



April 4, 2025

City of Aurora – Planning Department
15151 East Alameda Parkway
Aurora, CO 80012

**Re: Point Plaza Park – Nine Mile Station – Photometric Analysis Requests
(Pre-App #1845889)**

Dear Mr. Fettig,

On behalf of The Point Metropolitan District, we submit the following letter in response to discussions between the project team and the City of Aurora Engineering Reviewers regarding the photometric status of the properties surrounding the project site. The letter provides background information requested by the City Engineers / Engineering Reviewers and explains the position of the design team.

Context

During the Pre-Acceptance Review, Engineering Reviewers provided the following comments:

“Please add the following notes:

1. A photometric analysis of the existing private street lights along E Dartmouth Avenue, S Quari Street and E Eastman Place shall be submitted with the street lighting plans in the civil plan submittal. During the civil plan submittal the existing street light photometrics will be checked for compliance with the 2025 Roadway Manual, and additional lights will be added as required.”

and

“For E Dartmouth Avenue, S Quari Street and E Eastman Place, private streets shall have streetlights in conformance with COA standards.

Identify the following information as part of the site plan submittal in conformance with Section 3.L.1 of the Roadway Manual:

- Roadway Classification (typical section name)
- **Adjacent Land Use Category (i.e., TOD), as applicable**
- Number of lanes
- Back-to-back curb width
- **Pedestrian Activity Level**
- **Pavement Type: R3, for all lighting calculations”**

Applicant’s Position

The Point Metropolitan District feels the request for photometric analysis of the surrounding streets is unnecessary and unreasonable for the following reasons:

1. This District Park project does not propose to modify, extend, or in any way change or improve the roadway tracts.
2. All roadway tracts bounding the project are private streets previously approved by the City and built to public standards during their 2020-2021 development.



3. All limits of construction for the proposed development are behind back of curb, and tract lines are located on back of curb.
4. The two adjacent developments to the West were not required to analyze adjacent street lighting. Both developments are open and operating, and have received Certificate of Occupancy or Temporary Certificate of Occupancy. The Certificate of Occupancy on the market rate property will be provided following completion of landscaping, expected this year.
5. The roadway tracts were developed as part of a singular infrastructure project – all roadways and lighting were constructed according to the City of Aurora-approved plans.
6. All roadways and lighting within those rights of way are District owned. All other adjacent parcels and vacant parcels are privately owned and are not controlled by the District.

Applicant's Concern

As outlined above, the roadways and the Plaza Park are the only District-controlled areas. All other land areas / parcels are private property. By requiring a photometric analysis of roadways for each developing parcel moving forward, a conflict is created between public (District-controlled) and private developments, despite the City approving the prior development, construction, and standards of construction for the roadways and lighting. The project team has concerns about the precedent this requirement creates for other parcels, and about how the City plans to handle enforcement of changing light standards, design updates, construction updates, etc., on private properties.

The Point Metropolitan District would like to continue the discussion with the City regarding these photometric analysis requirements while the rest of the proposed project is under review.

This letter will also be shared with the reviewer we have been in contact with, but please do not hesitate to reach out for additional information or clarification.

Sincerely,
Norris Design

A handwritten signature in black ink that reads "Leah Bryant".

Leah Bryant, PLA, SITES AP
Associate