

February 22, 2021

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

Re: **Metro Center #1449821**: Response to Second Review Comments

Dear Heather,

Thank you for your first review Master Plan comments, which we received on December 18, 2020. We have reviewed all the comments and have addressed them in the following pages. Responses are also informed by the meetings held with staff on December 18, 2020, December 22, 2020, January 14, 2021, and February 17, 2021. We appreciate all of the feedback and hope to continue working with Staff as we advance this application.

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

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Parcel PA-A1 requires secondary vehicular and pedestrian connection from Dawson Street as illustrated on Page 26 of the SAP and appears necessary to meet the long-term development goal identified in the SAP.
Response: *Per discussions and requests/requirements from Staff, a connection to A1 via E. Dakota Ave. is now shown. We understand that different departments and stakeholders have different impressions on the necessity and desire for this street connection. The conceptual design shown is the current best compromise intended to meet the needs of most.*
- Please provide the anticipated number of units; conflicting numbers have been provided. It is important to have the unit count correct for the purposes of PROS and school district reviews.
Response: *Per this request, the potential proposed density is included with this resubmittal. Please see Master Plan sheet 2.*
- Provide additional detail to the open space network to address the goals of planning documents and PROS requirements and clarify expectations moving forward.
Response: *Per discussions and requests/requirements from Staff, additional detail on the parks and land dedication network is provided in this resubmittal. Please see Master Plan sheet 4 for detail on the parks network being provided with this Master Plan.*
- A comprehensive overview of staff recommendations on adjustment requests is provided below.
Response: *Comment noted, thank you.*
- No central plaza has been provided as a gathering space as required by the Station Area Plan and other plans and regulations. As designed, the park space that is proposed does not meet the standard for a central gathering space. It is suggested that a central plaza be located in Area C adjacent to Centrepont Drive consistent with the below comments.
Response: *The Metro Center Plaza has been identified as the central gathering space for Metro Center. The park on the south side of C1 is on the high point of the site and will provide views of the front range and an ideal spot for both passive and active uses. Additionally, Dawson Street now runs from Grand View Park to the Metro Center Greenway as the main street for the development, with a connected network of small urban parks/plazas.*

PLANNING DEPARTMENT COMMENTS

1. Community Questions, Comments and Concerns

1A. No community comments were received this review cycle.

Response: *Comment noted. A community meeting was held on February 18, 2021 with City Staff and the Owner's development team. A summary of this meeting was provided to Staff.*

1B. Repeat Comment: A neighborhood meeting will be required. Please contact Scott Campbell (scampel@auroragov.org) regarding scheduling a meeting. The meeting will be held as a virtual meeting.

Response: *Comment noted. A community meeting was held on February 18, 2021 with City Staff and the Owner's development team. A summary of this meeting was provided to Staff.*

2. Completeness and Clarity of the Application

2A. Additional land use and residential density information is needed to determine the required amount for neighborhood and urban parks to be provided on site. The amount of on-site parkland must be determined as part of this review process. A sample table has been provided below that was drafted during a previous Master Plan review of the site.

Response: *Comment noted. As requested by City Staff, current proposed residential densities are provided.*

Please see Master Plan sheet 6 for more clarity and detail regarding Metro Center parks provisions and requirements.

2B. What is the proposed density for each planning area? A sample of a land use table from the Nine Mile TOD development is provided for reference purposes. Please include a similar table on the Master Plan.

Response: As requested, current proposed density is shown on sheet 2 of the Master Plan. Densities are subject to change at Site Plan level design.

Comprehensive Planning Comments

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

Primary Issues:

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

Aurora Places:

2C. Aurora Places Placetype Map identifies Metro Center as an “Urban District” Placetype which is defined as follows: “Urban Districts are critical to the economic and fiscal health of the city because they will serve as the centers of employment, culture and activity. Urban District is the city’s most intensely developed area with mixed-use, entertainment, institutional, retail, restaurant and multifamily residential as defining uses. In the absence of a “Downtown Aurora,” this placetype creates a unique mix of uses in a dense urban fabric, that provides a pedestrian-friendly environment and a place to live, work, shop, dine, recreate and more. It is distinguished from other placetypes by density, scale and the prioritization of multimodal transportation.”

Response: We have responded to the recitation of the Aurora Places with each submittal. Metro Center will meet the Aurora Places vision for an Urban District Placetype. It is envisioned and planned to be a vibrant mixed-use, urban, transit-oriented district.

2D. The comprehensive plan further describes Urban District placetypes as an “opportunity to define Aurora’s image and aesthetic through high-quality design and architecture supporting active places and distinctive destinations.” This district can offer high-quality public spaces, a home to local or unique businesses, and a new and diverse urban neighborhood experience. New development and investment in the City Center area offers a once-in-a-generation opportunity to offer the community a new experience and destination and offers Aurora a rare opportunity to redefine itself to metro area residents, visitors, and potential investors and developers.

Response: We have responded to the recitation of the Aurora Places with each submittal.. Metro Center will meet the Aurora Places vision for an Urban District Placetype. The Design Guidelines and Standards set the stage for high-quality design and architecture with high-quality public spaces. The design will be provided and fulfilled at time of Site Plan.

Designated DRCOG Urban Center

2E. The proposed development Metro Center is also identified by the city (through the comprehensive plan) and DRCOG as a designated Urban Center and “DRCOG’s Metro Vision plan describes the “urban centers” as a model for healthy, livable communities. These designated centers are intended to feature a multimodal travel network within a mixed-use, urban district with diverse housing, employment and service opportunities accessible without sole reliance on automobiles.”

Response: Comment noted. Metro Center is designed to be a mixed-use, transit-oriented urban district with a multi-modal travel network, diversity of housing and employment and service opportunities.

2F. These designated Urban Centers represent the city’s most advantageous and desirable locations for urban-scale concentrations of residential, commercial, and office development. Urban Centers are intended to receive significant residential and employment growth in coming years. Planned densities and building formats should exceed typical suburban scale development and enable substantial concentrations of both jobs and residents. By focusing significant new growth into these strategic areas, the city can capitalize on valuable development opportunities and build upon existing transportation networks and infrastructure investments.

Response: Comment noted. Metro Center is designed to represent a DRCOG urban center with higher densities than typically found in the more suburban subareas in Aurora.

City Center Vision and Development Framework (in progress 2020)

2G. In Spring 2020, the city kicked off the development of a vision and development framework for the City Center area, which includes the Metrocenter property. Additionally, the steering committee for the project includes area property owners (including property owners for Metrocenter) as well as elected and appointed city officials and other key stakeholders and partners. The city has conducted a series of community engagement opportunities, including virtual meetings and online surveys. Based on the feedback received to date, key themes that have emerged from community input include:

- a) Stakeholders like the accessibility and shopping/dining options available in the area, but want even more diversity and choices.

Response: Comment noted. Metro Center will be a vibrant mixed-use destination, offering a variety of retail/ dining options.

- b) Unattractive or "cookie cutter" development with expansive parking lots were disliked. There is a desire for a cohesive and recognizable feel for Aurora’s city center.

Response: Comment noted. Metro Center will not be cookie-cutter- rather a unique, vibrant mixed-use destination within the City of Aurora.

- c) Active public spaces, including parks, plazas, and other outdoor areas should be part of the district. Safety, attractiveness, and maintenance are key.

Response: Active public spaces, parks and plazas are a cornerstone of the Metro Center Master Plan, please see sheet 8 of the master plan and the design guidelines for more details.

- d) Stakeholders desire more options for shopping, dining, and entertainment, including a strong desire for unique or local businesses. Additional mid-tier and upscale dining was a clear desire.

Response: Comment noted. Metro Center will be a mixed-use destination, offering a variety of stores, restaurants, destinations, and activities.

- e) A "park once and walk" district is supported by stakeholders, with safe and convenient crossings at major streets and to surrounding neighborhoods being important. Stakeholders support inclusion of a variety of transportation options, including walking, biking, and public transit.

Response: Comment noted. Metro Center is designed to be a walkable, bikable, mixed-use community.

- f) The atmosphere of the shopping district or neighborhood and convenience to a variety of stores, restaurants, and activities were cited as very important to stakeholders.

Response: Comment noted. Metro Center will be a mixed-use destination, offering a variety of stores, restaurants, destinations, and activities.

- g) Stakeholders desire activities and destinations that attract individuals and families of all ages and types, as well as draw visitors from across the metro area.

