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AuroraGov.org

September 12, 2024

Lyle Artz
Fitzsimons Redevelopment Authority
12635 E Montview Blvd.
Aurora CO 80045

Re: Initial Submission Review: Fitzsimons Innovation Campus GDP Amendment No. 16
Application Number: DA-1233-55
Case Numbers: 1998-2011-16

Dear Mr. Artz:

Thank you for your initial submission, which we started to process on August 22nd. 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 community members.

Since several important issues remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before September 30th.

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.

The estimated Planning & Zoning Commission hearing date is still set tentatively scheduled for Nov 13, 2024, and City Council on December 16, 2024. Please remember that all abutter notices for public hearings must be sent and the site notices must be posted at least 10 days prior to the hearing date. These notifications are your responsibility and the lack of proper notification will cause the public hearing date to be postponed. It is important that you obtain an updated list of adjacent property owners from the county before the notices are sent out. Take all necessary steps to ensure an accurate list is obtained.

As always, if you have any comments or concerns, please let me know. I may be reached at 303-739-7227 or atibbs@auroragov.org.

Sincerely,

Aja Tibbs, Planning Supervisor
City of Aurora Planning Department

cc: Ryan Shaaban, Tryba Architects, 1620 Logan St. Denver CO 80203
Cesarina Dancy, ODA
Filed: K:\\$DA\1200-1299\1233-55rev1



Initial Submission Review

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Review submission documents for consistency. The CU Anshutz properties should be similarly addressed between all sheets of the GDP and the technical studies, the land uses and circulation layouts should also align with all sheets of the GDP. (All departments)
- Further define planning phasing of public improvements such as streets, parks, and detention areas. The timing of design and construction should be organized by planning area to ensure services are provided as development occurs. (All departments)
- Further define what is intended with a “mixed-use” residential land use. Specific items to address are the requirement for ground floor commercial uses; locations and context of townhome product; remove the term “flex” from the description; and provide additional guidance on the distribution/focus of residential density. (Planning)
- Clarify what park spaces and types are intended to meet PROS credit and the design standards that will apply to those spaces. Ensure that these areas will meet the minimum requirements. (Planning and PROS)
- Revise street sections to remove park and buffer areas that will not be maintained by the City. (Civil Engineering)
- Base volumes collected in May of 2024 should be used for the existing analysis. All reports should be submitted in their final form and not appear as drafts when presented for City review. (Traffic Engineering)
- Strongly encourage that you include analysis for the entirety of Fitzsimmons, not just the northern portion that is being planned for development. None of these NE basins are identified in the "sanitary average daily flow -by block table" in the report. (Aurora Water)
- The substantial increase in residential density warrants extensive bike/pedestrian connectivity and neighborhood parkland dedication, amounting to more than 40 acres. This project’s unique circumstances—primarily the greenfield development and exceptionally high residential density—make the inclusion of at least one, if not more, neighborhood parks necessary. (PROS)
- The requirement to minimize breaks is imperative for neighborhood parks. Connecting sites like PA-2 and PA-3 through a bridge or eliminating the last stretch of Quentin Street would get rid of the break in connection between the two parks for users and would create a complete neighborhood park. (PROS)
- With a significant increase in residential units, there will be a corresponding increase in the school land requirement. In light of this, APS is interested in exploring the potential for expanding educational opportunities in alignment with this development. While APS does not have definitive plans for a new school on the campus at this time, we believe that such a facility could greatly benefit from and complement the existing Fitzsimmons Innovation and Anschutz Medical campuses. (Aurora Public Schools)

PLANNING DEPARTMENT COMMENTS

1. Community Questions, Comments, and Concerns

- 1A. No public comments have been received by staff so a neighborhood meeting will not be required at this time.
- 1B. The Master Drainage Study has been moved to a separate review process managed by Aurora Water. Please note that review comments on this item will be processed independently of this GDP amendment.

