



Planning Division  
15151 E. Alameda Parkway, Ste. 2300  
Aurora, Colorado 80012  
phone 303.739.7217

*AuroraGov.org*

March 27, 2025

Chris Fellows  
Windler Public Improvement Authority  
9155 E Nicholas Ave, Ste 360  
Centennial, CO 80112

**Re: First Submission Review:** Windler Connector Road 3 – Biloxi Street South  
**Application Number:** DA-1707-43  
**Case Numbers:** 2025-6009-00; 2025-3012-00

Dear Chris Fellows:

Thank you for your first submission, which we started to process on March 6, 2025. 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 issues remain, you will need to proceed with technical resubmission.

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.

Please note that the application fee of \$18,979.00 has already been paid.

The estimated Administrative Decision date is tentatively scheduled for May 28, 2025. Please remember that all abutter notices must be sent and the site notices must be posted at least 10 days prior to the decision date. These notifications are your responsibility and the lack of proper notification will cause the decision 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.

Note: Projects that have gone one year without a submission will be considered inactive and require a 25% restart fee to be reactivated. After 18 months of inactivity, projects that are not reactivated will be closed and retired.

As always, if you have any comments or concerns, please let me know. I may be reached at 303.739.7121 or [cbailey1@auroragov.org](mailto:cbailey1@auroragov.org).

Sincerely,

Connor Bailey, AICP, Senior Planner  
City of Aurora Planning Department

cc: Craig Northam - 10333 E Dry Creek Road, Ste 400, Englewood, CO 80112  
Jazmine Marte, ODA  
Filed: K:\\$DA\1700-1799\1707-43rev1



## *First Submission Review*

### **SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS**

- Ensure data and labels are correct on the Cover Sheet. (Planning)
- Address information regarding streetlights and standard grading notes. (Civil Engineering)
- Make sure all tapers meet SHAC requirements. (Traffic)
- Identify connections to existing waterlines. (Aurora Water)
- Address comments to ensure consistency between the Plat and the Site Plan. (Land Development)

### **PLANNING DEPARTMENT COMMENTS**

#### **1. Completeness and Clarity of the Application**

- 1A. Site Plan Data on the Cover Sheet: The zoning designation needs to be revised MU-A.
- 1B. Cover Sheet: The title should be renamed as Windler Connector Road 3 – Biloxi Street South – ISP and Plat.
- 1C. Sheet 2: Green line needs to be removed or grey-scaled. Make sure all applicable sheets are revised accordingly.
- 1D. Sheet 2: Please revise the Key Map to remove the northern highlight. All applicable key maps should be revised accordingly.
- 1E. Please note a Mylar Change will need to be processed for the 48<sup>th</sup> Avenue ISP (DA-1707-11) to incorporate the site plan for Biloxi Street South.

Please note the Landscape review was not completed and will be forthcoming with the second submission. This was due to a referral error in our system.

### **REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES**

#### **2. Civil Engineering** (Julie Bingham / [jbingham@auroragov.org](mailto:jbingham@auroragov.org) / comments in green)

- 2A. Ready for technical review. Minor comments to add information regarding streetlights, standard grading notes.
- 2B. Please add the following note: “The maximum cross slope in an accessible path shall not exceed two percent. The maximum longitudinal slope in an accessible path shall not exceed five percent.”
- 2C. Please add the following note: “The maximum slope within ROW is 4:1, the maximum slope for property outside of the ROW is 3:1.”
- 2D. Please add the following note: “The minimum slope on asphalt is 1%, the minimum slope on concrete is 0.5%, and the minimum slope on unpaved surfaces is 2%.”
- 2E. Public streets shall have public streetlights in conformance with COA standards. For each street, identify the following information as part of the Site Plan submittal in conformance with Section 2.12.0.1 of the Roadway Manual:
  - Roadway Classification (typical section name)
  - Adjacent Land Use Category (i.e. TOD), as applicable
  - Number of lanes
  - Back-to-curb width
  - Pedestrian Activity Level
  - Pavement Type; R3, for all lighting calculationsThis information (if its not already shown) can be added to the street sections provided if desired.

#### **3. Traffic Engineering** (Jason Igo / [jigo@auroragov.org](mailto:jigo@auroragov.org) / Comments in orange)

##### **Site Plan & Landscape Plan**

- 3A. Make sure all tapers meet SHAC requirements.
- 3B. Not correct DA number. It is DA-1707-11 regarding E 48<sup>th</sup> Avenue.
- 3C. Add additional information to typical section such as ADT, Design speed, and clear zone.
- 3D. Add a couple additional signs. Please see plans for locations of signs.
- 3E. Landscaping section has changed in the 2025 Roadway Specifications.
- 3F. Plat should show the Traffic Utility easement.



