

Planning Division
15151 E. Alameda Parkway, Ste. 2300
Aurora, Colorado 80012
303.739.7250



November 28, 2023

Carlo Ferreira
The Aurora Highlands, LLC
141 Union Blvd Ste 150
Lakewood, CO 89228

Re: Initial Submission Review: The Aurora Highlands Master Plan Amdt No 3 - Master Plan Amendment
Application Number: DA-2062-52
Case Number: 2017-7002-04

Dear Mr. Ferreira:

Thank you for your initial submission, which we started to process on October 9, 2023. We have reviewed your plans and attached our comments along with this cover letter. The first section of our review highlights our major comments. The following sections contain more specific comments, including those received from other city departments and referral agencies.

Several important issues still remain; therefore, you will need to make another submission. A meeting to talk through the comments might be helpful to vet key issues and clarify what should be prioritized in the revised plans. Please contact me if you'd like to schedule a meeting and who you would like to attend.

Please revise your previous work and send us a new submission on or before December 18, 2023. 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 let me know. I may be reached at 303-739-7261.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Bickmire".

Debbie Bickmire, Senior Planner
City of Aurora Planning Department

Attachments: City Council Results Letter, Xcel Energy Comments

cc: Patrick Chelin, Aerotropolis Area Coordinating Metropolitan District
Jacob Cox, ODA
Filed: K:\\$DA\2062-52rev1.rtf



Initial Submission Review

- Update the Letter of Introduction to fully outline the proposed amendment (Planning)
- Identify the location of the Urban District and the MU-R required elements (Planning)
- Update standards to be in compliance with the UDO (Landscaping)
- Streets shall be in compliance with COA standards, move street sections to the PIP, remove bike lanes from the minor arterial (Public Works Engineering)
- Provide a Maximum Proposed Density, revise open space calculations, confirm if credit is going to be requested for floodplain (PROS)
- Update the Master Utility Study (Water)
- Provide a Traffic Letter (Traffic)
- Remit payment of \$28,606.00 for the Development Application fee prior to the next submittal

PLANNING DEPARTMENT COMMENTS

1. Community Questions, Comments and Concerns

- 1A. Notification was sent to twenty-three (23) adjacent property owners, six (6) outside agencies, and seven (7) registered community associations. There were no comments received from adjacent property owners or community associations. Comments were received from one (1) outside agency and are attached to this letter.

2. Zoning and Land Use Issues

- 2A. The proposed amendment includes more than the anticipated design standards for non-residential uses. Residential densities have been increased in many Planning Areas without any analysis or clarification on whether the maximum density for the Master Plan (MP) will be modified. Include a complete summary of the items included in the amendment in the Letter of Introduction. It is helpful to list them by Tab. Please be thorough.
- 2B. Previous discussions indicated the proposed amendment was intended to address design standards for the future hospital, however, numerous non-related items were included. Please be advised that the expanded amendment request will require additional analysis and may result in additional reviews.
- 2C. The proposed land use and density changes need to be compared by Planning Area to the development standards of the respective underlying zoning of Mixed Use-Regional (MU-R), Mixed Use-Airport (MU-A), or Medium Density Residential (R-2) District. All permitted and proposed densities should be outlined in Tab 8.
- 2D. The initial Master Plan with Waivers was approved by the City Council in 2019. There were several conditions of approval (see attached City Council Results) including one that stated, “The waivers associated with lot size and layouts shall comply with the standards outlined in the adopted version of the 2018-2019 Unified Development Ordinance” (UDO). Please remove all waiver request(s) and associated discussions related to lot size and layout.
- 2E. Review the approved waivers relative to what is included in the approval vs. what is permitted in the current underlying zone districts. The approved waivers cannot be modified. Any proposed changes will require compliance with the UDO standards, or you will need to request an adjustment to the UDO requirements. Major adjustments are subject to approval of the Planning and Zoning Commission.
- 2F. Areas located in unincorporated Adams County cannot be included in the Master Plan until they are annexed into the City of Aurora.
- 2G. The MU-R district is intended to serve the “image-making” area. Identify where/how the MU-R required elements per [Section 146-2.4.7](#) will be provided. The requirements and standards are briefly summarized as follows:
- At least one walkable main street bordered by plazas and/or buildings.
 - An identified focal point that serves as the center of the area.
 - At least one public plaza or outdoor meeting area consisting of a minimum of 600 square feet at the intersection of an arterial street.
 - At least two of the uses identified in Table 3.2-1.
 - Direct pedestrian, bicycle, and automobile access.



