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*AuroraGov.org*

June 24, 2024

Dane Hill  
Property Reserve Inc.  
51 S. Main Street, Suite 301  
Salt Lake City, UT 84111

**Re: Initial Submission Review:** Tributary – Master Plan with Adjustment and Zoning Map Amendments  
**Application Number:** DA-2383-00  
**Case Number:** 2024-7002-00; 2001-2005-02; 2001-2005-03; 2001-2005-04; 2001-2005-05

Dear Mr. Hill:

Thank you for your initial submission, which we started to process on May 20, 2024. We have reviewed your plans and attached our comments along with this cover letter. The first section of our review highlights some of our major comments. The following sections contain more specific comments, including those received from neighborhood groups, other city departments, and outside agencies.

Since many important issues remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before July 23, 2024 to remain on schedule. Staff is happy to coordinate a meeting with you and your team to discuss comments. Please coordinate with Lorianne Thennes in ODA to set up this meeting.

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

As always, if you have any comments or concerns, please give me a call. I may be reached at 303-739-7857.

Sincerely,

Sarah Wile, AICP  
Senior Planner III, City of Aurora  
Planning & Business Development Department

cc: Diana Rael, Norris Design  
Elyse Applegate, Norris Design  
Lorianne Thennes, ODA  
Cesarina Dancy, ODA  
Filed: K:\\$DA\2383-00rev1.rtf



## Initial Submission Review

### SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Schedule and host a neighborhood meeting prior to making a second submittal (see Item 1)
- Pay the \$176,811.00 invoice prior to the second submittal of the application (see Item 2)
- Add two designated “Retail” planning areas near the Harvest / I-70 interchange (see Item 3)
- Address inconsistencies with small lot calculations (see Item 3)
- Change the location of the Administrative Activity Center to comply with UDO requirements (see Item 3)
- Identify and illustrate the required elements within MU-R (see Item 3)
- Review concerns regarding the proposed 40’ and 75’ tall monument signs (see Item 3)
- Provide additional mitigation for the proposed small lot adjustment (see Item 4)
- Submit a conceptual local street connectivity plan and provide required access to all PAs (see Item 5)
- Update the urban design standards to be more detailed and specific to this Master Plan (see Item 6)
- Ensure all PAs meet connectivity requirements and update street sections (see Item 8)
- Review oil and gas well site setback requirements that will impact PA-31 and PA-32 (see Item 9)
- Revise requested street sections to match city standards and add the requested improvements (see Item 11)
- Provide a 6-lane section for Harvest Road according to NEATS (see Items 11 and 12)
- Address the significant issues with the Master Traffic Impact Study (see Item 12)
- Provide land dedication for a temporary and permanent fire station in the Master Plan (see Item 13)
- Review all Aurora Water comments in the PIP and MUS on water and sanitary connections (see Item 14)
- Include more details outlining the functionality of the parks and open space network (see Item 15)
- Update the Public Art Plan to include accurate calculations and more details on the art vision (see Item 16)
- Address all comments from outside agencies, including Arapahoe County and APS (see Items 17-20)

### PLANNING & BUSINESS DEVELOPMENT DEPARTMENT COMMENTS

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

- 1A. Notices were sent to all adjacent property owners and neighborhood organizations within one mile of the Master Plan. Multiple calls and three written comments were received regarding the application. In accordance with Section 146-5.3.1, a neighborhood meeting will be required prior to making a second submittal. Neighborhood meetings are still held virtually and are hosted by the developer. Kerri Drumm, Community Engagement Coordinator with Purpose Aligned ([kerri@purposealigned.com](mailto:kerri@purposealigned.com)), will moderate the meeting, and Planning staff will attend the meeting to answer any process-related questions. Please email Kerri and copy your Case Manager to determine some potential dates for this meeting. Invitations must be sent out by you to adjacent property owners and registered neighborhood organizations at least two weeks prior to the meeting.

*Name: James Niesel*

*Comment: See the attached comment letter.*

*Name: Jennifer Dykema*

*Comment: The widening of 6th Ave to 6 lanes will likely increase traffic noise considerably for the houses in the Cross Creek, Traditions, and Adonea subdivisions that currently back up to 6th Ave. Are there any plans for a noise barrier or other noise mitigation? The site in question between 6th Ave and I-70 is currently home to a lot of wildlife, such as deer, foxes, various birds, etc. Has an environmental impact study been done to assess how this development would affect these animals?*

*Name: Gary Haytread*

*Comment: Is a proposed supermarket part of this development as our community (Sky Ranch / Harmony / Adonea / Traditions / Murphy Creek) desperately needs one?*