2. Completeness and Clarity of the Application

- 2A. The GDP does not consistently address the area which is owned by CU Anshutz. Per discussions with the DRB, it is preferred that a consistent design plan be shown with clear notes and delineation of the areas that are conceptual due to the campus’ ownership. Some sheets show the future layout of this area exactly the same as the rest of the GDP, while others are clearly marked conceptual. Some sheets also show planned street and trail connections while others leave them off entirely. Clean this up to prevent confusion, and if the future of these improvements are uncertain, then that should be clear and obvious on every sheet.



- 2B. For reference, label the planning areas on all plan sheets. Ensure that the GDP plans are consistent with the technical studies.
- 2C. Address phasing of the planned improvements on each sheet. Even at a high level, the adjacent streets and parks should have planned timing for construction in association with the planning areas.
- 2D. When resubmitting, please make sure all AUTOCAD text is turned off and the document is completely flat.
- 2E. The GDP indicates the FRA/metro district will be responsible for the construction and maintenance of public improvements (streets, parks, detention, etc.). Is it the intent of the FRA to determine/monitor the construction responsibilities and obligations of each site developer? With the GDP as drafted, the city will continue to hold site development for the completion of applicable infrastructure, regardless of developer agreements with the FRA.
- 2F. Refer to additional redlined comments on the GDP document. The comments in this letter are meant to summarize the major comments, and some additional details may be found on the GDP redlined document.
- 2G. Update the letter of introduction to include an analysis of the approval criteria for this application – which can be found in Section 146-5.4.1.C.3.c.

3. Zoning and Subdivision Use Comments

- 3A. Remove the reference to “flex” within Mixed-Use Residential category. With the clarification between the three use categories, there is no longer any need for a “flex” category.
- 3B. Please clarify what is intended as a “mixed-use” residential district. Is this intended to provide a mix of residential types (MF and possibly townhome housing does not seem all that mixed), or is it to imply that ground floor commercial uses will be encouraged or required? Additionally, it would be helpful if more commercial uses are permitted as accessory uses within the residential district to enable more ground floor commercial opportunities.
- 3C. The amendment proposes to increase the number, area, and room maximum for hotel uses within the GDP. What is the need purpose of this increase? Additionally, does the Benson hotel meet the requirements outlined for the “service hotel” requirements, or is one of the additional two hotels still intended to fulfill this requirement?
- 3D. The FRA review of compatible uses is very discretionary and may provide a level of unpredictability. Doesn’t the FRA inherently control use by the sale and/or contract of land? Staff would prefer this note be removed.

4. Streets and Pedestrian Comments

- 4A. Per the GDP, development blocks should typically be 300-660 feet in length to support high density development. The proposed street layout includes blocks which are typically 750-950 feet in length. Therefore, it is anticipated that additional secondary and/or tertiary streets will be constructed with the development of future planning areas. The exact location or alignment of these streets does not need to be identified at this stage but should be anticipated per the GDP and design standard requirements.
- 4B. With the definition of a street network in this amendment, can the PIP be better outlined or determined rather than pushing it off to the development of each PIP sub-area? Having the priority streets and infrastructure outlined for each PIP sub-area will help ensure consistency with the master studies, budget for infrastructure planning, and provide predictability for developers.
- 4C. Clarify how the street sections provided for the collector and local streets relate to the street network.
- 4D. In several focus group meetings there has been some discussion about enhancing the sand creek trail connections beyond the currently proposed Hawk signal crossings. Particularly as it relates to trail improvements to connect to the crossing, and wayfinding. Are these items still proposed, and if so, where are they addressed in the GDP?
- 4E. Street trees are required on both side of Quintin Street. Revise the section to increase the amenity zone area if the stormwater detention areas will impact tree placement.
- 4F. Planning has a desire to keep roadways narrow, even at intersection where turn lanes are proposed. However, the MTIS and traffic reviews indicate turn lanes and 3-lane sections. Prior to resubmission, a solution needs to be explored which all departments can be supportive of.



