



August 28, 2019

City of Aurora
Planning & Development Services
Attention: Stephen Rodriguez, Planning Supervisor
15151 E. Alameda Parkway, Suite 5200
Aurora, Colorado 80012
Ph: 303.739.7186

**Re: Transport Colorado – FDP Sub Area #1
Response to 1st Comments**

Dear Mr. Rodriguez,

We have reviewed your comments of the Transport Colorado FDP Sub Area 1 application and associated plans for the subject property. Attached within are our responses to those comments.

If you require additional information or have any questions about our submittal items, please do not hesitate to call or e-mail me (303) 734-1777 or jcarpenter@laidesigngroup.com. We look forward to working with the City in completing this process in order to contribute to the City of Aurora.

Sincerely,

Jennifer Carpenter
Associate Principal



Initial Submission Review

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- See comments from external agencies Xcel Energy, Colorado Department of Transportation and Tri-County Health Department.
 - **Acknowledged.**
- All Waiver requests (if applicable) need to include justification to be properly analyzed by staff.
 - **RE: Signage and Uses to be discussed and reviewed**
- Please identify a street network, which includes addressing pedestrian and bicycle circulation, for this development.
 - **Acknowledged.**
- See the comment redlines from Landscaping, Engineering, Traffic, Real Property, Aurora Water, Life Safety and Parks.
 - **Acknowledged.**

PLANNING DEPARTMENT COMMENTS

Reviewed by Stephen Rodriquez srodrigu@auroragov.org / 303-739-7186 / PDF comment color is teal.

1. Community Comments

1A. No comments were received from surrounding neighborhoods. See the comments attached to this letter from CDOT and Tri- County Health regarding the proposal. No comments were received to date from Urban Drainage and Flood Control District (UDFCD) or Adams County.

2. Completeness and Clarity of the Application

Tab #1 Letter of Introduction

2A. There seems to be contradictory information in your submittal regarding waivers. If you are requesting any waivers, please include all justifications for the waivers. At the time these are received, staff will perform an analysis of each request. Are the proposed changes/additions to the permitted uses table what you are considering as “Waivers?” Please clarify.

RE: Waiver Requests and Justifications have been included in 2nd Submittal.

Tab # 2 DA Form with Attachments

2B. Please clarify for staff what the mineral lease information provided means. Is there the potential for Oil and Gas development in Sub-Area 1?

RE: No oil and gas pads identified in Sub-Area 1.

Tab # 4, Natural Features Map/Existing Conditions Map

2C. Please clarify if there are any of the following: streams, lakes, pond or wetlands that need to be identified on the Existing Conditions Map; easements, power lines, railroad rights of way; wildlife habitat, existing vegetation, significant views of the Front Range, designated open space areas and public parks.

RE: The natural features Map/Existing Conditions Map is up to date as shown.



Tab #8 – FDP Sub-Area 1 Conceptual Plan

2D. This plan although conceptual, does not adequately show road circulation and connectivity within the site. Please see the comment redlines on the plan.

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

Tab #10 Urban Design Standards

2E. The Primary Signage (monument sign) proposed exceeds what is allowed in city code regarding height. Is this proposed to be a waiver? Please clarify. Please note that all waivers require justification.

RE: Yes, this is a proposed Waiver. Justification has been added to the documents.

2F. Please include with your monument signs illustrations any dimensional standards that are *within code allowances* or reference code requirements. Signage typically includes high-quality materials such as brick or stone for the base and a common design theme across sign types. The proposal should also address wayfinding signage.

RE: Completed.

2G. Exterior Building Lights are required to be downcast. Please show the aforementioned on your Lighting Standards sheet.

RE: Completed.

2H. Per Section 146-1104(D) of City code outdoor storage of any type shall be screened with a visual barrier that adequately conceals material from the view of residential areas, public rights -of-way and trail or trail corridors. Outdoor storage shall be behind required front setbacks. Please include this note in Tab 10.

