



CITY OF BOULDER  
Planning and Development Services

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## LAND USE REVIEW RESULTS AND COMMENTS

DATE OF COMMENTS: May 5, 2017  
CASE MANAGER: Elaine McLaughlin  
PROJECT NAME: Academy on Mapleton Hill  
LOCATION: 311 MAPLETON AV  
COORDINATES: N04W08  
REVIEW TYPE: Site Review, Use Review, Rezoning  
REVIEW NUMBER: LUR2016-00065, LUR2017-00027 and LUR2017-00028  
APPLICANT: MICHAEL BOSMA  
DESCRIPTION: Application for a congregate care facility consisting of 51 Assisted Living units; 95 Independent Living Units less than 1,200 square feet in size with kitchens; and 36 Independent Living Units greater than 1,200 square feet in size with kitchens. The dwelling unit equivalency is a total of 77 dwelling units. Proposal also includes a warm water therapy pool. Intended as a full continuum of care including independent living, assisted living, short term rehabilitation and memory care.

IDENTIFIED MODIFICATIONS TO THE LAND USE REGULATIONS:  
Section 9-7-1, Height

### I. REVIEW FINDINGS

The proposed use of the site as a Congregate Care Facility could potentially fit into the surrounding context of the historic Mapleton Hill neighborhood, the Knollwood and Trailhead neighborhoods, as well as the Mt. Sanitas Open Space area. It is acknowledged that Congregate Care, as a use, tends to have fewer vehicle trips than a hospital use or than a standard single or multi-family residential use. That said, the mass and scale of the proposed project should more carefully respect the surrounding neighborhood, the topography and the wildland urban interface that exists in this location. As with previous comments, staff finds that the site lends itself to less physical impact on the natural features of the property than is currently presented. Key issues and comments herein are focused on the **project's consistency with the Site Review** criteria for cut and fill, as well as those related to building mass and scale in the context, and open space. In addition, the input from Open Space Board of Trustees in January prompted additional questions regarding the "Open Space – Other" Land Use Designation on the upper edge of the site. This is further discussed below.

In essence, staff finds that additional modification to the site plan, grading, and building mass and scale in specific locations of the site is necessary for the project to be found consistent with the Site and Use Review criteria. Following are specific comments that detail these remaining key issues. Additional comments will be provided regarding Transportation and the Wildland Urban Interface. Staff is happy to meet at your convenience to discuss revisions.

### II. CITY REQUIREMENTS

This section addresses issues that must be resolved prior to a project decision or items that will be required conditions of a project approval. Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Access/Circulation

Forthcoming. Comments will sent under separate cover the week of 5/8/17.

Building and Housing Codes, Elaine McLaughlin, 303-441-4130

As noted in the city's zoning code [section 10-8.5.2, B.R.C. 1981](#), The 2012 edition of the *International Wildland-Urban Interface Code* of the International Code Council is adopted by reference as the City of Boulder Wildland Code. The applicant must demonstrate how the project plans will comply with this code provision.

Site Design Elaine McLaughlin, 303-441-4130, Kalani Paho, 303-441-4248, Elizabeth Judd, 303-441-3138

1. In 1992, the City of Boulder adopted Ordinance no. 5476 that provides regulations of development on hillsides. Amendments to the BRC, 1981 were added to accomplish the following objectives:
  - a. Allow development of land to its fullest potential that is consistent with the policies of the BVCP (in that regard refer to the BVCP policies below in comment #2).
  - b. Assure densities that are compatible with the natural terrain and geology of hillside areas
  - c. Minimize water runoff and soil erosion problems
  - d. Preserve significant natural features of hillside areas
  - e. Preserve scenic qualities of the community
  - f. Minimize the dangers to life and property from natural disasters, fires and other emergencies
  - g. Assure that the taxpayers of Boulder are not burdened by the extraordinary cost of services attributable to the development of hillsides.

Therefore, and as stated in the previous comments, a soils engineering and geological report prepared by a Colorado Licensed Professional Engineer shall be submitted. This is based on the fact that the proposed development is located within a geological development constraint area and has slopes greater than or equal to 15 percent. As stated previously, related to the steep grade, the site is located within a Geological Development Constraint area, specifically a Potential Mass Movement Hazard and Consolidation/ Swell Constraint area as well as a Swell Potential Constraint area. These designations are assigned to several areas in the city that are affected by geologic constraints such as unstable soils or steep slopes. Redevelopment of properties affected by these designations requires studies to demonstrate that such properties are safe for development.

2. Given the location of the site, the applicant must provide responses to the following BVCP policies and indicate how project plans avoid or mitigate the following considerations:

*3.16 Hazardous Areas Hazardous areas that present danger to life and property from flood, forest fire, steep slopes, erosion, unstable soil, subsidence or similar geological development constraints will be delineated, and development in such areas will be carefully controlled or prohibited.*

*3.17 Hillside Protection Hillside and ridge-line development will be carried out in a manner that, to the extent possible, avoids both negative environmental consequences to the immediate and surrounding area and the degrading of views and vistas from and of public areas.*

*3.18 Wildfire Protection and Management The city and county will require on-site and off-site measures to guard against the danger of fire in developments adjacent to natural lands and consistent with forest and grassland ecosystem management principles and practices. Recognizing that fire is a widely accepted means of managing ecosystems, the city and county will integrate ecosystem management principles with wildfire hazard mitigation planning and urban design.*

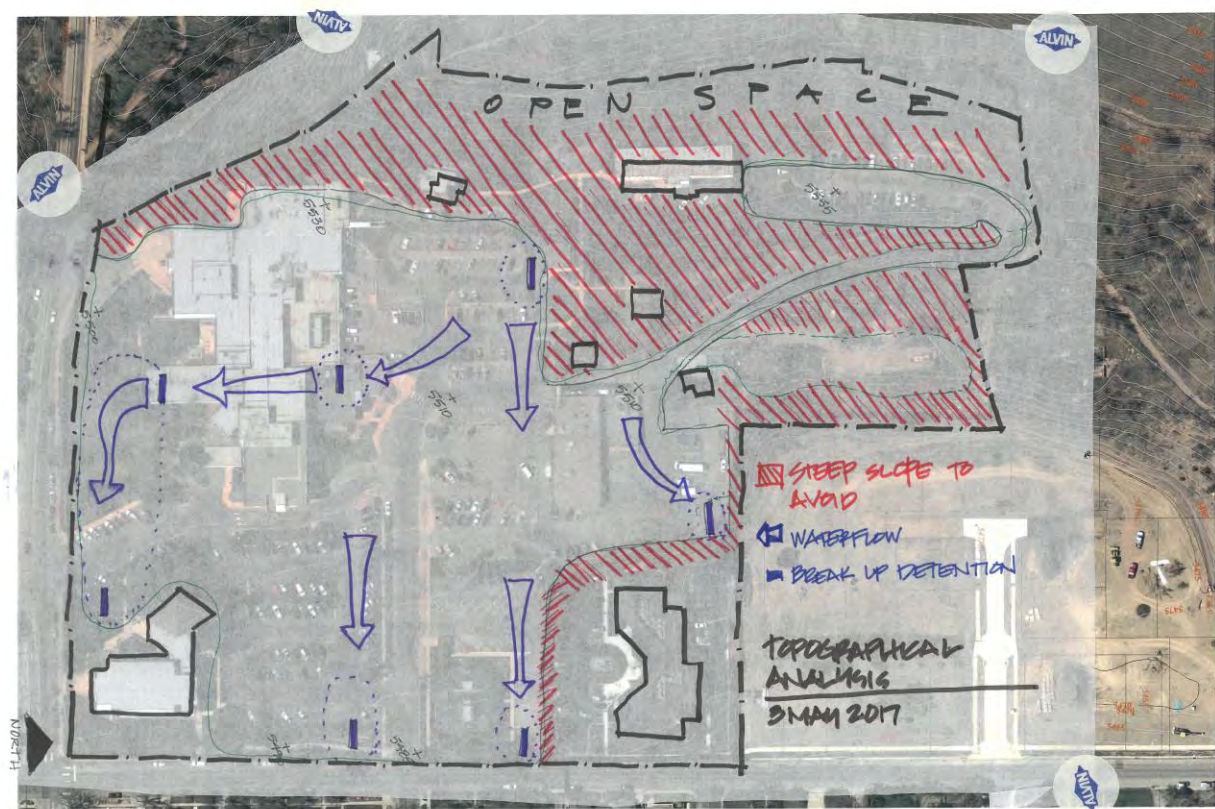
3. As previously noted, the site is at the interface of wildland and urban development. **The site's proposed roadways, as designed in a modified grid pattern, do have the potential to enhance access for fire mitigation purposes to the western edge of the site.** In addition, while construction techniques will be required at the time of building permit application that

demonstrate consistency with the city's adopted International Wildland Urban Interface Code, the applicant must additionally provide an emergency management plan for evacuation of residents in the event of a nearby wildfire.

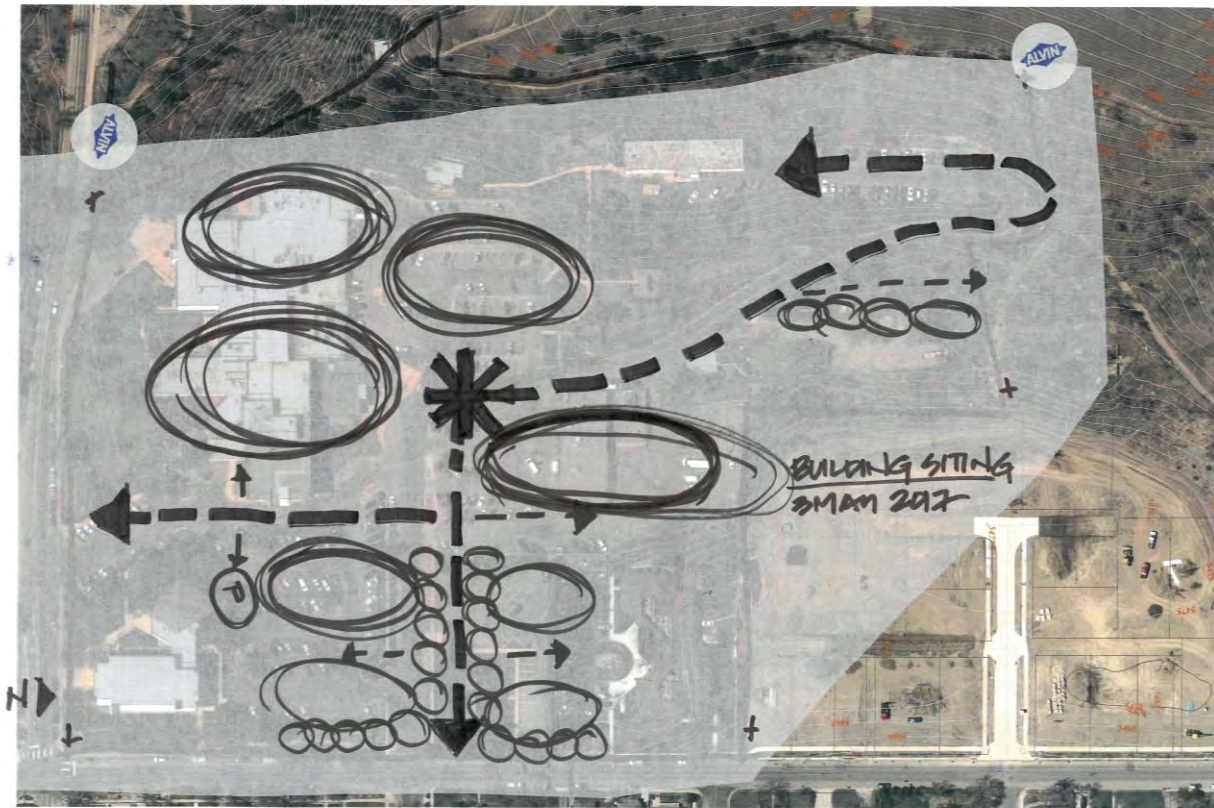
4. In general, staff notes that the amount of cut and fill on the site remains inconsistent with the site review criterion xiii as follows:

*Cut and fill are minimized on the site, the design of buildings conforms to the natural contours of the land, and the site design minimizes erosion, slope instability, landslide, mudflow or subsidence, and minimizes the potential threat to property caused by geological hazards.*

- a. There are areas of the site where the location of larger footprint buildings would be in keeping with the existing topographic setting, particularly in the center of the site, as was noted in the previous comments; with a building layout that is aligned with the topography, there is less intensive need for cut and fill. This could be said of the locations of Buildings B, C, D, F and G in that they are all located on areas that would require less cut and less fill, similarly, the cottages along 4<sup>th</sup> Street could be integrated into the topography. **Building A's northern wing does not fit the topography.** Below illustrates building siting, topographical, and character/mass/scale analysis that looks at existing conditions and topographic constraints, along with the drainage pattern on the site.







- b. The existing steep slopes surrounding the parking lots and cottages should be generally left as is to provide a transition zone to the western open space. In addition to re-massing and orienting the larger buildings on the site, consider leaving the cottages in their current location and creating a shared open space around them which would again minimize cut and fill. Numerous site review criteria point towards this solution including those within the Open Space and Building Design criteria:



*“(A) Open Space:*

*(iii) The project provides for the preservation of or mitigation of adverse impacts to natural features, including, without limitation, healthy long-lived trees, significant plant communities, ground and surface water, wetlands, riparian areas, drainage areas and species on the federal Endangered Species List, "Species of Special Concern in Boulder County" designated by Boulder County, or prairie dogs (*Cynomys ludovicianus*), which is a species of local concern, and their habitat;*

*(vi) The open space provides a buffer to protect sensitive environmental features and natural areas; and*

*(vii) If possible, open space is linked to an area- or city-wide system.*

*(F) Building Design, Livability and Relationship to the Existing or Proposed Surrounding Area:*

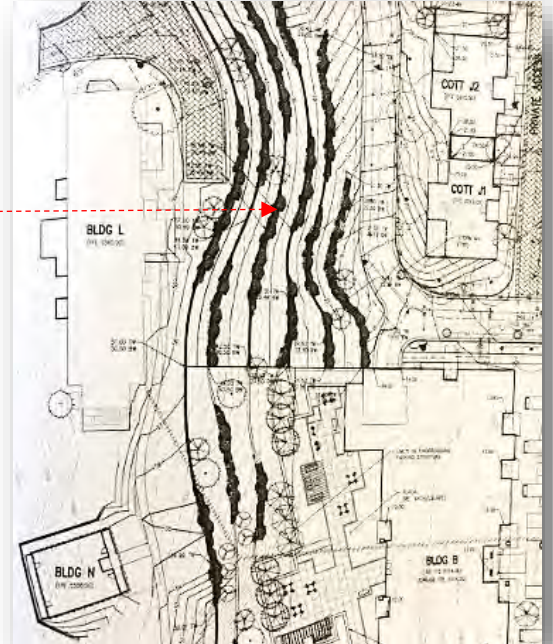
*(x) The project incorporates the natural environment into the design and avoids, minimizes or mitigates impacts to natural systems;*

- c. With a refined approach to building locations it is also possible to consider how drainage can better mimic historic patterns and reduce or eliminate the walls and deep ponds currently in the proposal. The site generally drains west to east with several low points that could accommodate shallow ponds. It is preferable to incorporate all ponds into the larger site design and utilize all possible green infrastructure techniques to reduce the need for deeper ponds. Consider pervious paving throughout the site and utilize rain gardens to reduce the depth and size of ponds. Note that while several low points are clearly adjacent to street, these need the greatest attention to meet site review criteria and ideally would not be immediately adjacent to sidewalks as is currently shown adjacent to Mapleton Avenue. A system of ponds is needed for each basin area to reduce any necessary ponds within setbacks. Refer to the following Site Review criterion:

*(C)(iv) The setbacks, yards and useable open space along public rights of way are landscaped to provide attractive streetscapes, to enhance architectural features and to contribute to the development of an attractive site plan.*

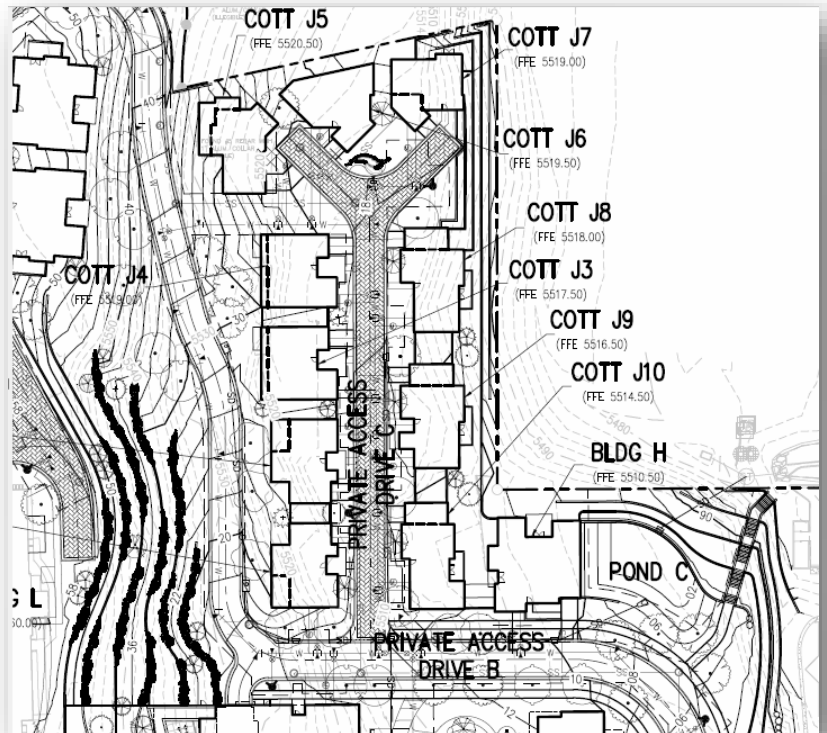
A deep structured pond in a setback (as shown adjacent to Mapleton Avenue in the plans) does not meet the criterion.

- d. With regard to cut and fill, concerns remain about the re-engineered access roadway at the base of the slope below Building L. **To achieve the number of units requested on the "plinth" area**, that existing roadway is shown to be pushed further into the hillside with a series of six retaining walls, some up to seven feet in height. While the plans indicate the use of boulders to create portions of the retaining walls, this would create a significant visual impact and one that would be inconsistent with the cut and fill Site Review criteria noted above. Site Design and grading must take cues from the existing landscape and topography in that, the existing hillside provides and roadway are adequate in this location.



- e. Also regarding the cut and fill criterion, the northern plateau (plinth) in which buildings J1 through J10 are currently illustrated also requires a significant amount of fill on the east side of this area, along with a series of four retaining walls, some also up to seven feet in height.

It appears as though the means to achieve the 10 buildings in this location is through significant cut on the slope to the west and filling the slope to the east. This would not meet the criterion regarding minimizing cut and fill on the site, nor do the design of these buildings conform to the natural contours of the land.





- f. As noted previously, a digital model is required for all applications requesting a height modification. During this stage, it should be simple representing topography, building footprint, massing and roof form, without being overly rendered at this point. A further developed model may be required to better illustrate how buildings will work with the grade on site and the streetscapes. Many of the comments from the neighbors as well as questions from staff arise because of uncertainty on how the massing of the many buildings across the site will appear from various angles, particularly along 4th.
- g. As requested previously, provide a perspective view from the Dakota Ridge Trail into the site, as it is another important public vantage point.



Building Design Elaine McLaughlin, 303-441-4130, Kalani Paho 303-441-4248

1. As noted previously, while the existing hospital building has a large footprint, the proposed plan includes a significant increase in the number of large footprint buildings across the western half of the site. Staff would find a single, main building similar in scale to the existing hospital, along with small to medium sized complimentary buildings and the proposed variety of small detached and attached homes more compatible to the context of the area. While the plans label Buildings A and B as separate structures these are ostensibly a single building with built connections between the **buildings and total building length over 600' running across the site abutting the hillside**. The oversized Building A combined with buildings C & E with footprints in **excess of 150' x 100' and 40' building heights does not meet the criteria** for compatibility of character and context. Reduce the amount of large footprint buildings and attenuate the overall massing and scale to an appropriate size considering the context.
2. The relocation of the rehabilitation facility along with the memory care facility to the lower area of the site, closer to 4<sup>th</sup> Street and Mapleton is a responsible revision. Staff recommends simpler building forms on the rehabilitation facility to more closely resemble the style of the historic Mapleton Hill district.
3. The row of Independent living cottages are attractive, yet in the interface with the historic Mapleton District, staff recommends reducing the footprint of the buildings to more closely resemble those directly across 4<sup>th</sup> Street. Similarly, staff recommends a meeting with the Design Advisory Board to provide input into refinements in the design of the

residences in this critical interface.