5. Parking Comments

- 5A. Consider requiring structured parking for residential uses. This type of use is less likely to transition to a structured parking system after it is constructed. Perhaps the only exception to this would be a planned investment by a campus parking management system.
- 5B. Per HB 24-1304, the city is restricted from enforcing minimum parking requires for multi-family residential developments within transit service areas, which the FIC is considered within. The current draft of the GDP does establish minimum parking requirements that would apply to these types of future developments. Since the future of city regulation and enforcement is somewhat uncertain, it might be useful to add a footnote that references "city enforcement subject to HB24-1304" or something similar.

6. Architectural and Urban Design Comments

- 6A. The GDP is not clear on which park types or spaces are intended to meet the parks credit. Please review the PROS manual to clarify if the pocket parks, linear parks, etc. are intended to meet the Special Urban Park (SUP) criteria at the time of construction.
- 6B. There is a need to further define and clarify the design of the park spaces which are needed to meet PROS credit. If this cannot be achieved in the GDP document, then compliance with the PROS manual should be required (both in area, quality, and design). If alternatives are being requested, that should be clearly called out in the GDP document. An amendment to the design standards to refine and establish a vision for each of the park areas will also be needed.
- 6C. Identify the timing of construction for each of the proposed park spaces. The city will want assurances that parks will be constructed at the same time as adjacent development and/or concurrent with parcels that will need to use and access the amenity spaces.
- 6D. The GDP establishes townhome product as a permitted use within the residential planning areas. The maximum number of 40 units has been removed, and there is no context provided on how this use type will be compatible within a high-density urban context. Providing some context to this use would be beneficial. Additionally, Table 4 on page 12 indicates a minimum building height of 6 stories. Is it implied that all townhome products would need a variance by the DRB?
- 6E. Revise the minimum building heights to a single number – a range of numbers does not establish a minimum.

REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES

7. Civil Engineering (Julie Bingham / 303-739-7403 / jbingham@auroragov.org / Comments in green)

- 7A. Remove the linear park and buffer areas from ROW.
- 7B. City Maintenance for the normal section will at the edge of the sidewalk. Revise ROW limits as redlined.
- 7C. Please provide dimensions for all of the sidewalks, tree lawns, parking, drive lanes, etc. within the ROW. (typical all sections)
- 7D. Identify who will maintain the stormwater detention and treatment areas within the ROW. Public Works will not own/maintain these areas. (typical all sections with detention/treatment areas within the ROW)
- 7E. The City will not own/maintain any softscape trails within the ROW. Please swap the softscape and the hardscape trails to include the hardscape trail in the ROW instead.
- 7F. Provide a 6" maintenance area between the sidewalk and edge of ROW. (typical all sections)
- 7G. Add Note to page 15: Intersections shall meet requirements from detail 14.3 for urban intersections.
- 7H. Revise ROW widths to match required changes to the section details, typical.
- 7I. On the PIP add: "private" if Aurora Water will not be owning/maintaining the treatments sites within the ROW. (see redlined location)

8. Traffic Engineering (Joshua Hoffman / 303-739-1770 / jhoffman@auroragov.org / Comments in orange)

GDP

- 8A. Quintin and 21st streets are shown to be a connection the TIS and there is not a scenario in the TIS with it missing. Either we will need a traffic evaluation with them not in or to be shown as a secondary street.
- 8B. N/S Street between Ursula and Scranton is not shown in the TIS.



- 8C. Has the Land Use Summary on sheet 6 been updated based on the TIS? Office lab is more than 4 times bigger than civic in the TIS.
- 8D. Hard to check the Land Use Map against the TIS. MTIS needs to include the PA to verify that this matches the MTIS.
- 8E. Fitzsimons Pkwy is a 4 lane facility and Ursula is a 2 lane facility but they look the same.
- 8F. TIS has Montview as a 2 lane roadway. The two documents should correlate.
- 8G. Some of the roadways in the TIS had left turn lanes at every intersection. A three lane roadway would work better for these roadways instead of a 2 lane roadway.