**4. Fire / Life Safety** (Steve Kirchner / (303) 739-7489 / [rtenorio@auroragov.org](mailto:rtenorio@auroragov.org) / Comments in blue)

Sheet 4

- 4A. Please show all proposed and existing hydrants.

**5. Aurora Water** (Samantha Bayliff / (303) 828-6563 / [sbayliff@auroragov.org](mailto:sbayliff@auroragov.org) / Comments in red)

**Site Plan**

- 5A. Sheet 1: Advisory: Site Plan will not be approved until Preliminary Drainage Report is approved.  
5B. Sheet 4: Provide EDN for this development.  
5C. Sheet 4: Remove pipe lengths, don't need to include that much detail at this time. Type all pipe labels.  
5D. Sheet 4: Identify connection to existing waterline.  
5E. Sheet 4: Remove double line types.  
5F. Sheet 4: Make sure you are maintaining 10' separation between all utilities.  
5G. Sheet 4: Remove any mention of stationing, just need to call out the fact that this is a manhole. Type all.  
5H. Sheet 4: Call out the typical horizontal spacing between parallel utilities.

**6. Land Development Services** (Su Wever / [Swever@auroragov.org](mailto:Swever@auroragov.org) / Comments in magenta)

Subdivision Plat Sheet 1:

- 6A. Advisory: Send in the updated Title Commitment to be dated within 30 calendar days of the plat approval date (This Commitment should be submitted at the time of your final submittal of the electronic Plat for recording.) per COA 2025 Subdivision Plat Checklist Item 19.b.  
6B. Advisory: Provide statement of authority for person signing on behalf of the entity named in the title commitment.  
6C. Advisory: Send in the Certificate of Taxes Due show they are paid in full up to and through the plat approval date of recording. Obtained from the County Treasurer's office (This Certificate of Taxes should be submitted no later than your second submittal of the plat.) per COA 2025 Subdivision Plat Checklist Item #19.a.  
6D. Advisory: There may be some items that were not shown or pointed out in this review. The Subdivision Plat checklist is to be utilized as a guide. Any items not adhering to the Checklist may be pointed out in this or the subsequent reviews, then it is up to the Surveyor to have those changes made prior to the final submission of the plat for electronic recording.  
6E. Send in a closure report for the plat exterior boundary per COA 2025 Subdivision Plat Checklist Item #19.d.  
6F. Legal description:
  - o Add "A PART OF" to the second line to read- BEING A RESUBDIVISION OF A PART OF TRACT A  
6G. Covenants:
  - o The text must be verbatim from text outlined in Plat check list: The undersigned owner(s), for themselves, their heirs, successors and assigns (collectively hereafter "Owner"), covenant and agree with the City of Aurora or ("City");  
6H. Notes: #6. Provide Title Commitment within 30 days of Plat recording date.  
6I. Owner: Statement of Authority has Windler Public Improvement Authority and not GVP Windler, LLC. Please send in the statement of Authority for GVP Windler, LLC, a Delaware limited liability company.  
6J. Mortgage Holder: The mortgage holder is not shown on the title. Please confirm.  
6K. City of Aurora Approvals: Extend the Month line for longer months names.  
6L. Surveyor's Certificate: Surveyor must stamp the plat, and provide contract email address, physical address and phone number.

Subdivision Plat Sheet 2:

- 6M. Please provide the monument record for this Corner- SW Cor Section 18.  
6N. Should this street be labeled? Site Plan mentions N. Biloxi St.  
6O. Drainage Easements: Please provide recording number.  
6P. Drainage Easements: This is labeled differently in Site Plan.  
6Q. Show second tie out Bearing & Distance COA 2025 Subdivision Plat Checklist Item #13.d.(6).



- 6R. Surveyor must stamp the plat, and provide contract email address, physical address and phone number.
- 6S. Provide one Accepted by the State Board – NW Cor. Section 18 and N ¼ Cor. Section 18.

Site Plan Sheet 1:

- 6T. Legal Description:
  - Change wording from Being a part of Tract A to Being a resubdivision of a part of Tract A.
  - SOUTH 19°54'44" EAST- Does not match the bearing on the Plat.

Site Plan Sheet 2:

- 6U. Add bearings, distances and curve data per the site plan checklist.

Site Plan Sheet 2-4

- 6V. PR. 16' S.E.- This is labeled as a Drainage Easement on the Plat. Please clarify. Confirm easement name with Aurora Water.
- 6W. PR. 40' W.E., S.E., & S. S. E.- This is labeled as a Drainage Easement on Plat. Please clarify. Confirm easement name with Aurora Water.

Site Plan Sheet 5:

- 6X. The Vicinity Map is showing an incorrect project area.

