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Friday, April 11, 2025

City of Aurora, CO  
Planning Department  
Attn: Ms. Ani Karabashian  
15151 E. Alameda Parkway  
Aurora, CO 80012

RE:     **Response to Initial Review** for  
          Development Application DA-1024-28  
          Case Number 1996-6067-28  
          Vertical Bridge Telecom Facility at Arapahoe Crossings - Conditional Use and Site Plan  
          Amendment with Adjustment  
**Applicant Reference:** Vertical Bridge Development, LLC ref. US-CO-5212  
**Property:** Arapahoe County PIN 035410897, which is Lot 1 Blk 1 Arapahoe Crossings Sub Flg No 3  
**Property Address:** 6696 S Parker Rd  
**New Address Assigned by City to Project:** 6587 S Lewiston Way

Dear Ms. Karabashian, City of Aurora Planning & Zoning Commission, and Planning Department Team,

On behalf of Vertical Bridge Development, LLC, Buell Consulting, Inc. hereby submits this response to the initial submission review to further add clarification and information to support application number DA-1024-28 for Vertical Bridge Telecom Facility at Arapahoe Crossings - Conditional Use and Site Plan Amendment with Adjustment on the property with Arapahoe County PIN 035410897 owned by Arapahoe Crossings LP.

The following pages address each numbered item of the City's initial review. We appreciate the City's diligence and assistance with this project.

Please do not hesitate to call for any clarifications or additional questions related to any of our application materials.

Sincerely,

***Scott Buell***

Site Development Agent on behalf of Vertical Bridge Development, LLC

Phone: 651-225-0793

Email: [sbuell@buellconsulting.com](mailto:sbuell@buellconsulting.com)

Encl.

**Applicant Response to City's Initial Review**  
**Vertical Bridge Telecom Facility at Arapahoe Crossings - Conditional Use and  
Site Plan Amendment with Adjustment**

Arapahoe County PIN 035410897  
Property Address: 6696 S Parker Rd  
New Address Assigned to Project: 6587 S Lewiston Way

Cited City responses are in *blue italics*, our responses are in normal font. Our responses constitute our supplemental information required as per the City's collection of feedback on our project, and are intended to be read in conjunction with our revised site plans and other materials submitted originally.

**PLANNING DEPARTMENT COMMENTS**

**1. Community Questions, Comments, and Concerns**

*1A. No community comments at this time.*

**2. Completeness and Clarity of the Application**

*2A. Letter of Introduction: Please revise the previously submitted letter of introduction to include the following:*

- Major Adjustment Criteria of Approval: Please add the Major Adjustment Criteria to your Letter of Introduction and describe how the project meets each criterion. This information must be included in the designated Letter of Introduction, not in the comment response letter provided. Please upload a revised Letter of Introduction with the Major Adjustment Criteria*
- More Details Needed for Co-Location Analysis: While the response to this comment details the requested need for a taller structure, the City requires that the applicant provide a more detailed analysis on the nearby co-location options. The analysis should include a coverage map, all the possible co-location sites, ownership of each co-location site, and the heights of the towers or equipment at each co-location site. The reason behind this is that the City needs to see that an effort was made by the applicant to research co- location options in the area and that this analysis will show that a co-location facility is or is not tall enough to meet the needs of the applicant. Please revise the letter of introduction to include this information and a Collocation Analysis report as discussed with Staff. Re-upload both documents to the development application portal. Failure to include adequate information requested by staff may result in further delay of the public hearing.*

We've inserted our responses to the criteria for Major Adjustment to a revised Letter of Introduction. We've provided an updated and separate Co-Location Analysis including the rejection by the Regis Jesuit HS for our project.

*2B. Please verify if the highlighted area is the legal description. If yes, please add a title or a form of identification to signal that this is the legal description. If not, please add the legal description*

This has been addressed on the revised site plans to clarify this is the legal description of our land rights.

*2C. Please include the information on Sheet ZT-2 on Sheet ZT-1. All the information on both sheets needs to be included altogether on one (1) cover sheet.* This has been addressed on the revised site plans – now combined onto one cover sheet.

*2D. Recommendation: Remove the gate opening at this location. Access may be an issue if a car is parked at that location.* This has been addressed on the revised site plans – we moved the H-frame and related gate.

*2E. Clarify if the proposed curb extension is going into the proposed 30' access easement.* This has been addressed on the revised site plans. The curb is being moved to outline the parking lot sides of our fenced area.