## **2. General Planning Comments**

- 2A. An invoice in the amount of \$176,811.00 is due prior to the second submittal of the application. This is required before the Master Plan is recorded.
- 2B. The numbering in each tab should restart at “1” and not continue with the numbering from the previous tab. Please update this in all tabs.
- 2C. Upload Tabs 3 and 4 as separate documents with the next submittal.
- 2D. Update Tab 1 to include the missing approval criteria, address inconsistencies, add additional information where requested, and include missing text. See redline comments for additional information.
- 2E. Please follow the Master Plan Manual when filling out Form D. There are some inconsistencies with the current format / calculations that made it difficult to fully review what is proposed and offer comprehensive comments.
- 2F. Please submit signed and notarized aviation easements with exhibits with the next submittal for both Buckley Space Force Base and Denver International Airport. The aviation easement forms can be found at the bottom of [this](#) page.
- 2G. Include key maps on each exhibit in the Public Improvement Plan and add sheet numbers to all of the narrative sheets.

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

- 3A. Two designated “Retail” planning areas are required near the Harvest / I-70 interchange within the planning areas that are currently designated as Mixed Use. The city needs assurance that there will be commercial uses at this major interchange and the generic “Mixed Use” designation does not guarantee this since the underlying zoning allows a broader range of uses. Currently only 30 acres of the ~1,200 acres (2.5%) in the Master Plan are identified as retail. Adding more retail along this key corridor will ensure consistency with the Comprehensive Plan, which identifies those areas as Urban Districts and City Corridors. It would also help support the adjustment request for additional small lots because being in close proximity to a diversity of uses is important to having a more dense neighborhood. Please coordinate with Planning on determining the appropriate size of these planning areas and the exact locations.
- 3B. According to the Small Residential Lot standards in the UDO, the maximum number of small lots should be determined by adding the total number of Single-Family Detached, Two-Family, and Single-Family Attached units and dividing by 2 (50% maximum). It appears that the total Multi-Family units (2,020) are being included as part of the small lot calculation in Form D currently, which is not accurate. Based on the provided numbers, there will be 2,911 Single-Family Detached, Two-Family, and Single-Family Attached units, which means that 1,455 small lots would be permitted if complying with the UDO. Form D should reflect this better and also needs to note if an adjustment is requested to exceed this. Based on the 2,466 small lots proposed currently in the table, this would be ~85% small lots. Staff would not support this adjustment.
- 3C. Per Section 146-5.4.3.I, Administrative Activity Centers (AAC) are required to be located at the intersection of two platted collector streets or at the intersection of a platted arterial street and a platted collector street. The proposed AAC (PA-15) location does not meet this requirement. Please change the location of it with the next submittal. In addition, it should not be shown in green as this implies it is a park and not an AAC that will be developed pursuant to MU-N zone district standards.
- 3D. Per the Master Plan Manual, all requirements within the MU-R district need to be addressed within the Master Plan. This includes items such as the focal point, plaza, walkable main street, main street sites, and local streets. Please include an exhibit and descriptions identifying these elements with the next submittal.
- 3E. “Single Family” is not an approved land use designation in the Master Plan Manual. Please revise all planning areas to clarify if they will have SFD-SMALL, SFD-STANDARD, SFD-LARGE, TWO-FAMILY, SFA, or a combination of these. Without this information, the single-family detached (297.5 acres) and single-family attached (122.3 acres) planning area acreage calculations could not be reviewed or verified.
- 3F. PA-2 and PA-10, which are located in MU-R, are currently designated as “Single Family.” Please note that single-family detached and two-family are not permitted in MU-R. The land use designation needs to reflect that only single-family attached is permitted in this zone district.



