



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

AuroraGov.org

September 19, 2024

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

Re: Third 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 submission. 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.

Prior to scheduling the administrative decision the Narrative, Tab 8 and Tab 9 require revisions. Please revise these per the comments and return them to me. If all comments have been addressed the administrative decision will be scheduled. Feel free to reach out if you need additional clarification.

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,

Debbie Bickmire, Senior Planner
City of Aurora Planning Department

Attachment: Approved Public Art Plan

cc: Patrick Chelin, Aerotropolis Area Coordinating Metropolitan District
Jacob Cox, Director of Development Review
Justin Andrews, ODA
Filed: K:\\$DA\2062-52rev3rtf



Third Submission Review

- Update the Letter of Narrative, Land Use Map and Matrix and Open Space Map and Matrix prior to Administrative Decision (Planning)
- Address outstanding comments on Tabs 3, 10, 11 and 12 (Planning)
- The shared road shall be private (Public Works Engineering)
- Revise triggers and update map and Form J to be consistent (PROS)
- Update the Master Traffic Impact Study (Traffic)

PLANNING DEPARTMENT COMMENTS

1. Zoning and Land Use

- 1A. The total Master Plan acreage has been reduced from 2,497.4 to 2,306.6 acres. Please explain the reduction and try to account for area in Form D.
- 1B. Per Aurora Public School's comments, warrants have been met for a high school. Identify a site for the proposed high school and show it on the map and in the Land Use Matrix.
- 1C. The Mixed-Use land use designation shall only be permitted in planning areas within the Mixed Use-Regional (MU-R) district. All other planning areas shall identify land uses as described in the Master Plan Manual.
- 1D. Review the definitions of a transit station and transit facility; as well as the [use specific standards](#) for a transit facility. We are not discouraging transit-related use in PA-25; however, our expectation is there will be commercial development within that planning area.
- 1E. Address how non-compatible uses and/or the edges of the urban district will mitigate impacts on the adjacent to lower-density residential areas.

2.Completeness and Clarity of the Application

Tab 1 -Letter of Introduction

- 2A. Address comments and notations on the redlines. Ensure references are consistent with Tabs 8 and 9.

Tab 3 – Context Map

- 2B. Repeat comment: Update the Context Map for the items listed in the Master Plan Manual. You will probably need a new base map. Contact staff if you need help with the updates. The updates should include, at a minimum:
 - Current zoning of adjacent property.
 - 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

- 2C. Update the zone districts referenced throughout. Remove references to "Airport Corporate and/or North East Plains (NEP)."
- 2D. Revise text per redline comments and suggestions.
- 2E. Verify acreage references for consistency with revised land uses.

Tab 8 – Land Use Map and Matrix

- 2F. Add a note under the matrix stating, "Land use in Mixed-Use Planning Areas
- 2G. Several planning areas have been relocated, redesigned, split, or uses changed. Revise the planning area labels so the sub-areas are clearly numbered (ie. eliminate plain PA number, use PA-#.1, PA-#.2) and delineated on



the map, and itemize them separately in the matrix. Adjust the acreages of the planning areas to correspond with the changes. If a planning area has been divided, the sum of the sub-areas should equal the total area.

- 2H. Update the land use matrix so all planning areas are associated with the appropriate village.
- 2I. Planning area acreages should be the same on the map and the matrix.
- 2J. Revise the land use(s) and acreages in the southeast corner to reflect the area after Aerotropolis Parkway is constructed. Development won't be feasible within the right-of-way.
- 2K. Please add the boundaries of the villages to the map on page 9.
- 2L. Add "Small Urban Park" (SUP) to the Land Use Map legend.

Tab 9 – Open Space, Circulation, and Neighborhood Plan

- 2M. Ensure all planning areas and acreages are consistently referenced on the map and Form J.
- 2N. Update Form J as needed to be consistent with Form D.