Response: Comment noted. Metro Center is designed to be an inclusive mixed-use community, with a variety of destinations and activities for a diverse public.

- h) Housing options at a variety of prices, from lower to higher, are reported by stakeholders as important. This includes support for "for sale" housing options.

Response: Comment noted. The mixed-use zoning allows for both for-rent and for-sale product. Final residential products will be confirmed at time of site plan.

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

Response: Comment noted. The vision, design guidelines and standards, as well as the zoning for Metro Center are in alignment with the Urban District placetype.

Parks and Open Space Comments (Comprehensive Planning)

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

Response: Urban parks are featured and described in Form J and the Urban Park plan provided in the master plan.

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

Response: A variety of small urban parks meeting PROS standards are distributed throughout Metro Center. Larger spaces are provided in Greenway Park and Grand Vista park to give additional recreational options.

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

Response: The TIP match payment is identified in the Master Plan. The UDO & 2015 SAP specifically calls for use of Small Urban Park and does not require large parks on each Planning Area. Following is the section on parks from the City Center Station Area Plan:

To meet the city of Aurora requirements for dedication of community and neighborhood park lands in association with new residential development, options such as Small Urban Parks should be explored and a system of open spaces should be linked.

Small Urban Parks are specifically designated for areas defined as urban centers, transit-oriented developments and urban infill development parcels. Such parks can be no less than 10,000

square feet in size should complement and integrate with surrounding uses and serve two functions; 1) provide facilities to meet the park needs of residents by serving as place for social interaction and leisure opportunities; 2) create focal points and activity nodes with the urban fabric; and 3) provide “meaningful recreation, education and conservation benefit”. Please refer to the City of Aurora’s Parks and Open Space Manual for complete requirements.

Diversity of Housing Comments (Community Development)

2L. Aurora Places Community Principle: Housing for All: “By expanding the types of housing and neighborhoods that Aurora offers, the city can better meet the diverse preferences and needs of residents across the income spectrum.” Aurora Places “participants described the need for more high-quality housing in a range of types and prices, including affordable housing.”

Response: Comment noted. Metro Center celebrates diversity and is working hard to ensure that they can bring a diverse population. The Master Plan and Design Guidelines speak to the vision and the importance of diversity at Metro Center. An adjustment from the City UDO has been requested to ensure that we can achieve housing diversity within this Master Plan. A variety of urban, mixed-income housing options will be provided at Metro Center.

2M. Aurora Places Community Principle: A Diverse and Equitable City “The population of Aurora is diverse in every way. Aurorans want to celebrate this diversity and make sure that services are provided to the people of Aurora, regardless of background, age, income or ability.”

Response: Comment noted. Metro Center celebrates diversity and is working hard to ensure that they can bring a diverse population. The Master Plan and Design Guidelines speak to the vision and the importance of diversity at Metro Center. An adjustment from the City UDO has been requested to ensure that we can achieve housing diversity within this Master Plan. A variety of urban, mixed-income housing options will be provided at Metro Center.

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

Response: Comment noted. The market rates will be further explored at time of Site Plan. Metro Center celebrates diversity and is working hard to ensure that they can bring a diverse population. The Master Plan and Design Guidelines speak to the vision and the importance of diversity at Metro Center. An adjustment from the City UDO has been requested to ensure that we can achieve housing diversity within this Master Plan. A variety of urban, mixed-income housing options will be provided at Metro Center.

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

The Consolidated Appropriations Act of 2018 (the Act) was signed into law on March 23, 2018, that permanently established Income Averaging (IA) as a third minimum set-aside election is intended to serve households earning as much as 80 percent of Area Median Income (AMI), provided the average income/rent limit in the property is 60

percent or less of AMI. Developments that select IA must commit to having at least 40 percent of the units in the property affordable to eligible households.

Response: *The mixed use allows for a variety of density, developer currently and developer currently anticipates different construction types, different rental rates, including the potential for affordable housing. Developer will provide proposed density and land use table, understanding it may change at site plan application.*

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

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

Response: *Comment noted.*

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

Response: *Comment noted. The developer has undertaken a feasibility study (and provided to AURA) for all asset classes that includes residential for-rent and for-sale.*

3. Station Area Plan

3A. The City Center Station Area Plan, adopted by reference as part of the Aurora Places Plan, serves as the design guidance for the Metro Center Station.

Response: *Comment noted. Metro Center complies with the goals and the spirit of the City Center Station Area Plan.*

3B. Central spaces give identity to TODs. Public spaces are very important in TODs; parks, plazas and main streets that are beautiful and useful can become important identifying elements with the city of Aurora's Small Urban Parks (SUP) standards serving as an implementation tool. The proposed open space network needs refinement in terms of quantity, location, classification, and proposed use. More detailed comments are provided below.

Response: *Comment noted. We have revised the master plan to where Dawson Street extends from Grand Vista Park to the south to the Metro Center Plaza and Greenway, with small urban parks connected along the way- reinforcing the "string of pearls" concept for public realm.*

3C. The Station Area Plan also requires a defined Main Street. It is important that a defined main street be developed with buildings and public opens spaces fronting the street with minimal building setbacks. The desired building forms along this street shall have active ground floor uses with on-street parking. Building forms should be related to the width and activity on the street that fronts them, so that a sense of enclosure is created. While the proposed Main Street has many desirable qualities it does not, by itself, meet the main street requirements in terms of setbacks or enclosure. Staff recommends consideration of an alternative or additional main street area as previously discussed.

Response: *Main Street has been defined in Metro Center as and Dawson Street. There will be active ground floor uses and on-street parking, as well as an enhanced streetscape that connects the Greenway park on the north to Grand View park on the south and dotted with additional small urban parks as a string of pearls.*

Per requests from Staff, additional design standards are applied to buildings along Dawson Street.

3D. While the regional drainage corridor that leads from the Municipal Building to Metro Center station serves a utilitarian function, it is also envisioned as a park space that provides for passive recreation. Please address this as a project amenity; furthermore, a concept landscape plan should be provided to illustrate compliance with the grant match obligation for this project (\$234,000). Design elements from the guidelines should continue through this park space, and there are opportunities for public art installations along this corridor. (Previous sketches provided below for review)

Response: Conceptual plans for the Metro Center Greenway (drainage corridor) have been provided to the City within the Design Guidelines, along with all of the proposed design elements and opportunities for park installations.

3E. The zoning guidance in the plan has specific standards regarding TOD-Core and TOD-Edge subdistricts and should be included as an exhibit in the plan.

Response: Please see page 22 of the Design Guidelines. This has been included since the first submittal. It is also included pm Sheet 2 of the Master Plan.

4. Zoning and Land Use Comments

4A. The Master Plan approval criteria are as follows (Section 146-5.4.1E3): a. A Master Plan shall only be recommended for approval, and shall only be approved, if: i. It is consistent with the Comprehensive Plan, the purpose statement for the zone district(s) where the property is located, the use regulations in Article 146-3 for the zone district(s) where the property is located, and all other adopted plans and policies of the City Council; *This criterion is not met*

Response: Metro Center (as well as the Town Center at Aurora, Aurora City Plan, and the Aurora Municipal Complex) is located in the Comprehensive Plan – Aurora Places’ Urban District Placetype. The Comprehensive Plan describe Urban Districts as “a mix of residential and commercial uses focused around great public spaces where people can live, work and come together” and creating “outdoor spaces that are appropriately sized and surrounded by active uses to create around-the-clock places”. The Urban District 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. Urban Districts are critical to the economic and fiscal health of the city because it is a center of employment, culture, and activity. Through the City’s Aurora Places adoption, it was clearly determined by the community that the Metro Center site should serve as the key location within Aurora’s Downtown with Transit Oriented Development (TOD). The Comprehensive plan calls for TODs to “Ensure an appropriate mix of housing, employment, entertainment and services focused around gathering places, such as a central plaza or main street” and are described as a “key entry point to the city with quality urban design, public art, and innovative businesses”. The Metro Center Master Plan is a mixed-use, urban, walkable TOD community that will be a hub for entertainment, retail, multi-family housing, hospitality, and commercial uses. The Master Plan and Design Guidelines are written to allow the organic development of this urban center with the necessary guidance to require quality growth. The Metro Center Master Plan is consistent with the goals and the spirit of the Comprehensive Plan.

