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August 27, 2021

City of Aurora  
Office of Development Assistance  
Attn: Laura Rickhoff  
15151 E. Alameda Parkway  
Aurora, CO 80012

Re: Letter of Introduction to Application for Major Site Plan Amendment for the Phase II Redevelopment at Town Center at Aurora Mall

Dear Ms. Rickhoff:

We represent Washington Prime Group ("Washington Prime") and Concord Eastridge with respect to their proposed Phase II Redevelopment within the Town Center at Aurora Mall (the "Town Center at Aurora"), in Aurora, Colorado (the "City") located at 14200 E Alameda Avenue, as more particularly described on the attached Exhibit A (the "Property"). Washington Prime and Concord Eastridge intend to develop a new 119 key hotel facing Alameda, 4-5 new restaurants/retail spaces with associated patio space, and a high-quality 256-unit multi-family project for its Phase II Redevelopment ("the Project"). The project will also feature community spaces for farmer's markets and other community events such as celebrations for Juneteenth, Pride, and Fourth of July, and Back to School among others, as explained in more detail below. This letter is intended to provide the Letter of Introduction for our application for a Major Site Plan Amendment (the "Site Plan Amendment") and to provide the City with additional information that may aid the City in reviewing the application.

#### **BACKGROUND**

The Property is currently zoned Regional Mixed-Use District (MU-R). The proposed uses, including the hotel, restaurants/retail, multi-family units and community spaces are uses permitted by the current zoning, subject to approval of the Site Plan Amendment. The Property is also subject to the approved Site Plan and City Center Master Plan approved in 2005 and recorded in the office of the Clerk and Recorder of Arapahoe County at Reception No. B512-4994 and the approved Fieldhouse USA at Aurora Town Center Site Plan Amendment approved in 2020 and recorded in the office of the Clerk and Recorder of Arapahoe County (collectively the "Existing Site Plan"). The Aurora Places Comprehensive Plan ("Comp Plan") designates the Property as an Urban District. The proposed land uses, as detailed above, are permitted uses in the MU-R district.

This project will require the construction and relocation of new stormwater pipes, sanitary lines, and waterlines to replace aging infrastructure. Preliminary conversations have already occurred between our clients and the Aurora Water and Public Works Departments concerning this issue.

With this Project, part of Washington Prime's and Concord Eastridge's goal is to create family-oriented uses through the development of its Fieldhouse USA project, as well as energizing the existing retail uses through its multi-family development in this TOD area adjacent to the RTD light rail station. With the proposed mixed-use programming (i.e. new multifamily, a new hotel, new restaurants/retail, and the proposed shared use office space), this development along with FieldHouse USA will embody the "live, work, play" model and draw a larger, more diverse customer base to the shopping center. This project would no doubt solidify the health of our shopping center and also advance WPG's stated goal of being a true "Town Center" within the Community.

WPG has appreciated being part of the City Center Steering Committee for the Aurora City Center Vision and Station Area Plan and being part of the process as the City of Aurora further solidifies the downtown district. As the Town Center at Aurora is one of the major anchors in the four quadrants of the City Center District, WPG and Concord Eastridge are committed to strengthening the district by providing attractive destinations for entertainment, dining, shopping, and multifamily housing.

WPG and Concord Eastridge had a pre-application meeting with the City on April 15, 2021. All of the Phase II Redevelopment is on land currently owned by Washington Prime. In addition to the 256 units of multi-family residential, The Project will bring approximately 21,000 square feet of new retail space, plus a new 119 room hotel, and there will be direct connections between the Fieldhouse USA development and the restaurants/retail and hotel as shown in the Site Plan.

Concord Eastridge intends to use volumetric modular construction assemblies for both the multifamily and hotel projects meaning the apartments and hotel rooms will be internally completed before arrival at the site and only exterior finishes and selected atypical portions of the projects will be site-built. Utilizing modular construction reduces time spent on site since major portions of the project are built off-site and there are virtually no weather delays. This approach also reduces disruption to on-going businesses, and minimizes operational site requirements (i.e. no stored materials); it reduces waste materials and streamlines quality control and inspection processes.