RE: Completed.

Tab #11 Landscape Standards

2I. Please see redline comments and comments in the landscape section below. The recommended approach for landscaping and other FDP requirements is that city code shall apply unless you are proposing alternative or enhanced approaches which would be identified in the FDP. Please consider revising your landscape standards in this manner as a means to clarify expectations for future developers.

RE: Additional redline comments were not included in SubArea #1. Tab #11 and the Matrix states that landscape will meet or exceed minimum code requirements. We have included Chapter 146 – Article 14 of the Code to ensure that those requirements are approved with this Development.

Tab #14 Adjacent Neighbor/Abutting Property Owners

2J. Please verify that your list includes all of the required adjacent property owners. In looking at the map, do the areas in yellow represent abutting property owners? If so, it appears that all of the abutting property owners were not notified. See redlines on Tab 14.

RE: Completed: An updated list was sent to Staff.



3. Zoning, Land Use Comments and Transportation Issues

3A. Please identify your goals for internal site circulation for large industrial sites. Typically, this will address your goals for employee and visitor traffic relative to truck traffic, and your approach for the primary internal circulation routes. Primary internal routes should be street like with limited access and back out situations and pedestrian sidewalk and landscaping.

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

3B. Include street names to any and all internal/local and surrounding streets.

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

The internal streets can be conceptual and are required to be shown on the Planning Area and Land Use maps.

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

Also, please verify how you meet the required minimum percentage of public land/space required in all FDP's.

RE: Completed: Please refer to the Matrix

3C. Transportation – The internal street circulation, layout and connections are not acceptable. See redlines in Tab 8.

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

3D. Are there any marijuana grow facilities planned for the development? If so, there are specific regulations/requirements associated with these types of facilities. Please advise.

RE: Yes, Marijuana facilities will be required to follow City and State regulations.

Open Space, Recreation, and Land Dedication

3E. In Tab 9, identify a complete pedestrian network and circulation plan throughout the development.

Street Sections –

RE: Acknowledged. Narratives have been added to the FDP as well as the PIP. Local Roadways will be delineated at the time of ISP and CSP.

3F. Continue to work with Porter Ingrum regarding the required avigation easements for the Master Planned development.

RE: Acknowledged.

4. Landscape Comments

Reviewed by: Kelly K. Bish, PLA, LEED AP/ Kbish@auroragov.org/ (303) 739-7189/ PDF comments in teal.

4A. Kelly K. Bish, PLA, LEED AP/ Kbish@auroragov.org/ (303) 739-7189/PDF comments in teal.

• Form G Matrix

Everywhere the Matrix references Article 14, it should also reference Tab 11.

RE: Completed.



• **Parking Lot/Loading Dock Buffer**

Change the wording to remove “or” from the buffer description.

RE: Completed.

• **Trail Corridors**

What is the width of the buffer being provided and the required plant quantities?

RE: Landscape buffers will meet or exceed minimum code requirements following Chapter 146 – Article 14 and the Aurora Parks and Open Space Dedication and Development Criteria Manual at the time of ISPs and/or CSPs.

• **Chapter 146- Article 14**

Please update the landscape section to remove any references to residential standards as it is understood that no residential will be taking place within Transport.

RE: Completed.

REFERRAL COMMENTS FROM OTHER DEPARTMENTS AND AGENCIES

5. Civil Engineering

Reviewed by: Kristin Tanabe, ktanabe@auroragov.org / 303-739-7306 / Comments in green.

PIP Sheet 1

5A. Comments from the overall Transport FDP Amendment have not been addressed. Most of the comments contained here are the same as the overall PIP.

RE: Acknowledged.

5B. Please put the exhibits at the back of the document.

RE: We submitted the exhibits as a separate file and are not sure how they got placed before the text. The street names have been added.

5C. Half of the median will not be constructed. Either construct the entire median or just construct the curb.