- A high visibility site is defined as a single row of building sites located between the E-470 right-of-way and a boundary road located at least 300 feet from the E-470 right-of-way.
 - A street network of arterial, collector, and local streets meeting all street spacing and layout requirements.
 - A network of walkways for pedestrian circulation.
 - At least one distinct architectural feature.
 - Limited vehicle-related operations/uses.
- 2H. Provide design standards that will characterize the proposed MP, but do not simply restate existing code requirements. Concentrate on specific standards, features, and upgrades that will be provided by the developer.
- 2I. Proposed roads must meet the requirements of the COA Roadway Manual and be included in the PIP. Any deviations will require additional conversation and may require an adjustment.
- 2J. The proposed MP includes increased density, but the overall open space has been decreased. Provide the Maximum Proposed Density for the purpose of calculating PROS requirements.

3. Completeness and Clarity of the Application

Tab 1 -Letter of Introduction

- 3A. The Letter of Introduction should summarize the Master Plan and the proposed amendment, as well as include the items discussed above. Review the approved “waivers” and remove those that require compliance with the UDO. Outline all the items being amended and, if applicable, include any requested adjustments to the current code. See comments in Tab 6 for further clarification.
- 3B. The mylar cover sheet was submitted as Tab 1, however, that is a component of the amendment that will not be needed until the amendment is complete. It should reference all amendments with descriptions and dates.

Tab 3 – Context Map

- 3C. Update the Context Map for the items listed in the Master Plan Manual. It has been 4 years since the MP was approved and there have been numerous changes. The updates should include, at a minimum:
- Current zoning
 - The locations of all recorded subdivision plats within the MP area. A boundary outline of each plat will be acceptable for each.
 - Ownership for all non-developed areas
 - The names of adjacent Master Plans and the general locations of major street intersections

Tab 6 - Narrative

- 3D. Include a full narrative that discusses the approved/proposed MP. See the required elements per the MP Manual and update the applicable sections.
- 3E. Remove the waiver request and associated discussion for a waiver(s) related to residential lot size and layout, as they are no longer applicable.
- 3F. Changes cannot be made to the approved waivers, which reference old code sections. We recommend you review the waivers relative to what was approved vs. what is permitted in the current underlying zone districts. The waiver(s) standards are retained in the MP unless the applicant chooses to remove them. Any proposed changes to a previously approved waiver will be reviewed to the UDO standards.

Tab 8 – Land Use Map and Matrices

- 3G. There are significant changes proposed for residential density. Identify the maximum proposed density and demonstrate there is adequate infrastructure. Ensure all the changes are clouded throughout the tables and maps.
- 3H. Planning Areas (PA) 22 and 25 have been revised from commercial land use to mixed-use. Additionally, PA-22 is discussed as an area for civic uses and a transit hub. More information about what is envisioned is required to support the change.
- 3I. The approved MP only supported residential uses adjacent to E-470 if it was high density and included structured parking. Provide justification for any proposed changes to these conditions.
- 3J. The proposed land uses should be in conformance with the underlying zoning. Review the proposed changes for



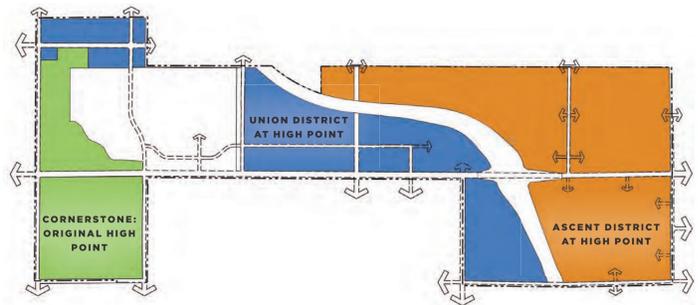
- PA-4, PA-11, and PA-64 to ensure the proposed densities and uses are permitted.
- 3K. If changes are proposed for portions of a PA, revise the plans to identify each area separately, relabel each respective PA (i.e., 64a, 64b...), and include each PA separately in the matrix.
 - 3L. Review the “Villages” referenced in Tab 10 and in the Land Use Matrix and adjust accordingly per the proposed Urban District.
 - 3M. Remove the unincorporated area at E-470 and 26th Avenue.
 - 3N. Numerous areas along E-470 have been annexed. Please adjust the acreage to include these areas.
 - 3O. Rename the Commercial Activity Center (CAC) label to Administrative Activity Center.
 - 3P. Ensure all PAs are labeled (and readable) and include a proposed land use designation.
 - 3Q. Cloud all proposed revisions.