Master Traffic Study

- 8H. Next submittal can have additional comments due to existing counts not being incorporated into this report and the additional phases left out.
- 8I. All reports should be submitted in their final form and not appear as drafts when presented for City review, see all yellow highlighted text.
- 8J. Base volumes collected in May of 2024 should be used for the existing analysis
- 8K. Update LOS section
- 8L. Report page formatting issues
- 8M. Ratio method is the preferred method. Provide a section that discusses why the difference method was selected
- 8N. Report needs a conclusion and a responsibility matrix
- 8O. Appendix should only contain pertinent information
- 8P. TDM strategies should identify the responsibility between developer and employer
- 8Q. More data should be presented regarding RTD ridership

9. Fire / Life Safety (Mark Apodaca / 303-739-7656 / mapodaca@auroragov.org / Comments in blue)

Sheet 13 of 19 / Street Sections

- 9A. See comment to update note #2.
- 9B. Add fire hydrant placement detail.

10. Aurora Water (Samantha Bayliff / 303-739- / sbayliff@auroragov.org / Comments in red)

GDP

- 10A. Need to indicate what has changed with the adjusted roadway layout. Need to bubble the utility layouts that have changed, not just the page number.

Master Utility Study (see redlined document for additional redlines and comment)

- 10B. Define IMP and AMC
- 10C. Strongly encourage that you include analysis for the entirety of Fitzsimmons, not just the northern portion that is being planned for development. We would like to get a clear view of the Fitzsimmons as a whole.
- 10D. Residential flow calculations need to be updated to be in conformance with current AW standards. Commercial and industrial flows can remain based on the 2001 IMP.
- 10E. With the exception of residential, residential analysis should meet current standards
- 10F. AW standards do not show a change in the Hazen-Williams coefficient for different pipe sizes. Remove.
- 10G. Industrial has been updated to 4000GPM for 3 hours in 2024 standards
- 10H. Do not include discussion of permit process in the MUS.
- 10I. Land use tables not showing institutional/civic anchors. Please include references to this if not providing full analysis
- 10J. Tax exemption not relevant to utilities, remove from page 27.
- 10K. Include a column identifying the population density (DU/Acre) on the table shown in sheet 32
- 10L. See redlines to Sanitary Sewer Routing and Pipe Sizing Calculations
- 10M. None of these NE basins are identified in the "sanitary average daily flow -by block table" in the report.

**11. PROS** (Erick del Angel / 303-739-7154 / edelange@auroragov.org / Comments in mauve)**11A. Overall Comments and Recommendations:**

In relation to parks:

- 11B.** The amendment proposes a significant increase in allowed dwelling units, from 850 to 7,173, representing over seven times the current limit. This substantial increase warrants extensive bike/pedestrian connectivity and neighborhood parkland dedication, amounting to more than 40 acres. Although Transit-Oriented Developments (TODs) are typically allowed to meet parkland requirements through Small Urban Parks (SUPs) instead of a dedicated neighborhood park (usually a minimum of 3 acres, often 5 acres), this project's unique circumstances—primarily the greenfield development and exceptionally high residential density—make the inclusion of at least one, if not more, neighborhood parks necessary.
- 11C.** While SUPs, as outlined in the PROS D&DC manual, "may offset the amount of land otherwise required to be dedicated and constructed on-site as qualifying Neighborhood Park and Open Space lands," they cannot fully replace the neighborhood parkland dedication requirements due to the project's scale. Additionally, as a TOD project, it is exempt from open space land dedication, so none of the SUPs would count towards that requirement. Therefore, despite the TOD designation, the high density of this development justifies the need for neighborhood parks.
- 11D.** According to Section 6.13 of the PROS manual, land dedication credit for SUPs may be issued by PROS when in conformance with the site design criteria. Despite the applicability of SUP criteria within designated areas, a minimum three-acre neighborhood park may be required by PROS when a development introduces more than 1,000 residents into a part of the city that is underserved by neighborhood parks. This decision will be based on an analysis of the new residents' park needs and the ability of proposed SUPs to serve these needs, the quantity of existing park facilities within a one-half (½) mile service radius of the development, the size of the development, the population density, and the feasibility of integrating a three-acre park into the mix of proposed land uses. Unfortunately, PA-39, the closest residential land use to General's Park, is well outside of the ½ mile service area of the park.
- 11E.** In addition, the proximity to Sand Creek Park also does not mitigate the need for a dedicated neighborhood park, as Sand Creek Park features a very low number of amenities compared to a standard community park. Due to the floodplain and natural area at Sand Creek Park, the missing assets such as sports fields, athletic courts, and extensive playgrounds cannot be added, limiting its functionality.
- 11F.** Here is a comparison of the available features and programmatic elements of Sand Creek Park versus those typically found in a community park:

Features and Elements	Sand Creek Park Availability	Standard Community Park Requirements
Large Playground	Natural playground (no inclusive components and not classified for a specified age group)	Large playground: (Refer to Section 6.22.B for design criteria.) (i) Inclusive Play Feature – A minimum of two (2) inclusive play features with appropriate inclusive access shall be integrated into both play areas for each age group of children to provide multiple experiences. (Refer to Section 6.22.B for design criteria.)
Large Group Picnic Facilities	Yes, but not rentable.	Yes
Sports Fields	No	Yes
Athletic Courts	No	Yes
Internal Paths with Trail Connections	Yes	Yes
Restrooms	Yes	Yes



Motor Vehicle Parking	No	Yes
Landscaping and Beautification Plantings	Limited	Yes
Site Furnishings (benches, trash receptacles, etc.)	Partially meets requirements	Examples include benches trash receptacles, picnic tables, bike racks, bike repair station, water bottle fillers/fountains, pedestrian and security lighting

In relation to connectivity and circulation:

- 11G. The trail system overall is well done. Multi-use trails connect the parks and greenbelts throughout the site; however, a higher level of connectivity is missing. The following excerpt from the PROS D&DC manual illustrates the need for seamless connectivity for SUPs: “SUPs co-located with transit facilities should be designed to minimize breaks in pedestrian/bicycle circulation patterns and to avoid the division of activity”.
- 11H. This regulation is just for SUPs, therefore, the requirement to minimize breaks would be even more imperative for neighborhood parks. As you will see in the redline comments, connecting sites like PA-2 and PA-3 through a bridge or eliminating the last stretch of Quentin Street would get rid of the break in connection between the two parks for users and would create a complete neighborhood park.

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

- 12A. We would like to see further articulation of public art plans for this campus. This should include a map of public art site, a timeline for implementation, and some indication of the types of projects anticipated.

13. Aurora Public Schools (Josh Hensley / 303-365-7812 / jdhensley@@aurorak12.org)

- 13A. In accordance with Section 4.3.18 of the Aurora Unified Development Ordinance, school land dedication is required for all new residential development within the city. The school land requirement for the 850 residential units in the approved GDP was approximately 2.7 acres. Aurora Public School used the school land requirement to acquire the property for the Aurora Science and Technology 6-12 school.
- 13B. With the proposed amendment to the Fitzsimons Innovation Campus GDP, which envisions a significant increase in residential units, there will be a corresponding increase in the school land requirement. In light of this, APS is interested in exploring the potential for expanding educational opportunities in alignment with this development. While APS does not have definitive plans for a new school on the campus at this time, we believe that such a facility could greatly benefit from and complement the existing Fitzsimons Innovation and Anschutz Medical campuses.