*2F. Recommendation: Please add a color image of the proposed fence or send a separate document to your case*

*manager showing the proposed fence material that shows the opacity and color of the fence material.*

We've inserted more detail, including color photo of the material so opacity and color is apparent. We are able to select any of the three colors provided on that detail page for the fence. The City can direct us to select one, or allow us to choose any of those three.

### **3. Landscaping Issues**

*3A. Sheet ZT-1: All sheets in the plan set should be just consecutive numbers, 1, 2, 3 etc. Do not include letters.*

This has been fixed on all sheets on the revised set of site plans.

*3B. Sheet ZT-1: Make the adjustments line longer.* This is complete on the revised set of site plans.

*3C. Sheet ZT-2: Update the sheet numbers per the comment provided on the cover sheet.* See comment on 3A.

*3D. The relocated evergreen tree is drawn too large.* This is fixed on the revised site plans. It's smaller, now.

*3E. The symbology for some of the plant material on the plan does not match what is in the Existing Landscape Key.* This has been addressed on the revised site plans.

*3F. Do not include junipers in the tree mitigation plan existing or proposed.* The junipers have been removed from the tree mitigation sheet.

*3G. Update the sheet title to Landscape Plan.* This has been addressed on the revised site plans.

*3H. Add the street name.* This has been addressed on the revised site plans.

*3I. Draw the relocated evergreen tree at the appropriate size.* This has been addressed on the revised site plans.

*3J. Proposed implies 'new' landscaping. If any plant material in the legend is relocated plant material, that should be stated or a separate list provided of relocated plants.* This has been clarified on the revised site plans. We are removing all existing plant material impacted by our site, and installing all new plantings.

*3K. Proposed landscaping requires that it be listed with a common and botanical name as well as a size. Trees are required to be a minimum of 2" unless mitigation is proposed in which tree sizes can be upsized.* We confirmed with the forestry department what mitigation is required to replace the hawthorns and white fir tree, and have used that guidance to revise this information on the revised site plans.

*3L. Include the city-required landscape notes per the Landscape Reference Manual available online, include a plant schedule and a legend that indicates what the hatches represent.* This has been addressed on the revised site plans.

### **4. Civil Engineering**

*Sheet ZA-1 (see redlines on site plan)*

*4A. A revision to the civil plan is required for the signage and striping.* This has been added to the revised site plans.

*4B. Sheet 23: Repeat Comment from 1st Review: Remove copyright notes restricting reproduction of the approved plans and reports. (2.03.10 of the 2023 COA Roadway Manual).* This has been addressed on the revised site plans this time.

### **6. Forestry**

*6A. There is a note on P. 7 that states existing trees are not part of the scope of the work and will be preserved. There is another note regarding spading 3-4 trees on the site. The hawthorns identified to be spaded are in too poor health to be spaded. The spruce tree is too large to spade. If these trees will be removed mitigation will be required.* We confirmed with the forestry department what mitigation is required to replace the hawthorns and white fir tree, and have used that guidance to revise this information on the revised site plans.

### **7. Land Development Services**

*7A. Pursuant to Code Section 3.3.5.jj.3 (D): The applicant has still not demonstrated the good faith effort to locate or collocate on existing telecommunications towers within the surrounding vicinity. "The applicant shall demonstrate that contact has been made with the owners of all suitable structures within the search area of the proposed site and was denied permission to locate its telecommunications facility on those structures". A propagation map will not suffice that a new 75' freestanding monopine is the only solution.* We've provided a

separate co-location analysis to the City to address this.

7B. *There are two (2) possible sites for collocation at Regis Highschool which is a quarter mile north from the proposed tower site. Please incorporate this location in the Collocation Analysis, detailing the reason as to why this site is not an option for this project. If the site meets the height requirement AT&T is seeking, then at minimum I need a rejection letter from Regis Highschool noting that they were approached directly about collocating at this particular facility. Please contact me directly regarding this matter as well as with any questions at (303) 594-1551 or [korloff@auroragov.org](mailto:korloff@auroragov.org) and cc your case manager.* We included the Regis Jesuit High School location and their written confirmation of their unwillingness to lease anything to another wireless service provider with our co-location analysis document.

Thank you for your time and consideration of this project. Please feel free to call me with any questions.

Sincerely,

Scott Buell  
Site Development Agent on Behalf of Vertical Bridge Development, LLC  
Buell Consulting, Inc.  
Direct: 651-225-0793  
Email: [sbuell@buellconsulting.com](mailto:sbuell@buellconsulting.com)