**7. Easements** (Grace Gray / 303.990.3413/ [ggray@auroragov.org](mailto:ggray@auroragov.org) )

7A. Advisory comment: All departments requiring a license, easement dedications or releases need to be started. Easement dedications to be submitted to [dedicationproperty@auroragov.org](mailto:dedicationproperty@auroragov.org). Releases to be submitted to [releaseeasements@auroragov.org](mailto:releaseeasements@auroragov.org).

**8. Parks, Recreation, and Open Space** (Scott Hammons / [shammons@auroragov.org](mailto:shammons@auroragov.org))

- 8A. Include 2-foot recovery zone next to sidewalk. The steep grade is a risk to pedestrians.

**9. Denver International Airport** ([Denplanningreferrals@flydenver.com](mailto:Denplanningreferrals@flydenver.com))

9A. The proposed development is in the “5-Mile ‘Known - Wildlife Attractant Separation Area” for the final buildout of future DEN Runways, as defined by the Federal Aviation Administration (FAA). The USDA Wildlife Biologists assigned to DEN ([#dia-operations-usdawildlife@flydenver.com](mailto:#dia-operations-usdawildlife@flydenver.com)) assist in implementing DEN's Wildlife Hazard Management Plan and have requested coordination as this project progresses. USDA and DEN will provide assistance with the requirements outlined in the current version of [FAA Advisory Circular 150/5200- 33C](#). DEN also requests that the landscape plan include maintenance of trees and grasses to reduce attractants for wildlife such as raptor species, blackbirds/starlings, and geese. Fruit-producing trees and shrubs should be avoided. Water quality ponds/detention structures must be designed to meet a 48-hour drain time following a 100-year event.

Please see attached document from USDA for full comment. Project still includes trees, please review the USDA’s landscaping suggestions.

9B. The site is found within/under the navigable airspace associated with DEN, as promulgated and regulated by the Federal Aviation Administration (FAA) under 14 CFR Part 77, Objects Affecting the Navigable Airspace. Based on Part 77 and the development site location, the proponent is required to file notice with the FAA, via the FAA Form 7460-1 process (Notice of Proposed Construction or Alteration), of any structure or temporary construction equipment (e.g., cranes) that penetrate Part 77 surfaces. The FAA website from which the need for the 7460 process can be determined (“Notice Criteria Tool”) and/or the filing can be initiated is: <https://oecaaa.faa.gov/oecaaa/external/portal.jsp>. Further comments from USDA are found in the attachment.



## MEMO

Date: March 21, 2025

To: City of Aurora                      From: DEN Planning + Real Estate                      Through: Camilla Soechtig

**Subject: 1875944 – Windler Connector Road 3 – Biloxi St South – ISP and Plat**

Denver International Airport (DEN) received your referral letter, and we appreciate the opportunity to comment on the proposal. DEN provides the following comments:

- The proposed development is in the **“5-Mile ‘Known - Wildlife Attractant Separation Area”** for the final build-out of future DEN Runways, as defined by the Federal Aviation Administration (FAA). The USDA Wildlife Biologists assigned to DEN ([#dia-operations-usdawildlife@flydenver.com](mailto:#dia-operations-usdawildlife@flydenver.com)) assist in implementing DEN's Wildlife Hazard Management Plan and have requested coordination as this project progresses. USDA and DEN will provide assistance with the requirements outlined in the current version of FAA Advisory Circular 150/5200-33C (see link below). DEN also requests that the landscape plan include maintenance of trees and grasses to reduce attractants for wildlife such as raptor species, blackbirds/starlings, and geese. Fruit-producing trees and shrubs should be avoided. Water quality ponds/detention structures must be designed to meet a 48-hour drain time following a 100-year event.

Please see attached document from USDA for full comment. Project still includes trees, please review the USDA's landscaping suggestions.

[https://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document.current/documentnumber/150\\_5200-33](https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentnumber/150_5200-33)

- The site is found within/under the navigable airspace associated with DEN, as promulgated, and regulated by the Federal Aviation Administration (FAA) under 14 CFR Part 77, Objects Affecting the Navigable Airspace. Based on Part 77 and the development site location, the proponent is required to file notice with the FAA, via the FAA Form 7460-1 process (Notice of Proposed Construction or Alteration), of any structure or temporary construction equipment (e.g., cranes) that penetrate Part 77 surfaces. The FAA website from which the need for the 7460 process can be determined (“Notice Criteria Tool”) and/or the filing can be initiated is: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.