- Sheet A3.04 presents building height calculations. Per the land use code section 9-16-1, B.R.C. 1981, height is defined as follows:

*“Height means the vertical distance from the lowest point within twenty-five feet of the tallest side of the structure to the uppermost point of the roof. The lowest point shall be calculated using the natural grade. The tallest side shall be that side whose lowest exposed exterior point is lower in elevation than the lowest exposed exterior point on any other side of the building.”*

Note that for Building A, the applicant is illustrating three different low points. For each wing of Building A to be considered as a separate building with an internal connection, per 9-7-5(d)(1)(B), B.R.C. 1981; each wing must function as a separate building per the building code: Please provide details that demonstrate the wings of Building A will be constructed as separate buildings.

- Ordinance 8172 includes a provision to modify height based on the topography of a site within the maximum number of stories permitted per Section 9-7-1, B.R.C. 1981 (in the case of the “P” zoning district: three stories). Sheet A3.04 indicates low points for each building as superimposed onto the existing topography. However, for staff to determine if there are areas of slope greater than twenty degrees, with a different height calculation the applicant must provide a more detailed topographic base map with low points of each building to clearly demonstrate the low point in the context of the steep slope. As currently shown, it appears that there are several buildings that may be located on existing slopes that are greater than twenty degrees and thereby necessitating a different approach to measuring height (refer to section 9-7-5(a)(2), B.R.C. 1981).
- Regarding compliance with Ordinance 8172, note that under the definition of a “story” a basement is a story if any portion of the space included between the surface of the floor and the surface of the ceiling above it extends more than two feet above the natural grade around the perimeter. Given that the height modifications may only occur per ordinance 8172, there are areas of the “basement” or below grade parking structure that would qualify as a “story” and thus not be permitted as number of stories under this provision is not permitted.



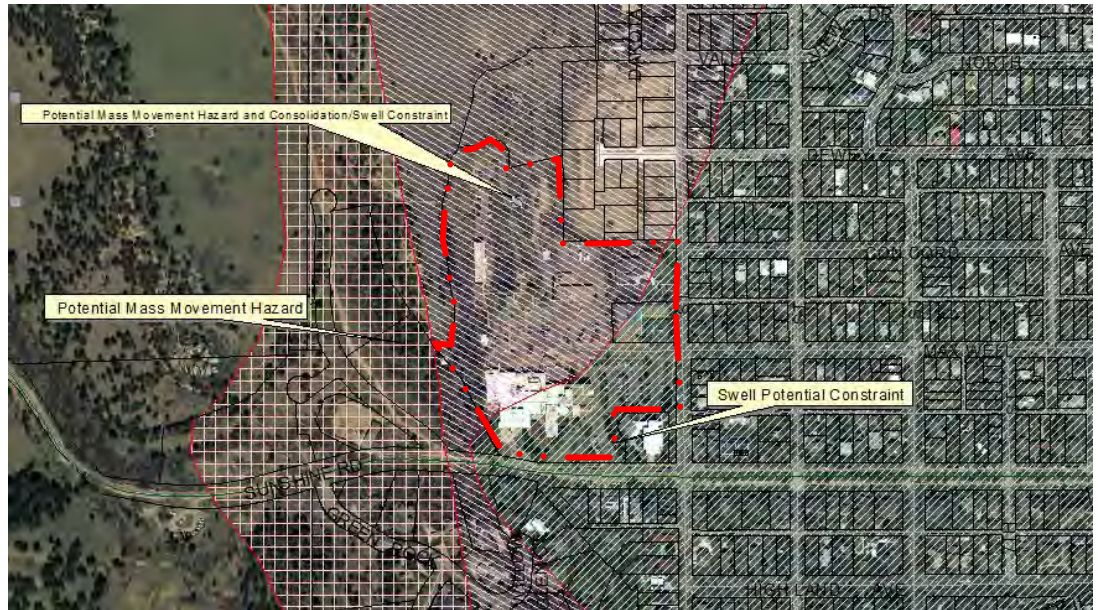
- Regarding Building A: as currently shown, the access into the parking structure along with the area considered a “podium” for the below grade parking (shown to extend above the grade) does not present a public street face to the building along Mapleton Avenue. The building should be redesigned at this critical corner to create greater pedestrian orientation.



Drainage Scott Kuhna, 303-441-4071

1. Per previous comments from city staff, per Section 7.03(B) of the City of Boulder *Design and Construction Standards (DCS)*, existing drainage problems (upstream and downstream) and groundwater conditions contributing to site runoff are required to be included in the Preliminary Storm Water Report (also see Open Space and Mountain Parks comments).

2. Per previous comments from city staff, this property is located in the Potential Mass Movement Hazard and Consolidation/Swell Constraint area of the city. The development on this site must be done in accordance with the Steep Slope Ordinance and Hillside Development Guidelines. A soils engineering and geological report prepared by a Colorado Registered Professional Engineer is required at this time (Site Review). Supplemental reports will also be required at time of building permit application to address specific design issues relating to foundations, retaining walls, and groundwater discharge.



3. Per previous comments from city staff, the plans show the outfall pipe of proposed detention/water quality Pond B discharging to a proposed sidewalk chase drain into the flowline of 4<sup>th</sup> Street, instead of connection to the proposed storm sewer line in 4<sup>th</sup> Street. Minor storm event discharge and nuisance flows (irrigation and snow melt from snow storage) need to be routed into the storm sewer, and not the gutter pan in 4<sup>th</sup> Street.
4. Per previous comments from city staff, the plans do not include emergency overflow release features for any of the proposed detention/water quality ponds. Of most concern is proposed detention/water quality Pond C considering the 20+ feet of retaining walls north and east of the pond. The applicant's response states **"additional design detail for the emergency overflow structures will be provided with the technical document review"**, but the locations of the emergency overflow's need to be shown on the plans at this time.
5. Per previous comments from city staff, all of the storm sewer on-site needs to be labeled private and all public storm sewer (4<sup>th</sup> Street, etc.) needs to be labeled public.
6. The plans show the retaining wall behind the outlet structure for Pond C to be up to 5.74 feet tall, where only 30-inches (2.5 feet) maximum is allowed per Section 7.12(D)(3) of the *DCS*.
7. The plans show what appear to be pavers near the cottages on the north end of the site, the cottages along 4<sup>th</sup> Street, near Building L, and in the drop-off area for Building A on top of public water and wastewater mains. Pavers may not be placed over existing or proposed public water or wastewater lines.

## Fees

Please note that 2017 development review fees include a \$131 hourly rate for reviewer services following the initial city response (these written comments). Please see the P&DS Questions and Answers brochure for more information about the hourly billing system.

Flood Control Alysha Geiger, 303-441-4053

1. Please show the limits of the high hazard and conveyance flood zones for this property on the site plan.
2. The property is located within the 100-year floodplain of Sunshine Canyon Creek. Buildings A, B, K, P, Annex A West, Annex A East and the parking garages under these structures are located in the 100-year floodplain. Since the buildings all appear to be structurally connected they are all considered to be in the 100-year floodplain requiring elevation of all levels, including the below grade parking structures to a minimum of two feet above the base flood elevation, where no base flood elevation is defined the lowest floor shall be two feet above the highest adjacent grade. The structures may be considered separated structures if they are able to meet the Building Code criteria for a separated structure including the required fire separation, structural independence, and separate utilities serve the structures. The design as proposed will prohibit the installation of the below grade parking structures under these buildings.
3. The City of Boulder has adopted floodplain regulations for critical and lodging facilities that impact this project. The regulations require critical facilities to develop an Emergency Management Plan that addresses activities and procedures for effective response from flood and disaster events when the site meets redevelopment criteria or by January 1, 2019. Information on the ordinance can be found on the City of Boulder website at [www.bouldercolorado.gov/flood/critical-facilities-lodging-facilities-ordinance](http://www.bouldercolorado.gov/flood/critical-facilities-lodging-facilities-ordinance).

Groundwater, Scott Kuhna, 303-441-4071

Per previous comments from city staff, groundwater is a concern in many areas of the City of Boulder. Please be advised that an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quantity and quality of the groundwater encountered on the site is required at this time (Site Review) to determine if treatment is necessary prior to discharge from the site. City and/or State permits are also required for the discharge of any groundwater to the public storm sewer system. **The applicant's response states "additional design detail will be provided with technical document review", but preliminary design is required at this time.**

## Irrigation Ditches

The city is interested in purchasing any interests in water or water rights associated with, or appurtenant to the Subject Property including any and all interests, be they contractual interests or otherwise, in the Silver Lake Ditch Company. Please contact Kim Hutton, Water Resources Specialist at 303-441-3115.

Historic Preservation, James Hewat, 303.441.3207

Historic preservation acknowledges the retention of the chimney stack in this revised proposal and finds the proposed common area around this feature to be appropriate. However, it is unclear what other features on the property are being proposed for landmark designation. Staff again recommends that the applicant submit landmark applications prior to Site Review of the proposal by the Planning and suggests a historic preservation plan be developed for the property as a whole. The plan should indicate the location of proposed boundaries of all landmarks including how the landmarks interface with changes in grade and adjacent new construction.

Historic preservation staff also acknowledges **the "cottages" have been revised to be** more in scale and compatible with the design of the east side of 4<sup>th</sup> Street. However, the houses still appear very close together and building C (**35'** high behind cottage r1-4) **is 22'** from the back walls. Consider providing more space between and around these houses more in keeping with properties in Mapleton Hill to create permeability and a provide a transition from single-family residential to the multi-unit housing envisioned for the site. As a suggestion, **the "architectural inspiration" for houses shown on A-3.01**, might be



employed to further refine and simplify the design of the cottages. To this end, materiality should be further simplified and use asphalt in lieu of metal roofing. It is unclear whether garage space is included in the square footages of the cottages.