ii. It will allow future development of the property to comply with all applicable standards in this UDO; *This criterion is met*

Response: This criterion is met. There is one adjustment requested with this Master Plan, and the reason for this adjustment is to better allow for a diversity of housing. The Master Plan complies with all other applicable standards in the UDO.

iii. It will result in a coordinated system of streets, trails, sidewalks, open spaces, and infrastructure systems that do not create significant adverse impacts on the surrounding area, or any significant adverse impacts have been mitigated to the degree practicable; and, *This criterion is not met (coordinated system of streets, which includes the need for a bridge)*

Response: *A coordinated system of streets, trails, walks, bikeways and infrastructure is a part of the Master Plan application. A street connection to A1 is included as a part of this resubmittal as discussed and requested by Staff. In addition, the proposed road network for Metro Center matches what is proposed in the Station Area Plan.*

iv. It will improve or expand multi-modal connections with adjacent sites, neighborhoods, and urban centers. *This criterion is met.*

Response: *The proposed road network for Metro Center matches what is proposed in the Station Area Plan. In addition, dedicated bicycle lanes are also proposed, providing north-south and east-west connectivity throughout the site, and dedicated pedestrian routes to and from the RTD station.*

4B. The Adjustment approval criteria are as follows (Section 146-5.4.4.D.3)

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

Response: *Comment noted. One adjustment is included as a part of this application. The goal for the parking adjustment is to allow a wider diversity of product and market pricing – allowing for a more diverse population. It will not provide any adverse impacts on any abutting lot and any adverse impacts are mitigated by the urban design commitments included in the adjustment.*

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

Response: *Comment noted.*

- c. At least one of the following criteria have been met:

- i. The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment. *This criterion may not be met with surface parking. Additional standards should be provided about where surface parking may be permitted and how it meets the overall intent of the parking screening requirements in the TOD zone district standards.*

Response: *Please see parking table that is included on Sheet 4 of the Master Plan. And adjustment from the parking requirement is requested for PA C – such that the aggregate of the parking for C1, C2, and C3 will have 50% surface parking. Surface parking will be tucked behind any buildings on Centrepont and Dawson Streets to maintain an urban streetscape. Any buildings will still meet setback and build-to requirements, will be 4-story, elevator served and will provide the urban setting desired at City Center.*

- ii. The adjustment will provide options for a more connected neighborhood layout or, for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment. *If a setback adjustment request is to be considered for approval, it will be required that this criterion be more fully addressed in the design guidelines.*

Response: *Acknowledged, we will comply with the setbacks.*

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

Response: Comment noted.

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

Response: Comment noted.

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

Response: Comment noted.

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

Response: Acknowledged, thank you.

Code Section 146-2.4.6 H - Streets and Public Space

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

In the applicant's response letter dated Nov. 19, 2020, the applicant indicates the SAP takes precedence and this adjustment is no longer required and cites Figure 12 in the SAP as the controlling document.

Figure 12 in the SAP is a Concept Plan. The block length and perimeter standards in the UDO further define required block size and are not in conflict with the SAP Concept Plan. If the UDO standards are not met an adjustment is required. Staff does not support an adjustment for block length at the master plan stage. Block length and perimeter can be reduced at time of site plan through the use of alleys, private drives, public realm, and building articulation. If still required, an adjustment to block standards can be considered at the site plan stage. This requirement is written into the Master Plan and the Design Guidelines.

Response: Per the Station Area Plan "block size and street grid: A system of streets with on-street parking shall reflect an urban form street grid similar to that depicted in Figure 12. Concept Plan within this document (p.30)". The Metro Center Master Plan follows the roadway configuration as shown on Figure 12 Concept Plan on page 23 of the Station Area Plan, meeting the requirements of the SAP.



In addition, to help satisfy Staff concerns, the Master Plan and Design Guidelines state on Page 23, Mixed Use Blocks, “To meet the TOD block standards, blocks may be broken up by: public streets, private streets, alleys or private drives, breaks in the building facade, or outdoor rooms.”

We believe we are in general agreement, with the exception of B5. This parcel has a high likelihood of becoming a site for affordable or senior housing potentially prohibiting a “continuous” street or pedestrian connection based on the nature of these types of development. The following statement is included in this resubmittal .

PA-B5 WILL FOLLOW BLOCK STANDARDS PER THE U.D.O. AND METRO CENTER MASTER PLAN DESIGN GUIDELINES, UNLESS IT DEVELOPS AS AFFORDABLE OR SENIOR HOUSING.

We believe that this is a moot point as Metro Center meets the City’s block layout identified in the Station Area Plan. We have given an added layer of requirements with the statement in the Design Standards.

Code Section 146-2.4.6.F Motor Vehicle Parking

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

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

Response: The goal to provide a diverse mix of housing types is greatly impacted by the structured parking component. Diverse housing allows for a diverse community, which is a top priority for Metro Center. The vision for parking in Parcel C is shown in the illustrative plan, which has one development with structured parking, and another development with tuck under combined with surface parking sited behind primary building frontages. Multi-family buildings would still need all building setbacks as well as the 4-story minimum height with elevator-served requirement.

Code Section 146-4.3.C

This request is for an adjustment from the maximum permitted parking in Parcel B should it develop as office uses.

The adjustment allows up to 4.0 spaces per 1,000 GFA in Parcel B for office developments. Staff does not support this adjustment at the master plan stage. If still required, an adjustment to parking can be considered at the site plan stage.

Response: This is no longer a waiver request. This was removed in the second submittal.

Section 146-4 (Table 4.2-3)

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

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

Response: Densities have been identified on Sheet 6 of the Metro Center Master Plan.

UDO Table 4.2-3

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

Staff does not support this adjustment.

Response: We have included building heights on Sheet 4 of the Master Plan. We will follow the minimum building height, unless a grocer user and associated retail locates on PA A2.

UDO Table 4.2-3

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

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

Response: Comment noted. We no longer are requesting deeper build-to requirements for curved streets.

4D. Main Street: The main street here is envisioned as a destination and part of Aurora's downtown. A walkable place with high-quality urban design features, building design creating a sense of enclosure with sufficient retail space to create a destination within this market. Additional discussion regarding the Main Street and retail has been provided in the Economic Development and Retail comments below.

Response: Dawson Street is the true main street for Metro Center. It provides both a vehicular and a pedestrian experience that connects the existing City Center Park and Civic Plaza north of Alameda into the Metro Center Greenway Park, Metro Center Plaza and the mixed-use development and "last mile transit" zone. An extension of Dawson Street is included with this revised Master Plan showing that it will extend south to the C1 Grand Vista Park at the top of the hill to provide the necessary link that connects the two parks on either end. This connection will include enhanced streetscaping and a pedestrian amenity zone that will make a stronger connection and "string of pearls" from the Grand Vista Park located in PA-C1, to the SUP in PA-C2, to Metro Center Plaza and Greenway Park. Additionally, please note the following:

- a) There is no provision in the UDO or the SAP that requires that the Main Street be a "two-sided" Main Street. No additional main street location within Metro Center would be comparable to the public realm amenities that are being provided along Dawson. The SAP identifies that the RTD parking lot may redevelop as Mixed Use over time. Should this redevelopment occur over time, there is the potential for development on both sides of Dawson, fulfilling this current preference.**
- b) The SAP clearly calls out the term "Main Street" on Figure 13 (page 25) in the location we identify as Dawson Street.**
- c) The SAP Figure 13 (Page 25) shows the "second side" as the "Future Mixed Use" on the RTD parking. Dawson Street Plaza, as currently configured allows for the implementation per the SAP.**

4E. Two-sided Main Street: Based on the continuing dialogue regarding the location of the main street, the need for a unified central gathering space, and other design issues changes will be required. Staff recommends consideration of an alternative or additional main street area as previously discussed.

Response: The 2015 SAP (page 25) shows Dawson St defined as Main Street and the RTD site developing in the future as the "second side" of the street. The Master Plan complies with the 2105 SAP using Dawson as Main and the Central Plaza that connects the station, the trail corridor, Alameda Parkway, and other Planning Areas at Metro Center. There is no provision in the UDO or the SAP that requires that the Main Street be a "two-sided" Main Street. No additional main street location within Metro Center would be comparable to the public realm amenities that are being provided along Dawson. The SAP identifies that the RTD parking lot may redevelop as Mixed Use over time. Should this redevelopment occur over time, there is the potential for development on both sides of Dawson, fulfilling this current preference.