Animal and Plant  
Health Inspection  
Service

Wildlife Services CO

State Office  
12345 W. Alameda  
Parkway  
Suite 204  
Lakewood, CO  
80228  
303.328.9041 Main  
303.328.9047 Fax

## Project Review for Windler Village North – 1804763

Documents Reviewed – Site Plan, Landscape Plan, Plat

The Windler Village North development is within the Denver International Airport (DEN) 5-mile separation distance, as detailed in Federal Aviation Administration (FAA) Advisory Circular (AC) 150-5200-33C. It is within the approach/departure corridors of four out of six runways, as well as other frequently used circling airspace. Additionally, the project boundaries are approximately 4.5 miles from Colorado Air and Space Port property, and 3.5 miles from Buckley Space Force Base property. Therefore, the Windler Village North project exists within a complex aeronautical environment near multiple airports, all of which are managed for wildlife hazards to aviation by the United States Department of Agriculture, Wildlife Services (WS). The site on which the project will be executed previously existed as agriculture and/or grazed land, providing little outstanding habitat attractants as compared to the surrounding area.

Multiple portions of AC 150-5200-33C apply to the Windler Village North development and should be considered by planners and developers to not introduce avian wildlife attractants to this critical airspace. The following items within Windler Village North planning documents would potentially attract wildlife and should be modified to prevent introducing hazards to aviation safety:

- **Landscaping:** WS recommends against the establishment of any landscaping or vegetation in the 5-mile separation buffer which may attract wildlife. Throughout the Landscape Plan document are plans for dense, linear, and overlapping segments of vegetative landscaping (reference pages 7-16). While the introduction of vegetative landscaping is aesthetically pleasing, it will likely increase bird abundance to the area which previously existed as grazing land. Page 18 lists plans to introduce 271 trees and 2,620 shrubs along the streetscape. Page 30 lists plans to introduce 144 large trees, 112 ornamental trees, 4,539 shrubs, over 8,000 grasses, and over 600 perennial flower plants.

WS generally discourages introducing trees and shrubs in to the 5-mile separation zone. If this recommendation cannot be adhered to, tree and shrub species should be significantly reduced and spaced as to prevent the establishment of a continuous canopy or dense cover. WS recommends against planting layered vegetation as depicted in the Landscape Plan. Long-term plant growth should also be considered when spacing. Any introduced plants should also be of species or cultivars which do not produce seed, fruit, or any other wildlife food attractant. Any grass species not currently listed in the DEN WHMP approved seed mixes is not recommended for use within the 5-mile separation buffer.

### **Reference FAA AC 150-5200-33C for guidelines on landscaping for projects within the 5-mile separation zone.**

- **Community and Neighborhood Parks:** The Windler Village North Landscaping Plan document lists plans to create multiple types of parks throughout the development (reference page 1). As previously mentioned, the conversion from grazed land to irrigated, turf grass conditions with layered, landscaped plants would likely attract wildlife. Parks with short turf grass also have high potential to attract Canada geese and Snow geese. Goose species have been shown to present an increased potential for damaging aircraft strikes. Community parks often allow for the establishment of resident Canada goose populations also. These individuals may not migrate and often present year-round strike risk. WS recommends diligent efforts by local communities to prevent geese from utilizing any parks near DEN.

WS recommends limiting features in parks, such as fruit, seed, or dense canopy bearing trees or shrubs. Increasing vegetative spacing and reducing individual plants is also recommended. The use of hardscaping such as large rocks, crushed stone, and other landscaping features which do not attract birds should replace plants to the greatest extent possible.

- Detention Ponds, Wetlands, and other Water Sources: WS did not observe in the reviewed documents any plans to establish bodies of open water. If there are plans which were not noticed in the review, WS recommends adhering to the guidelines below.

FAA AC 150-5200-33C states “Drinking water intake and treatment facilities, storm water and wastewater treatment facilities, associated retention and settling ponds, ponds built for recreational use, ponds and fountains for ornamental purposes, and ponds that result from mining activities often attract large numbers of potentially hazardous wildlife. Where possible, airport operators should modify stormwater detention ponds to allow a maximum 48-hour detention period for the design storm”. Additionally, “Detention basins should remain totally dry between rainfalls”. WS recommends against the establishment of any body of water which does not completely drain within 48 hours.

**Reference FAA AC 150-5200-33C for guidelines on water-based attractants within the 5-mile separation zone.**

Plans within the Windler Village North documents have the potential to increase wildlife abundance and strike risk in the project area and should be reconsidered within the 5-mile separation zone. While WS recognizes the importance of aesthetically pleasing landscaping and water features, aviation safety is paramount and should be prioritized within the FAA designated safety zones. Given the geographic orientation of the Windler development, WS recommends that landscaping plans be significantly modified and specifically reference practices which will mitigate the potential to increase avian wildlife hazards near DEN.

Reference the USDA General Project Review 2024 document for additional information on wildlife attractants which are common to development projects near DEN.

Respectfully,

Jared Myers, Wildlife Biologist  
USDA Wildlife Services, CO