RE: The street sections have been revised to show only the curb being constructed.

5D. The FDP will not be approved by public works until the Master Drainage Study has been approved. There may be additional analysis required with the drainage report submitted with this sub-area.

RE: RE: Acknowledged. We are working with COA and MHFD to resolve comments to the MDS.

5E. Add street names to the relevant sections.

RE: Street names have been added to the relevant sections.

5F. If this is to be emergency access only, it will need to be gated. If it will be open for the public to use, 2 lanes (min 24') with curb and gutter will need to be constructed.

RE: The section has been modified to reflect the section for public use provided by Kristin Tanabe.

5G. There is no 84' three lane collector in S1.3. Please make sure you are using the most recent updates to the Roadway Manual.

RE: This section is per the NEATS update. The reference to the roadway manual has been removed.



5H. Include intersections that were identified in the Traffic Study for future signalization. Include a note that references the City's Traffic Signal Escrow Ordinance.

RE: Signalized intersections are now indicated on the PIP exhibits. A note referencing the escrow ordinance has been added. Monies will be escrowed for traffic signal construction as individual subareas are being developed.

5I. The current condition of the Manila Road interchange does not support truck traffic. The interchange improvements will likely be required with any development.

RE: Comment addressed in phone conversation with Kristin Tanabe. Traffic counts show that trucks are using the interchange in its existing condition. Future improvements will be based on increased volumes and phasing recommendations per the FHU traffic study.

Sheet 2

5J. Cores showing adequacy of pavement are required for existing roads such as Imboden to ensure the existing sections meet traffic demands and loading. If they do not meet standards, reconstruction will be required.

RE: Verbiage has been added to the PIP document. Based on conversation with K. Tanabe, it is understood this is not required at this point in the design.

5K. Traffic demands by any planning area may trigger improvements to Manila Road, the rail crossing or the interchange. Specific triggers need to be identified to address this, typical for each planning area.

RE: Per the traffic study, triggers are based on developed acreage. These triggers have been added to the PIP.

Sheet 3

5L. Channel is described in narrative, but not shown as improved even though the culverts are called out, typical multiple planning areas.

RE: Culverts may be installed due to the associated roadway improvements rather than channel improvements. Channel improvements have been updated where necessary.

Page 4 Narrative

5M. Cores showing adequacy of pavement are required for existing roads such as Imboden to ensure the existing sections meet traffic demands and loading. If they do not meet standards, reconstruction will be required.

RE: Acknowledged. Verbiage has been added to the PIP document. Based on conversation with Kristin Tanabe, it is understood this is not required at this point in the design.

Page 5 Narrative

5N. The interim section is only 23'. If this is to be emergency access only, it will need to be gated. If it will be open for the public to use, 2 lanes (min 24') with curb and gutter will need to be constructed.

RE: The section has been modified to reflect the section for public use provided by Kristin Tanabe.

5O. Specific triggers need to be identified for these improvements.

RE: Due to the size and unknown rate of development, triggers will be added in terms of developed acres rather than years.



Page 7 Narrative

5P. This channel is described in multiple planning areas as conveying offsite flows, but not identified as "proposed" until PA-15.

RE: The narrative has been updated to more clearly describe routing of off-site flows.

Page 9 Narrative

5Q. Existing channel?

RE: The narrative has been updated to more clearly describe routing of off-site flows.

Page 11 Narrative

5R. This narrative does not discuss the full spectrum pond shown on-site.

RE: The narrative has been updated to discuss the full spectrum pond shown in PA-10.

Page 20 Narrative

5S. The channel south of 32nd Avenue is never highlighted as being improved nor is it discussed at any point in this narrative.

RE: The narrative has been updated to include the channel south of 32nd Ave with the development of PA-16.

5T. No channel improvements are indicated on the exhibit.

RE: The improvements described in this sentence are general in nature that will be detailed in subsequent design phases. The narrative has been updated to more clearly describe the channel improvements in question.