- 3G. The proposed densities for the Multi-Family planning areas in the Master Plan (all within MU-R) are currently shown at 20 DU/AC. This is very low density for multi-family developments, even for those that are only three stories and are primarily surfaced parked. Generally most multi-family developments in the city are around 25-40 DU/AC. Staff has concerns that the multi-family densities are not being accounted for accurately, or are being underestimated. Please clarify this with the next submittal.
- 3H. The density calculations in Form D are incorrect as it currently reflects that all zone districts that permit residential in the Master Plan (R-2, MU-A, and MU-R) have a maximum density of 5 DU/AC. R-2 has a maximum density of 5 DU/AC, but MU-A is 40 DU/AC and MU-R does not have a maximum density. Therefore, it is inaccurate to say that the entire Master Plan is limited to 5 DU/AC when that only applies to the R-2 area. Please update Form D accordingly.
- 3I. Four zoning map amendment legal descriptions / exhibits were submitted as part of the application. All of the exhibits need to be revised to label them as “Exhibit B” instead of “Exhibit A” to match the future ordinances. Please revise the MU-R exhibit to only include areas that are being rezoned from R-2 to MU-R; do not include areas that are already zoned MU-R as part of the exhibit. For the R-2 exhibit, it appears that all of the areas included in the exhibit are already zoned R-2, so is a rezoning needed? Please clarify.
- 3J. Provide an existing and proposed zoning map specifically for each proposed zoning map amendment (MU-A to AD, R-2 to MU-R, and R-2 to MU-A). The adjacent zoning / areas should be grayed back. These exhibits are needed for Planning Commission and City Council. A brief letter of justification / description should be provided for each of the zoning map amendments as well since they will be separate items / ordinances at Planning Commission and City Council.
- 3K. For any Mixed-Use planning areas proposed within MU-A, a note should be added to Form D that states that a maximum of 50% of the land area within MU-A can include residential uses per Section 146-2.4.8.D.1. No more than 50% of that residential can be single-family detached as well.
- 3L. Fix the calculations and formatting for the bottom portion of Form D per redline comments.
- 3M. The population projections in Tab 9 do not match the calculations in Tab 8. Please ensure consistency.
- 3N. The maximum height for monument signs in large-scale master planned communities is 30’ per Section 146-4.10.12. The community marker and commercial / retail signs shown in Tab 10 range between 40’ and 75’ tall, which is not permitted in the UDO. Please remove all signage heights and dimensions unless an adjustment is being pursued at this time. Additional coordination would be required prior to resubmittal if an adjustment is being requested with the Master Plan as staff will likely not support signs this tall.
- 3O. Please note that monument signs need to have a “permanent base where the entire bottom of the sign is affixed to the ground.” Although it is understood that the signage design is conceptual, the proposed design does not meet this requirement because the signage extends beyond the base and would be considered a pole sign, which isn’t permitted in the UDO. Please revise the design accordingly.
- 3P. Include additional site constraints in Tab 4 per redline comments. Ensure that all constraints include specific details on how they will be handled / mitigated.
- 3Q. Identify the names of all adjacent Master Plans in larger text in Tab 3.
- 3R. The required setbacks and the buffer treatment from the oil and gas well pad in Jamaso should be specifically addressed in Tab 11. See Item 9 for additional information.
- 3S. Include discussion in Tab 6 and potentially specific urban design or landscape standards in Tabs 10 and 11 about what will be permitted over the 130’ easement (100’ CIG plus 30’ CCVW) that runs north / south through the Master Plan. This easement seems particularly impactful to PA-1. There are concerns about how this will impact the future building locations and site layout within this retail planning area.
- 3T. Tab 6 states that Tributary will “contribute funding, as required” for the proposed recreation center. Please note that Tributary would be required to contribute all funding as this appears to be a private facility.

#### **4. Adjustments**

- 4A. The adjustment request noted in Tab 6 to have 65% small lots within the Master Plan is not consistent with the small lot percentage shown in Tab 8 (see Item 3B). Please ensure consistency between all tabs so staff can adequately review and offer feedback on the adjustment. The language in Tab 1 should also be clarified as it seems to imply that the adjustment will be requested with the future Site Plans as opposed to with the Master Plan.



- 4B. Staff has some concerns regarding the proposed mitigation for the small lot adjustment outlined in Tab 6. Please address the following items with the next submittal in order for staff to provide better feedback on the adjustment request: 1) Provide additional details about what qualifies as the ½ acre open space. Green courts, for example, should not count for this requirement since this is already required if there are houses facing it and is more of a private space than public. The spaces should front on streets and accommodate turf play areas. Identify minimum required dimensions for the open space and note that they need to be uninterrupted by alleys, streets, etc. 2) The statement outlining the exceptions for block length and width “for regional improvements, including but not limited to drainage, school sites, parks, and natural features” needs to be removed as street connectivity is one of the most important components when considering additional small lots and why the street network plan is being requested. 3) No diagram was provided for the housing types so this item could not be reviewed. 4) No information has been provided about what is considered a “housing type” for the purposes of mitigating the adjustment request so this item could not be reviewed.
- 4C. The small lot percentage adjustment needs to be noted in Tab 8 and the calculations need to match the adjustment request. The proposed mitigation measures / requirements also need to be included in Tab 8 and not just in Tab 6.