4F. Building relationship to the street. In conjunction with the clarifications and discussions on the public spaces, we would like to prioritize building street frontage in various planning areas. For example, the north/south drive through Planning Area B shows building oriented to this street instead of other streets in the planning area. When development is proposed, there should be clear expectations in this regard. An approach may be to utilize the conceptual rendering to set those priorities across the master plan area.

Response: To provide some clarity and intent, following please find a building frontage plan identifying primary and secondary frontages. We have included a building frontage exhibit on Sheet 8 of the Metro

Center Master Plan, along with additional performance standards to help alleviate this concern.

4G. In the Design Guidelines, (7.2.2.3) Replace “Building Department” with “Planning and Development Services”

Response: This has been revised as requested.

4H. In the Design Guidelines, (7.3) Remove language about the DRC amending text in the guidelines.

Response: We will comply with this request. Language about DRC amending text has been removed.

4I. Planning Area A-1 – The Bridge: A public vehicular connection between Parcel A, Lot 1 and the remainder of the project is important to realize the vision for this site identified in the City Center Station Area Plan. The Station Area Plan notes that the intersection of Sable Boulevard and Alameda Avenue is considered to be the gateway to the station area and should serve as the primary architectural highlight of the district. Without this connection total development on the parcel will be limited to approximately 124,000 square feet and buildings will be limited to 30 feet in height. In addition, challenging access from the east could negatively impact market interest and future land uses for this site. Staff is open to discussing options to achieve access between Parcel A, Lot 1 and the remainder of the project but additional analysis of the feasibility of a vehicular connection is needed. With your next submittal please provide a preliminary analysis of a bridge and at-grade connection to allow staff to understand the feasibility, and cost of providing a connection and provide a proposed approach for maintenance. Staff is also available to meet and discuss this issue if needed.

Response: We have extended E. Dakota Avenue to make the vehicular connection to PA-A1, as requested.

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

5A. The question most often asked and reflected in the city’s newly adopted Aurora Places Comprehensive Plan, is “Where is Aurora’s downtown?” Prior to the construction of the I-225 interchange at Alameda Avenue, the Aurora Mall and the construction of Aurora’s Municipal Center, the city of Aurora has identified this vacant land area now known as Metro Center to be part of the city’s downtown serving as a primary center of activity and even had designated the area for a specialized zoning categorization of City Center. To realize this vision, a downtown should include a mix of residential, office, retail, restaurants, entertainment and other amenities. Based on data within the local Economic Development community, the goal is to create both; 1) a unique, walkable place to live/work/recreate/relax; and 2) a regional destination for residents and visitors to travel to and enjoy an overall mix of parks, exceptional restaurants, retailers and personal services occupying up to 100,00 square feet of area. In order to create a successful “park once and walk” known more commonly “walkable urbanism”, there needs to be a critical mass of both residential and office space serving as an anchor forming a base of customers that can enjoy flexible spaces which facilitates the spending money within an eclectic mix of retail/restaurants/entertainment. If this critical mass is reached, customers will travel from an average of 5-7 miles to experience this project, with average “stays” of between 1.5 - 3 hours. This is referred to as a “Destination mix” of retail/restaurants (aka Leisure and Lifestyle mix), which occupies the opposite end of the retail spectrum from a “Convenience mix” of retail/restaurants (5-15 minute “stays”).

Response: Comment noted. We believe Metro Center complies with the Aurora Places Comprehensive Plan, providing a vibrant mixed-use destination. Metro Center will be a part of Aurora’s downtown, serving as a center of activity. Please refer to all of the provided responses above.

5B. Downtown destination restaurants are typically sit-down restaurants with lots of outdoor spaces and seating, unique design, eclectic menus, some form of entertainment in the later hours, and a sense of activity, energy and excitement. Please note that as per the adopted Station Area Plan, franchise architecture is not permitted with the intent of creating unique, new to market destinations. The overall mix of restaurants should be more than twice the typical restaurant mix (psf) of a retail project, meaning 100,000 square foot project could have 4-5 restaurants, plus at least two focused concepts (coffee, ice cream, etc) and may occupy up to half the total retail space.

Response: Comment noted. Metro Center Plaza, and enhanced streetscape areas along E. Centerpoint

Avenue provides central gathering spaces, and an extension of space for retailers and restaurants for outdoor shopping and dining in these areas. We believe unique destinations can incorporate franchise architecture when providing much needed goods/ services, for example a national grocer.

5C. In particular on Parcel A, Lot 1, whether or not this prominent corner property is limited due to its access challenges, the use there should be a unique destination reflective of its prominent location and serve as a “gateway landmark” for the entire development and should be unique destination use and could possibly be a music venue similar to a Soiled Dove, Ophelia’s or Golden’s Buffalo Rose.

Response: Comment noted.

5D. The other half of the retail space would be home to unique retailers selling a full variety of products that set themselves apart from the national retailers. These are not ‘Value’ retailers, these are full-price retailers selling items not found at Department stores or Target/Wal-Mart. Belmar in Lakewood, Downtown Arvada, Pearl St in Boulder and South Pearl St in Denver are examples of this type of Retail/Restaurant mix.

Response: Comment noted.

6. Aurora Urban Renewal Authority Comments (Jennifer Orozco / (303) 739-7483 / jorozco@auroragov.org and Melissa Rogers / mrogers@auroragov.org) 6A. The developer has indicated interest in exploring options for public-private cooperation and financing. For this to occur there will be a requirement for alignment of this Master Plan document with the adopted Urban Renewal Plan and the Visioning Plan. To determine compliance and to identify gap financing, additional land use, density and infrastructure expenditures will need further definition. Please continue meeting with the Urban Renewal Staff with Jennifer Orozco at jorozco@auroragov.org as the primary point of contact.

Response: The Owner/Developer has been in communication with AURA and Jennifer Orozco has attended a number of meetings held with Staff to discuss these comments.

City Center District:

6B. The 2015 City Center Station Area Plan envisioned a distinctive, transit-supportive area at the Metro Center station. The extensive infrastructure improvements that have been invested in the City Center “district” over the last 15 years, sets the framework to develop City Center as a Transit Oriented District providing a dense and diverse mix of uses, parks and public gathering places, that are interconnected and pedestrian accessible. The Metro Center property provides a unique opportunity to achieve this vision, while leveraging the light rail station location and creating a connection and linkage to the “four corners” districts and existing and future neighborhoods within City Center.

Response: Comment noted.

6C. The undeveloped Metro Center property, located within a TOD Core zoning district, has long been viewed with expectations of a high-density, pedestrian-oriented destination that will serve as Aurora’s downtown. To assist on-going inquiries within the larger City Center district, Planning Staff initiated a public visioning exercise to confirm the public’s vision for the area, and inform the City Center and four corners districts, including the development of the Metro Center property.

Response: Comment noted.

6D. Implementation of a process for public feedback is also considered an essential step by City Council and the AURA Board associated with any financial assistance. As it pertains to the Metro Center project, the Master Plan document must align with and meet the goals of the Aurora City Center II Urban Renewal Plan, the City Center Station Area Plan and the visioning plan.

Response: Comment noted. A second community meeting was held on February 18. Three neighbors were in

attendance. The presentation and meeting notes were provided to Staff.

Proposed Metro Center Plan:

6E. While the planned Metro Center retail component is still somewhat in flux, the 10,000 SF of retail located in two separate locations, as shown in the Plan, is lacking in scale and design format to fulfill the goals of creating a unique and inviting “destination”. A retail component approaching 70 to 100 thousand square feet in scale would allow implementation of a substantial main street or town square destination, and better facilitate a mix of retailers that could create a synergy of activity, interest and excitement.

Response: Comment noted.

6F. In addition, the project should address the strong public desire for some type of unique entertainment use, whether it be “live music, cultural, arts, special events or other indoor or outdoor entertainment.”

Response: We understand the desire for specific uses, but cannot guarantee these uses at time of master plan. Mixed use zoning allows for these uses if the market conditions allow. Consideration needs to be taken avoid cannibalizing any future Aurora Mall re-development.

