



March 10<sup>th</sup>, 2023

Jazmine Marte  
Office of Development Assistance  
15151 E. Alameda Parkway, Suite 5200  
Aurora, Colorado 80012

**RE: Sable Blvd Townhomes(#1633277)/Pre-Application Meeting held June 16, 2022**

**KA#: 222010**

To Jazmine Marte:

We received the Development Review staff comments dated July 1, 2022. Please see our responses below:

**Key Issues**

1. Application Process: Townhomes/Green Courts are not permitted by the property's current zoning, Rural Residential (R-R). A Zoning Map Amendment/Rezone is required to change the zoning to Medium Density Residential (R-2) in support of this use. The Zoning Map Amendment will require a recommendation of approval in a public hearing before the Planning and Zoning Commission and approval at a public hearing before the City Council. The Site Plan and Subdivision Plat submittals may be processed simultaneously.

*Response: Acknowledged.*

2. The townhomes will be required to meet the Green Court standards referenced in Section 146-4.2.3.C of the UDO. Standards relate to unit types, open space width, number of dwelling units, orientation, parking, landscaping, front entry features, maintenance of common areas, access and connectivity. Please find more information on page seven of the Pre-Application Meeting letter.

*Response: Acknowledged.*

3. Section 146-5.4.4 details the definitions, applicability, procedures, and criteria of approval for all adjustments to development standards. It appears that several adjustments are required, and they must clearly be listed and justified in the Letter of Introduction. Find more information on the adjustment process on page 11 of the Pre-Application Meeting letter.

*Response: Acknowledged, all code deviations and justifications have been included in the Letter of Introduction and on the cover sheet of the submittal set.*

4. The city has a policy on the preservation of trees. If the trees on this property are in good condition and will be removed during construction activities, mitigation is required.



Furthermore, the trees on adjacent properties must be protected and those neighbors notified of your planned development activities. This notification must be sent via registered mail and a copy shall be uploaded with your site plan. Please see comments from the

*Response: There are no onsite trees that are in good condition warrant of mitigation during construction. It is acknowledged that trees on adjacent properties must be protected and that the neighbors must be notified of the planned development activities. Notification will be provided to the neighbors during the Site Plan Review as part of the Neighborhood Notice process.*

5. Ensure access points into the site are adequately spaced from intersections, aligned and/or offset per city standards. Details on the expected spacing and alignment are within the comments from Traffic Engineering beginning on page 17 of the Pre-Application Meeting letter.

*Response: The site driveway access points to both Montview Boulevard and Sable Boulevard were specifically reviewed with COA DPW: Traffic, and found to be acceptable.*

6. The intersection of Montview Boulevard and Sable Boulevard is a potential candidate for a future traffic signal if and when signal warrants are met. As an adjacent land owner/developer, you must participate in the cost of the traffic signal installation.

*Response: Acknowledged.*

7. Public improvements, as well as Right of Way Dedication, are required along all three adjacent streets. Information is provided on page 19 of the Pre-Application Meeting letter.

*Response: Acknowledged, see responses to specific comments offered later in this document.*

8. Detention and water quality/EURV are required. Per the City of Aurora Storm Drainage Design and Technical Criteria Section 3.61, underground detention may be used only as a last resort and must be approved by the City Engineer, when all other alternatives are exhausted. If a development chooses to propose underground detention, they are doing so at-risk of significant redesign if the underground detention is not approved. A variance, with supporting documentation, must be included with the preliminary drainage report and will be evaluated on a case-by-case basis.

*Response: Acknowledged re: Detention and Water Quality/EURV being required. A variance to allow underground detention is being sought and is discussed within the Preliminary Drainage Report. It is acknowledged that the underground detention system is being proposed "at risk"; however, there are no other suitable options for development of this parcel of land.*

9. Minimum easement widths for two utilities (water and sanitary sewer) is 26-feet.

*Response: Acknowledged. This is reflected on the PLAT that is being submitted as part of this Site Plan Application.*





## Planning and Development Services Comments

1a. This property is zoned R-R (Rural Residential), within Subarea A, which allows very low density, single-family residences and limited agricultural uses within a rural environment. This district is intended to prohibit most commercial activities and permitted home occupations that are unrelated to agricultural or rural activities.