6. Traffic Engineering

Reviewed by: Carlie Campuzano / Brianna Medema, ccampuza@auroragov.org / bmedema@auroragov.org / 303.739.7646. Comments in gold.

TIS – Previous comments not incorporated. Do not submit another Master Plan Sub Area or update to the FDP without updating.

6A. See the numerous comments on the TIS regarding trip generation, signal warrant analysis, lane configurations, intersection control, access, traffic volumes and phasing.

RE: FHU staff met with City Traffic Engineering staff on June 24 to discuss the City's comments and to obtain clarifications. Comments will be addressed in the revised TIS.

6B. See additional comments throughout TIS.

RE: Comments have been addressed.

Reviewed by: Brianna Medema / bmedema@auroragov.org / 303-739-7336 Comments in gold.

PIP

6C. Sheet 2 - For all of these Planning Areas, improvements of roadways not fronting the Planning area may be required, pending update & review of TIS. See NEATS for laneage vs ADT thresholds. See TIS guidelines for LOS thresholds for intersections and improvements to offsite (of PA) intersections may be required for any of these PA's.

RE: It is understood that off-site improvements may be required. Individual TIS's will be prepared for each parcel that is being planned for development at which time off-site improvements will be identified.



6D. Cover Page for Narrative - Additional comments will be supplied once Traffic Comments on TIS had been incorporated. Traffic Volumes, roadway laneage, intersection laneage, potential signalized intersections, overall geometry, and may other items may be modified. Conformance with LOS NEATS (based on ADT) may be discussed (additional lanes may be needed in multiple locations) and COA TIS Guidelines will be required.

RE: Acknowledged.

7. Real Property

Maurice Brooks/ mbrooks@auroragov.org / 303-739-7294 Comments in magenta.

7A. No comment redlines.

RE: Acknowledged.

8. Aurora Water

Casey Ballard / / (303) 739-7382) Comments in red.

RE: Acknowledged.

Master Utility Report

8A. Please address numerous redline comments.

1. Include the following language in the proposed system section:

The use of groundwater wells requires a separate water agreement and approval from the City Council. Approval of this Master Utility Study does not constitute approval of groundwater well use or well location.

RE: Language has been added to the proposed system section.

PIP Sheet 1

8B. Replace "as necessary" with "as required by the City of Aurora."

RE: The text has been updated.

8C. Additional conversations have been had regarding water main sizing. Please ensure those discussions and comments are reflected in this utility study and any other utility studies for the Transport Colorado Development.

RE: Conversations regarding main sizing and other water system details are reflected in this study and will be carried forward to subsequent utility studies.

8D. Storage tank should be on a looped portion of the water mains to ensure fire service.

RE: We are working with Aurora Water and Life Safety to determine an acceptable tank location. The location shown represents the highest point on the site based on proposed elevations.

Sheet 2

8E. Any water mains under roads that are to be constructed should be constructed with those roads.

RE: Plans have been updated to show water main installation along the frontage of proposed planning areas.

8F. The City is in discussions with Metro Waste Water regarding the box elder basin. Comments regarding this statement and the sanitary sewer situation for this area may be provided in later reviews. The applicant will be kept aware of any developments regarding this item.

"Aurora Water and Metro Wastewater Reclamation District are working collaboratively on a feasibility study to develop a regional approach for development in the Box Elder Basin. The study will evaluate the anticipated water



supply demands within the Basin, anticipated timing of future water supply demands, the resulting wastewater flows, and the engineering infrastructure options to meet demands/flows with the intent of developing a solution such as a reuse facility to keep wastewater flows within the Box Elder Basin."

RE: Acknowledged.

Sheet 3

8G. Extend water mains along the frontage of any proposed planning area or project. Typical for all phases.

RE: Plans have been updated to show water main installation along the frontage of proposed planning areas.

Sheet 9

8H. See previous comments regarding water main extensions.