6G. A vehicular connection from Parcel A, Lot 1 to the remainder of the site would greatly enhance the connectivity and cohesion within the development, as well as to provide the second point of access required from the corner parcel, in order to develop a use that is higher than the approximately 130,000 square feet and 30-foot height limitation set by Life Safety codes. The City Center Station Area Plan specifies that “this high visibility intersection is considered to be the gateway to the station area and should serve as the primary architectural highlight of the District”. In addition, Parcel A, Lot 1’s location as one of the key “four corners” of the City Center Districts, places significance on what is developed on the site. The future use should be a unique and architecturally significant development (non-franchise architecture).

Response: Comment noted. A street connection to A1 is provided with this resubmittal per discussions and requests/requirements from Staff.

6H. The guiding underlying documents also place an emphasis on the creation of an active and well-designed presence, beginning first at the RTD station. Staff suggests a phased approach, leading with an initial focus centered around the light rail station within Parcel Areas A and C, developing both the destination retail focus along with its residential base.

Response: Comment noted. We believe residential is vital to the first phase of development, in order to provide the necessary density to support retail and commercial uses.

6I. The approved Urban Renewal goals with regards to housing, specify the goal of “maintaining affordable units while creating a diversity of new units”. See the more detailed housing discussion below, but this would include offering a variety of housing choices and prices, with strong support to include medium density mixed-income and for-sale housing product in locations A and/or C, closest to the Station.

Response: Comment noted. A variety of urban housing options at a variety of incomes is planned at Metro Center.

7. Public Art Comments (Roberta Bloom / (303) 739-6747 / rbloom@auroragov.org)

7A. The Public Art Plan will require approval and payment of fees in conjunction with the Master Plan approval.

Response: Comment noted. Will pay fee upon receiving invoice.

7B. The narrative elements about the goals for public art at the Metro Center, the prescient images, and the maps indicating what types of art opportunities might occur at specific locations are very strong and powerful.

Response: Acknowledged, thank you.

7C. I did not notice a budget for the public art plan. For Metro districts, public art budgets are developed using a specific formulary that is updated annually based on acreage and land use. The version we are currently using is below.

Current Rates for Calculating the Public Art Requirement

Residential = \$330.77 per acre

Mixed Use = \$508.88 per acre

Non-Residential = \$540 per acre

Response: We believe the rates shown are incorrect as we are in a TOD. We will comply with the TOD public art requirements.

7D. This will give the total Public art requirement. Is the development at a point where there is a sense of how the land use is going to break out? It seems like it probably is, so this would be a good time to start looking at the budget ramifications.

Response: Comment noted.

7E. Then, typically, it is recommended that 75% is set aside for the actual Professional Artist Budget, and 25% is set aside for administrative and maintenance costs as outlined below.

Example Project: Total Budget of \$100,000

75% Professional Artist Budget \$75,000

5% Public Art Plan Application Fee (paid to City) \$ 5,000

10% Future Maintenance & Repairs (set aside) \$ 10,000

10% Project Coordination (up to 10%) \$ 10,000

Response: Comment noted.

7F. The other element that is missing is some sort of timeline. Which areas will be developed first, and approximately when is it anticipated that will that begin? How will the public art process overlap with that development on-site? We are not looking for dates like mid-September 2022, but it could be broader like "third quarter of 2022."

Response: Public art will be provided on a site plan by site plan basis and will be reviewed and approved by the Metro Center architectural control committee and reviewed with the Public Art Coordinator.

8. Streets, Light Rail and Pedestrian Issues

8A. Street Dedication must be addressed as part of the development of each planning area through a plat.

Response: Understood.

8B. Safe pedestrian connections to the Metro Center Light Rail stations are important. Those connections should be provided outside of the current bus circulation area as well as the parking lot so that if that area is redeveloped, sufficient connections from this development to the station will be provided.

Response: Comment noted. All streets have public sidewalks that provide safe pedestrian connectivity throughout the site. Additionally, we have provided an elevated bike lane that runs along E. Center Ave, Centerpointe and Dawson Street.

9. Parking Issues

Design Guidelines

9A. (1.3.9) The commentary about visible parking is not understandable and it is not clear what you mean - visible as in surface parking? This appears contrary to much of the intent of code to minimize the visual impact of surface parking.

Response: Comment noted. This section has been revised for clarity.

9B. (4.17) Two of these standards on the parking structures conflict with code requirements, relating to the maximum height of lighting on the top floor of the parking structure code limits this to 12' and code also has a minimum height of ground floor clearance. Please remove these or clarify.

Response: Comment noted. These have been removed as requested.

9C. (7.2) there is a duplicate Section 7.2

Response: Comment noted. The duplicate has been removed.

9D. Except on a very limited basis, surface parking is not permitted. Shared parking is encouraged. Section 146-2.4.6.F states, "For properties located in the MU-TOD Core subdistrict, at least 80 percent of provided parking shall be located in parking garages or alternate parking facilities, such as elevated parking lifts, rather than surface parking lots, Please be aware that the only manner in which you can exceed the maximum parking in the zone district is through structured parking." Planning Areas B-1, B-2, C-2 and C-3 do not meet this criterion.

Response: Comment noted. A parking table has been provided to clarify proposed parking allowances per the Station Area Plan. Please see sheet 2 of the Master Plan.

9E. Section 146-4.6.5.A.2.a states that no more than 25% of the lot frontage on arterial or collector streets to a depth of 60 feet shall be occupied by surface parking. *This criterion is not being met, especially with the parcels in Planning Area B. The illustrative plans should not show circumstance of exceeding the 25% limitation.*

Response: Please see page 8 of the Master Plan that provides a building frontage exhibit, provided at the request of Staff. We believe that the primary focus for building frontage for PA B1 and B2 should be on Granby Street. Granby will have on-street parking and will be improved with enhanced street frontages. If this particular layout were proposed at time of site plan, we understand an adjustment would be required. However, no adjustments are being proposed with the Master Plan.

10. Architectural and Urban Design Issues

10A. The area defined as a "Drainage Easement" on your plans was part of Transportation Improvement Grant and requires significant landscaping and urban design enhancements to function as an activated park space also serving as the pedestrian primary connection to the light rail platform. Internal connections should traverse through this space connecting both to E. Alameda Drive and Parcel A, Lot 1.

Response: Comment noted. A landscape plan has been provided for this area, showing proposed improvements.

10B. Please refer to the design guidelines for redlines.

Response: Comment noted. We have addressed all redlines within the design guidelines document as requested.

10C. Planning Area C Park Space and related issues. An emphasis with the next submittal is to locate the primary "park" space for Planning Area C in a more central location within the residential area with design elements consistent with the Station Area Plan (SAP) and other details identified within PROS comments. The Station Area Plan emphasizes the importance of open space in terms of key TOD Principles and fundamental concepts of the plan. The current master plan submittal provides some parks, plazas or open space features which are not centrally located, are not well connected, appear to be remnants surrounding building sites, or do not meet PROS standards.

Response: *The location of the parks has been discussed numerous times to help describe the vision for Dawson as the Main Street and the string of pearls/small urban parks defining the public realm along this street.*

The current location is accessible via Dawson Street and highly visible from Sable, and commands views of Front Range from highest point of site. Dawson Street is the true main street for Metro Center. It provides both a vehicular and a pedestrian experience that connects the existing City Center Park and Civic Plaza north of Alameda into the Metro Center Greenway Park, Metro Center Plaza and the mixed-use development and “last mile transit” zone. An extension of Dawson Street is included with this revised Master Plan showing that it will extend south to the C1 Grand Vista Park at the top of the hill to provide the necessary link that connects the two parks on either end. This connection will include enhanced streetscaping and a pedestrian amenity zone that will make a stronger connection and “string of pearls” from the Grand Vista Park located in PA-C1, to the SUP in PA-C2, to Metro Center Plaza and Greenway Park.

10D. While the Dawson Street urban plaza is a desirable design element it is some distance from the residential core of the project in Parcel C. Planning staff maintain a centrally located park or plaza is needed in the southern portion of Parcel C to serve the substantial population in that area, create a clearer identity for the area and connect with other parks and plazas.

