Centrepoint Drive
 - j. Intersection of Exposition Avenue at Chambers Road
 - k. Intersection of Center Avenue at Chambers Road**Response: Roundabout analysis (if needed for item 5) will be conducted using SIDRA Version 8 software.**
 - 4) Signal Warrant Analyses of all peripheral full-movement intersections – Warrant 1,2,3 all to be included (collect 72-hour tube counts for analysis)
Response: Comment noted. Please see Traffic Impact Study for more details.
 - 5) If a traffic signal or multiway stop warrant is met at an intersection, then a roundabout shall also be considered at the intersection.
Response: No roundabouts are being proposed. Please see Traffic Impact Study for more details on traffic signals and multiway stops at Metro Center.
 - 6) Analysis of pedestrian connectivity, Pedestrian LOS.
Response: Pedestrian Connectivity will primarily be evaluated qualitatively, ensuring that requirements are met with respect to the City's designation of the site as a Mixed Use –

Transit Oriented Development.

- 7) Discussion of the application of elements from the Traffic Calming Toolbox to address any concerns for speeding, pedestrian crossings, etc. Techniques in the Traffic Calming Toolbox include: Advanced Yield Lines, Enhanced Crosswalk, High-Visibility Signs and Markings, In-Street Pedestrian Crossing Signs, Enhanced Pedestrian Crossing Sign Devices (HAWK or RFB), Mid-Block Lane Narrowing, Curb Extension, Angled Parking, Pedestrian Safety Island, Staggered Pedestrian Safety Island, Lane Narrowing, Mini Roundabout, Speed Cushions and Chicane. Details of Enhanced Crosswalk, compact roundabout, speed cushions and chicane may be made available if requested.

Response: Comment noted.

The Traffic Study shall be prepared in accordance with the City of Aurora Traffic Impact Study Guidelines.

Submitting the Traffic Study:

- The Traffic Study shall be sent directly to *Brianna Medema* at *bmedema@auroragov.org* as soon as possible.

Response: Comment noted.

- The Traffic Study shall also be uploaded with the rest of the submittal. • Based on our review of the Traffic Impact Study, additional improvements may be required

Response: Comment noted.

Engineering Division

The Engineering Division reviews the drainage and public improvement components of your project plans. Engineering reviews referrals of the Site Plan and Subdivision Plat from the Planning Department.

Key Issues:

- A Public Improvement Plan (PIP) shall be submitted with the master plan. Improvements required for each planning area shall be described in the narrative with exhibits to show the improvements. New roadways or existing roads that are not currently public shall be private. Any off-street multi-modal facilities shall be adequately sized. Sidewalks providing both pedestrian and bicycle access shall be a minimum of 10' in width, clear from the back of the tree openings.

Response: Comment noted.

- Coordinate with RTD regarding the vehicular connection to the parking lot that was proposed with the Metro Center Station Site Plan.

Response: Comment noted.

- A master drainage study shall be submitted with the master plan. Detention and water quality shall be provided for the entire development. Previous reports indicated offsite detention was provided. This shall be analyzed and confirmed with the master study. A preliminary drainage report shall be submitted for each site plan. Detention and water quality shall be in conformance with the master drainage study. Per previous agreements with RTD, water quality shall be provided for the RTD site.

Response: Comment noted.

Improvements:

Sections and details referenced in the Improvements section refer to the City's Roadway Design and Construction Specifications (Roadway Manual).