RE: Plans have been updated to show water main installation along the frontage of proposed planning areas.

Page 5 Narrative

8I. Update water main size based on previous comments.

RE: Water main size has been updated.

Page 8 Narrative

8J. Adjust water mains required for each planning area based on comments on the plan sheets.

RE: Water main sizes have been updated.

9. Life Safety

Reviewed by: John J. Van Essen / jvanesse@auroragov.org / 303-739-7489 Comments in blue.

9A. Please see Marked-Up (In Blue) FDP Tabs for Specific Comments. Thank You!

RE: Comments have been addressed.

Master Utilities Plan:

- Please revise sheet 41 to read: "Fire Department".

RE: The Approval Block has been updated.

TAB 8: Sheet 2:

- Please update the Land Use Matrix and the Map to reflect the 2.5 acres for the Fire Station; 1.75 acres for the Temporary Fire Station and the 10' x 10' (100 square foot area) for the Whelen Warning System.

RE: Completed

- This information will be determined during a meeting you can schedule with Mike Dean by calling 303-739-7447 or emailing mdean@auroragov.org. At this meeting we can determine the locations for all fire department needs.

RE: Completed

TAB 8: Sheet 3:

- A new note will be needed in this area to address the manner in which the permanent, temporary fire stations and Whelen siren systems will be provided. The specific wording will be determined in the previously stated separate meeting with Fire/Life Safety. Please call Mike Dean at 303-739-7447 or email mdean@auroragov.org.

RE: Completed



TAB 13: PIP Sheet 1:

- The use of "interim condition/life safety access" roadways cannot be supplemented without Public Works approval. If allowed, the section shown below must be labeled as a fire lane easement, dedicated and constructed to the Public Works specifications for a fire lane easement. An additional note will be required within a phasing plan to state when the required public roadway will be installed, and the dedicated fire lane removed.

RE: The road section has been modified to reflect the section for public use provided by Kristin Tanabe.

- Please label Fire Lane Easement on all appropriate sheets.

RE: Comment addressed with Mike Dean. The interim roadway section has been updated and easements will not be required where right-of-way will be dedicated.

- Fire/Life Safety concurs with the note Arora Water put on the Water Tank.

RE: See response to 8D above.

TAB 13: PIP Sheet 2:

- No matter the size of the water line underneath the roadway, fire hydrants will be required on alternating sides of the street being constructed. See 2015 IFC, Appendix B and C.

RE: Acknowledged. Hydrants will be shown on Site Plan level design drawings.

TAB 13: PIP Sheet 2:

- Fire hydrants will be required along all roadways on alternating sides of the proposed street systems regardless of water main sizing.

RE: Acknowledged. Hydrants will be shown on Site Plan level design drawings.

TAB 13: PIP Sheet 7 & 8:

- Please add "looped".

RE: Text has been added.

- Fire hydrants will be required along all roadways on alternating sides of the proposed street systems regardless of water main sizing. Note: Please correct on all appropriate sheets.

RE: Acknowledged. Hydrants will be shown on Site Plan level design drawings.

TAB 13: PIP Sheet 13:

- See life safety comments reflected in Exhibit 5.

RE: Comment has been addressed with Mike Dean. Interim roadway section has been updated to reflect the section for public use provided by Kristin Tanabe.

TAB 13: PIP Sheet 14:

- Add: To be determined at time of CSP submittal.

RE: Text has been added.

TAB 13: PIP Sheet 120

- The city of Aurora will not be responsible for the costs associated to the construction of the Temporary Fire



Station. A separate meeting with the applicant, ODA staff, Fire Department and Fire/Life Safety is needed to solidify requirements in this area. Please contact Mike Dean at 303-739-7447 to schedule an appointment.