Per the Zoning Inquiry letter dated July 13, 2021, staff is neutral to a Rezone from R-R Rural District to R-2 Medium Density Single-Family District. The Rezone would allow townhome development for this site that complies with city code. The townhomes will be required to meet the standards referenced in Section 146-4.2.3.C of the UDO for Green Courts. Standards relate to unit types, open space width, number of dwelling units, orientation, parking, landscaping, front entry features, maintenance of common areas, access and connectivity.

The proposal should provide an explanation in the Letter of Introduction regarding how the site will function, so staff may better understand the proposal. Discuss how parking, trash pickup, public areas, access, and circulation will function.

*Response: Acknowledged.*

1b. The subject property is within Subarea A, and generally includes areas of west Aurora that were primarily developed and platted before or within the decade after World War II, with development occurring in the southern portion of the area into the 1970s. These areas are generally characterized by rectangular blocks with a typical 330-foot by 660-foot dimension, often bisected by a north south or east-west alley. Residential lots were often created with street frontages of between 25 and 50 feet, and arterial and collector street frontages were often designed for small-scale commercial or multifamily uses. Both residential and non-residential buildings tend to be smaller than those in Subarea B, and often reflect traditional designs and brick, stone, and masonry construction methods. Currently, Subarea A includes a mix of industrial, residential and commercial developments. Future development will occur as mainly infill as well as redevelopment of existing sites and structures. Larger developments are expected to occur along transit routes.

*Response: Acknowledged.*

1c. The Aurora Places Comprehensive Plan designates this area as the Established Neighborhood placetype. The Established Neighborhood placetype is characterized by predominantly residential areas with a variety of unit types, including single-family detached and attached, and multifamily, typically constructed between 1950 and 1990. Although primarily a residential area, this placetype may also support limited retail, service and office uses located at intersections or along major perimeter streets. Supporting uses can include appropriately scaled and located restaurants, retail, commercial services, community gardens and other neighborhood-serving gathering places.

*Response: Acknowledged.*

2a. The proposed use is subject to Zoning Map Amendment/Rezone recommendation by the Planning Commission and subsequent approval by City Council, to change the zoning from R-R, Rural Residential District, to R-2, Medium Density Single-Family Residential. Without this approval, the proposed green court use is not permitted as currently zoned.





*Response: Acknowledged. The applicant is requesting a rezone from R-R to R-2.*

3a. The proposed green court development must comply with the following standards or request an adjustment. The items marked with an “\*” will require an adjustment request:

- Green Court width: 30’ minimum or height of the tallest residential building (whichever is greater) as measured from building face to building face.
- \*No more than 14 dwelling units may face the same green court open space. The concept plan shows more than 14 green court dwellings facing an open space and an adjustment will be required.
- \*Front Setback: 20-feet (Porches/patios may encroach 5-feet into required setback)
- Exterior Side Setback: 10-feet
- \*Rear Setback: 15-feet
- Lot Width: 20-feet
- \*Lot Area: 1,600 sf
- Height: 38-feet

*Response: Acknowledged, all code deviations and justifications have been included in the Letter of Introduction and on the cover sheet of the submittal set. No setback adjustments are being requested at this time.*

3f. Section 146-4.8 of the UDO contains specific standards for the design of buildings. These standards include requirements for building orientation and spacing, breaking up the massing of building facades with articulation elements, four-sided building design, and permitted materials, among other things.

Code requires that you incorporate material changes and architectural features such as glazing, textured surfaces, projections, color, overhangs, and changes in parapet height to improve the façade and create an inviting and attractive street presence. Ground floor designs should support a pedestrian-friendly environment, provide visual interest, and help to create an atmosphere that promotes foot traffic. Code also requires that you use changes in the horizontal wall planes at specific intervals and provide a variety of durable materials to create visually interesting buildings. Architectural details shall be continued on all four sides of the buildings to prevent the back of house appearance. See the table below for applicable building design standards and ensure that the building elevations meet all applicable requirements. Elevation plans must be included in the Site Plan that illustrate compliance with building design standards for townhomes.