Land Uses: Density, Elaine McLaughlin, 303-441-4130

1. The application submitted with the Use Review appears to be inaccurate as it states:

Project will consist of 79 Dwelling Unit Equivalents. Due to congregate care density bonuses we are requesting 131 Independent Living units with kitchens. Of these 131 dwelling units, proposal is taking advantage of the 3:1 density bonus on 95 units which is allowed to us by the congregate care density bonus code. Within the memory care building we have 10 dwelling units without kitchens at a 5:1 density bonus for a total of 2 additional for a total of 70 Dwelling unit equivalents within the congregate care use. The remaining 36 congregate care units count as 1:1. This is a total of 86 dwelling unit

Note that staff calculates the following Dwelling Unit Equivalencies per the land use code section 9-8-6, B.R.C., 1981 Please correct the application per the below table and revise in the application materials:

	Equivalency Standard	Number of rooms or units	Equivalency Conversion	Unit Count per Equivalency
Total Rooming Units (Buildings C and D)	5 rooms = 1 du	51	51 / 5=10.2	10
Independent Living Units (IL) < 1,200 sf (Buildings A and B)	3 units = 1 du	95	93 / 3=31.0	31
Independent Living Units (IL) > 1,200 sf (Buildings F, G, H, J1-10, L, M, N, O)	1 unit = 1 du	36	36 / 1=36.0	36
Totals	--	182	--	77

*Per Land Use Code section 1-1-22(a) "Rounding Rule" Unless otherwise specifically provided, if it is necessary under this code or any ordinance of the City to determine which whole number a computed fractional number represents, it shall be presumed to represent the lower.*

Land Use: Congregate Care Use Elaine McLaughlin, 303-441-4130

Refer to Criteria Analysis of Attachment A.

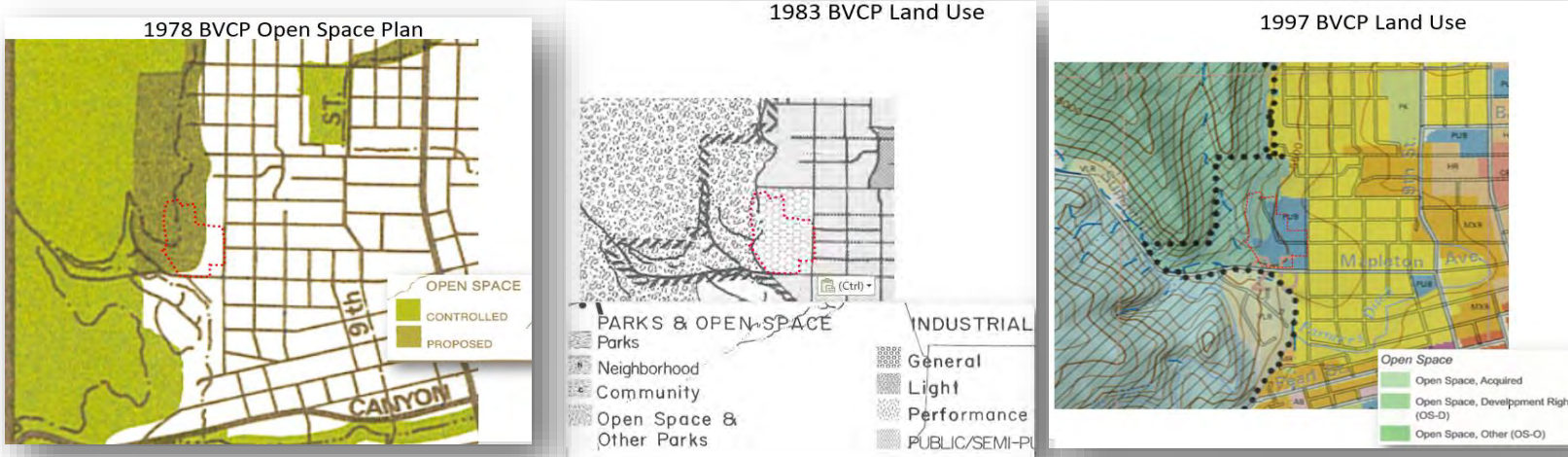
Land Use: BVCP Land Use Mapping Elaine McLaughlin, 303-441-4130

Staff must make findings of consistency with the following Site Review criterion. At this time, the findings are that the proposed project partially meets this criterion

*?? (A) The proposed site plan is consistent with the land use map and the service area map and, on balance, the policies of the Boulder Valley Comprehensive Plan.*

The current BVCP Land Use Map illustrates a portion of the site as "Open Space – Other" and in the previous review, staff noted that given the developed nature of the location of this "OS-O" designation (for nearly 80 years) the mapping likely was in error and that there is a process for correcting the error. Since that time, new questions arose from the Open Space Board of Trustees study session in January 2017, that prompted additional research. Staff looked at older BVCP Land Use and Open Space maps and found that the designation of this portion of the site as OS-O has been this way for a number of

years and iterations of the BVCP maps. While this is not consistent with the zoning, to make changes to the BVCP map regarding open space designations requires OSBT action on that change, as well as a request to change it through the five-year update process.



Landscaping Elizabeth Judd, 303-441-3138

While staff appreciates the efforts to respond to previous comments, fundamental issues remain with meeting the site review criteria related to site design and minimizing cut/fill. The necessary attention to a more balanced design approach is likely to result in significant changes. With the previous comments in mind, develop a landscape plan that responds to the new layout and incorporate the many positive aspects including, but not limited to, tree selection, native/bee friendly planting, detached sidewalks and overall quality of open space.

Legal Documents Julia Chase, City Attorney's Office, Ph. (303) 441-3020

1. The Applicant will be required to sign a Development Agreement, if approved. When staff requests, the Applicant shall provide the following:
  - a) an updated title commitment current within 30 days; and
  - b) Proof of authorization to bind on behalf of the owners.

Neighborhood Comments Elaine McLaughlin, 303-441-4130

Staff received a significant number of comments from neighbors, both indicating support and opposition for the proposed project. Those comments are found in Attachment 1, assembled in a 125 page document. Staff recommends that the applicant assemble responses in topic categories for these comment letters as many have similar issues and or comments.

Open Space and Mountain Park Bethany Collins 303-413-7646

1. Ecological Systems - **The landscape plan doesn't address any of the land along the western portion of the site**, including proposed maintenance/management of these areas in their natural state and/or restoration of the network of existing social trails to discourage trespassing onto the private site from the adjacent public lands. Please revise and/or comment. **During concept plan, applicant was asked to consider certain BVCP sections specifically related to the site's location on the western edge of the city, including the management of wildlife-human conflicts.** Please provide information on proposed management.
2. Visitor Experience/ Trails and Trailheads - The subject property has served as an access to city-owned lands managed as open space at least since acquisition of those lands by the city. Continuing access to these public lands would be of considerable benefit to the residents of and visitors to Boulder. The city is interested in providing continued access across the subject **property over the trail connection in the northwest corner and acknowledges the applicants' interest** and willingness to allow for continued access to Open Space and Mountain Parks (OSMP). This will be accomplished via a negotiated public trail easement or via fee acquisition (further detailed in the real estate section below). This trail connection will be managed and maintained by OSMP and will be subject to OSMP rules and regulations.

The proposal to construct a restroom available to the public, labeled as **"Building Q" on the site plans is unacceptable** considering future management of the trail connection vs. the private facilities, and utility infrastructure needs. Staff requests removing Building Q from the site plan or locating it southeast of the trail connection. Staff agrees with the applicant that if a restroom is built it will not be the maintenance responsibility of the City of Boulder. This facility will be **subject to the applicants' operating plan, including overnight closure and cannot be** located adjacent to a public trail where it will be mistaken for a publicly-managed facility/amenity.

3. Ditches and Water Rights - In addition to resolving the ownership and encroachment issues associated with the water storage tank/facility (see Real Estate section), Applicant will need to coordinate their proposed use of the facility utilizing their Silver Lake Ditch rights for storage and irrigation with the Silver Lake Ditch company and consistent with applicable regulations.
4. Scenic Resources - **The applicant has requested a variance from the 35' height limit. While staff appreciates the 3D renderings included in the revised submission, there is no "before" drawings to compare them too. Because of the importance of the Mt. Sanitas open space area as an iconic component of Boulder's mountain backdrop, and the level of investment by the city in the acquisition and management of the Mt. Sanitas, staff requests that the applicant provide a before and after visualization to accompany a scenic impact assessment of the site development that would allow for an objective analysis of the visual impacts of the proposed development upon the views to the west, especially the views of OSMP lands and major iconic features that may be obscured by the development.**
5. Facilities and Infrastructure - As the applicant has noted, there is a water storage facility spanning the property line between OSMP land and their private site. To-date, OSMP has performed all management and enforcement related to this facility and true ownership needs to be researched and the property line will need to be adjusted accordingly.
6. Real Estate - The applicant somewhat mistakenly states in their responses that it has never been the desire for the city to acquire this parcel of land. Most recently, during discussions regarding the public trail easement with the applicant, staff did express an interest in acquiring the northwestern corner of the property, including the trail corridor, in fee and we are still interested in doing so. City ownership would allow clearer management, maintenance and enforcement responsibilities of this trail area than a trail easement.

Rejecting the fee acquisition proposal, applicant has proposed dedication of a permanent public access easement for the Dakota Ridge Trail which is supported by staff. Staff believes for clarity the easement area must extend from the southern/eastern boundary of the trail to the northern/western property line of the site since this area will become the management, maintenance and enforcement authority of the City and would otherwise cut the remaining corner off from **the site's private management efforts.**

Especially under the above easement scenario, and as stated previously, the proposed restroom cannot be in an area that makes it appear to be a city-controlled amenity or an area that would require private access over the publicly maintained trail for required private maintenance/management/enforcement of the restroom facility.

The western property line generally follows the centerline of the Silver Lake Ditch and a couple of encroachment/management concerns exist as a result. As noted by applicant there is a water storage tank/cistern split by the property line that Applicant is claiming the right to use for irrigation, however this tank area has been fenced and managed by the City since its acquisition in 2001. Also, the stone bridge across the ditch poses management and enforcement issues if kept in its split ownership state and staff requests the entire bridge be under City ownership and management control. Staff proposes to do lot line adjustments to clean up these encroachment and management issues – water tank footprint to the applicant and the bridge to the City.

7. Other Parking and Access - **Applicant's revised site plan shows surface parking along its private streets and the "Operating Plan and Good Neighbor Policy" indicates the owners intend to provide public access to the streets,**



sidewalks and outdoor areas during daylight hours. Please confirm whether this includes opportunity for public parking.

Applicant states that they proposed providing public parking on the site during concept plan review and that it was not **received well. Staff's cursory review of the minutes and video from that meeting indicate there was concern regarding** the amount of surface parking and the site being over-parked, but no discussion/opposition specific to public parking. The site has long provided informal parking for people seeking to access the adjacent city-owned open space. With the development of the site in accordance with the site plan, these informal public parking opportunities on the site will be lost. In a situation where levels of use of open space are more likely to increase than decrease, a net loss in parking availability for the community on the site will likely result in increasing parking and associated traffic in nearby neighborhoods. The city continues to receive comments from community members expressing concern over this potential future.