RE: Acknowledged

11. Parks and Recreation (PROS)

Reviewed by: Chris Ricciardiello / cricciar@auroragov.org / 303-739-73xx

1. The proposed trail should be located within the Open Space & Drainage planning areas to enhance the trail user experience and to also potentially double as a maintenance road for access to the drainage corridor. It is unclear whether that is the intent as shown in the Open Space, Circulation & Neighborhood Plan and on other land use maps for this submittal. This should be made graphically clear by shifting the dotted line to the right to fall entirely within the respective planning areas.

RE: Completed

2. All open space areas shall be shown in the FDP as individual planning areas.

RE: Completed

3. Specify the programmatic use of and planned facilities at the proposed land dedication areas. For example, a description for PA-36 and PA-37 should be added that describes the proposed trail, including its width and surface treatment. Also, will any complimentary site furnishings, such as benches, trash cans, etc., be provided along the trail?

RE: Completed

4. Provide triggers for construction of the trail (in the open space-drainage corridor) in Form J. Be sure that they are stated in the PIP as well.

RE: Open space triggers have been added to the PIP.

5. Stormwater infrastructure is not eligible for land dedication credit. Therefore, the acreages in column D of Form J should not include the area comprising the detention ponds.

RE: Completed.

11. Xcel Energy

11A. See the attached letter

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the documentation for Transport Colorado Master Plan Sub Area 1. To ensure that adequate utility easements are available within this development, PSCo requests that the following language or plat note be placed on the preliminary and final plats for the subdivision:

Minimum ten-foot (10') wide utility easements are hereby dedicated on private property abutting all public streets, and around the perimeter of each commercial/industrial lot in the subdivision or platted area including tracts, parcels and/or open space areas. These easements are dedicated to the City of Aurora for the benefit of the applicable utility providers for the installation, maintenance, and replacement of electric, gas, television, cable, and telecommunications facilities. Utility easements shall also be granted within any access easements and private streets in the subdivision. Permanent structures, improvements, objects, buildings, wells, water meters and other objects that may interfere



with the utility facilities or use thereof (Interfering Objects) shall not be permitted within said utility easements and the utility providers, as grantees, may remove any Interfering Objects at no cost to such grantees, including, without limitation, vegetation. Public Service Company of Colorado (PSCo) and its successors reserve the right to require additional easements and to require the property owner to grant PSCo an easement on its standard form.

PSCo owns and operates existing electric distribution facilities in several areas of the proposed project area and requests that they are shown on all plan sets.

As the project progresses, the property owner/developer/contractor must complete the application process for any new natural gas or electric service, or modification to existing facilities via xcelenergy.com/InstallAndConnect. The Builder's Call Line is 1-800-628-2121. It is then the responsibility of the developer to contact the Designer assigned to the project for approval of design details.

As a safety precaution, PSCo would like to remind the developer to call the Utility Notification Center by dialing 811 to have all utilities located prior to any construction.

RE: Acknowledged. CVL has been in discussions with Larry Claxton (Xcel) to get a Land Rights Agent assigned to the project and begin the new service application process.

12. Urban Drainage (UDFCD)

12A. Comments have been received and are being addressed.

13. CDOT

Reviewed by: Marilyn Cross

13A. Comments have been received and are being addressed..

14. Adams County

14A. No comments received to date.

15. Tri-County Health Department

15A. See attached letter.

Thank you for the opportunity to review and comment on the Master Plan Sub Area 1 for the Transport Colorado development with heavy rail industrial, data center, warehouse, aerospace manufacturing, and mixed commercial uses located at the northwest corner of Colfax and Manila. Tri-County Health Department (TCHD) staff previously reviewed the application for the Framework Development Plan Amendment, and responded in a letter dated June 4, 2019. After reviewing this application, TCHD has the following comments.