Response: *A small urban park is now identified in PA C2 at the intersection of Centrepont and Dawson Streets. This SUP provides a connection for the string of pearls defining the public realm along Dawson Street.*

10E. 4B. Clarify which spaces are anticipated to qualify as SUPs. You have proposed a variety of amenity spaces ranging from usable green spaces and plazas that, according to PROS, do not qualify as SUPs. You have also identified a number of Small Urban Parks (SUPs). It is a little unclear which amenity spaces you anticipate to qualify as SUPs as defined by PROS and which spaces are development expectations for the planning areas. We would like to coordinate with you and PROS to clarify this differentiation. Once we identify any non-SUP public spaces, we will work with you to have clear expectations for future development

Response: *Please see sheet 6 of the Master Plan set for clarity on Small Urban Parks and provided amenities.*

11. Signage Issues

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

Response: *Comment noted.*

12. Landscaping Issues (Chad Giron / 303-739-7185 / cgiron@auroragov.org / Comments in bright teal)

Design Guidelines

Page 2

- Change the footer on all sheets to “Metro Center Design Standards and Guidelines”.
Response: *This has been revised as requested.*

Page 12

- Add the circles with description to the map legend.
Response: *This has been revised for clarity as requested.*
- Show potential future street crossing and add to the legend. This should be shown on all maps throughout these submittal documents.

Response: This has been revised for clarity as requested.

- Add light rail to the legend.

Response: This has been revised for clarity as requested.

- Add the street names to the maps for easier reference.

Response: Street names have been added to the maps as requested.

- The street legend lines should be dashed to match the plan.

Response: This has been revised for clarity as requested.

Page 13

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

Response: Comment noted.

- Drive-thru businesses are not permitted within a TOD.

Response: Comment noted. References to drive-thrus have been removed.

- Include street names for easier reference.

Response: Street names have been added to the maps as requested.

Page 14

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

Response: This has been revised for clarity as requested.

- Extend the elevated bike lanes to Sable Blvd.

Response: The elevated bike lane is on the north side of E. Centerpointe Avenue. The portion of the elevated bike lane that would connect to Sable is part of the ROW associated with the RTD parcel. We cannot accommodate this request as the RTD parcel is not a part of the Metro Center Master Plan.

Page 16

- Move the highlighted guideline to the Design Standard.

Response: This has been revised as requested.

- All illustrative graphics must indicate the possible future street connection with at least a dashed line.

Response: Comment noted. This has been revised as requested.

Add the Urban Streetscape Standard is a minimum of 16' wide and shall be used throughout the Metro Center.

Response: Comment noted. The majority of streets within Metro Center comply with the 16' urban streetscape requirement. The street sections in the Metro Center Design Guidelines measure 16' from face of curb to back of walk/amenity zone, meeting the City's Urban Street Standards. The streets that do not comply with the 16' urban streetscape are those that are being improved with the two-way cycle track.

Centrepoint and Center Drive are existing streets that were overdesigned with excessively wide rights-of-way. The public improvements proposed by the Metro Center Master Plan reduce the width of the travel lanes to right-size these streets, reduce traffic speeds and provide bicycle connectivity. These were goals

requested by Staff for the Metro Center development and provided upfront with by the Applicant, assuming a public-private partnership between the two parties could be realized. In addition, Dawson Street provides the grade separated two-way bike lanes for bicycle connectivity from Centrepont to Greenway Park – making the last pivotal connection across the site, linking amenities and regional railways. These improvements have not been recognized by Staff as desirable thus far.

The Metro Center application is balancing the City's Street standards with additional requests for public improvements to existing constructed streets. We believe that these significant improvements are worthy of a slightly reduced public realm. Dawson Street has a 12-6" amenity streetscape on the west side to accommodate a two-lane cycle-track. This cycle track provides the final leg to connect the site between the Highline trail to the north and the Tollgate Trail to the east, providing what is arguable a regional improvement. As an offset to the reduced public realm, outside the ROW on the east side of Dawson is Metro Center Plaza - a plaza at approximately 70' on average that will be lined with shops and will include a public realm for outdoor eating, seating areas, food truck parking and more. This section is provided within the same 66' ROW required for a Local Urban street. Given the additional amenities provided on Dawson, we request the City accept this revised street section to help fulfill the vision for Metro Center.

The section of Centerpointe Drive between Dawson and Sable Blvd already has landscaping on the north side that is existing and to remain. On the south side of the street, an enhanced amenity zone will be provided as an urban plaza and heightened entry into Metro Center.

The Main Street at Metro Center is Dawson Street. We need to further discuss the 16' urban amenity zone with Staff. If the sections provided are not preferred, and a public-private partnership is not established between the City and the Applicant, an alternative more cost-effective section for Centrepont, Dawson and Center will be pursued that meets Urban Street Standards – removing the two-way cycle track and providing more standard improvements.

Page 17

- Show potential future street crossing and add to the legend.
Response: Comment noted. This has been added as requested.

- Add internal street names to the map.
Response: Street names have been added to the maps as requested.

Page 18

- Add description of how the elevated bikeway will be vertically separated.
Response: The elevated bikeway is vertically separated through the use of a 6" curb. Please see street sections provided in Design Guidelines for more details.
- The Urban Streetscape Cross-Section is 16' wide. Please modify the proposed plans and graphics to reflect this standard.
Response: Please see response to Page 16 redlines above.
- Add internal street names. Enlarge map on page if necessary.
Response: Street names have been added as requested.
- Please extend the dimension lines down from the cross-section to the plan view to confirm dimensions.
Response: Comment noted. This has been revised as requested.

- The graphic does not accurately reflect the urban streetscape standard. Please show trees in a 5'x15' tree opening and hardscape.

Response: Comment noted. This has been revised as requested.

- Extend the elevated bike lands to Sable Blvd. Add this to all graphics shows the proposed elevated bike lanes.

Response: This cannot be accommodated, as RTD's parcel is not a part of the Metro Center Master Plan. In order to extend the elevated bike lane to Sable, we would need RTD to opt into the Metro Center Master Plan; or the bike lane extension could occur with the potential redevelopment of the RTD site.

Page 19

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

Response: Comment noted. This has been added as requested.

- Add Virginia Ave. to the map. Enlarge the map if necessary.

Response: Virginia Ave. has been added to the map as requested.

Page 20

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

Response: Comment noted. This has been added as requested.

Page 21

- The highlighted text is barely legible at this scale. Either enlarge the graphic, enlarge the text, or don't rasterize the text on any cross-sections.

Response: Comment noted. This has been revised as requested.

- Change all references of a tree lawn to Curbside Landscaping within this document.

Response: Comment noted. This has been revised as requested.

- Extend the dimension lines from the cross-section or add new dimension lines to the plan view for clarification. Add another dimension line that combines the sidewalk with amenity zone on all graphics to show compliance with the 16' minimum width of the Urban Streetscape standard.

Response: Comment noted. This has been revised as requested.

- The legend information is difficult to see at this scale. Please enlarge the map.

Response: Comment noted. This has been revised as requested.

- Please show the direction of the numbered section views, street names and north arrows on all Key Maps for clarification.

Response: Comment noted. This has been revised as requested.

- Trees should be in 5'x15' openings.

Response: Comment noted. This has been revised as requested.

Page 22

- Add "Deciduous Shade Trees...". Add this description for all street trees.

Response: Deciduous "shade" tree has been added to all street tree descriptions.

- Add "...Curbside Landscaping that meets or exceeds current City Urban Streetscape Standards."
Response: This has been revised as requested.

- Show trees in 5'x15' openings.
Response: Comment noted. This has been revised as requested.

Page 23

- Since Sable Blvd. has an existing 10' multipurpose path, please extend the elevated bike lane to Sable Blvd. to better connect these valuable multipurpose pathways.
Response: This cannot be accommodated, as RTD's parcel is not a part of the Metro Center Master Plan. In order to extend the elevated bike lane to Sable, we would need RTD to opt into the Metro Center Master Plan; or the bike lane extension could occur with the potential redevelopment of the RTD site.

Page 24

- 16' minimum Urban Streetscape standard.
Response: Comment noted. Please see response to Page 16 redlines.
- Label the widths of the planting area and sidewalk when not specifically dimensioned above in all plan view cross-section graphics within this document.
Response: Comment noted. This has been revised as requested.
- Add "...that meets or exceeds current City Urban Streetscape Standards."
Response: This has been revised as requested.

Page 25

- Add "...that meets or exceeds current City Urban Streetscape Standards."
Response: This has been revised as requested.

Page 27

- Add 5. Landscape: Urban Landscape Character
Response: This has been revised as requested.

Page 33

The master plan should have a large, usable park space that is more central to support the residential development with surrounding activated ground floor uses.