Tab 10 – Urban Design Standards

- 2O. Address the previous comments:
 - Illustrate the Urban District and label major roadways in the diagram on Page 27. The Area Vision and the Guiding Principles sections are very brief. Additional context is needed before leading into detailed specifics.
 - The proposed guidelines are not entitlements. They allow the developer to have higher density but will still be subject to the design standards in the UDO. Revise the language on Page 29 and throughout the Tab.
 - Exhibits are referenced in the text several pages ahead of their location. Rearrange the material so the figures can be viewed on the same or the next page.
 - Define and illustrate the locations of Main Street north and south.
 - Describe the different uses/applications for the proposed roadways. Use consistent naming conventions in the labels and text. How do the sections relate to the descriptions on Pages 38-39. All sections should be consistent with the approved Public Improvement Plan. The roadway sections also need to be in conformance with the Roadway Manual.
 - Which street section is an urban section that can be applied to the walkable main street? Review the code standards for street landscape and ensure the section is consistent.
 - Per previous conversation, please do not quote the code. Additionally, the creation of additional step-back standards will be difficult to address until site plans are submitted. They are standards that should be enforced by the developer, not the city.
 - The sign plans have been revised since the original approval. Use the amended information.
 - There has been an issue regarding differing permitted fence types for different-size lots. This has been communicated to staff by the development review manager. We would be happy to amend the fence standards in the MP to help resolve this issue.
 - The table on Page 20 was never approved by PROS and there are concerns about compatibility of uses. Please consider updating the table per their guidelines.
 - Revise all references to the old code and replace them with the UDO.
 - Since the approval of the UDO, Pages 21-26 are no longer applicable. Please remove them from the Tab.



Tab 11 – Landscape Standards

2P. Address comments from the previous review:

- The landscape descriptions need to be updated to remove references to old code sections.
- Enhance the discussion of landscape and buffers between non-compatible uses. Specifically, identify measures to be taken to mitigate impacts such as berming, additional landscape, etc. This is particularly relevant for the edges of the urban area that will be adjacent to residential.
- Add street labels and a north arrow to the map on Page 23.

Tab 12 – Architectural Standards

2Q. The proposed standards for non-residential uses should be added to the previously approved residential standards in Tab 12.

2R. The images to illustrate the architectural character should be included in Tab 12 instead of Tab 10.

REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES

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

Tab 10

3A. Identify the frontage road/shared street as private.

3B. If special paving is used, in lieu of a license agreement, an IGA may be necessary, and since the specific materials/locations/extents are not yet defined, there may be additional comments throughout the rest of the review until civil plan approval.

4. Traffic Engineering (Dean Kaiser / 303-739-7584 / djkaiser@auroragov.org / Comments in amber)

Master Traffic Impact Study

4A. We concur with these findings and RTC documentation.

4B. This response was added for future clarity for the City's benefit:

1. We understand the school site location is still being discussed and the location hasn't been agreed to.
2. Matrix analyzed the land use for the 65-acres as a 1,000 student school compared to 330 units of SFD and the 330 units of SFD have approximately 1,400 more trips per day.
3. We are going to show the land use as SFD's acknowledging that if it is converted to a school, the traffic report will be conservative and have slightly more vehicles shown in the area.

5. PROS (Scott Hammons / 303-739-7147 / shammons@auroragov.org / Comments in purple)

Tab 9

5B. Revise the open space trigger language to state, "Open space shall be developed when any one of the adjacent planning areas receives temporary certificates of occupancy (TCO) or certificates of occupancy (CO) for 50% of the platted lots."

5C. Update the trigger for the community park to include, "Plans for the community park shall be submitted to the city when 40% of platted lots have received a certificate of occupancy."

5D. The acreages shown in Form J and on the map should match. Ensure all referenced planning areas are shown.

5E. Neighborhood parks must be a minimum of 3 acres.

6. Public Art (Roberta Bloom / rbloom@auroragov.org)

6A. The Aurora Highlands revised their public art plan in 2022 and I have attached the mylar of that plan. The required public art components are located within the green space that runs from the central western edge to the southeast corner of the development. Many, but not all of the proposed artworks have been completed and installed.



I do not see anything within the updated land use map that interferes with any identified public art locations. However, as a matter of public record, it would be helpful to see the public art locations (completed and remaining to be completed) identified within the TAB 8 Land Use Map. This will also help to ensure that future changes will not impact the existing and future art.

Please let me know if you need any additional information from me.

7. Aurora Public Schools (Josh Hensley / jd hensley@aurorak12.org)

- 7A. A high school shall be located within the Aurora Highlands property boundary, preferred location is in the northeast $\frac{1}{4}$ section of Section 20. A proposed location is identified on the Land Use Map within PA-37. The final size and location shall be coordinated with Aurora Public Schools at the time of CSP, or when demand for a high school is warranted.