*Response: We have provided multiple material changes both horizontally and vertically, we have also projected the upper floor out from the main level footprint.*

3g. Standards for exterior lighting are found in Section 146-4.9. Show typical details of lighting on the plan and on building elevations.

*Response: Refer to Photometric for light spec, refer to Building Elevations for locations.*

4. Section 146-5.4.4 details the definitions, applicability, procedures, and criteria of approval for all adjustments to development standards. It appears that several adjustments are required, and they must clearly be listed and justified in the Letter of Introduction. They must also be listed on the cover sheet of the Site Plan and any other sheets on which they are applicable. Approvals of adjustment requests are not guaranteed. Adjustment requests should identify the reason for the





adjustment, efforts to minimize the adjustment, and design elements proposed to mitigate the standards proposed for reduction. Typically, mitigation techniques should go *above and beyond* requirements from other code sections. If an adjustment does not meet the limits for administrative approval under Section 146-5.4.4.F, then the adjustment will require approval from the Planning and Zoning Commission.

*Response: Acknowledged, all code deviations and justifications have been included in the Letter of Introduction and on the cover sheet of the submittal set.*

7. Please work proactively with registered neighborhood organizations and adjacent property owners. Registered neighborhood organizations within a one-mile radius and adjacent property owners will formally be notified of the application when a submittal has been made to the Planning and Development Services Department.

- *Maria Saldana* the Community Engagement Coordinator for the project. She has put together a report attached to these notes listing the registered neighborhood organizations within one-mile of your proposed project and can assist in scheduling and facilitating meetings with community members. Please work with the organizations that express interest in your project to address comments and mitigate concerns.
- All meetings with registered neighborhood organizations should also include the Planning and Development Services Department Case Manager so that questions concerning the UDO and procedures can be properly addressed. The Case Manager will record any project-related commitments that are made to the community at these meetings.
- Additional information about the Community Engagement Program can be found on the [Housing and Community Services](#) page of the city website.

*Response: Acknowledged.*

### **Oil and Gas Development**

1. We have reviewed the area of your development. There are no known plugged and abandoned (P&A) wells within your site and no existing or planned oil and gas surface facilities on your site at this time. There may be existing underground pipelines in rights-of-way. If you have questions or concerns about this, the Oil & Gas Division can assist with providing additional information. Should you have any questions about oil and gas development, please reach out to Jeffrey Moore, Manager of the Oil & Gas Division.

*Response: Acknowledged.*

### **Parks, Recreation & Open Space Department**

1. Based on the proposal, the following information has relevance to the determination of PROS' requirements for this project:

- Proposal includes up to 70 single family attached units.
- Proposed site is considered an infill development; therefore, no open space land dedication is required.





*Response: Acknowledged.*

2. For homes located in transit-oriented development zones, population calculations for the project are based on an average household size multiplier of 2.65 persons per unit, resulting in an overall projected population of 186 persons residing in 70 units.

*Response: Acknowledged.*

3. To ensure that adequate park land and open space areas are available to meet the needs of the population introduced into the city by the new dwelling units, Section 147-48(b) of City Code specifies that land shall either be dedicated on-site within the project's limits or a cash payment in-lieu of land dedication shall be paid. The required dedication acreage is computed by applying the following standards to the projected population for the project:

3.0 acres for neighborhood park purposes per 1,000 persons

1.1 acres for community park purposes per 1,000 persons

The resulting acreage required is as follows:

	70 Single Family Attached Infill Units
Neighborhood Park Land	0.56 acres
Community Park Land	0.20 acres
Total Land Dedication	0.76 acres

*Response: Acknowledged.*

4. Given the small overall acreage of park land impact generated by the population increase and the fact that the subject development is not conducive to on-site dedication due to minimum park size criteria, the land dedication shall be satisfied by a cash-in-lieu payment prior to subdivision plat/replat. The amount of the payment is computed by multiplying the dedication acreage by the estimated market value for the land.