Tab 9 – Open Space, Circulation, and Neighborhood Plan

- 3R. PA-18 is no longer a parking site. Please revise the land use accordingly on the map and in the matrix to label PA-26 as a neighborhood park.
- 3S. Review all PAs for consistency with Form D in Tab 8.

Tab 10 – Urban Design Standards

- 3T. Update the approved Tab 10 to reflect the proposed modifications and the “proposed” Tab 10 should be incorporated to address the new uses and standards. This includes updating Forms F-1 and F-2 for the different land uses and/or districts. Ensure the standards address screening for non-residential uses, site furniture, lights, etc.
- 3U. Identify how the MU-R requirements will be met and show the location of the walkable main street. Identify the other elements that will be required at the time of development. See [Section 146-2.4.7](#) for the complete list of requirements and the redlines for more information.
- 3V. Identify the intended “Urban District” on the map. The Area Vision is very brief before leading into the Guiding Principles. Additional context is needed.
- 3W. Consider establishing sub-areas in the Urban District that will guide the character and design standards. These sub-areas could/should be referenced in all the design standard tabs. See the example to the right.
- 3X. Urban Design Standards should provide the elements that will be used to create spaces. The street sections should meet COA standards and be added to the Public Improvement Plan. Tab 10 should identify the elements used in the public areas surrounding the streets. Update Form F-1 and F-2 to define the character for the different zones and/or uses.
- 3Y. See the redlines for examples of Urban Street Frontage Zones. These zones include a wider sidewalk, a landscape in planter beds, and furnishings to activate the streetscape. This type of street frontage should be used along Main Street and adjacent streets.
- 3Z. Terminology is used to discuss streets and areas throughout the urban district; however, the terms are not referenced consistently in the text or maps.
- 3AA. Do not quote code requirements. Discuss characters, locations, and standards that exceed code.
- 3BB. The Focal Point for the South Residential District (Page 6) seems misplaced. It is situated adjacent to a detention pond, single-family detached residential, and unincorporated out parcels.
- 3CC. Correct the title on Page 7 and review the corridor references for consistency.
- 3DD. Review the southern corridor area to ensure the proposed development is feasible around the greenway corridor.
- 3EE. Land Uses should be consistent with the Land Use Matrix in Tab 8. Land Use Districts can be used to describe character areas.
- 3FF. As previously stated, PA-22 is designated for civic uses and as a transit hub. More information for what is envisioned is required to support the change from commercial land use.
- 3GG. Clarify what Page 10 is intended to illustrate. There is no commentary. Adjust the registration of the map and





- overlay and revise the Commercial Activity Center (CAC) to the Administrative Activity Center (AAC).
- 3HH. Maximum building heights will be permitted based on the standards of the underlying zone district. Please review the proposed heights relative to the R-2, MU-A, and MU-R design standards. Heights cannot be permitted “in exchange” for design standards.
- 3II. The locations of the proposed building heights and setbacks should reference defined street corridors. The naming conventions need to be consistent.
- 3JJ. The frontage road section on page 13 should include a detached sidewalk. Will all buildings be grade-separated from the frontage road? This will make it very difficult to screen back-of-house areas.
- 3KK. Add notations to the illustrations on pages 15-17 to highlight key elements and intent.