Also, it was discussed that the access point from the private site onto the Dakota ridge trail would be open to the **residents and the public subject to the "Operating Plan."** Please make specific mention of that threshold and your intended access plan.

8. Other Hillside Development - **The city's codes and regulations specifically address hillside and steep slope development** to preserve hillside areas and minimize dangers associated with soil erosion and stability, water runoff and dangers to life and property from natural disasters and other emergencies. Staff has concerns that the proposed site design and cut and fill do not sufficiently mitigate these threats considering the vulnerable population. Applicant was asked to consider this section of the BVCP and provide additional information during concept plan review.
9. A portion of the site is designated as Open Space-Other Land Use under the Boulder Valley Comprehensive Plan. At the January 2017 Open Space Board of Trustees (OSBT) study session regarding this designation, a number of questions posed by trustees and members of the public, prompted additional research by planning staff who have determined this designation does not appear to be in error. Any proposed changes to a BVCP Land Use designation would need to be considered during the mid-term or 5-year update to the BVCP with recommendation by the Open Space Board of Trustees.

The OS-O designation generally indicates the land is desired for preservation for one or more open space purposes, however as noted most of this area has been developed for decades – somewhat conflicting with its designation - but also informally used by visitors to the Mt. Sanitas trail system for many years. This area is not currently prioritized for acquisition (except as stated above, but unrelated to the designation), nor included in any planning documents used by OSMP. The Mt. Sanitas Area is scheduled to undergo a focused planning effort in the coming years, after which OSMP staff will be better equipped to comment on the visitor use patterns and land and infrastructure needs in this area.

Solar Shadow Access Analysis Elaine McLaughlin, 303-441-4130

1. The solar access analysis is incomplete. Please provide an analysis consistent with the required methodology that includes specific lengths of shadows cast. Staff has provided an analysis spreadsheet to the applicant via email, and has attached it again herein for use as found **here**.
2. As currently proposed, the project plans appear to show a solar shadow encroachment. While staff highly recommends that the applicant review the comments herein, under Building and Site Design to remove any solar shadow encroachments on adjacent properties, if the applicant chooses to pursue an encroachment please file the following documentation that requires approval of the encroachment by adjacent (effected) property owners: [solar shadow encroachment](#).

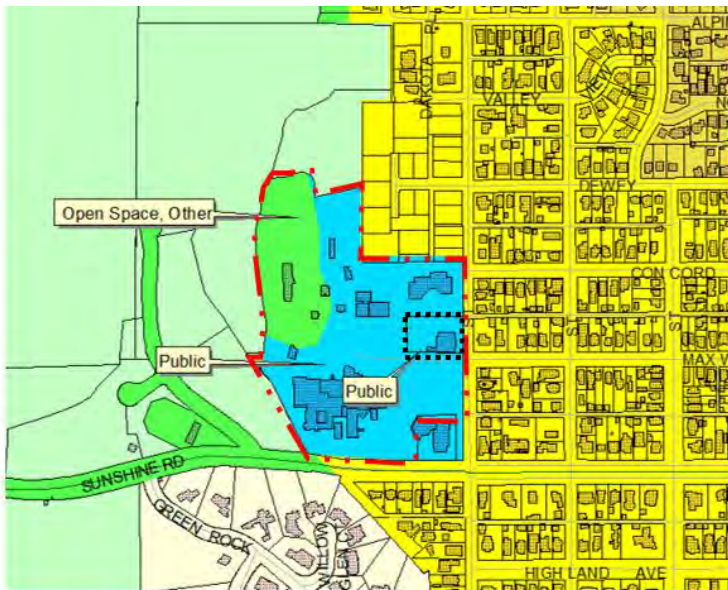
Utilities Scott Kuhna, 303-441-4071

1. Water meter vaults (approximately 9-feet x 12-feet) are required for water meters 3-inches or larger. Revisions to the plans are required for the water meters for some of the larger buildings.

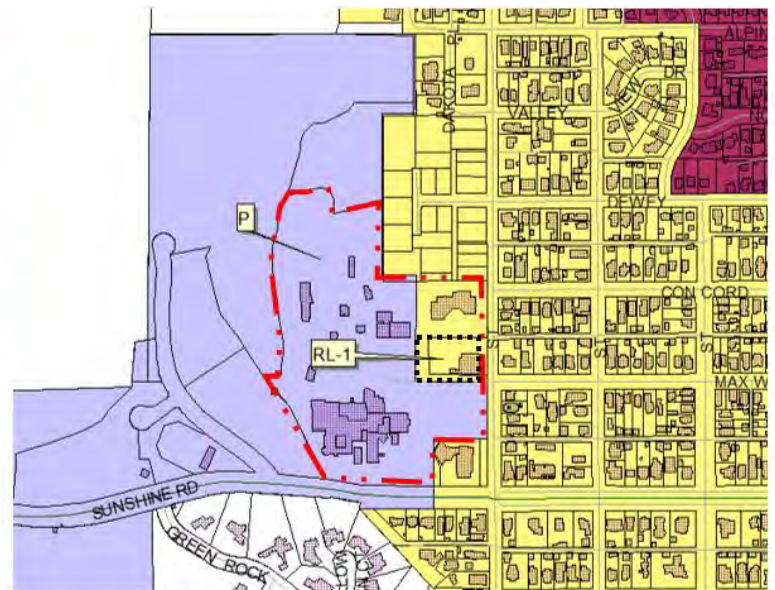
2. Minor redesign of the water main connection into Mapleton Avenue and re-alignment of the water main configuration near Cottage J10 is necessary. There may also be an opportunity to eliminate one or two of the connections to 4<sup>th</sup> Street. Please contact city staff regarding these changes and the water model.
3. **The applicant's written statement discusses the use of an existing** cistern fed by Silver Lake Ditch to be used from May to September, and city water (potable water) in the shoulder seasons when the ditch is not running. The two systems will be required to be separate to eliminate the possibility of cross-connection of the raw and potable water systems. Issues to be considered include, but are not limited to; marking of the **"raw water" system with purple pipe and sprinkler heads**, and posting signs for raw water irrigation.
4. The plans show a proposed storm sewer manhole and dead-end line south of Cottage R5. Clarification is needed.
5. Per city standards, trees shall to be located at least 10 feet away from existing or future utilities. The following utility lines (or trees) were identified as not meeting separation requirements.
  - Proposed trees (3) northwest of Building D – proposed private storm sewer
  - Proposed trees (6) north of Building B and Building G – Proposed wastewater main
  - Proposed trees (2) south of Cottage J10 – proposed private storm sewer
  - Proposed trees (2) west of Cottage J1 – proposed private storm sewer
  - Proposed tree northeast of Building L – proposed wastewater service line

Zoning Elaine McLaughlin, 303-441-4130

Regarding the request for a rezoning under LUR2017-00027, per the land use code section 9-2-19(e)(1), B.R.C. 1981, the applicant has demonstrated by clear and convincing evidence that the proposed rezoning is necessary to come into **compliance with the BVCP map**. As shown below, the Land Use Map illustrates "Public" land use and the current zoning illustrates RL-1 zoning.



Boulder Valley Comprehensive Land Use Map



City of Boulder Zoning Map

### III. INFORMATIONAL COMMENTS

This section addresses issues that are for the applicant's reference but are not required to be resolved prior to a project decision or as a condition of approval. Informational Comments Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's

department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Architectural Inspections, Jessica Andersen

Note that at the time of building permit inspections, architectural inspections will be performed as a part of the regular building permit inspection process to ensure high quality outcomes in new buildings and landscaping. **The “rough architecture” and the “final architecture” inspections for buildings approved as a part of a discretionary site or use review** will require that building architecture, materials and window details are consistent with details approved in discretionary review plans.

Drainage, Scott Kuhna, 303-441-4071

1. A Final Storm Water Report and Plan will be required as part of the Technical Document Review process. All plans and reports shall be prepared in accordance with the City of Boulder Design and Construction Standards (DCS).
2. Discharge of groundwater to the public storm sewer system may be necessary to accommodate construction and operation of the proposed development. City and/or State permits will be required for this discharge. The applicant is advised to contact the City of Boulder Storm Water Quality Office at 303-413-7350 regarding permit requirements. All applicable permits must be in place prior to building permit application. Additionally, special design considerations for the properties to handle groundwater discharge as part of the development may be necessary.
3. All inlet grates in proposed streets, alleys, parking lot travel lanes, bike paths, or sidewalks shall utilize a safety grate approved for bicycle traffic.
4. A construction stormwater discharge permit is required from the State of Colorado for projects disturbing greater than 1-acre. The applicant is advised to contact the Colorado Department of Public Health and Environment.
5. Page 7 of *The Academy at Mapleton Hill Preliminary Stormwater Report (Drainage Report)* states that **“Private streets will be designed to convey the 100-year storm event with any overtopping limited to elevations less than finished floor elevations of adjacent buildings or other occupied structures”**. **Calculations and cross sections are required to be included in the Final Report at time of Technical Document Review.**

Flood Control Alysha Geiger, 303-441-4053

The applicant shall dedicate a flood conveyance easement for that portion of the property which is in the conveyance zone of the 100-year flood zone of Sunshine Canyon Creek as depicted on the current floodplain maps. The easement dedication must be completed before or concurrently with Technical Document Review approval. No encroachments, including retaining walls or fences will be allowed in this easement, section [8-6-3](#) of the Boulder Revised Code, 1981.

Groundwater, Scott Kuhna, 303-441-4071

Groundwater is a concern in many areas of the city of Boulder. Please be advised that if it is encountered at this site, an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quality of the groundwater encountered on the site will be required to determine if treatment is necessary prior to discharge from the site. City and/or State permits are required for the discharge of any groundwater to the public storm sewer system.

Inclusionary Housing (IH) Michelle Allen 303-441-4076

Applicant has indicated that they intend to meet the inclusionary requirement with off-site affordable senior independent living units to be located at 1665 33rd St. Acceptance of off-site affordable units is dependent on the following factors:

- Approval of the off-site location;
- Successful completion of Site Review;
- Agreement on the number and details of the off-site units;



- Timing; concurrency with the development that created the requirement;
  - Provision of security to ensure performance;
  - Execution of required documents; and
  - Successful completion of all required inspections.
1. Affordable rental units required by IH must be owned all or in part by a Housing Authority or similar agency.
  2. Per 9-13 B.R.C., 1981, and associated regulations, permanently affordable off-site dwelling units must be proportionate in type (such as detached, attached or stacked units) and number of bedrooms to the sending site market rate units. Attached permanently affordable units must have an average floor area equal to at least 80 percent of the market-rate units however, this is a minimum size and larger units are encouraged.