Being an infill development, this project is able to take advantage of a less-than-market-rate value which the city offers to reduce the cost of PROS' requirements for infill. The current per-acre value of \$60,200 multiplied by the dedication acreage results in the following potential cash-in-lieu payments:

70 Units: \$45,752.00

*Response: Acknowledged.*

5. In accordance with Section 146-306 of City Code, Park Development Fees shall be collected by the city to cover the cost of constructing new park facilities to serve the needs of the projected population. These fees apply to the project because park facilities are not proposed to be provided on-site. Fees are based on the park land dedication acreages and an annual cost per acre for construction of park facilities. The fees, which are computed and collected on a per-unit basis, shall be paid at time of building permit issuance.

The current per-unit fee of \$1,958.22 would apply if permits for construction of the residential units are pulled in 2022.





*Response: Acknowledged.*

6. The monetary calculations presented herein are estimates based on park construction costs and a per-acre value for infill development at this point in time (current year 2022). The timing for implementation of the project may affect the ultimate amount of fees collected and other payments imposed to satisfy park-related obligations. Furthermore, if aspects of your project change, such as the number of dwelling units proposed, the park land dedication requirements may also change.

*Response: Acknowledged.*

### **Aurora Public Schools**

1. The proposed Sable Boulevard Townhomes development would replace housing that was previously located on the site. In accordance with Section 4.3.18 of the Unified Development Ordinance, the school land obligation for the proposed project would be the difference between the obligation for the new project and what would be required based on the number of residential units the project is replacing. School Dedication Requirement Difference = 0.4439 acres (pg. 15 of Pre-Application Meeting letter).

*Response: Acknowledged.*

### **Aurora Water**

1. Water meters are to be in a landscaped area with pocket easements.

*Response: The use of “gang meters” was specifically discussed with representatives of Aurora Water, and what is currently proposed on the Preliminary Utility Plan was found to be acceptable.*

2. Please note, Aurora Water is processing a non-functional turf ordinance which will limit the amount of cool-weather turf allowed in all developments. Please find the ordinance [here](#) under Item 5. Please plan to incorporate these requirements in your future submittals.

*Response: Acknowledged. The Landscaping Plan incorporates the requirements of the non-functional turn ordinance for cool-weather turf.*

3. Based on the proposed plan, mains cannot be located within the green courts.

*Response: Acknowledged. There are no mains – either sanitary sewer or water – planned within the green courts.*

4. Minimum easement widths for (2) utilities is 26-feet.

*Response: Acknowledged. Easements are shown on the PLAT, which is a part of the Site Plan Application.*

5. Each unit is to be individually served.

*Response: Acknowledged. Reference the Preliminary Utility Plan within the Site Plan set.*





6. Detention and water quality are required.

*Response: Acknowledged. Detention and water quality/EURV are planned within and beneath (underground stormwater detention, variance requested) the green courts.*

7. Connection fees are those in effect at time of payment.

*Response: Acknowledged.*

8. A [domestic allocation agreement](#) will be required for connections 2" and larger.

*Response: Acknowledged; however, not applicable. There are no connections 2" or larger planned for this development.*

### **Public Works Department**

1. A Detailed Traffic Impact Study (TIS) will be required for this development. See below for additional information. If an interim roadway/access network is proposed, a traffic analysis for this condition would be required.

*Response: The requirements for the TIS were scoped with COA Staff by our Traffic Consultant (SM Rocha). Traffic Counts were completed and a Detailed TIS was prepared. This document is included in the submittal package. No "interim roadway/access network" is proposed.*

2. Site access drives/streets shall be located 150' CL-CL from Sable Boulevard (confirm that spacing of the northwest driveway meets criteria). Access spacing along Montview Boulevard and 21<sup>st</sup> Avenue shall be a minimum 150'. Verify the two western most accesses on Montview Boulevard & 21<sup>st</sup> Avenue meet spacing requirements.

*Response: Acknowledged. All site access points from Sable Blvd. meet the 150' requirement.*

3. The eastern accesses onto 21<sup>st</sup> Avenue and Montview Boulevard shall align with the opposing intersections to the north, Eagle Circle and Eagle Street, respectively, or be offset from those intersections by 75' minimum, centerline to centerline.