Response: Comment noted. There are several small urban parks provided within the Metro Center Master Plan along with the Greenway Park, Metro Center Plaza and Grand View Park. The UDO & 2015 SAP specifically calls for use of Small Urban Park and does not require large parks on each Planning Area. Following is the section on parks from the City Center Station Area Plan:

To meet the city of Aurora requirements for dedication of community and neighborhood park lands in association with new residential development, options such as Small Urban Parks should be explored and a system of open spaces should be linked.

Small Urban Parks are specifically designated for areas defined as urban centers, transit-oriented developments and urban infill development parcels. Such parks can be no less than 10,000 square feet in size should complement and integrate with surrounding uses and serve two functions; 1) provide facilities to meet the park needs of residents by serving as place for social interaction and leisure opportunities; 2) create focal points and activity nodes with the urban

fabric; and 3) provide “meaningful recreation, education and conservation benefit”. Please refer to the City of Aurora’s Parks and Open Space Manual for complete requirements.

- It is preferred that one of these green space areas around this intersection be enlarged to create a larger and more usable active park area for the residents and office users on the east side of the development.
Response: Comment noted. See response above.
- The Master Plan Graphic calls this a Pedestrian Plaza. Please clarify the difference or use consistent language throughout the proposal.
Response: Form J and the Urban Parks and Public Realm exhibit have been revised to clarify the various amenitized areas.

Page 34

- Add “...that consists of plant specimens having a high degree of visual interest during all seasons.”
Response: This has been added as requested.
- Please add a cross-section like what is shown on page 51, but include some of the RTD parking to the west and the full width of the plaza to the east.
Response: Plaza dimensions are included in the Master Plan.

Page 38

- Add “...meet or exceed the City’s current Landscape Standards.”
Response: This has been added as requested.
- Move the highlighted Guidelines to Standards.
Response: This has been moved to standards as requested.

Page 39

- Specify the screening method where highlighted.
Response: This has been added as requested.
- The London Planetree have not proven to perform well in Aurora.
Response: This has been removed as requested.
- Add “... and what is allowed in the UDO.”
Response: This has been added as requested.

Page 40

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

Page 46

- Primary buildings entrances should face the street.
Response: This has been revised as requested.
- Move the Guideline highlighted to the Standard.
Response: The guideline to have ground floor residential entrances face the street has been removed, due to anticipated grading challenges on site, having residential entrances along the street may not be feasible.

Page 65

- Add "... Plans, Documents and Criteria."
Response: This has been added as requested.
- Add "... and Documents."
Response: This has been added as requested.
- Add "Unified Development Code"
Response: This has been added as requested.
- Change Building Department to Planning and Development Services Department.
Response: This has been revised as requested.

Page 66

- Change waiver to adjustment.
Response: This has been revised as requested.
- Change builder to applicant.
Response: This has been revised as requested.
- Remove the highlighted text.
Response: The highlighted text has been removed as requested.

Master Plan

Page 2

- Use consistent language throughout the Master Plan document. The highlighted callout and legend text should reference a potential future vehicular and pedestrian connection.
Response: Comment noted. Labels have been updated for consistency.
- Reference to this future vehicular connection must be indicated on all graphics throughout the Master Plan and supporting documents. All proposed improvements must not prohibit the possibility of a future vehicular at-grade or bridge crossing in this location.
Response: Comment noted. E. Dakota Avenue has been extended to connect into PA-A1.
- The master plan should have a large, usable park space that is more central to directly support the residential development with surrounding activated ground floor uses.
Response: Comment noted.
- Extend the Elevated Bike Lanes to Sable Blvd.
Response: This request cannot be accommodated as RTD is not a part of the Metro Center Master Plan.

- It is preferred that one of these green space areas around this intersection be enlarged to create a larger and more usable active park area for the residents and office users on the east side of the development.
Response: Comment noted.

Page 3

- All illustrative graphics must indicate the possible future street connection of the two planning areas with at least a dashed line.
Response: Comment noted.

- Why does the highlighted section of the elevated bike lane look different than the other sections that are colored green?

Response: This exhibit has been revised for clarity.

Page 5

- Add the view direction lines to match the previous sheet graphics for clarification.
Response: This has been added as requested.

Page 6

- The Plazas and Promenades labels do not match the Master Plan that calls out a Pedestrian Plaza in the same locations. Please use consistent labels throughout the proposed documents to avoid confusion.
Response: Labels have been updated for consistency.

Page 7

- The Urban Streetscape Cross-Section standard is 16' wide.
Response: Comment noted. Please see response to page 16 redlines in this letter.
- Extend the dimension lines down to match the plan view.
Response: Comment noted. This has been revised.
- Please show a more accurate representation in all plan views to what may be installed and not just a hatch pattern in two different areas that will not have the same surface treatment.
Response: Comment noted.

- Show trees in 5'x15' tree openings.
Response: Comment noted.

- Extend the Elevated Bike Lanes to Sable Blvd.
Response: Response: This request cannot be accommodated as RTD is not a part of the Metro Center Master Plan. See previous responses in this letter.

13. Addressing (Phil Turner / 303-739-7357 / pturner@auroragov.org)

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

REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES

14. Civil Engineering (Kristin Tanabe / 303-739-7306 / KTanabe@auroragov.org / Comments in green)

Public Improvement Plan

14A. An at-grade crossing to PA-A1, even for emergency access only, will require an evaluation of drainage characteristics, and specifically depth of flow, across the trail/secondary accessway. Even a small depth of flow could prohibit an at-grade crossing. (Haley B. Johansen)

Response: Response: An at-grade crossing for PA-A1 has been created on the upstream end of the channel so that it will not create additional flow down in the trail corridor.

14B. The Master Plan will not be approved until the Master Drainage Study is approved.

Response: Comment noted.

14C. Add that improvements outside the described planning area may be required to meet these demands (page 3)

Response: A statement to this effect has been added to the PIP report.

14D. Is there a reason why each planning area was not separated? The descriptions were separated as far as improvements. Page 4

Response: The planning areas have been separated in the report.

14E. These elements are discussed in the following sections (typical all planning area descriptions) page 4

Response: Statement has been added to the report.

14F. The exhibit implies full sections will be constructed. Please clarify, typical

Response: A statement has been added to clarify that full sections will be constructed except where indicated otherwise.

14G. Existing Fraser Court is currently private. In order to be public, the existing pavement and improvements will need to be analyzed and verified they meet current standards. Additional repairs or mill and overlay may be required

Response: Existing Fraser Court will be removed and replaced, as indicated by the section. The only portion of the existing area to remain in place is some of the existing landscaping adjacent to the Arapahoe County property. The road will be removed and replaced with a smaller pavement section and the existing inlets removed and replaced to new curb locations. The other existing utilities will remain in place.

14H. Could this exhibit not fit on this page at a 1:100 scale? the details for the utilities are difficult to see, typical.

Response: Exhibit scales have been adjusted to be 1"=100' as requested.

14I. Park area is usually identified. A reference to the small urban park is in note 4, but not clearly identified on the exhibit

Response: The park locations are uncertain at this time. The stars indicating parks have been generally located where we currently think the parks will be located. The location is subject to change as is indicated in the note on the plans.

14J. The different sections are not identified on the exhibit. Also, Centrepoint is an existing roadway. Portions of it also have existing sidewalk and landscaping. Please clarify the sections

Response: Identifying section labels have been added to the plans. The majority of the Centrepoint roadway will be removed and modified to a much smaller paved section. The few areas where existing amenities will remain are noted on the sections.

14K. Alameda Drive is existing with existing improvements on the east side. Please clarify

Response: Alameda Dr. will be removed completely, leaving only the existing landscaping adjacent to the

Arapahoe County property. The road will be removed and replaced with a smaller pavement section and the existing inlets removed and replaced to new curb locations. The other existing utilities will remain in place.

14L. Existing Fraser Court is private. There is also existing sidewalk and landscaping on the west side
Response: Existing Fraser Court will be removed and replaced, as indicated by the section. The only portion of the existing area to remain in place is some of the existing landscaping adjacent to the Arapahoe County property. The road will be removed and replaced with a smaller pavement section and the existing inlets removed and replaced to new curb locations. The other existing utilities will remain in place. The proposed section is an Aurora urban street section and the client prefers this street be made into a public street.

14M. There is no designation on the exhibits identifying the different sections

Response: Section callouts have been added to the plans.