Formatted for DRC comments				
IH Requirement				
Units	type	BR	Bath	Min. Size
0	studios	0	1	304
1	flats	1	1	498
3	flats	1	1.5	938
17	flats	2	2	1078
2	single fam	2	2	1200
2	single fam	3	2	1200
25	plus .8 CIL			

3. Permanently affordable dwelling units must be functionally equivalent to market rate units and must meet the **“Livability Standards for Permanently Affordable Housing.”** The Livability Standards have been updated recently, please download the most up to date version at <https://bouldercolorado.gov/housing/ih-program-details>.
4. The first step to propose affordable units off-site is to submit a Planning Pre-application for the proposed off-site location.
5. The process for approving off-site units can take several months and must be complete before a building permit is submitted. Details about the location review and additional information about off-site units may be found at: <https://bouldercolorado.gov/housing/ih-program-details>, see documents reference **“off-site”** on the right side bar.

Cash-in-lieu (CIL) Option

1. Cash-in-lieu remains an option until an off-site project is accepted up until the time of the first residential building submittal. The revised proposal includes 129 independent living congregate care units subject to inclusionary housing. Of these, 109 units are attached and 20 are detached cottages. Attached and detached units are assessed separately for CIL as follows:

<b>CASH-IN-LIEU CALCULATION - RENTAL</b>		<b>ATTACHED</b>
	<b>109</b>	Number of Market-Rate units
x	20%	IH requirement
	21.8	Required Affordable units
x	<b>\$ 149,760</b>	Cash-in-Lieu amount per Affordable unit
	<b>\$ 3,264,768</b>	<b>Cash in Lieu</b>

**CASH-IN-LIEU CALCULATION - RENTAL DETACHED**

		20	Number of Market-Rate units
x	20%		IH requirement
		4	Required Affordable units
C	x	<u>\$ 192,589</u>	Cash-in-Lieu amount per Affordable unit
		<b>\$770,356</b>	<b>Total Cash in Lieu</b>

Total estimated CIL is \$4,035,124. Please note that this is an estimate. Cash-in-lieu amounts are adjusted annually on the first of July and the amount in place when the payment is made will apply. Any applicable cash-in-lieu contribution must be made prior to receipt of a residential building permit.

Conversion of rental units to for-sale when IH met with a CIL contribution. The Inclusionary Housing ordinance requires that for-sale developments pay an additional 50 percent CIL premium in the event that they do not provide affordable units on-site. Accordingly, if you choose to convert the rental units to for-sale units within five years you will be required to pay the difference between the rental and for-sale CIL amounts. Rental developments that meet the inclusionary requirement with a **cash contribution are required to execute an "Agreement for Costs Due on Sale: Affordable Housing Restrictive Covenant and Deed Restriction" (aka Conversion Agreement) that will then be recorded with the county assessor. These documents will be sent to you for signature prior to permit issuance**

Irrigation Ditches, Scott Kuhna, 303-441-4071

The applicant is responsible for obtaining approvals for any relocations or modifications to irrigation ditches or laterals from the impacted ditch company. This includes the crossing of any irrigation ditch or lateral for vehicular or utility purposes and the release of stormwater runoff into any ditch or lateral. The applicant is advised that revisions to any approved city plans necessary to address ditch company requirements may require reapplication for city review and approval at the applicant's expense.

Miscellaneous, Scott Kuhna, 303-441-4071

1. The applicant is notified that any groundwater discharge to the storm sewer system will require both a state permit and a city agreement. The steps for obtaining the proper approvals are as follows:

Step 1 -- Identify applicable Colorado Discharge Permit System requirements for the site.

Step 2 -- Determine any history of site contamination (underground storage tanks, groundwater contamination, industrial activities, landfills, etc.) If there is contamination on the site or in the groundwater, water quality monitoring is required.

Step 3 -- Submit a written request to the city to use the municipal separate storm sewer system (MS4). This submittal should include a copy of the Colorado Department of Public Health and Environment (CDPHE) permit application. The written request should include the location, description of the discharge, and brief discussion of all discharge options (e.g., discharge to MS4, groundwater infiltration, off-site disposal, etc.) The request should be addressed to: City of Boulder, Stormwater Quality, 4049 75th St, Boulder, CO 80301 Fax: 303-413-7364

Step 4 -- The city's Stormwater Quality Office will respond with a DRAFT agreement, which will need to be submitted with the CDPHE permit application. CDPHE will not finalize the discharge permit without permission from the city to use the MS4.

Step 5 -- Submit a copy of the final discharge permit issued by CDPHE back to the City's Stormwater Quality Office so that the MS4 agreement can be finalized.

For further information regarding stormwater quality within the City of Boulder contact the City's Stormwater Quality Office at 303-413-7350. All applicable permits must be in place prior to building permit application.

2. No portion of any structure, including footings and eaves, may encroach into any public right-of-way or easement.

Utilities, Scott Kuhna, 303-441-4071

1. The applicant is advised that any proposed street trees along the property frontage may conflict with existing utilities, including without limitation: gas, electric, and telecommunications, within and adjacent to the development site. It is the **applicant's responsibility to resolve such conflicts with appropriate** methods conforming to the Boulder Revised Code 1981, the City of Boulder Design and Construction Standards, and any private/franchise utility specifications.
2. Final utility construction drawings will be required as part of the Technical Document Review process (which must be **completed prior to building permit application**). All existing and proposed "dry" utilities (Xcel, Comcast, Century Link, etc.) will also need to be included on the plans.
3. Maintenance of sand/oil interceptors and all private wastewater and storm sewer lines and structures shall remain the responsibility of the owner.
4. The landscape irrigation system requires a separate water service and meter. A separate water Plant Investment Fee must be paid at time of building permit. Service, meter and tap sizes will be required at time of building permit submittal.
5. The applicant is advised that at the time of building permit application the following requirements will apply:
  - a. The applicant will be required to provide accurate plumbing fixture count forms to determine if the proposed meters and services are adequate for the proposed use.
  - b. Water and wastewater Plant Investment Fees and service line sizing will be evaluated.
  - c. If the existing water and/or wastewater services are required to be abandoned and upsized, all new service taps to existing mains shall be made by city crews at the developer's expense. The water service must be excavated and turned off at the corporation stop, per city standards. The sewer service must be excavated and capped at the property line, per city standards.
  - d. Since the buildings will be sprinklered, the approved fire line plans must accompany the fire sprinkler service line connection permit application.
6. All water meters are to be placed in city right-of-way or a public utility easement, but meters are not to be placed in driveways, sidewalks or behind fences.
7. The applicant is notified that, though the city allows Xcel and Qwest to install their utilities in the public right-of-way, they generally require them to be located in easements on private property.
8. Floor drains internal to covered parking structures, that collect drainage from rain and ice drippings from parked cars or water used to wash-down internal floors, shall be connected to the wastewater service using appropriate grease and sediment traps.
9. Trees proposed to be planted shall be located at least 10 feet away from existing or future utility mains and services.



#### IV. NEXT STEPS

The applicant should review the comments in detail. As questions arise, please feel free to contact staff. In particular, it is recommended that the applicant meet with staff development review team members to strategize approaches to revisions to the project plans *prior* resubmittal. At the time of resubmittal, please provide six sets of full sized plans; two sets of revised documents; along with digital copies of all of the resubmitted plans and documents on a jump drive or a CD. These should be provided to a P&DS project specialists to check in, *prior* to the start of a three week review track – generally the first and third Monday of the month.

#### V. CITY CODE CRITERIA CHECKLIST

Refer to Use Review criteria checklist following; Site Review Criteria checklist will be provided upon a review of revisions.

#### VI. Conditions On Case

To be provided upon a review of revisions.

Attachment A: Comments Received Since January.

Use Review Criteria

No use review application will be approved unless the approving agency finds all of the following:

Yes (1) Consistency with Zoning and Non-Conformity: The use is consistent with the purpose of the zoning district as set forth in [Section 9-5-2\(c\)](#), "Zoning Districts Purposes," B.R.C. 1981, except in the case of a non-conforming use;

The purpose of the "Public" zoning as defined in section 9-5-2, B.R.C. 1981 is as follows:

**"Public areas in which public and semi-public facilities and uses are located, including without limitation, governmental and educational uses."**

There are a number of uses that are permitted either by-right or through a Use Review, within the Public zoning that **are part of the "including without limitation" standard that is noted above**. Among them are a variety of residential and non-residential uses. The use as a congregate care facility is consistent with the Public zoning density standards where densities are permitted of up to 6.2 dwelling units per acre. As currently shown, the 15.77-acre site could accommodate up to 97 dwelling units. As proposed, the project plans illustrate 77 dwelling units (given the density conversion factors permitted under 9-8-6, B.R.C. 1981).

Yes (2) Rationale: The use either:

\_\_\_\_\_ (A) Provides direct service or convenience to or reduces adverse impacts to the surrounding uses or neighborhood;

\_\_\_\_\_ (B) Provides a compatible transition between higher intensity and lower intensity uses;

Yes (C) Is necessary to foster a specific city policy, as expressed in the Boulder Valley Comprehensive Plan, including, without limitation, historic preservation, moderate income housing, residential and non-residential mixed uses in appropriate locations, and group living arrangements for special populations; or

There are specific city policies within the BVCP for group living arrangements for special populations, in this case, seniors who are both active and who require a greater level of care. The following policies are specific to senior residential uses:

7.03 Populations with Special Needs The city and county will encourage development of housing for populations with special needs including residences for people with disabilities, populations requiring group homes or other specialized facilities, and other vulnerable populations where appropriate. The location of such housing should be in proximity to shopping, medical services, schools, entertainment and public transportation. Every effort will be made to avoid concentration of these homes in one area.

7.09 Housing for a Full Range of Households The city and county will encourage preservation and development of housing attractive to current and future households, persons at all stages of life and to a variety of household configurations. This includes singles, couples, families with children and other dependents, extended families, non-traditional households and seniors.