Tab 11 – Landscape Standards

- 3LL. Section 138-191 overrides the landscape standards approved by the original MP. We recommend the landscape standards be updated to reference the UDO; however, a note will suffice. Please ensure the standards address all the proposed non-residential uses or add specifics.
- 3MM. Include all of Tab 11, not just a portion. Update accordingly for the updated uses and cloud the areas revised.
- 3NN. Include additional comments for the E-470 frontage landscape to address equivalents when trees are not permitted due to easements; and, to recommend additional landscape where “back of house” areas need to be screened. The intent should be for the buffer landscape to be distributed throughout the buffer rather than grouped together to screen service areas.

Tab 12 – Architectural Standards

- 3OO. The proposed standards for non-residential uses should be more descriptive. They have not been adjusted for different uses or locations. Include the architecture standards for the MU-R area and include elements from Tab 10 to emphasize the character. Describe how materials, color, or architectural features can contribute to the character.
- 3PP. Include standards for the uses in the Entertainment and Hospitality District.
- 3QQ. Include illustrations to demonstrate the desired architectural character.
- 3RR. There are terms used that are undefined. Define what the terms Traditional, Hybrid, and Retail Housing Core mean and where they are located. Flipping between tabs should not be necessary. Additionally, the table does not include elements/examples of architectural “features.”

General Comments

- 3SS. Cloud all areas revised in this amendment in all tabs.
- 3TT. Revise land use types per comments on the redlines.
- 3UU. Make sure all Planning Areas are labeled and readable.
- 3VV. Flatten all comments prior to submittal.
- 3WW. Maps should be darker and major roadways labeled.
- 3XX. Address redlines and comments in all tabs.

REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES

4. Civil Engineering (Julie Bingham / 303-739-7300 / jbingham@auroragov.org / Comments in green)

Tab 10

- 4A. No bike lanes within the street for the minor arterial (Main Street). Please match the PIP.
- 4B. All proposed roads should conform to the COA Roadway Manual street sections.

5. Traffic Engineering (Carl Harline / 303-739-7548 / charline@auroragov.org / Comments in amber)

- 5A. Provide a Traffic Letter documenting the changes to densities and that the trip generation does not exceed a 20% increase in the trip generation previously studied.
- 5B. Show bike lanes off-street in Tab 10 on Page 13.



6. Aurora Water (Steve Dekoskie / 303-739-7490 / sdekoski@auroragov.org / Comments in red)

- 6A. An amendment to the Master Utility Study will be required to provide new water demands and sewer loading rates. The utility study must demonstrate the increase in densities can be served by the existing onsite and offsite infrastructure.

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

Tab 8

- 7A. The Maximum Proposed Density is needed in Form D for the purpose of calculating PROS requirements. PROS cannot verify the population as no actual density is proposed. Please update the density and make sure it is consistent with Form J.
- 7B. Open space (OS) may be within the floodplain up to a certain percentage. What does Note 2 in Tab 8 mean?

Tab 9

- 7C. You are showing a reduction in the overall neighborhood park dedication which is leading to a deficit in the requirements. Please rectify. See comments on the redlines.
- 7D. Note that the numbers are not adding up correctly. Despite having reduced overall acreage with this submittal, you're showing more dedication than the previously approved FDP. Please clarify.
- 7E. Form J should identify 40 acres that will be dedicated for the community park per the previous approval. Call out that the additional community park acreage will be counted toward open space credit.
- 7F. Please clearly list the anticipated OS credit within the floodplain.

8. Xcel Energy (Donna George / donna.l.george@xcelenergy.com)

- 8A. See attached comment letter.



Right of Way & Permits

1123 West 3rd Avenue
Denver, Colorado 80223
Telephone: **303.571.3306**
Facsimile: 303.571.3284
Donna.L.George@xcelenergy.com

October 26, 2023

City of Aurora Planning and Development Services
15151 E. Alameda Parkway, 2nd Floor
Aurora, CO 80012

Attn: Debbie Bickmire

Re: The Aurora Highlands Master Plan Amendment No. 3, Case # DA-2062-52

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the master plan amendment for **The Aurora Highlands Master Plan Amendment No. 3**. Please be aware PSCo owns and operates existing natural gas or electric *distribution* facilities within the subject property. As projects progress, the property owner/developer/contractor must complete the application process for any new natural gas or electric service, or modification to any of the existing facilities via xcelenergy.com/InstallAndConnect. It is then the responsibility of the developer to contact the Designer assigned to the project for approval of design details.