The current high school serving the growing E-470 corridor is operating at 90% capacity and is expected to reach or exceed its designed capacity within the next few years. Demand for a high school site within the Aurora Highlands master plan is warranted. APS requests that the proposed 65-acre high school site identified in PA-37 of the approved master plan and proposed amendment be designated as the high school location in Aurora Highlands. Aurora Public Schools, the City of Aurora and the Aurora Highlands development team collectively agreed that the proposed location is acceptable for a high school when the Master Plan was approved. This site remains the school district's preferred option. APS is fully committed to constructing a high school in the Aurora Highlands and the district is eager to collaborate with both the City and the developer to finalize the high school site location and dedication.

The public art at the Aurora Highlands will be a defining element intended to brighten and enliven the parks, open spaces, plazas, and the public realm. The public art within the community will service public spaces, incite interaction and conversation, serve as reference points for navigating, and instill a sense of sustainability and longevity. The art will be multi-faceted, providing the necessary spark to enhance the community. Selected pieces will strive to reflect, reveal, and create the personality of the community.

The intent for public art in The Aurora Highlands is to provide cultural and social value to the community and surrounding areas. Public art is encouraged throughout the project and within public spaces as focal points for gathering areas. It is intended to beautify the neighborhood and inspire residents. Public art shall encourage residents to strike up conversation and stimulate community engagement.

- Create a sense of ownership within the community with pieces that resonate with the area
- Provide interesting conversation starters for community members to strengthen neighborhood ties
- Emphasize areas of high use, while connecting areas of low use
- Help to create a unique identity for the area where it is located
- Uphold sustainability goals through the use of low impact materials
- Provide longevity through the use of durable materials

Art at The Aurora Highlands will be concentrated in Hogan Park at Highlands Creek. The goals of the public art will work to uphold the overall design goals of the Aurora Highlands and support the landscape and surrounding spaces for each location. Unique goals for individual pieces will be generated on a case by case basis depending on the specific location. The Applicant will work with one or more artists (as identified by City of Aurora Standards) to generate the big picture vision intended for the project.

The public art selection will begin no later than the first CSP for residential development. It may also start with the Infrastructural Site Plan for The Aurora Highlands Parkway and Gun Club Road with the selection in the roundabout. The art piece selections will be phased with the phasing of the community. The Public Art Plan is intended as a living document, to be updated as the community evolves and art is installed over time.

Specific materials, locations, and schedule for public art installments shall be determined at the time of CSP. Fees, timelines, and budgets may change as the project evolves.

Land Use Map - Matrices - Standard Notes

The attached Land Use Maps delineate the following items:

- Location of all existing and proposed access points
- Location of all planning areas
- Ten (10) acre reference grid
- Indications of all proposed detention/retention ponds
- Indications of planning areas that will constitute Neighborhood Activity Centers (NACs)
- Locations of planning areas that indicate all open space and park areas to be counted toward fulfillment of Parks and Open Space Departments park and open space requirements
- Locations of all rail lines and utility easements

In addition to the standard Form D required with traditional FDP applications, the Aurora Highlands Applicant proposes a Framework Development Plan Land Use Tracking Chart. This chart will ensure all densities and land dedications required by the City are met throughout the course of the development's approval process. The tracking chart will accompany all subsequent CSP applications submitted under this Framework Development Plan.

Residential density shall be calculated for all land use areas (with the exception of industrial areas) based on a gross 5 dwelling unit per acre factor. A maximum of 32% of the Aurora Highlands development area shall be allowed for multi-family development. Park, open space, and school dedications shall be calculated from these population assumptions. Within this FDP, however these calculations are subject to change with each CSP as the project develops.

The City Standard FDP Notes have been attached. The below changes have been made to more accurately reflect The Aurora Highlands project.

- Modification to standard note 8
- Modification to standards note 10
- Modification of standard note 11
- Modification to standard note 12
- Removal of standard note 13
- The addition of note 16
- The addition of note 17
- The addition of note 18
- The addition of note 19
- The addition of note 20
- The addition of note 21

Installation dates are approximate and may change.

Specific materials, locations, and schedule for public art installments shall be determined at the time of CSP. Sizes, timelines, and budgets may change as the project evolves.