#### **5. Streets and Connectivity Comments**

- 5A. As previously requested, local street connectivity within planning areas needs to be shown at a high level within Tab 10. This is conceptual in nature, but needs to identify that all planning areas will be able to meet connectivity and block size requirements given the limited access that some planning areas will have. This is requested due to the deviation from NEATS and the required mitigation. This was also referenced in the December 13, 2023 email sent to by staff: *"A conceptual street network plan (including local streets) is required in Tab 10 to demonstrate that all PAs can comply with required block sizes. This should be provided in conjunction with the MU-R expectations. This will help provide justification for the street alignment changes to NEATS and ensure that there will be a well-connected street network despite the drainage and utility corridor encumbrances."* The proposed pedestrian circulation plan in Tab 10 is not sufficient and doesn't adequately access vehicular circulation, many of the planning areas, accesses to arterial / collector streets, and MU-R requirements.
- 5B. Planning areas should not rely on local streets through other planning areas to provide access. Two points of access are also needed. PA-32, PA-35, PA-37, and PA-38 do not meet this requirement. See Items 5C and 5D regarding the updates needed to the street network within the Master Plan.
- 5C. Trussville Street is required to be constructed as part of the Tributary Master Plan. The section should match the 2-lane collector (80' ROW) shown to the north in Jamaso. The street does not need to connect across the stream corridor down to 6<sup>th</sup> Avenue, but it needs to provide access to PA-32 and PA-35.
- 5D. Access and possible improvements to the I-70 Frontage Road for PA-42, PA-44, PA-37, and PA-38 need to be addressed within the PIP. PA-37 and PA-38 in particular will require access to this road as local streets in other planning areas cannot provide the only access. Coordination with CDOT is required before making a second submittal on the application. Please provide written correspondence from CDOT outlining what the expectations will be for this road regarding access and improvements. Arapahoe County may need to be involved with this discussion as well.
- 5E. Please clarify if a pedestrian crossing is proposed across Tributary Parkway near PA-10 as depicted in Tab 9. This trail provides important north / south connectivity through the Master Plan, but it does not appear to be specifically called out in the PIP. Is the intent for this to be at a signalized intersection to ensure pedestrian safety?
- 5F. The proposed deviation from NEATS for the Colfax Avenue / 13<sup>th</sup> Avenue / 12<sup>th</sup> Avenue high-frequency transit corridor needs to be discussed and justified in detail in Tabs 1 and 6. Although a Comprehensive Plan Amendment is not required, this was an important regional connection and this deviation needs to be mitigated as noted in previous discussions. Please include specific mitigation details.
- 5G. Local street alignments should not be shown in the PIP like they currently are in some of the planning areas. The PIP should focus only on arterial and collector streets as all planning areas should have access from an arterial or collector without relying on local streets.





- 5H. Any proposed custom street names (such as Tributary Parkway) need to be reviewed and approved by the city's addressing committee. Please contact Phil Turner, City Addresser, to begin this process.
- 5I. Please ensure that all streets are labeled correctly throughout all documents. Harvest Road is labeled as Powhaton Road in many of the tabs.

#### **6. Architecture, Urban Design, and Open Space Comments**

- 6A. Please provide more detailed information for the parks and open spaces in Tab 9 that notes the intent of each park / open space, what features will be provided, etc. This should be provided now based on the location of each park (i.e. within a single-family area, within a mixed-use area, along the First Creek corridor, etc.) to offer guidance for the future. This is important to setting the vision for the Master Plan.
- 6B. Some of the language in Tab 10 is duplicative (i.e. contains the same description for all "zones" even though they have different land uses and zoning), which is not the intent of the urban design matrix. It should be customized for each zone based on the proposed character of those areas. In addition, the language that states there may be "unique roadway sections and non-standard roundabouts" is problematic and should be removed unless these have been reviewed and approved by Civil Engineering and Traffic Engineering.
- 6C. Please clarify if the intent is to provide architectural standards in Tab 12 with the next submittal, or if they will be deferred until the first Site Plan submittal. Please note that the architectural standards for all land uses in the Master Plan (SFD, Two Family, SFA, MF, Mixed Use, Retail, Industrial, Community Buildings) will be required before or concurrently with the first Site Plan submittal through a Master Plan Amendment. This can potentially delay approval of Site Plans in the future if they are deferred.

#### **7. Landscaping (Kelly Bish / 303-739-7189 / [kbish@auroragov.org](mailto:kbish@auroragov.org) / Comments in bright teal)**

##### *Tab 10*

- 7A. If the intent is to have loading areas visible from public rights-of-way, then additional screening methods should be proposed that go above and beyond ordinance requirements as the Unified Development Ordinance does not permit this. Refer to Section 146-4.8.10.C.
- 7B. The tables provided with the placetype plan are not legible.

##### *Tab 11*

- 7C. Update Form G per redline comments.
- 7D. Provide landscape standards that address the residential homes / planning areas that are abutting the transformer yard and data center property along the western boundary, the residential proposed adjacent to the existing oil and gas well site, and the utility corridor that traverses Neighborhoods 1 and 5.
- 7E. The Urban Design Standards mention having loading areas visible from public rights-of-way. This is not permitted by the UDO. What landscaping measures are being proposed that go above and beyond code requirements to address this condition?
- 7F. Item #11 states the use of expanded buffers and setbacks, yet the last sentence states that landscaping will conform to the UDO. Is the intent to have more plant material and buffer depths greater than UDO standards? If so, then specify where those would occur and what the quantity requirements and buffer widths would be for those specific conditions.
- 7G. It appears the intent is to comply with the UDO in all landscape instances. Please include this statement in Form G in all instances and not just a few. The landscape will conform to the City of Aurora UDO.
- 7H. Combine the local roadways information with the graphic and information provided on Sheet 81. There should not be two separate sheets.