PSCo has no objection to this proposal, contingent upon PSCo's ability to maintain all existing rights and this amendment should not hinder our ability for future expansion, including all present and any future accommodations for natural gas transmission and electric transmission related facilities, and that our current use/enjoyment of the area would continue to be an accepted use on the property and that it be "grandfathered" into these changes.

Please note PSCo also has an existing *high-pressure natural gas transmission line, meter stations* west of Powhaton along and *high-tension electric transmission* lines along Powhaton Road. If there are any activities in these areas, property owner/developer/contractor must contact the following, respectively:

- **for High Pressure Natural Gas Transmission and Meter Stations:**
[encroachment requests \(xcelenergy.com\)](http://xcelenergy.com/encroachmentrequests) - click on Colorado; an engineer will then be in contact to request specific plan sheets
- **for Electric Transmission:** email coloradorightofway@xcelenergy.com or website www.xcelenergy.com/rightofway

Additional easements may need to be acquired by separate document for new facilities.

As a safety precaution, PSCo would like to remind the developer to contact Colorado 811 for utility locates prior to construction.

Donna George
Right of Way and Permits
Public Service Company of Colorado dba Xcel Energy
Office: 303-571-3306 – Email: Donna.L.George@xcelenergy.com



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October 11, 2018

Carlo Ferreira
 Aurora Highlands, LLC
 6550 S. Pecos Rd Suite 124
 Las Vegas, NV 11711

Re: CITY COUNCIL HEARING RESULTS: The Aurora Highlands Comprehensive Plan Amendment to the E-470 Land Use Plan, Rezoning and Framework Development Plan with Waivers
 Application Numbers: DA-2063-01 and DA-2062-00

Dear Mr. Ferreira:

Congratulations! Your applications were approved, one with conditions, by the Aurora City Council on October 8, 2018. The table below shows the results of the City Council actions.

| Planning Case Number | City Council Action | Further City Council Action Required? | City Council Conditions |
|----------------------|---------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2018-1004-00 | Approved | Yes (2 nd Reading) | None |
| 2018-2007-02 | Approved | Yes (2 nd Reading) | None |
| 2017-7002-00 | Approved | Yes | 1. The Framework Development Plan with Waivers shall be contingent upon the applicant entering into surface use agreements with oil and gas companies to place oil and gas operations and other industrial development within the designated energy and technology corridor. No Contextual Site Plan(s) (CSP) will be approved without execution of such agreements. 2. The waivers associated with lot size and layouts shall comply with the standards outlined in the adopted version of the 2018-2019 Unified Development Ordinance. 3. Resolution of outstanding technical issues prior to the recordation of the Framework Development Plan. 4. The following PROS conditions apply as follows: a. The Aurora Highlands shall provide land dedication for Neighborhood Park, Community Park and Open Space as required by city code and the Parks and Open Space Dedication and Development Criteria Manual. This includes dedication of open space property outside of the 100-year floodplain conveyance. b. Add the following note to the FDP (Form J): Due to proposed density transfer, the actual park and open space dedication acreage requirement will fluctuate. Therefore, Neighborhood Park locations are to be shown to meet the ½ mile radius service area requirement. At the time of each CSP submittal, there will be an evaluation of the Parks and Open Space dedication required for that Village. The actual size of the parks and open spaces will be adjusted to meet current dedication requirements such that there is not an actual deficit within any Village. |



Please note that the Comprehensive Plan Amendment and Rezoning Request contain ordinance changes which must pass a second reading by City Council. The date for the second reading has been tentatively set for October 29, 2018.

If you have any questions about the Planning Department's approval process, please feel free to give me a call. I can be reached at 303-739-7261.

Sincerely,

Deborah Bickmire, Planner II
City of Aurora Planning Department

cc: Samantha Crowder - Norris Design 1101 Bannock Street Denver, CO 80204
Eva Mather, Norris Design
Susan Barkman, Neighborhood Services
Vinessa Irvin, ODA
Dan Money, Asst. City Attorney
Filed: K:\\$DA\2062-00ccres.rtf