Sewer Service

The applicant's engineer, CVL Consultants, have prepared a Master Utility Report (Report), dated April 2019. The report states: "The approach taken by the project will to provide just-in time delivery of infrastructure to support the development. Because there are many unknowns regarding timing and users, the design will need to be revised and reevaluated throughout the development of the site. Section 2.4 of the Report addresses the Proposed Wastewater System. Section 2.4 states: "Initially, parcels will be served by ISDS." TCHD notes that the current regulatory term for ISDS is now Onsite Wastewater Treatment System (OWTS.) Consequently, we recommend that the term ISDS be replaced with OWTS, where applicable. Table 1-ISDS Loading, in section 2.5.1 of the Report, provides values for OWTS for Planning Areas in Sub-Area 1. The average daily flow for all planning areas ranges from 1889 gallons/day to 21,260 gallons/day. However,

Table 2-On Site Flows, indicates substantially higher flow values, with ranges from 107,748 gallons/day to 1,182,779 gallons/day at full buildout.

TCHD does not support the use of OWTS, for the following reasons:

1. OWTS are limited to a maximum design flow of 2000 gallons/day. Systems larger than 2000 gallons/day are classified by the Colorado Department of Public Health and Environment (CDPHE) as “Domestic Wastewater Treatment Works” (DWWTW). Based on the flow values from Table 1 and 2, we anticipate that the OWTS will not be adequate to accommodate the wastewater flows and DWWTW will be necessary.
2. Our experience is that OWTS constructed as “temporary” facilities typically become permanent, even if public sewer subsequently becomes available. This is due to the financial and logistical challenges of connecting to central sewer, even if central sewer lines are available in proximity to the facility.
3. The provision of central sewer service with centralized collection systems and DWWTW to Transport Colorado will be more protective of the groundwater within the Denver Basin Aquifers than OWTS. Under a central system, wastewater is collected and delivered to a DWWTW that has a discharge permit and regular monitoring to demonstrate compliance with the permit. The discharge permit limits are determined based on the assimilative capacity of the receiving water(s). In addition, there is a higher level of assurance that the DWWTW is being properly maintained and operated by certified operators and a management entity.

RE: We are working with Tri-County Health to address comments regarding the use of OWTS on an interim basis and ensuring connection to a public system once available. Discussions with the City regarding a regional wastewater treatment solution are ongoing.

Water Service-Initial

Drinking water contaminated with pathogens can cause a variety of illnesses in humans. It is important to protect source water from contamination, and to treat drinking water to eliminate pathogens before it is provided for human consumption.

Section 3.6, System Analysis states: “Initial users on site will be served by groundwater wells and a tank. As mentioned above, it is anticipated that the first 100-300 acres will be served by wells, a tank and pumps installed at the high point of the site.”

If the water system is classified by CDPHE as a Public Water System, it will be regulated, and all applicable regulations will apply. The definition of a public water system is: “a system for the provision to the public of water for human consumption through pipes or other constructed conveyances, if such system has at least fifteen service connections or regularly serves an average of at least 25 individuals daily at least 60 days per year.” (CDPHE Water Quality Control Commission Regulation No. 11). The applicant shall contact the CDPHE Drinking Water Section at (303) 692-3500 or <https://www.colorado.gov/pacific/cdphe/drinking-water> to determine requirements for the drinking water system.

If the water system for the facility is not a regulated system, and water service will be by a private well, we recommend that precautions be taken to protect users.

Individual well owners have primary responsibility for the safety of the water drawn from their own wells. Well owners with questions about wells or well water can call the Wellcare® Hotline operated by the Water Systems

Council, a national organization focused on well systems not regulated under the Safe Drinking Water Act., at 888-395-1033 or online at www.wellcarehotline.org.