##### *Public Improvement Plan*

- 7I. Do not include any buffer information in any of the street cross sections. That should be included in Tab 11. Update all sections accordingly.

#### **8. Transportation Planning (Tom Worker-Braddock / 303-739-7340 / [tworker@auroragov.org](mailto:tworker@auroragov.org) / Comments in teal)**

- 8A. PA-32 and PA-35 need to meet connectivity requirements per Section 146-4.5.3.A.1.
- 8B. Harvest Road and Powhaton Road should have 14' side paths on each side of the 6 lane major arterials to reflect them serving as primary bike access point across I-70.



- 8C. All collector roads should reflect bike lanes in the final conditions.
- 8D. A grade-separated crossing is required for Powhaton Road across UP railroad per NEATS.
- 8E. Address access and connectivity to the frontage road for PA-37, PA -38, PA-42, and PA-44.

**9. Energy & Environment** (Maria Alvarez / 303-739-6824 / [malvarez@auroragov.org](mailto:malvarez@auroragov.org))

- 9A. We have reviewed the area of your development. There are no known plugged and abandoned (P&A) wells within your site. We do not anticipate any subsurface hazards during construction related to plugged oil and gas wells. Note that there may be existing underground pipelines in rights-of-way. If you have questions or concerns about this, the Energy & Environment Division can assist with providing additional information.
- 9B. In January 2021, the Colorado Energy & Carbon Management Commission (ECMC) implemented new rules which include a two-thousand-foot (2000') setback between oil and gas locations and certain surface features, including residences and schools. The setback is measured from the edge of the oil and gas location (also referred to as the "well pad," which represents the area of greatest extent of surface disturbance around a well.) A portion of your site is within this 2000' setback from an existing and/or planned oil and gas facility. Currently, there are no City regulations against constructing residences within this setback from an existing oil and gas facility. However, there is a pre-sale requirement to notify future owners of the fact. The following notice language appears in Section 146-3.3.5.DD.2:

*7. "Notice to Purchasers"*

*a. A seller of real property upon which an oil or gas well or facility has been located shall provide written notice of the existence of such well to a purchaser of such real property prior to the closing of the sale. The seller shall cause the following notice to be recorded with the clerk and recorder of the appropriate county: Notice: The property known as [legal description and address] contains an oil and/or gas well. This requirement to provide notice to prospective purchasers and record such notice shall only apply to the transaction between the developer or builder and the initial purchaser and does not apply upon any subsequent sale of the property.*

*b. Vendors of residentially zoned real property within a state-determined setback shall provide the following notice to prospective purchasers in 14-point bold type on a single sheet of paper that is signed by the prospective purchaser prior to entering into a contract for purchase:*

*Notice: Nearby oil and gas facility. This property is located within a state-determined setback from an oil and gas facility. Vendors of residentially zoned real property within a state-determined setback from an oil and gas facility shall cause the following notice to be recorded with the clerk and recorder of the appropriate county:*

*Notice: The property known as [legal description and address] is located within a state-determined setback from an oil and gas facility. This requirement to provide notice to prospective purchasers and record such notice shall only apply to the transaction between the developer or builder and the initial purchaser and does not apply upon any subsequent sale of the property.*

- 9C. It is at your discretion whether you choose to construct residences within the state setback or modify your development plans to accommodate such. The City of Aurora regulations regarding setbacks from oil and gas facilities are subject to change in the future. Even though Colorado voters struck down a proposed 2,500' setback in 2018, future public perception may change now that the new ECMC rules are in effect.
- 9D. The Energy & Environment Division will work with you during your project development to help you understand the location of current and future oil and gas facilities that may affect your site.
- 9E. Currently there is a horizontal well drilled underneath your site. The well is at a depth of greater than 7,000 feet below the surface. The operation of the well is not anticipated to impact your surface development. The City of Aurora has no authority or control over subsurface well equipment or operations. Contact the Colorado Energy & Carbon Management Commission (ECMC) for more information.



- 9F. Additional information regarding oil and gas development can be found in the data and maps on the Colorado Energy & Carbon Management Commission (ECMC) website at ECMC Home ([ecmc.state.co.us/#/home](http://ecmc.state.co.us/#/home)) and ECMC Gasoline ([https://cogccmap.state.co.us/cogcc\\_gis\\_online/](https://cogccmap.state.co.us/cogcc_gis_online/)).
- 9G. Should you have any questions about oil and gas development, please reach out to Jeffrey S. Moore, Manager of the Energy & Environment Division.

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

- 10A. 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.

**REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES**

**11. Civil Engineering (Julie Bingham / 303-739-7306 / [jbingham@auroragov.org](mailto:jbingham@auroragov.org) / Comments in green)**

- 11A. In coordination with Traffic Engineering, there is no evidence at this point to support a smaller street section for Harvest Road. Please revise to match the 6-lane section as identified in NEATS.
- 11B. 14<sup>th</sup> Avenue / Tributary Parkway should match the street section approved for Colfax Avenue within the Aurora Crossroads development. In lieu of on-street bike lanes, provide a 14' walk / bike shared used path.
- 11C. Add a note to the PIP stating that a portion of Tributary Parkway will be required to be constructed by this development through unincorporated Arapahoe County to connect to the eastern edge of the Aurora Crossroads development.
- 11D. The timing of the Harvest Road / I-70 interchange is very impactful to the timing of improvements. Identify that the interchange is required for this project to develop. Identify which planning areas will be impacted by the timing of the interchange. If ARTA does not build the interchange, it still would be required for this property. ARTA does not have the obligation.
- 11E. Identify Trussville Street as a requirement adjacent to PA-32 and PA-35. There is no way to access those two planning areas without Trussville Street or without a stream crossing.
- 11F. Remove the requested statement in the PIP regarding landscaping. Landscape improvements within the ROW are required when the street is built.
- 11G. Identify the crossing over the Harvest Tributary as a responsibility in the PIP. There are also no exhibits that identify when this crossing will be required.
- 11H. Provide specific written confirmation from CDOT that no improvements will be required for the I-70 Frontage Road along the perimeter of this application.
- 11I. Include a sheet in the PIP that identifies all the proposed street sections.
- 11J. NEATS identified a grade separated crossing over UPRR for Powhaton Road in this location. This project has a 50% obligation for cost. Identify the timing and the requirement of the crossing in the narrative and in the exhibits.
- 11K. There is no evidence to support a smaller section for Harvest Road. Additionally, this section does not match the standard section for a 4-lane arterial. The city would not own or maintain a crusher fines trail within the ROW.
- 11L. Ensure that the text and exhibits in the PIP match for all planning areas as there are inconsistencies.
- 11M. Revise the boundary of the street improvements to match the text.
- 11N. Planning areas that connect to 6<sup>th</sup> Avenue should provide the street section from intersection to intersection.
- 11O. Identify how two points of access are provided to PA-10 if 10<sup>th</sup> Avenue is not built to the west.
- 11P. The Fultondale Street section does not match the COA standard section. This section should match the typical 80' collector section approved as part of the Gun Club Road Data Center Site Plan. The city will not own or maintain a crusher fines trail within the ROW.
- 11Q. Identify when all crossings are required in both the comment response letter and in the text / exhibits.
- 11R. Add a note to the PIP stating that the street sections provided are conceptual, and when Site and Civil Plans are submitted, the street sections must comply with the current effective Roadway Design and Construction Specifications.





- 11S. Address all miscellaneous redline comments on the exhibits in the PIP.
- 11T. Review all redline comments in Tab 10 related to streets, lighting, and retaining walls and remove any language that is inconsistent with city standards.

**12. Traffic Engineering (Dean Kaiser / 303-739-7584 / [djkaiser@auroragov.org](mailto:djkaiser@auroragov.org) / Comments in orange)**

- 12A. The Master Traffic Impact Study has significant issues that need to be addressed prior to the next submittal. Review all redline comments in the MTIS and resubmit with the next submittal.
- 12B. The typical collector section is 80'. Please update accordingly in the PIP.
- 12C. Trussville Street is required to be constructed.
- 12D. The PIP should reflect that 6-lanes are proposed for Harvest Road north and south of the proposed Master Plan.
- 12E. I-70 Frontage Road must be addressed to provide sufficient access to planning areas.

**13. Fire / Life Safety (Will Polk / 303-739-7371 / [wpolk@auroragov.org](mailto:wpolk@auroragov.org) / Comments in blue)**

- 13A. The Master Plan will require a land dedication of 1.75 acres for a temporary fire station and 2.75 acres for a permanent fire station. Please show the land dedications within the planning areas. Add requested notes to Tab 8 and also identify the Whelen warning system location.
- 13B. In the PIP, show the infrastructure improvements needed to support development to include an approved looped water supply, fire hydrants, and access roads. The goal in creating a second independent point of emergency access needs to follow the requirements of the 2021, IFC, Section D. Remoteness requirements. Where two fire apparatus access roads are required, they shall be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the property or area to be served, measured in a straight line between accesses. Access roads must account for the construction of any emergency crossing improvements, meaning that each phase of development to include plan areas must account for required access points and looped water supply.