*Response: The design team met with Public Works throughout the site planning process, and it was determined that due to low traffic flows in this neighborhood the eastern most intersection off of E. Montview would be allowed to be offset more than 75' from Eagle St. All other intersections will meet this criterion.*

4. Show all adjacent and opposing access points on the Site Plan.

*Response: Information shown.*

5. Label the access movements on the Site Plan.

*Response: All access movements, as discussed with COA staff prior to this submittal, are intended to be full movement.*







6. Objects and structures shall not impede vision within the sight triangles. Show sight triangles on the site plan and landscaping plan at all access points in accordance with [City of Aurora Standard Traffic Detail TE-13](#). In addition, street trees shall be set back from Stop signs and other Regulatory signs as detailed in [City of Aurora Standard Traffic Detail TE-13.3](#).

**Add the following note landscape plans:** 'All proposed landscaping within the sight triangle shall be in compliance with COA Roadway Specifications, Section 4.04.2.10'

*Response: The Sight Triangles are shown at the Montview & Sable Blvd intersection and the 21st and Sable Blvd intersection. General Note #11 on the Landscaping Plan was included regarding plantings within the sight triangles.*

7. Show existing stop signs and street name signs or the installation of new stop signs and street name signs by developer at the site access points onto public streets. Add the following note to the Site Plan: "The developer is responsible for signing and striping all public streets. The developer is required to place traffic control, street name, and guide signs on all public streets and private streets approaching an intersection with a public street. Signs shall be furnished and installed per the most current editions of The Manual on Uniform Traffic Control Devices (MUTCD) and City Standards and shown on the signing and striping plan for the development."

*Response: Existing and proposed signage is shown and annotated on the Site Plan. COA Site Plan Note #10 noting the above is included on the Cover Sheet of the Site Plan document.*

8. Designate a Public Access Easement along private drives.

*Response: The private drives are encapsulated in the required 23' Fire Lane & Sanitary Sewer Easement, as shown on the PLAT.*

9. Pending the TIS a traffic signal easement may be required at the intersection of Montview Boulevard and Sable Boulevard to accommodate the proposed traffic signal pole, underground conduits, pull boxes and signal control cabinet.

*Response: Acknowledged.*

### **Engineering Division**

1. Public improvements required with this development include:

- 21<sup>st</sup> Avenue: complete the south half of the street utilizing the local type 2 street section, including curb and gutter, pavement, a 5.5' detached sidewalk, streetlights and right of way dedication. There may be a need to restrict parking to provide necessary width to meet Life Safety requirements.
- Sable: 6' detached sidewalk, streetlights, and 5' of right of way dedication.
- Montview: complete the north half of the street including curb and gutter, pavement, 5.5' detached sidewalk, streetlights, and right of way dedication.

*Response: Acknowledged. These required public improvements are reflected in the Site Plan documents and the PLAT (for the right-of-way dedication).*





2. Undergrounding of the overhead Xcel utilities within right of way in Sable Boulevard can also be considered with the city's 1% fund utility undergrounding policy. Further coordination will be required. The developer is responsible for any private connections or asset acquisition such as additional easements.

*Response: Acknowledged; however, existing overhead infrastructure is currently active both north and south of this project.*

3. Alleys or private street less than 30' in width shall be paved with concrete.

*Response: Acknowledged. As reflected by key note 6.9, the onsite pavement is proposed as "concrete pavement".*

4. A preliminary drainage report shall be submitted with the site plan. On-site detention and water quality/EURV is required.

*Response: Acknowledged. A Preliminary Drainage Report, reflecting both on-site detention (underground, variance requested) and water quality/EURV is included as part of the Site Plan Submittal.*

5. Per City of Aurora Storm Drainage Design and Technical Criteria Section 3.61, underground detention may be used only as a last resort and must be approved by the City Engineer, when all other alternatives are exhausted. If a development chooses to propose underground detention, they are doing so at-risk of significant redesign if the underground detention is not approved. A variance, with supporting documentation, must be included with the preliminary drainage report and will be evaluated on a case-by-case basis.