## **ANALYSIS**

### **I. Major Site Plan Approval**

The Project requires an amendment to the existing Aurora Mall Site Plan. The process for a Site Plan Amendment is governed by the City's Unified Development Ordinance ("UDO"). Pursuant to the UDO, the Site Plan Amendment will be subject to review by the Planning and Zoning Commission at a public hearing. UDO, § 146-5.2. In addition, City Council may call up the Site Plan Amendment for City Council consideration as soon as practicable after the Planning and Zoning Commission reaches its decision. UDO§ 146-5.3.11. A.

As part of their review of the Site Plan Amendment, City staff, the Planning and Zoning Commission, and City Council must evaluate whether the Site Plan Amendment satisfies certain criteria for approval set

forth in the Code. Below this letter discusses how the application for a Site Plan Amendment satisfies those criteria for approval.

## II. Criteria for Approval of a Major Site Plan

Section 146-5.4.3 B.2.c.i of the UDO provides the following criteria for approval of a Site Plan Amendment. As demonstrated in our responses to the criteria below, the Project complies with all criteria.

1. The application complies with the applicable standards in this UDO, other adopted City regulations, any approved Master Plan that includes the property, and any conditions specifically applied to development of the property by the Planning and Zoning Commission or City Council in a prior decision affecting the property.

**Response:** The application complies with all applicable standards in the UDO, subject to the variances requested and described below. The UDO promulgates zoning standards and development and site design standards that include requirements for access and connectivity, parking, building design, and landscaping. The Project complies with all applicable standards subject to the aforementioned variances, as demonstrated by our "Comment Response Letter", submitted concurrently herewith, in response to Pre-Application staff comments.

The Existing Site Plan, which encompasses a Master Plan, provides architectural design guidelines for development of the Town Center at Aurora. A property owner's consent to proposed architecture changes is required before any development may be approved. As the owner of the Property, WPG hereby formally consents to the proposed architecture.

Other conditions of approval have not been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, as described above.

The application proposes the following deviations from the UDO:

- Restaurants/Retail:
  - Roof form per *Section 146-4.8-4.8.8(A)(2)(b) – Development Standards; Building Design Standards; Roof Design; Mixed-Use, Multifamily and Non-Residential Districts; Roof Form* to allow for uninterrupted roof in excess of 60 linear feet of façade.
  - Horizontal Articulation per *Section 146-4.8-4.8.5(B)(4) – Development Standards; Building Design Standards; Massing and Articulation; Horizontal Articulation* to allow for more than 50' without horizontal articulation
- Hotel:
  - Primary building materials per *Section 146-4.8-4.8.6(C)(3) – Development Standards; Building Design Standards; Building Materials; Primary Building Materials* to allow for the use of Exterior Insulation Finish System ("EIFS") for approximately 40% of the exterior building skin for the hotel building.
- Site (including Multifamily):
  - Parking per *Section 146-4.6-4.6.3(C) – Development Standards; Parking, Loading, and Stacking; Required Off-Street Parking; Minimum Required Parking*

to allow for a parking reduction due to Proximity to Transit per *Section 146-4.6-4.6.4(A) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Proximity to Transit* and Shared Parking per *Section 146-4.6-4.6.4(I) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Shared Parking*.

As detailed in Section III below, the above deviations from the UDO comply with the criteria in the UDO for a Major Adjustment.

Therefore, the application satisfies this criterion for approval.

2. The City's existing infrastructure and public improvements, including but not limited to its water, wastewater, street, trail, and sidewalk systems, have adequate capacity to serve the proposed development, and any burdens on those systems have been mitigated to the degree practicable.

**Response:** The traffic Impact Study and preliminary drainage letter attached to this application demonstrate that the City's existing infrastructure, and public improvements, along with the proposed reconstruction and re-routing of the stormwater and waterlines, have adequate capacity to serve the proposed development, provided that the development include improvements to the South Crystal Street entrance. The Site Plan Amendment includes the South Crystal Street improvements and the reconstruction and re-routing of the stormwater and waterlines.

Therefore, the application satisfies this criterion for approval.

3. Major Site Plans shall be designed to preserve and protect natural areas. Ridgelines, swales, natural landforms, water quality and wildlife habitat of riparian corridors, wetlands, and floodplains affected by the proposed development and to integrate those areas into site design where practicable.

**Response:** Given that the Property is already developed, there should be few concerns regarding the environmental impact of the Project as compared to new development, such as development over riparian areas or protected habitats. Additionally, new landscaping will be planted to provide an attractive and environmentally friendly Project. The Project does not have any negative impact on existing natural areas, ridgelines, swales, natural landforms, water quality, wildlife habitat, wetlands or floodplains. The roundabout improvements will have minor impacts into the existing pond easement, but is not anticipated to impact the water quality functionality or detention volume of the pond.