**14. Aurora Water (Casey Ballard / 303-739-7382 / [cballard@auroragov.org](mailto:cballard@auroragov.org) / Comments in red)**

- 14A. Any offsite infrastructure that is not installed by another development must be installed by this development.
- 14B. The sanitary will need to extend to Powhaton Road to allow upstream users to connect.
- 14C. Notes are needed in the PIP to clarify that all utility layouts are conceptual and do not reflect any actual design choices.
- 14D. Water needs to be looped to the west where requested in the PIP.
- 14E. The ATEC development is proposing to align the water under 26<sup>th</sup> Avenue.
- 14F. Account for known designs such as Aerotropolis Parkway to avoid confusion in the future.
- 14G. Sanitary sewer should not be within the pond embankment. The better option would be in the roadway when possible.
- 14H. Per the MUS, the sanitary sewer along 12<sup>th</sup> Avenue will serve the east side of Powhaton Road. Thus, they must be extended to allow those future developments access.
- 14I. Review and acknowledge all advisory comments throughout the PIP.
- 14J. Address all redline comments in the Master Utility Study and resubmit with the next submittal.

**15. PROS (Scott Hammons / 303-739-7147 / [shammons@auroragov.org](mailto:shammons@auroragov.org) / Comments in purple)**

- 15A. PROS would like to see more detail outlining the functionality of the parks and open space network within this Master Plan. The inclusion of pedestrian corridors throughout the residential and commercial areas would help provide the detail required. PROS also encourages more functional open space surrounding PA-46, 49, and 51. Please also note that median information will need to be added and drainage infrastructure will not be counted for open space. Include additional information regarding identified open space areas within the floodplain.
- 15B. Will there be landscaped medians on major arterial roads? Indicate who will maintain them.
- 15C. Detention ponds are not creditable for open space.



- 15D. Consider including pedestrian corridors throughout the site showing how people will access parks and open spaces.
- 15E. Show service radii for parks in Tab 9.
- 15F. Differentiate trail types on the map.

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

- 16A. There is a math error in calculating the total for residential land use:  $472.0 \times 330.77 = \$156,123.44$ . Please make this correction and then make the corresponding corrections throughout the Public Art Budget breakdown.
- 16B. The map does not indicate a Planning Area number for the northernmost Primary Art Location. Please provide clarification regarding which site plan will reference this public art location.
- 16C. The Intent and Vision for public art feels very generic. We will look for additional information within each site plan that includes public art.

**17. Aurora Public School District** (Josh Hensley / 303-365-7812 / [jdhensley@aurorak12.org](mailto:jdhensley@aurorak12.org))

- 17A. The number of residential units has increased from what was proposed during the pre-application. The overall school land dedication requirement is approximately 50 acres based on the planned number of residential units. A single 18.5-acre P-8 school site is proposed. Based on previous conversations with the development team, as well as existing schools in proximity to the proposed development, a single P-8 school may be sufficient. However, APS respectfully requests the ability to discuss a second P-8 school site if additional residential units are added in future master plan submittals or amendments. All high school aged students will be served in district facilities outside of the development.
- 17B. The proposed school site is centrally located within the development and appears to be walkable from many of the planned residential neighborhoods. The shape of the site is somewhat unusual given the adjacency to First Creek but the site is generally compact and rectangular. Approximately 2.5 acres of the school site is labelled as shared school and park land. APS is not opposed to a joint school/ park site for a playfield, but the school district will need to own the entire site to provide flexibility in site design. Additionally, the school will require primary use of any shared areas during school hours and for school activities.
- 17C. First Creek is adjacent to the proposed school site. APS will not accept any land within the 100-year floodplain or in the FPO overlay zone district. Additionally, land dedicated to the school district should not include any regional stormwater detention or wetlands. School sites should also not contain any drainage areas or channels that would preclude development of the entire site.
- 17D. A pedestrian trail is shown between the school site and the shared school and park area. The proposed trail creates a triangle shaped shared school/ park area. It would be challenging to site a playfield on the shared area given the shape of the site and the presence of the trail. If possible, the pedestrian trail should be relocated to the west between the school site and the neighborhood park. Otherwise, the shared use area would have limited utility as part of the school site. APS may need further discussions with the developer concerning the site topography and drainage to determine if there are any conditions that would impede development of the school.
- 17E. Aurora Public Schools will require cash-in-lieu for any school land obligation above the acreage dedicated for schools. Cash-in-lieu is required to serve some school age students, including high school students, at other district locations. Cash-in-lieu is based on fair market value of zoned land with infrastructure in place and will be due when residential site plans are recorded.

**18. Arapahoe County Public Works** (Sue Liu / 720-874-6500 / [referrals@arapahoe.gov](mailto:referrals@arapahoe.gov))

- 18A. See the attached comment letter.

**19. E-470 Public Highway Authority** (Brandi Kemper / 303-537-3727 / [bkemper@e-470.com](mailto:bkemper@e-470.com))

- 19A. Occupying space for utility work, access, and any construction within the E-470 ROW and MUE (multi-use easement) is subject to and will be in compliance with the E-470 Public Highway Authority Permit Manual, April 2008, as may be amended from time to time (the "Permit Manual") and will require an E-470 Construction or Access Permit. The administration fee is \$750.00 and \$75,000 per acre for construction.