*Response: Acknowledged re: Underground Detention. As detailed with the Preliminary Drainage Report, a variance to allow this is being sought.*

6. Previously approved plans and reports can be found on the city's website. Instructions can be found here: [Getting to Engineering Documents Online](#). Older documents can be provided upon request.

*Response: Acknowledged. Thank you.*

### **Fire/Life Safety Comments – Building Division**

1. **Address Directory Signs for [Single-Family Dwellings Facing Green Belts instead of Public Right-of-Way](#):** An approved address directory shall be shown within the detail sheet of the site plan and/or civil plan sign package. Address Directory Signs must be installed at properties where the single-family unit is facing a green belt and access to the unit is from garage of an adjacent access road.

- Adjacent public/ private roadways, or fire lane easements/public access easements must provide emergency access to within 150' of all exterior portions of the first floor of each structure. The utilization of a greenbelt product cannot exceed this requirement.

*Response: Address should be displayed on both the Green Belt side as well as the adjacent access road on the garage side. Refer to building elevations for proposed locations.*





2. All buildings or structures, except accessory buildings, shall display the proper building number in the manner provided in this article. It shall be the responsibility of the owner, occupant or any person obtaining a building permit to place such number in the manner provided in the Aurora City Code of Ordinance, Chapter 126 - Article VII - Numbering of Buildings.

*Response: This note has been added to the Building Elevations*

5. Based on the information presented so far, the type(s) of fire apparatus access road(s) needed for this particular site is: [Fire Lane Easement](#)

- Buildings greater than 30' in height are regulated by the 2015/2021 IFC Section D105 and require a both a 26' Fire Lane Easement and two points of emergency access. Typically, the 26' fire lane easement is located on the front main entry side of the structure within a minimum of 15' and a maximum of 30' from the exterior wall of the building. Structures greater than 30' in height also require a second point of emergency access.

*Response: The design team met with Mike Dean throughout the conceptual site planning phase and it was confirmed that a 24' wide fire lane easement would suffice for this project and that the aerial apparatus requirement described above would not be needed because the 150' hose pull requirement can be met from E. Montview Blvd. and E. 21<sup>st</sup> Avenue. Roads will also support 85,000 lbs. weight limits.*

7. The requirements for the installation of a fire sprinkler system are provided within the Chapter 9 of the 2015/2021 IFC and IBC.

General Comments:

- Our jurisdiction has amended the IFC through a city ordinance that removes the requirement for fire sprinkling R-3 Single-Family residences. During the pre-application meeting it was stated that these units would be IRC R-3 Occupancy. If this is changed to IBC R-2 occupancy, then a fire sprinkler system will be required for these units.

*Response: Project is still classified as R3*

9. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for lifesaving of fire-fighting purposes, the fire code official is authorized to require a key box to be installed in an accessible location.

*Response: If a key box is requested by the Fire Code Official we will provide a location near the front door of each unit.*

14. Per the 2015/2021 International Fire Code, Section 304.3.3, dumpsters and containers with an individual capacity of 1.5 cubic yards or more shall not be stored in buildings or placed within 5 feet of combustible walls, openings, or combustible roof eave lines.

*Response: Acknowledged.*





### Real Property Division

1. Unplatted land shall be subdivided at the time of development. Please submit a Subdivision Plat along with the Site Plan. Contact Real Property for a pre-submittal review of the Plat.

*Response: Acknowledged. A Subdivision Plat is INCLUDED as part of the Site Plan Submittal.*

2. Easements can be dedicated by the Plat.

*Response: Acknowledged. Proposed Easements are shown on the PLAT.*

3. Possible configuration of surrounding streets may require Right of Way dedication(s).

*Response: Acknowledged. Right-of-Way Dedication, as required by comments from Public Works, is shown on the PLAT.*

Please do not hesitate to contact me if you have any questions or concerns, or if you require additional information regarding our submittal.

Sincerely,

Jeff Neulieb

KEPHART