Therefore, the application satisfies this criterion for approval.

4. The application will improve or expand multi-modal connections with adjacent sites, neighborhoods, and urban centers.

**Response:** The proposed Phase II Redevelopment will provide various uses that will expand the multi-modal connections with adjacent sites and urban centers, most notably increased connectivity to Metro Center and adjacent outparcels. The project will provide sidewalk connections and improved traffic circulation including a proposed roundabout and striping improvements at the Crystal St. access. Guests and residents of the project will continue to use the circulation infrastructure that was approved as part of the existing Site Plan, including the pedestrian connections throughout the shopping center.

Therefore, the application satisfies this criterion for approval.

5. The application is compatible with surrounding uses in terms of size, scale and building façade materials.

**Response:** The building materials and facades for the new hotel, multi-family project and restaurants are all high-quality as demonstrated in the Site Plan.

Therefore, the application satisfies this criterion for approval.

6. The application mitigates any adverse impacts on the surrounding area to the degree practicable.

**Response:** The project will provide community meeting space, including spaces for farmer's markets and other community events such as celebrations for Juneteenth, Fourth of July, Pride, and Back to School. The use of these community spaces will invigorate the retail environment and have a positive impact on the surrounding area and the surrounding community. The invigorated retail environment, along with the new retail space will generate tax revenues for the City and other governmental entities.

Therefore, the application satisfies this criterion for approval.

### III. Proposed Waivers of City Code

Washington Prime will make all reasonable efforts to comply with all applicable UDO standards.

As demonstrated in the attached Parking Analysis, a waiver for the parking requirements in the multifamily area may be required due to the proximity of the multi-family project to the light rail station.

The application proposes the following deviations from the UDO:

#### Restaurants/Retail:

*Roof form per Section 146-4.8-4.8.8(A)(2)(b) – Development Standards; Building Design Standards; Roof Design; Mixed-Use, Multifamily and Non-Residential Districts; Roof Form to allow for uninterrupted roof in excess of 60 linear feet of façade.*

As noted above, WPG requests a Major Adjustment from requirements of Section 146-4.8-4.8.8(A)(2)(b) of the UDO that requires flat roofs to include at least one change in setback or height of at least three feet along each 60 linear feet of façade. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

Allowing a flat roof with uninterrupted roof in excess of 60 linear feet of façade will have no material adverse impacts on any abutting lot. As noted above in Section II, allowing a flat roof will enhance the

look of the restaurant/retail building to help it feel like more of a main street atmosphere while encouraging tenants to have their own defined storefront area. This ensures design compatibility with the rest of the shopping center.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture.

Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because it encourages tenants to have their own defined storefront area, while still maintaining a cohesive frontage.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. *The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. Allowing a flat roof with uninterrupted roof in excess of 60 linear feet of façade will not increase parking or congestion.

- e. *For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood, and is necessary to compensate for unusual shape or orientation of the lot or to allow sign*

*visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the Roof Form requirements in the UDO.

*Horizontal Articulation per Section 146-4.8-4.8.5(B)(4) – Development Standards; Building Design Standards; Massing and Articulation; Horizontal Articulation to allow for more than 50’ without horizontal articulation*

As noted above, WPG requests a Major Adjustment from requirements of Section 146-4.8.5(B)(4) of the UDO that requires two methods of horizontal articulation every 50 linear feet for a mixed-use and multifamily development for the restaurant/retail portion of the project. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

Allowing a façade without horizontal articulation every 50 feet will have no material adverse impacts on any abutting lot. As noted above in Section II, allowing a horizontal façade without any articulation for 50 linear feet will enhance the look of the restaurant/retail building to help it feel like more of a main street atmosphere while encouraging tenants to have their own defined storefront area. This ensures design compatibility with the rest of the shopping center. It’s also important to note that horizontal articulation will be employed where possible between tenant spaces.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture.

Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*
  - a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because it encourages tenants to have their own defined storefront area, while still maintaining a cohesive frontage.

- b. The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. Allowing a horizontal façade without articulation every 50 linear feet will not increase parking or congestion.

- e. For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood, and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the Horizontal Articulation requirements in the UDO.