The well owner may want to consider having the well water analyzed for a number of contaminants as a baseline of the water quality. A baseline water quality analysis is valuable for future reference in the case of possible contamination. Certain parameters such as coliform bacteria and nitrate, pH and Total Dissolved Solids (TDS) are recommended to be analyzed annually as these can indicate possible breaches in the well. The Colorado Department of Public Health and Environment (CDPHE), Laboratory Services Division can assist you with water analyses. The CDPHE offers individual water tests as well as testing packages to choose from depending on your needs. The CDPHE laboratory web site is located at: <https://www.colorado.gov/pacific/cdphe/water-testing>. TCHD recommends that the applicant provide additional information about whether the initial system(s) will consist of private unregulated wells or CDPHE regulated systems. This information will better inform the applicant about the compliance costs associated with regulated systems and the potential risks posed by unregulated systems.

In Section 3.6, Table 3 Water Demands, indicates large water demands. TCHD understands that these values may apply to “full buildout”; however, we are concerned about the adequacy of the Denver Basin Aquifers to support the water demands. Consequently, TCHD recommends that the applicant provide an analysis by a groundwater hydrologist of the capacity of the aquifers to demonstrate adequate capacity.

RE: We are working with the City of Aurora and Tri-County Health to address the use of wells for a public system. The well system is intended to be temporary in nature until a connection to the City system is made.

Water Service-Long Term

The Report does not discuss the provision of water for longer term. If the City of Aurora will provide the water, we recommend that this be clearly mentioned in the Report, and that the City of Aurora provide a “will serve” letter indicating that they will provide water to the development.

Environmental Site Assessments and Remediation

The application materials included a Phase 1 Environmental Site Assessment (ESA) prepared by CTL Thompson, and dated January 24, 2019. The assessment revealed evidence of the following:

- Oil/Gas Wells
- Petroleum-contaminated soils
- Solid Waste Disposal Areas
- Waste Tires
- Historical gasoline tanks
- Railroad lines
- Possibility of buried asbestos debris
- Dry or abandoned wells

TCHD recommends that the site be remediated to remove the above described hazards. For more information, the operator may contact the Colorado Department of Health and Environment Voluntary Cleanup Program at (303) 692-3320 or the Hazardous Waste Corrective Action Unit under the Resource Conservation and Recovery Act (RCRA) at 303-692-3368.

RE: The long-term water supply solution is discussed in Section 3.4 – Proposed System and Section 3.5 Phasing, which includes a connection to the City system at the Porteos site approximately 5 miles to the west of



Transport Colorado.

The hazards described above will be removed as required with the development of the site.

On-Site Wastewater Treatment System (OWTS) – Abandonment

Proper wastewater management promotes effective and responsible water use, protects potable water from contaminants, and provides appropriate collection, treatment, and disposal of waste, which protects public health and the environment. There is a possibility that unused On-Site Wastewater Treatment System (OWTS) exist on the subject property. Any existing OWTS that is not in use shall be abandoned in accordance with Regulation No. O-17, Section 6.8. TCHD must be notified in writing once the system has been properly abandoned. For more information, or to submit the notification, the applicant may contact the TCHD Aurora Office, 15400 E. 14th Place, (303) 341-9370. More information is available at <http://www.tchd.org/269/Septic-Systems>.

RE: Any existing unused OWTS will be abandoned in accordance with the referenced regulation as development in that area occurs. TCHD will be notified as required.

Well Abandonment

Any well that is no longer being used, must be properly plugged and a Well Abandonment Report (GWS-09) must be filed with the Colorado Division of Water Resources. Please visit the DWR web site at <http://water.state.co.us/groundwater/wellpermit/Pages/WellAbandonment.aspx> for more information. Please feel free to contact me at 720-200-1575 or kboyer@tchd.org if you have any questions on TCHD's comments.

RE: Any unused wells will be abandoned in accordance with the referenced regulation as development in that area occurs.

16. RTD

No comments on the project as RTD has no service in this area.

17. E-470 Public Highway Authority

17A. At this time E-470 Public Highway Authority has no comments. Please advise if we can be of further assistance. For any question please contact Chuck Weiss at 303.537.3420 or cweiss@E-470.com

18. Century Link - See attached letter.

Reviewed by: Karen Caime

18A. No objections to the submittal.