Standard Notes

3. **Traffic Signal Crossovers.** Owner and/or developers are responsible for 100 percent of signal costs for interior intersections. The cost of signals at perimeter intersections will be prorated. Signal locations and cost sharing will be determined at Contextual Site Plan.
4. **Street Lights.** Street lights must be constructed along all public streets as required by City Code Section 126-236, or current code.
5. **Archaeological Finds.** The owner, developer and/or contractors will notify the City if archaeological artifacts are uncovered during construction.
6. **Parks.** Neighborhood park sites shall not exceed 3 percent maximum finished grades.
7. **Residential Density Reductions.** The developer has the right to build at a lower residential density in any map area provided the City has determined that the use is permitted and compatible with surrounding land uses. A finding of compatibility will be determined at the time of CSP review. This reduction shall be considered an administrative FDP amendment.
8. **Master Drainage Plan.** No subdivision shall be approved prior to the City's approval of the Master Drainage Plan. In the event of any plan conflicts with the FDP, including, but not limited to, the size, location and regional detention ponds and/or drainage way locations, cross sections and widths, the Master Drainage Plan, as approved by the City, shall govern. Drainage ponds drop structures and other facilities are subject to CSP review.
9. **404 Permit.** The developer is responsible to comply with any requirements of the Army Corps of Engineers (if any) with regards to 404 permitting and wetlands mitigation.
10. **Emergency Access.** The developer is responsible for construction of all on-site and off-site infrastructure needed to establish two points of emergency access to the overall site and each internal phase of construction. The requirement includes, but is not limited to, the construction of any emergency crossings improvements, looped water supply and fire hydrants as required by the adopted fire code and city ordinances. These items will be provided at a future date or with future sub-area FDPs.
11. The Master Utility Study, Master Drainage Study and Master Transportation Study are incorporated as a part of the FDP. Final approval of these documents is required before acceptance of an application for the first CSP within the project.
12. **Landscape Standards.** Unless otherwise noted herein in a waiver, the landscape standards outlined in Appendix 14 do apply to the FDP.
13. **Future Amendments.** Any future amendments to architecture, landscape architecture and other urban design standards and related drawings must demonstrate an equal or better quality than the approved FDP standards.
14. **FDP Waivers.** Except for the waivers listed below, this FDP will be interpreted to mean that all standards contained in the FDP will meet or exceed all city code requirements.

Due to the extended development timeline that The Aurora Highlands requires, the Applicant reserves the right to incur waiver requests at the time of Contextual Site Plan submittal that do not require additional Master Framework Development Plan amendments.

The following waivers are approved:

GROW • SUSTAIN • INSPIRE • INTERACT

1 Public Displays of Awareness

2 Poetry in the Tunnel

3 Rock Art/Etchings

4 Totem Structures

5 Poetry in the Sky

6 K Vitamins

7 Aurora Borealis Sculpture

8 Umi Mother Nature Sculpture

Specific materials, locations, and schedule for public art installments shall be determined at the time of CSP. Sizes, timelines, and budgets may change as the project evolves.

Waiver No. 1

Code Section
Section 146-906 Permitted Density and Intensity of Development
(A) Maximum amount of Multi-Family Development in E-470 Corridor District Sub-Areas
a. Medium Density = 24%
b. Regional Retail/Commercial = 32%
c. Airport Corporate Subarea = 32%
(C) Permitted Residential Densities, Table 9.5
Maximum residential density in Medium Density Residential: 16.0 du/ac

The Aurora Highlands proposes a maximum 32% multi-family for the entirety of the community and 30.0 du/ac for parcels located adjacent to Mixed Use, Commercial, or a CAC. This waiver is requested for the approximately 1726 acres of Medium Density Residential to allow the potential for more urban and attainable multi-family units as the Aerotropolis expands over the next 30 years.

Waiver Justification

As the residential climate continues to evolve with the growing demand for attainable housing and rental options in the Aerotropolis area, the Applicant would like to reserve the option for additional multi-family in condensed areas that are suitable for this land use; for example, areas that are adjacent to commercial and mixed-use. By having additional multi-family in areas such as these, allows for the continued growth and sustainability of "urban pockets" within The Aurora Highlands community. Thereby fulfilling the intent of having a "city within a city" development, rather than a homogeneous, sprawling suburban development.

If residential develops in PA-2, 3, and 10 it shall be vertically integrated mixed use with structured parking. Any other residential developing at 30 du/ac or greater will meet or exceed current City Code, or Code as amended from time to time.



Code Sections

- Section 146-906 Permitted Density and Intensity of Development
- (C) Permitted Residential Densities
 - Table 9.5 and 9.6 Permitted Residential Densities E-470 Residential and Mixed Use Subareas
- 146-903

(F) Standards Applicable to Multi-Family and Single-Family Attached Townhome Development and Single-Family Attached Duplex Development

- Section 146-907

Other regulations still applicable

1. All development shall comply with the Aurora Subdivision Regulations, including without limitation those provisions related to... the amount, location, and design of residential lots containing less than 6,000 square feet.