- Typical roadway sections are specified in the City Code and summarized in Section 4.08 with details shown in the Standard Detail S1.
Response: Comment noted.
- Mountable curb and gutter shall be used on all Type 1 and 2 streets. All other streets, including those within the Urban Centers and TODs shall use 6" vertical curb and gutter.
Response: Comment noted.
- Curb ramps must be shown (located) on the plans at all curb returns, "T" intersections, residential mail kiosks or clustered mailboxes, and any other location of public necessity. Refer to Standard Detail S9. Any street grades in excess of three percent will require detailed grading of the curb ramps.
Response: Comment noted.
- Flared curb cuts, Standard Detail S7.4, are not permitted for commercial/industrial or residential driveways where traffic movements would be substantial. When the number of parking spaces exceeds 20, curb returns are required and the curb return radii shall be labeled on the plan.
Response: Comment noted.
- Pedestrian Bicycle Railings will be required at and continuous along vertical separations of 30 inches, or greater, or on slopes greater than or equal to 3:1 adjacent to pedestrian areas. See Standard Detail S18.
Response: Comment noted.
- Retaining walls shown on plans shall indicate material type and a height range or indicate a maximum height. Where appropriate, guard or hand rails may be required.
Response: Comment noted.
- The maximum private access drive slope may be 4% (non-residential) when sloping down toward the public street and up to 6% maximum when sloping up toward the public street.
Response: Comment noted.
- If gates are incorporated into the design of the development they are required to be setback from the street flow line a minimum of 35-feet or one truck length, whichever is greater.
Response: Comment noted.
- Street lights and pedestrian lights are required along adjacent roadways. Please refer to the Draft Lighting Standards for street light spacing, location, wattage, etc., information. Street lights along public right-of-way shall become City owned and maintained once they have been installed and the final acceptance letter for the lights has been issued. Street light locations shown on the site plan are conceptual. The street lighting plan shall be included with the Civil Plan submittal and will determine final street light locations based on a photometric analysis.
Response: Comment noted.

ROW/Easements/Plat:

- Please coordinate with the Real Property Division of Public Works for the dedication of any required easements. If a plat will be prepared for this development, the plat can cover the required easements.
 - Sidewalk easements may be required for new sidewalk installed.

- A drainage easement shall be required for any detention/water quality facilities on site. This drainage easement shall tie to a public way.
- Utility easements shall be required for any proposed water/sanitary sewer/public storm sewer located outside of public right-of-way.
- Public access/fire lane easement shall be required for fire lanes outside of public right-of-way. Please coordinate with Life Safety for their alignment.

Response: Comment noted.

Drainage:

Drainage design standards can be found in the City's "Storm Drainage Design and Technical Criteria".

- Please refer to the Drainage Criterial manual for Master Drainage Study requirements.
Response: Comment noted.
- For each subsequent, incoming Site Plan, per Section 138-367 of the Aurora Municipal Code, a Preliminary Drainage plan and report is required prior to Site Plan or Plat approval. A Preliminary Drainage Plan and Report shall be submitted at the time of Planning Department application submittal. A review fee shall be paid to the City prior to acceptance of the preliminary drainage report. The site plan will not be approved until the preliminary drainage report is approved.
Response: Comment noted.
- Under the provisions of Colorado Revised Statute 37-92-602(8), any detention or infiltration facility that becomes operational after August 5, 2015, is required to notify downstream water rights holders prior to operation. Urban Drainage and Flood Control District (UDFCD) has created a spreadsheet form (called *SDI Design Data*) for determining compliance with the statute and a web portal that will send a weekly e-mail notification to downstream water rights holders, satisfying the notification requirements. The developer will be responsible for having a professional engineer, licensed in the State of Colorado, complete the *SDI Design Data* and uploading to the web portal. Public Works Engineering will verify the information matches the final drainage report. Notification must be made before Civil Plans will be approved or Stormwater Permits will be issued.
Response: Comment noted.
- Detention of storm drainage is required for this site and shall be incorporated on the site, unless other accommodations are approved by the City Engineer.
Response: Detention for this project has been provided in the City Center regional detention pond facility. This will be further addressed in the Master Drainage Study for this project. Water quality for Aurora Metro Center will be provided on-site.
- Release rate for the detention pond shall be based upon the "Storm Drainage Design and Technical Criteria" Manual, latest revision.
Response: Water quality ponds will be designed in accordance with Mile High Flood District and City of Aurora Drainage Criteria.
- Storm water from concentrated points of discharge from a minor storm event shall not be allowed to flow over sidewalks but shall drain to the roadway by the use of sidewalk chase sections. Sidewalk chase sections shall not be located within a curb cut, driveway, curb ramp, or curb return.
Response: Comment noted.