#### Hotel:

*Primary building materials per Section 146-4.8-4.8.6(C)(3) – Development Standards; Building Design Standards; Building Materials; Primary Building Materials to allow for the use of Exterior Insulation Finish System (“EIFS”) for approximately 40% of the exterior building skin for the hotel building.*

As noted above, WPG requests a Major Adjustment from requirements of Section 146-4.8.6(C)(3) of the UDO that prohibits the use of EIFS in the building façade for the hotel portion of the project. A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the



following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

The use of EIFS for the building façade will have no material adverse impacts on any abutting lot. As noted above in Section II, the use of EIFS will enhance the hotel because EIFS is compatible with the look and feel of the existing shopping center.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture.

Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is equal to or better than what would have been required without the Major Adjustment because EIFS is used in neighboring structures and its use in the Project will enhance the compatibility of the Hotel with the Town Center at Aurora. Additionally, modern EIFS products offer a variety of benefits including improved drainage systems, reduced maintenance, increased flexibility with color and texture, the ability to easily refresh/refurbish via fresh coats of paint, etc.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will not affect the neighborhood layout. This criterion does not apply, as the Project meets at least one other of these criteria.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. *The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. The use of EIFS will not increase parking or congestion.

- e. *For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood, and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the requirements for primary exterior building materials in the UDO.

Site (including Multifamily):

*Parking per Section 146-4.6-4.6.3(C) – Development Standards; Parking, Loading, and Stacking; Required Off-Street Parking; Minimum Required Parking to allow for a parking reduction due to Proximity to Transit per Section 146-4.6-4.6.4(A) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Proximity to Transit and Shared Parking per Section 146-4.6-4.6.4(I) – Development Standards; Parking, Loading, and Stacking; Parking Alternatives; Shared Parking*

As noted above, WPG requests a Major Adjustment from the parking requirements of Section 146-4.6-4.6.3(C) supported by Proximity to Transit per Section 146-4.6-4.6.4(A) and Shared Parking per Section 146-4.6-4.6.4(I). A Major Adjustment from the development standards of the UDO must be approved by the Planning and Zoning Commission after a public hearing. UDO § 146-5.4.4.D. Section 146-5.4.4.D.3 of the UDO provides the following criteria for approval of a Major Adjustment. As demonstrated in our responses to the criteria below, the application complies with the criteria.

1. *The adjustment will have no material adverse impact on any abutting lot, or any material adverse impacts have been mitigated by conditions attached to the adjustment.*

As proven by the Parking Needs Study conducted by Kimley Horn and included in this submittal, the existing parking at Town Center at Aurora is sufficient to meet the parking demands of all the new components of the redevelopment as well as anticipated future demands at the site.

The redevelopment removes 281 existing parking spots for the multifamily component and 393 existing parking spots for the hotel and restaurant/retail component. Pursuant to the required parking requirements detailed in Section 146-4.6-4.6.3(C), the multifamily component is required to have 269 parking spots (assuming a TOD reduction is applied) and the hotel and restaurant/retail component is required to have 239 parking spots. The redevelopment provides a total of 247 new parking spots for the multifamily component and 230 new parking spots for the hotel and restaurant/retail component.

Any parking shortfall within any component of the redevelopment will be adequately satisfied due to the Project proximity to the RTD station (i.e. TOD development) and shared parking via cross-parking easements with the current mall site (which is currently underutilized as noted in the submitted Parking Needs Study).

As noted above in Section II, a reduction in the required parking will benefit the Town Center at Aurora property so development can be further densified as a more walkable mixed-use development.

Therefore, the application satisfies this criterion for approval.

2. *The adjustment does not violate any conditions of approval specifically applied to development of the property by the Planning and Zoning Commission or City Council.*

As noted above in Section II, no conditions of approval have been specifically applied to development of this property by the Planning and Zoning Commission or City Council in a prior decision other than in the Existing Site Plan, which requires consent of the property owner to the proposed architecture.

Therefore, the application satisfies this criterion for approval.

3. *At least one of the following criteria have been met:*

- a. *The adjustment will result in a perception of development quality as viewed from adjacent streets and abutting lots that is equal to or better than would have been required without the adjustment.*

The Major Adjustment will result in a perception of development quality that is better than what would have been required without the Major Adjustment because the Town Center at Aurora will better utilize the existing parking lots resulting in less vacant parking lots and a greater mix of uses and development activity.