\_\_\_\_\_ (D) Is an existing legal non-conforming use or a change thereto that is permitted under subsection (f) of this section;

?? 3) Compatibility: The location, size, design, and operating characteristics of the proposed development or change to an existing development are such that the use will be reasonably compatible with and have minimal negative impact on the use of nearby properties or for residential uses in industrial zoning districts, the proposed development reasonably mitigates the potential negative impacts from nearby properties;

*This criteria speaks not only to the “use” (in this case of Congregate Care) but of the “location, size, design” of the proposed use being reasonably compatible with and have minimal negative impact on the use of nearby properties...” In that regard, while a congregate care facility use could be compatible with residential uses and open space in that – in general – the use tends to have less single occupancy vehicle trips and noise can be less intensive than other uses, staff finds the current mass and scale on specific areas of the site would not be compatible in the context. To the east is the historic Mapleton Hill neighborhood; to the west is the Mount Sanitas Open Space; both of these areas are considered valued community resources. Because of the magnitude of the planned buildings on the site both visually and in terms of cut and fill on the site, the project as proposed does not yet meet this criterion.*





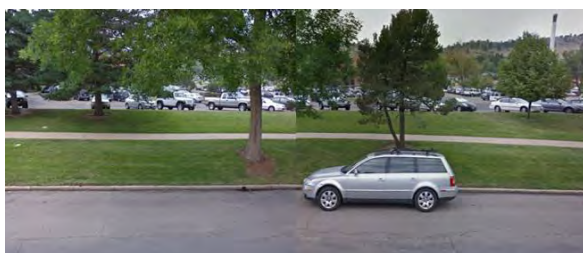
?? (4) Infrastructure: As compared to development permitted under [Section 9-6-1](#), "Schedule of Permitted Uses of Land," B.R.C. 1981, in the zone, or as compared to the existing level of impact of a non-conforming use, the proposed development will not significantly adversely affect the infrastructure of the surrounding area, including, without limitation, water, wastewater, and storm drainage utilities and streets;

*Infrastructure is provided to the site as has been the case with the hospital that previously occupied the site, the proposed development will not significant adversely affect the infrastructure of the surrounding area in terms of water and wastewater. However, greater information must be provided to determine if the storm drainage utilities (particularly with regard to the impacts to the existing groundwater conditions) and the impact of the construction traffic necessary, specifically truck trips due to excavations and removal of fill on the site would significantly adversely affect the surrounding streets.*

?? (5) Character of Area: *The use will not change the predominant character of the surrounding area or the character established by adopted design guidelines or plans for the area; and As noted in criterion (3) above, the site context is between two valued community resources: the Mount Sanitas Open Space and the Mapleton Hill Historic District. While it is acknowledged that the site has been developed for decades as a hospital site with large footprint buildings, the redevelopment starts with what is proposed rather than a comparison to what exists. The proposed plan would change the character of the area by increasing, in a significant manner, the perception of building mass, particularly as viewed from Mapleton Avenue with the newly proposed setback as shown below. Staff recommends redesign of this important interface with Mapleton Avenue, with the very large building mass along Mapleton that has a below grade parking structure entrance nearest the pedestrian, which would change the predominate character in this location.*



*While there are good transitional spaces on the 4<sup>th</sup> Street interface with the neighborhood, please refer to comments under "Historic Preservation" with regard to refinements for the interface with the Mapleton Hill Historic District.*



n/a (6) Conversion of Dwelling Units to Non-Residential Uses: There shall be a presumption against approving the conversion of dwelling units in the residential zoning districts set forth in [Subsection 9-5-2\(c\)\(1\)\(a\)](#), B.R.C. 1981, to non-residential uses that are allowed pursuant to a use review, or through the change of one non-conforming use to another non-conforming use. The presumption against such a conversion may be overcome by a finding that the use to be approved serves another compelling social, human services, governmental, or recreational need in the community including, without limitation, a use for a day care center, park, religious assembly, social service use, benevolent organization use, art or craft studio space, museum, or an educational use.

Not applicable.



CITY OF BOULDER  
Planning and Development Services

1739 Broadway, Third Floor • P.O. Box 791, Boulder, CO 80306-0791  
phone 303-441-1880 • fax 303-441-3241 • email [plandevlop@bouldercolorado.gov](mailto:plandevlop@bouldercolorado.gov)  
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CITY OF BOULDER  
LAND USE REVIEW RESULTS AND COMMENTS

DATE OF COMMENTS: August 29, 2016  
CASE MANAGER: Elaine McLaughlin  
PROJECT NAME: Academy on Mapleton Hill  
LOCATION: 311 MAPLETON AV  
COORDINATES: N04W08  
REVIEW TYPE: Site Review  
REVIEW NUMBER: LUR2016-00065  
APPLICANT: MICHAEL BOSMA  
DESCRIPTION: Application for a congregate care facility consisting of 147 dwelling units and 63 rooming units (a total of 211 units and potential for 300-325 residents along with 60-75 staff members at a maximum) and a total of 27 buildings where 10 buildings exist today. Intended as a full continuum of care including independent living, assisted living, short term rehabilitation and memory care.

IDENTIFIED MODIFICATIONS TO THE LAND USE REGULATIONS:

Section 9-7-1, Height  
Section 9-9-11, Parking Reduction 25% (280 spaces where 373 are standard) per Project Fact Sheet

I. REVIEW FINDINGS

The project plans appear to have responded to several of the Concept Plan Review comments as articulated by the Planning Board of November 5, 2015. However, there are a number of deficiency comments on the project plans necessitating additional information so that staff, community members and the Planning Board can best understand the proposal. Similarly, the comments herein include revisions to help bring the project into compliance with City Design and Construction Standards and the Site Review Criteria of the Land Use Code. Given the lack of detail provided on the site **plans for some of the site's design**, architecture, and engineering, the applicant should expect additional new comments **subsequent to staff's review of the** resubmittal. The project plans appear to have increased in intensity since the Concept Plan review. Comments throughout the letter point to the need for additional information to confirm the assumed increase in density and also question the overall size of the buildings and site grading intensity.

II. CITY REQUIREMENTS

This section addresses issues that must be resolved prior to a project decision or items that will be required conditions of a project approval. Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Access/Circulation, David Thompson, 303-441-4417

1. Please provide staff with supporting documentation to address the property boundary discrepancies between what **is shown on the site plans and the data the City has and what is shown on the Boulder County Assessor's website** along 4<sup>th</sup> Street, Mapleton Avenue, and Maxwell Avenue west of 4<sup>th</sup> Street. These discrepancies include:



- **The City and County's data shows the** site property includes a segment of the 4<sup>th</sup> Street from Maxwell Avenue south to Mapleton. If accurate, it would trigger a right-of-way dedication and potential public improvements along 4<sup>th</sup> Street pursuant to section 9-9-8 of the Boulder Revised Code.
  - **The City and County's data shows Maxwell Avenue west of 4<sup>th</sup> Street** to be a public street within sixty-feet of right-of-way that extends 288-feet west of 4<sup>th</sup> Street. If accurate, this would impact the **applicant's proposal to** reconstruct the road, the cross-section of the road and site design elements which encroach within the right-of-way.
  - **The City and County's data show a different property line at the** west end of the site along Mapleton Avenue where the applicant proposes to provide a curb-cut for a loading zone. If accurate, this would impact the driveway for the loading zone and the adjacent public improvements.
2. In accordance with Section 9-9-7 of the Boulder Revised Code, 1981, please update the site plans to show the appropriate sight triangles.
  3. Staff supports the six-foot wide detached sidewalk being shown along 4<sup>th</sup> Street; that said and in accordance with Section 9-9-8 of the Boulder Revised Code, 1981, please update the site plans to show the right-of-way to be dedicated in order to accommodate the detached sidewalk and landscape strip along 4<sup>th</sup> Street.
  4. Staff does not concur with the attached sidewalk being proposed along Mapleton Avenue west of 3<sup>rd</sup> Street **because it doesn't meet the City's roadway design** standards. As such, please revise the site plans to show a detached sidewalk west of 3<sup>rd</sup> Street and the dedication of right-of-way to accommodate the detached sidewalk and landscape strip **along the property's frontage with Mapleton Avenue.**
  5. Staff does not concur with the location of the curb-cut nor with the multiple curvature alignment of the driveway to **provide access to the site's loading zone from Mapleton Avenue. This is because the** new proposed location of the curb-cut eliminates existing on-street parking and the difficulty service vehicles will have in backing into the loading zone on a multi curvature alignment. Please revise the driveway to eliminate the reverse curves and demonstrate that any on-street parking being eliminated by the proposed curb-cut is being replaced along Mapleton Avenue.
  6. Staff does not support the reconstruction of Maxwell Avenue because it results in increasing the running slope of the sidewalk from approximately 5% to 8% which exceeds the maximum slope permitted for a sidewalk per the Guide to the Americans with Disabilities Act Accessibility Guidelines (ADAAG Manual).
  7. At time of resubmittal and in order to allow staff to review the proposal with respect to the site review criteria for circulation and emergency access as found in Section 9-2-14(h)(2)(D) of the Boulder Revised Code and Section **2.10 of the City's Design and Construction Standards (DCS)**, please include the following in the resubmittal of the site review package:
    - A narrative along with a supporting layout sheet which shows the pedestrian and bike circulation through the site and to the adjacent properties surrounding the site. The layout sheet must include sufficient detail for staff to determine that an appropriate connection is being made from the site to the adjacent sites. Sidewalk grades which exceed five percent must be shown on the layout sheet to include the limits of the non-standard running **slope and justified in the narrative for staff's** review and concurrence.
    - A narrative along with a supporting layout sheet which shows how emergency access will be achieved for each individual building on the site. The layout sheet must show the vehicle access routes, the turning radiuses at roadway curves and intersections, turnarounds, and where emergency access easements will be needed. The

need for variances must be requested and discussed in the narrative.

- A narrative along with supporting design information which show the proposed vertical profile of the internal roads and which design standards were used in the design of the horizontal and vertical layout of the internal roads. The vertical profile of the roadway must show the existing terrain / grades along with the proposed grades **for staff's review and concurrence.**
8. Pursuant to section 9-9-8 of the Boulder Revised Code and in order to ensure public access to the Church, please revise the site plans the show public right-of-way being dedicated on 3<sup>rd</sup> Street between Mapleton Avenue and Maxwell Avenue and on Maxwell Avenue from the terminus of the city owned right-of-way to the intersection of Maxwell Street and 3<sup>rd</sup> Street. The width of the roadway cross-section to be dedicated to the city shall be one-foot from the back of the sidewalk to one-foot from the back of the sidewalk on the other side of the two streets. Please **refer to Chapter 2 of the City's Design and Construction Standards (DCS)** for the right-of-way and design standards of local streets and specifically Table 2-1 for minimum spacing of access points from the intersection corner, Table 2-3 for the minimum right-of-way width, section 2.06 for the base (local) street standards and section 2.07 for street geometric design. The dedicated portions of the site must be removed from the overall lot area for the purposes of calculating density.
  9. Please revise the site plans to show the on-site bicycle parking meeting the criteria found in Section 9-9-6(g) of the **Boulder Revised Code or Section 2.11(E)(2) of the City's Design and Construction Standards. Specifically, the short-term bike parking must be inverted "u" racks and be located on the public access level within fifty feet of the building** as well as being dispersed among the different buildings on the site. Long-term bicycle parking must be provided for employees as well as residents and located around the site appropriately. In support of the project meeting the site review criteria for circulation a minimum of two long-term bicycle parking spaces must be provided for residential units without garages.
  10. Staff will provide review comments on the Traffic Study and TDM Plan to the applicant by Friday, September 2<sup>nd</sup>.