- A public storm sewer system appears to be located near this site. Please have your Engineer or Surveyor verify and tie your site drainage into it.
Response: Comment noted.
- Extend storm sewer through the site, including inlets, pipes, manholes, etc., as needed.
Response: Comment noted.

Fire/Life Safety Comments- Building Divisions

The Building Division will receive a referral of the Site Plan and Subdivision Plat for review and comment. They will review these documents for Life Safety (Fire Code) and Building Code issues.

Key Issues:

- The pre-application meeting drawings provided show a second point of emergency access from Parcel A, Lot 1 utilizing the RTD site to the south to access Centrepont Drive. Currently, the RTD site, Centrepont Sub. Flg. No. 4 does not contain a fire lane or public access easement. To formally establish this secondary emergency access, the applicant must acquire a cross access agreement in the form of a fire lane and public access easement from RTD. Please work directly with Real Property to define what is required to obtain this cross-access agreement.
Response: Comment noted.
- The Fire/Life Safety comments being provided address the Master Plan and Plat requirements associated to the general location of roadways and land uses.
Response: Comment noted.

Fire Department Access:

Based on the information presented so far, the type(s) of fire apparatus access road(s) needed for this site is:

- Fire Lane Easement
 - Buildings less than 30' in height require only a 23' wide fire lane easement with 29' inside and 52' outside turning radii. Building greater than 30' in height require a 26' wide fire lane easement with a 26' inside and 49' outside turning radii.
Response: Comment noted.
 - Buildings greater than 30' in height are regulated by the 2015 IFC Section D105 and require a both a 26' Fire Lane Easement and two points of emergency access. Typically, the 26' fire lane easement is located on the front main entry side of the structure within a minimum of 15' and a maximum of 30' from the exterior wall of the building. Structures greater than 30' in height also require a second point of emergency access.
Response: Comment noted.
- Public Street Adjacent to Site
 - Structures greater than 30' in height and adjacent to a public street must provide a 26' wide fire area capable of accommodating aerial fire apparatus (ladder trucks). The intent is to establish a fire apparatus parking area no greater than 30' and no less than 15' from the exterior wall of the structure. This fire apparatus area must be posted as "No Parking-Tow Away Zone" to ensure availability for fire apparatus.
Response: Comment noted.
- Urban Street Standards
 - The site reflects the use of urban street standards. To accommodate large emergency response vehicles, where structures are greater than 30' in height, a minimum of 26' of paved surface width can be required by means of driveways, "No On-Street Parking" areas or other equivalent design

features.

Response: Comment noted.

Fire Hydrants:

The number and spacing of fire hydrants are determined using the 2015 IFC, Appendix B & C. As indicated in the previously stated code sections, fire hydrant coverage requirements include both internal site areas and abutting public street systems.

The site reflects the use of urban street standards. Placement of fire hydrants within urban streets designations should begin at intersections. Where fire hydrants are required along urban streets using on-street parking, a 20' minimum section in front of a fire hydrant must be visually designated as "No On-Street Parking" or a landscape island bump-out could be used to place the fire hydrant a minimum of 3'-6" to a maximum 8' from face of curb.

Response: Comment noted. All hydrant requirements will be met.

Handicap Accessibility Requirements:

- The City of Aurora reviews handicapped accessibility requirements based on 2015 IBC, Chapter 11, the 2009 ICC/ANSI A117.1 and the 2003 Colorado State House Bill 03-1221, Article 5, Standards for Accessible Housing.
 - Residential
- The City of Aurora reviews handicapped accessibility requirements based on 2015 IBC, Chapter 11 and the 2009 ICC/ANSI A117.1
 - Residential
- The City of Aurora reviews handicapped accessibility requirements based on 2015 IBC, Chapter 11, the 2009 ICC/ANSI A117.1.
 - Commercial

Response: Comment noted. All accessibility requirements will be met.