- b. *The adjustment will provide options for a more connected neighborhood layout, or for an adjustment for a residential subdivision, the adjustment will result in a neighborhood layout and level of multi-modal connectivity equal or better than would have been required without the adjustment.*

The Major Adjustment will allow for more development activity to occur, resulting in a more walkable site with better connectivity within the site. The proposed density within this plan is also in keeping with the Station Area Plan for Metro Center and City Center Vision.

- c. *The adjustment will result in equal or better screening and buffering of adjacent properties and ground and roof mounted equipment than would have been required without the adjustment.*

The Major adjustment will not affect screening and buffering. This criterion does not apply, as the Project meets at least one other of these criteria.

- d. *The adjustment will not result in a material increase in on-street parking or traffic congestion on any local street in any Residential zone district within 200 feet of the applicant's site.*

The project meets this criterion. This Major Adjustment will not impact on-street parking or traffic congestion on any local street in any Residential zone district with 200 feet of the site.

- e. *For an adjustment to the maximum number or area of signs or sign setbacks, the adjustment will have a minimal visual effect on the surrounding neighborhood, and is necessary to compensate for unusual shape or orientation of the lot or to allow sign visibility comparable to, but not exceeding, that available to nearby lots of approximately the same size and shape in the same zone district.*

This Major Adjustment is not related to signs. Additionally, this criterion does not apply, as the Project meets at least one other of these criteria.

Therefore, the Project meets the criteria for a Major Adjustment to the requirements for primary exterior building materials in the UDO.

#### **IV. Names, Addresses, and Phone Numbers of the Property Owner and Project**

Below are the names, addresses, and phone numbers of the property owner and project consultants:

Property Owner:      Town Center at Aurora, LLC  
                                 111 Monument Circle, Suite 3500  
                                 Indianapolis, IN 46204  
                                 Attention: India Olson  
                                 Phone: (317) 986-8540

and

Town Center at Aurora II, LLC  
111 Monument Circle, Suite 3500  
Indianapolis, IN 46204  
Attention: India Olson  
Phone: (317) 986-8540

Applicants:            Washington Prime Group  
                                 111 Monument Circle, Suite 3500  
                                 Indianapolis, IN 46204  
                                 Attention: India Olson  
                                 Phone: (317) 986-8540

Concord Eastridge  
3160 Fairview Park Drive  
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Falls Church, VA 22042  
Attention: Mike Haller  
Phone: (703) 563-9810

Consultants: Kimley-Horn  
4582 South Ulster Street, Suite 1500  
Denver, CO 80237  
Attention: Bryce Christensen  
Phone: (303) 228-2339

NELSON  
311 Elm Street, Suite 600  
Cincinnati, OH 45202  
Attention: Doug Williams  
Phone: (513) 362-3470

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Greenwood Village, CO 80111  
Attention: Michael Sheldon  
Phone: (303) 770-0200

Gensler  
2575 East Camelback Road  
Suite 175  
Phoenix, AZ 8/5016  
Attention: Stefan Richter  
Phone: (602) 523-4900

## V. Conclusion

This letter illustrates how the Site Plan Amendment satisfies the applicable criteria for approval in the Code. On behalf of WPG and Concord Eastridge, we respectfully request approval of the application for a Site Plan Amendment and look forward to developing a successful project in cooperation with the City.

Sincerely,

Sheldon & Associates, LLC

*Michael A Sheldon*

Michael A. Sheldon, Esq.

## **Exhibit A**

### **Description of Property**

#### **Multifamily Parcel:**

Lot 3, Block 1, Aurora Mall Subdivision Filing No. 2, excepting that portion of Lot 3, Block 1 as conveyed in Rule Order recorded June 26, 2015 at Reception No. D5068530, County of Arapahoe, State of Colorado.

#### **Former Sears Parcel:**

Lot 2, Block 1, Aurora Mall Subdivision Filing No. 2, County of Arapahoe, State of Colorado.

#### **Main Mall Parcel:**

##### **Parcel A:**

Lots 4 and 5, Block 1, Aurora Mall Subdivision Filing No. 2, excepting that portion as conveyed in Rule Order recorded June 26, 2015 at Reception No. D5068530, County of Arapahoe, State of Colorado.

##### **Parcel B:**

Lot 1, Block 1, Aurora Mall Subdivision Filing No. 3, excepting that portion as conveyed in Rule and Order recorded June 26, 2015 at Reception No. D5068530, County of Arapahoe, State of Colorado