

January 29, 2024

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City of Aurora- Planning and Development Services
15151 E Alameda Parkway
Aurora, CO 80012

RE: The Stables | #1842883
Response to Pre-App Comments

Thank you for your Pre-Application comments that we received on November 7, 2024. We have reviewed and responded to the key issues below. The site has been awarded Low-Income Housing Tax Credits from the Colorado Housing Finance Authority in November 2024. We are happy to submit our site plan amendment with adjustment for the approximately 4.79-acre site to develop a single 4-story, 85-unit, multifamily affordable housing community for residents making between 30%-80% of the AMI.

We look forward to working with the City of Aurora to make this new affordable housing community at 1900 S. Chambers Rd. a success!

Key Issues:

1. **Frontage:** Each multi-family dwelling unit structure must have frontage along a street and require a building entrance connecting to and facing the street without intervening parking lots or other vehicular areas. Planning staff recommends that Phase 1 building front E. Exposition Avenue with Phase 2 and the parking moved to the rear of the site. Considering the limitations of the site, Planning recommends having at least one building front E. Exposition Avenue and the second phase building be designed to accommodate an entry towards plaza common area.
Response: The site has been redesigned to comply with the frontage requirements.
2. **Site Access and Connectivity:** With limited street access and connectivity the applicant is encouraged to further explore cross access with adjacent multifamily parcels. This will help resolve several code compliance issues with the proposal such as building frontage requirements, percentage of common area, and reduced paved areas for construction and maintenance.
Response: The site has been designed to have good pedestrian connectivity within the site and along E. Exposition Avenue which leads to the Westerly Creek Trail.
3. **Street Frontage Buffer:** A 20' wide street frontage buffer as measured from the back of walk along E. Exposition Avenue is required and cannot be reduced.
Response: Understood. We are complying with the street frontage buffer.
4. **Parks, Recreation and Open Space (PROS):** land dedication, cash-in-lieu, park development fees, and tree mitigation will apply to this project based on the proposal

received

Response: Aurora Housing Authority is partnering with Grovewood Community Development for this new affordable housing development. We anticipate submitting that agreement to waive impact fees.

5. **Utilities:** A watermain extension will be required along the lot frontage and looped water supply will be required for any new fire hydrants and fire service lines. A sanitary sewer analysis will be required to ensure that the existing sanitary sewer that is present in Exposition Avenue will have the capacity to meet the needs of the new development.

Response: Understood. Please see utility plan that accompanies this submittal.

6. **Westerly Creek Floodplain:** A significant portion of this site is within the Westerly Creek floodplain. Upon completion of the structure, elevation of the lowest floor, shall be certified by a licensed Colorado Professional engineer, architect or land surveyor. This certification must be submitted to the Floodplain Administrator, prior to the issuance of a certificate of occupancy. No work is allowed in the Floodplain without a Floodplain Development Permit, no work is allowed within the Floodway without a CLOMR or No Rise analysis included within the FPDP.

Response: Understood. We are not disturbing the floodplain.

7. **Mile High Flood District (MHFD):** MHFD's Major Drainageway Plan study identified capacity concerns in the existing culverts under Exposition Avenue that convey Westerly Creek, which could be a cause of increased risk of flooding to the site. There have been improvements upstream to Kenton Way culverts and Canterbury Park that may have impacted this condition. This development is not responsible for fixing preexisting drainage system deficiencies. However, this project must protect the proposed structures from existing hazards and must not make conditions worse for other properties. An analysis of this culvert may be required to quantify the flooding impacts the existing culvert may or may not cause to the site.

Response: Please see our PDR that accompanies this submittal.

8. **Impervious Area:** For development projects that add more than 5,000 square feet of new impervious area or disturb 1 acre or more, onsite Full Spectrum Detention is required. The proposed SCM(s) shall be in place prior to paving, and it shall be accepted prior to the issuance of Temporary Certificate of Occupancy (TCO) or Certificate of Occupancy (CO).

Response: We have designed detention and water quality on site. Please see site plan that accompanies this letter.

9. **Traffic:** If an interim roadway/access network is proposed, a traffic analysis for this condition will be required. The proposed site access drive shall be located opposite the existing parking lot access on the north side of Exposition Avenue in-leu of being positioned 300' from adjacent property accesses.

Response: Please see TIS that accompanies this site plan and letter.

10. **Public Improvements:** The public improvements required include a 6' detached sidewalk, 8' curbside landscaping, and streetlights along the frontage of E. Exposition Avenue. The pedestrian activity level for the photometric analysis of E. Exposition

Avenue is medium and additional lights should be provided if the existing photometric values do not meet current standards. A minimum additional 5' of Right of Way will be required along E. Exposition Avenue. Curb returns with curb ramps are required at the proposed accesses. If the access to the adjacent site on the west side of the project is modified, the curb ramps at the existing access will be required to be updated to current standards. This project will be required to evaluate if a guard rail is required along Exposition Avenue adjacent to Westerly Creek.

Response: Please see TIS that accompanies this site plan and letter.

11. **Fire Life Safety:** It is recommended that a 26' fire lane easement be provided within the site to avoid the installation of mid-block emergency set-up points for aerial fire apparatus (ladder trucks). The first phase of construction must include two points of emergency access and a looped water supply to support on site fire hydrants and fire service lines. See page 27 for further information.

Response: We are complying with all fire lane and fire life safety requirements. Please see site plan that accompanies this letter.