15. Transportation Planning(Tom Worker-Braddock / 303-739-7430 / tworker@auroragov.org)

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

Response: Response: Based on email communication from the City on 12/30/2020, the Master Traffic Impact Study has been approved. Additional comments map be provided on the Public Improvement Plan at a later date. No action necessary.

16. Traffic Engineering (Brianna Medema / 303-739-7336 / bmedema@auroragov.org / Comments in amber)

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

Response: Based on email communication from the City on 12/30/2020, the Master Traffic Impact Study has been approved. Additional comments map be provided on the Public Improvement Plan at a later date. No action necessary.

17. Fire / Life Safety (John Van Essen / 303-739-7489 / jvanesse@auroragov.org / Comments in blue)

Public Improvement Plan & Sheet 3 of Master Plan

17A. No additional comments.

Response: Lack of comments noted.

18. Aurora Water (Tony Tran / 303-739-7376 / atran@auroragov.org / Comments in red)

Master Utility Study

18A. Address minor technical comments.

Response: Utility study comments have been addressed.

19. PROS (Michelle Teller / 303-739-7437 / mteller@auroragov.org / Comments in mauve)

General

19A. Based on the proposed density of 1094 TOD units, the total park land dedication requirements are as follows:

- 6.63 acres of Neighborhood Park

Response: We are exceeding the neighborhood park requirement.

- 2.43 acres of Community Park

Response: Comment noted.

- No open space land dedication is required since this is a TOD site. 19B. Any park land which is not met on site must be paid via cash-in-lieu with the residential plat.

Response: Comment noted.

- 19C. Other reports such as the Master Utility study and correspondence with the Aurora Urban Renewal Authority show significantly higher counts. These unit counts should be consistent.

Response: Comment noted. The unit counts are now consistent.

Master Plan
19D. Page 1:

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

- "The \$234,300 development contribution to matching funds for a federal grant is due at time of 1st plat (residential or commercial). This payment and the costs incurred to install landscaping, irrigation or other recreation amenities within the trail easement will be credited toward satisfying Community Park Development fees for the entire Metro Center Project." 19E. Page 2:

Response: Comment noted. This is noted in the Master Plan.

- This location of Park C1 does not meet the requirement of being 'highly visible and inviting'. Please relocate or shift to be more centrally located.

Response: There is not a requirement for SUPs to be 'highly visible and inviting'. The location of the parks has been discussed numerous times to help describe the vision for Dawson as the Main Street and the string of pearls/small urban parks defining the public realm along this street.

The current location is accessible via Dawson Street and highly visible from Sable, and commands views of Front Range from highest point of site. Dawson Street is the true main street for Metro Center. It provides both a vehicular and a pedestrian experience that connects the existing City Center Park and Civic Plaza north of Alameda into the Metro Center Greenway Park, Metro Center Plaza and the mixed-use development and "last mile transit" zone. An extension of Dawson Street is included with this revised Master Plan showing that it will extend south to the C1 Grand Vista Park at the top of the hill to provide the necessary link that connects the two parks on either end. This connection will include enhanced streetscaping and a pedestrian amenity zone that will make a stronger connection and "string of pearls" from the Grand Vista Park located in PA-C1, to the SUP in PA-C2, to Metro Center Plaza and Greenway Park.

- Provide a formal proposed unit count table with totals. Based on density it looks like 1094 MF units are proposed.

Response: Unit counts have been added to the revised spreadsheet on Sheet 6 of the Metro Center Master Plan.

- What difference is there between the asterisk for the plaza/pocket park and the green boxes denoted as park. Please make a clear identification between Small Urban Parks and all other non-PROS related plazas?

Response: The public realm/parks exhibit has been revised to only show asterisks representing SUPs.

19F. Page 3:

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

Response: There is not a requirement for SUPs to be 'highly visible and inviting'. The location of the parks has been discussed numerous times to help describe the vision for Dawson as the Main Street and the string of pearls/small urban parks defining the public realm along this street.

The current location is accessible via Dawson Street and highly visible from Sable, and commands views of Front Range from highest point of site. Dawson Street is the true main street for Metro Center. It provides both a vehicular and a pedestrian experience that connects the existing City Center Park and Civic Plaza north of Alameda into the Metro Center Greenway Park, Metro Center Plaza and the mixed-use development and "last mile transit" zone. An extension of Dawson Street is included with this revised Master Plan showing that it will extend south to the C1 Grand Vista Park at the top of the hill to provide the necessary link that connects the two parks on either end. This connection will include enhanced streetscaping and a pedestrian amenity zone that will make a stronger connection and "string of pearls" from the Grand Vista Park located in PA-C1, to the SUP in PA-C2, to Metro Center Plaza and Greenway Park.

19G. Page 5:

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

Response: Comment noted. Small Urban Parks will be further defined and coordinated with PROS at time of Site Plan.

19H. Page 6:

- Update the triggers to say completed at 50% CO of surrounding planning area.
Response: This has been updated as requested.
- Why are the spaces within C1 separated out? If they are all contiguous please combine into one. It's also unclear that there is a SUP in C1 separate from the Park that's shown?
Response: The SUP in C1 is contiguous.
- Provide a line for the total NP credit and CP credit (drainageway) that's being proposed for tracking purposes.
Response: Comment noted.
- The trigger for the bikeway should be noted and consistent with the PIP. Remove this from Form J.
Response: Comment noted. Please refer to the responses on pages 19 and 20 of this letter as it relates to street improvements.
- The standalone bikeway is not eligible for SUP credit. You may include sections that *directly* abut a SUP but the bike lane alone does not meet the requirements outlined in the PROS dedication manual for all the elements required. See areas outlines in the adjacent map for what PROS will accept for credit.
Response: Comment noted.
- Remove land dedication number 3; so long as minimum size requirements and totals are met, shifting acreage at time of site plan/plat is not an issue.
Response: Comment noted. This has been removed as requested.

- Remove land dedication notes 4 & 5.
Response: Comment noted. This has been removed as requested.
- Per the agreement, the trail corridor improvements total 2.42 acres; the additional your proposing should be outside of PROS property boundary and included within the SUP below.
Response: Comment noted.
- Note the separated 0.89 CP credit and 1.32 NP credit here for tracking.
Response: Comment noted.

19I. Page 8:

- Why is this separate from the ped plaza when the whole plaza is requested for credit? Please create a consistent notation.
Response: Form J and the associated graphic has been revised with this resubmittal to help provide clarity on the different amenitized areas.

Public Improvement Plan

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

Response: Requested note has been added to the plans.

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

Response: Note has been added to plan.

19L. Please note that you have language that is not consistent with PROS requirements regarding small urban parks. Update all minimum sizes to state 10,000 which is the approved minimum for any small urban park. Smaller parks will not be accepted for neighborhood park land dedication. As a TOD site, you receive an incentive which removes any requirements for open space, so therefore sites under 10,000 are not required on site.

Response: Comment noted. Park size requirements are not included in the PIP report or plans.

19M. Formalize the map as an open space and circulation map within the Master Plan document, including the planning labels for every small urban park.

Response: This kind of map is already included in the Master Plan document. No change has been made to the PIP.

20. Real Property (Maurice Brooks / 303-739-7294 / mbrooks@auroragov.org / Comments in magenta) 20A. Add the standard site plan notes to the general Notes.

Response: Two site plan notes have been added to the plans.

20B. Any easements being released (vacated) and/or dedicated must be done by separate document or they may be dedicated on the proposed subdivision plat. Any new R.O.W. may be dedicated by the proposed Subdivision Plat also.

Response: Comment noted.

21. Mile High Flood District (Mark Schutte / 303-455-6277 / submittals@udfcd.org) 21A. Project is maintenance ineligible. Please see attached letter for additional detail.

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

- It is our understanding that the stream through this project, the Aurora Mall Drainage, was piped through the property as the result of a previous project. If the stream is to remain in a pipe, the project is Maintenance Ineligible.

Response: Comment noted, there is no plan to revise the pipe.

- Based on the documentation provided, it does not appear that there are any proposed changes to the pipe section of the Aurora Mall Drainage. At this time, we have no comments on this project.

Response: Comment noted.

- If this project intends to change this piped section to open channel, then it would become Maintenance Eligible and the District would want to review future submittals at that time. If no changes occur, we do not need to see future submittals.

Response: There is no intention for the piped section to be converted to open channel.

26. Aurora Public Schools (Josh Hensley / (303) 365-7812 / jd hensley@aurorak12.org)

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

Response: Comment noted.