- 19B. A permit will be required from E-470 for any encroachment or disturbance to E-470 ROW or MUE prior to construction.
- 19C. Here is a link to our permit: <https://www.e-470.com/Pages/WorkingWithUs/Permits.aspx>.
- 19D. Clearly identify the E-470 ROW and MUE on all applicable drawings.
- 19E. An E-470 ownership map is attached for your reference.
- 19F. E-470 will construct directional ramps from E-470 to I-70 in the future. This is why there's E-470 ROW adjacent to this project.
- 19G. Has the design of the Harvest Road interchange accounted for the future E-470 ramps?
- 19H. All runoff into the E-470 ROW shall be at or less than historic rates and shall be treated.
- 19I. Survey monuments along and within the E-470 ROW/MUE which are disturbed shall be reset and conform to the E-470 coordinate system.
- 19J. Revegetation of disturbed areas within the E-470 property will need to meet E-470 seed mix specifications.
- 19K. Any fencing disturbed will need to be reset meeting E-470 specifications.
- 19L. A comment / response document would be helpful to track the revisions to each submittal.
- 19M. Additional comments will be issued as design progresses.

## **General**

Aurora is clearing growing and must have a master plan in place. However it does not seem to have a timeline in place, allowing contractors and developers to set their own. Would like to see a more measured pace and a larger consideration for the existing residents.

Many recent changes (in the last 18 months) point to a very developer friendly environment where road closures can be extended for many months (Airport Road South of I70 comes to mind) and multiple closures in the same direction ( Airport plus Gun Club) without an appearance of an overall plan or string City oversight.

For this change in zoning proposal,

It is concerning that much of the work to mitigate the increased load on the roads, water and sewer is noted as by others.

Examples include:

- Traffic light at Harvest Road and 6<sup>th</sup> Street
- Interchange at Harvest Road and I-70
- Widening of 6<sup>th</sup> street on the south side towards Powhatan Road
- 30" water mains added at Trussville is by others.

## **Commercial development**

It is unclear what the airport zoning entails but this lot is still significantly far south ( several miles) from the airport.

There is already significant commercial development south of Smith Road east of 470 and new commercial development at Gun Club and 10<sup>th</sup> that has yet to be finished and occupied as well as west of Piccadilly off 26<sup>th</sup>.

There appears to be no justification for more commercial development other than a case of if you build it they might come.

## **Traffic**

The impact to the traffic flow of the area needs to be better considered. The Gun Club exit at I-70 has been closed for construction for over 2 months now and will not open for another month. This closure has pointed out the limits of the existing surface streets to handle the traffic load.

There is no note of a traffic light to be added at Catawba Way, which is the major/only entry into the Cross Creek Development and which will be greatly impacted by the increased traffic on 6<sup>th</sup> Ave.

## **Residential**

The introduction letter states that the density increase of single family housing will improve the gracious feeling of the neighborhood.

Is more residential even necessary? Cross Creek continues to build out, Aurora Highlands to the north is in construction, Murphy Creek to the south, Sky Ranch to the northeast and Harmony to the east. Given the quantity in construction or development why not leave the density as is and defer the approval to build more for now?

## **Water and Sewer**

The water and sewer report is dated April 2024, but does not indicate if it reflects the requested change in zoning. Personal experience in Cross Creek shows lower than average water pressure in the existing

community and the report says little about enlarging capacity but insists that the existing water and sewer are adequate. Would like to see real water pressure measurements taken in homes in the area.





**BRYAN D. WEIMER, PWLF**  
Director

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arapahoeco.gov

## **Engineering Services Division Referral Comments**

June 6, 2024

City of Aurora Planning & Development Services  
15151 E Alameda Parkway, Ste 2300  
Aurora, CO 80012  
Attn: Case Manager



RE: TRIBUTARY MASTER PLAN W/ ADJUSTMENT AND ZONING MAP AMD  
DA-2383-00 (1792692)

Engineering Services Division of Arapahoe County Public Works and Development (Staff) thanks you for the opportunity to review the outside referral for the proposed project located in the City of Aurora. Staff has the following comments regarding the referral at this time based on the information submitted.

- Per the First Creek (Upstream of Buckley Road) Major Drainageway Plan Conceptual Design report, a floodplain crossing at 6<sup>th</sup> Avenue/First Creek is proposed and required for E. 6<sup>th</sup> Avenue. The coordination with Arapahoe County Engineering Services Division is needed for the floodplain crossing design.
- Figure 5 Trip Distribution, within the Traffic Impact Study – shows two different sets of trip distribution for 6<sup>th</sup> Avenue (To/From East 6<sup>th</sup> Avenue). Need to clarify which set is the correct one.

Please know that other Divisions in the Arapahoe County Public Works Department may submit comments as well.

If you have any questions, please feel free to contact our offices at 720-874-6500.

Thank you,

Sue Liu, PE, CFM

Arapahoe County Public Works & Development  
Engineering Services Division  
cc Arapahoe County Case No. O24-104