Building and Housing Codes Jim Gery 303-441-3129.

1. It appears that the requirements of IRC R302.1 are not met for the cottages specifically Cottage 1 and 2: no projections are permitted within two feet of the fire separation distance.
2. Please also see informational comments.

Building and Site Design Elaine McLaughlin, 303-441-4130, Kalani Paho, 303-441-4248

1. Staff anticipates a significant revision to the site and building design therefore individualized comments specific to each building and architectural detailing will be further considered upon resubmittal, redesign and complete drawing set.
2. Staff is recommending the application be reviewed by the Design Advisory Board once the resubmittal is reviewed by staff. **Please contact Kalani Paho at the above number to arrange timing on submittal materials for the board's discussion.**
3. Ensure that the elevations and the plans match. **There are a number of instances where they don't appear to match.**
4. Ensure that all sides of the buildings are represented in the elevations. **There's a number of missing elevations on the buildings.** All elevations should be in color. In addition, please double check the elevation labels and color correction on page A-6.04 as it appears to illustrate the building in different colors on different sides of same building.
5. Follow a direction protocol with the elevations for each building: i.e., West Elevation followed by North Elevation followed by East, followed by South as a person would view it when walking around the building.
6. The perspective sketches provided need to be true perspectives rather than two dimensional drawings stretched to create a vanishing point.

7. A digital model is required for all applications requesting a height modification. At this time it can be fairly simple representing topography, building footprint, massing and roof form, without being overly rendered at this point. A further developed model may be required to better illustrate how buildings will work with the grade on site and the streetscapes. Many of the comments from the neighbors as well as questions from staff arise because of uncertainty on how the massing of the many buildings across the site will appear from various angles, particularly along 4th.
8. Please provide color elevations for all sides of all buildings. There are missing elevations for western elevations on most buildings and more than one elevation missing on other buildings, e.g. buildings C, E, K. It was noted some floorplans do not accurately reflect the elevations or vice-versa, for example Building A plans indicate the below grade garage entry at either the southern and/or eastern side of the building but do not show the access in the elevation. Please review and correct all the elevations and plans for consistency.
9. Please key the building materials to the elevations and provide materials samples of all cladding materials, exterior finish materials and paint color chips. Please indicate the type and finish for all windows.
10. Please provide wall section details for typical windows and special or key architectural features to demonstrate constructability, e.g. pool structure fronting Mapleton Avenue materials and preliminary design, e.g. timber elements, finish of the exposed stem wall and window details.
11. Please scale the site section to match the site plan scale and revise the current site sections into building sections. Adjust or revise the sections include information from the edge of the main streets through major buildings extending through grade changes outside the property:
  - a. Adjust the provided section to cross through a relocated hillside cottage and then Building B - Village Green – Building F - the cottages along 4<sup>th</sup> Street.
  - b. Add an E-W site sections through the following:
    - i. Annex L – Building C – Building D – the existing Surgical Center
  - c. Add a N-S site section through the following:
    - i. Mapleton – Building A – Building F – Building G – Building D
12. Section 9-2-14 (2)(A) Site Design - Open Space criteria:
  - a. The site is adjacent to the Sanitas Trailhead and open space. The western half of the project has a significant increase in grade as it is located along the mountainside. The design of a buffer transitioning the built out portions of the site and sensitive environmental features appears to be impacted by both significant grading (cut and fill) and the extensive, retaining walls separating the areas.
  - b. Account for resident circulation through the site and connectivity between buildings and to external elements, e.g. Sanitas trailhead along Mapleton and the access from parking to Building L. Currently the design for circulation through the site does not account for the southwest corner and presents a pedestrian/vehicular conflict with the delivery service entry drive. In addition, the informal pathways should integrate well with the landscape areas and compliment the formal sidewalks.
  - c. Provide private open space for the detached residential units, and staff recommends private open space for the attached residential.
  - d. The site plan indicates a disproportionate amount of the usable, community open space on the higher elevations of the western half of the site in relationship to the amount of open space to the eastern half of the site. Usable, accessible open space for the residential buildings located at the eastern half of the site appear to be relegated to the porch or balconies only. To be consistent with the criteria please provide a balance of private and shared areas, and both active, open areas and passive, smaller areas.
  - e. Please accommodate or indicate on the site plan how the urban habitat corridors, for example pollinators, is integrated into the informal landscape areas and circulation.
  - f. The maintenance and vehicular drive to access the service area between Buildings C & E runs through the northern half of the Village Green open space and renders this sheltered area inhospitable and less than fully functional to the residents. Relocate facility maintenance, delivery and all other back of house functions to access from locations out of the primary views and park areas.
13. Section 9-2-14 (2)(F) Site Design - Building Design criteria:
  - a. Compatibility, Building Proportion, Layout and Orientation (i-iii):



- i. While the existing hospital building has a large footprint, the proposed plan includes a significant increase of several large footprint buildings across the western half of the site. Staff would find a single, main building similar in scale to the existing hospital, along with small to medium sized complimentary buildings and the proposed variety of small detached and attached homes more compatible to the context of the area. While the plans label Buildings A and B as separate structures these are ostensibly a single building with built connections between the buildings and total building **length over 600' running across the site abutting the hillside**. The oversized Building A combined with buildings C & E with footprints **in excess of 150' x 100' and 40'** building heights does not meet the criteria for compatibility of character and context. Reduce the amount of large footprint buildings and attenuate the overall massing and scale to an appropriate size considering the context.
  - ii. In addition, the overall heights and placement of the buildings up the slope are amassed in a way as to not reveal horizontal breaks and landscaped areas. Consequently, the overall development has a negative visual impact on the hillside.
  - iii. As proposed, the building massing and orientation may cast very long shadows onto adjacent properties and affect quality of the interior open space. Provide a solar-shading analysis at sunrise, midday and sunset for the Winter and Summer Solstices and Fall and Spring Equinoxes. (See additional requirements for solar analysis in the Plan Documents section)
  - iv. Similarly, regarding the relatively steep slopes along Maxwell Avenue, the location of Building 'C' – potentially open to the public, is much further into the site and accessible along the steeper portions of Maxwell Avenue. Therefore, staff recommends reconsidering the location of Building 'C' **such that it's** more accessible to the public. One consideration is to relocate Building 'C' use to the Building 'H' location and in closer proximity to the public access.
- b. Architectural Character and Context (iv):
- i. In respect to architectural style, while staff finds it appropriate to have select nods to the adjacent historic district or landmarks there are opportunities to transition to more contemporaneous designs on discrete buildings which is fitting of this time period. This would provide a transition to the contemporary style of some of the Trailhead residential homes to the north.
  - ii. The cottages fronting 4<sup>th</sup> street appear to be the same pattern, form and massing with small variations of the building skin (finish materials). The neighborhood context of the detached residential in the surrounding blocks indicates of large variation in size, form and finish. As such, design the cottages with a variety of mass, bulk and style.
  - iii. Building A - Currently the building needs a clearly articulated entry. The main entry feature is compromised by three competing entry points at Building A, B and the building connection oriented around the porte-cochere. As such this lack of hierarchy impacts the organizing logic for the façade of the building. Consequently, the building reads a bit chaotic in materiality and roof form.
  - iv. In general please revise the building designs by simplifying the assorted roof forms, material and color palette, and architectural bay language.
- c. Pedestrian Experience (v):
- i. Staff notes that at the center of the site the grading and slope of the sidewalks along Maxwell exceed accessibility standards. Given that residents of Congregate Care may experience impairment of mobility staff has concerns that the site access may not employ principles of universal design. The site should inherently be accessible to people with or without disabilities. Similarly, staff questions the walkability of steeper sidewalks. Please revise the design to reduce the running slope.
  - ii. The overall design as proposed does not provide adequate permeability through the site. Revise the design to increase connectivity and permeability.
- d. Natural Environment and Energy (x-xi):
- i. Demonstrate how the building(s) and/or campus design elements are mitigating impact to the natural environment through sustainable design practices, e.g. rooftop photovoltaic, floor plate depths for adequate interior space daylighting, electric vehicle charging stations, high-efficiency mechanical

- systems, automated lighting system controls, and/or improved energy performance of the building envelope, etc.
- ii. Consider developing an energy district for the site.
  - e. Natural Land Contours (xiii):
    - i. As indicated in the plans, there is significant amount of grading and cut-and-fill on the site. This is **especially relevant in the western half of the property with combined retaining walls in excess of 21' in** in some instances. Staff finds the grading required to accommodate the large footprint buildings in this area of the site to be inconsistent with designing the building(s) to conform to the natural contours. Revise the building size and placement to create perceivable horizontal separation between the buildings up the slope.

Drainage Scott Kuhna, 303-441-4071

1. Per Section 7.03(B) of the *DCS*, existing drainage problems (upstream and downstream) and groundwater conditions contributing to site runoff are required to be included in the Preliminary Storm Water Report (also see Open Space and Mountain Parks comments). Additionally, the report shall include proposed runoff conditions following development for downstream properties and systems, such as streets, utilities, existing structures and developments, from the project site to the receiving major drainageway (Goose Creek).
2. This property is located in the Potential Mass Movement Hazard and Consolidation/Swell Constraint area of the city. The development on this site must be done in accordance with the Steep Slope Ordinance and Hillside Development Guidelines. A soils engineering and geological report prepared by a Colorado Registered Professional Engineer is required at this time (Site Review). Supplemental reports will also be required at time of building permit application to address specific design issues relating to foundations, retaining walls, and groundwater discharge.
3. It is not clear on the plans or in *The Academy at Mapleton Hill Preliminary Stormwater Report (Drainage Report)* how runoff from the major storm event (100-year) will be conveyed into the proposed detention/water quality ponds. The storm sewer inlets and lines are designed only for the minor storm event (5-year), so the major event flowing in the private streets will bypass the inlets and continue off-site into Mapleton Avenue and 4<sup>th</sup> Street. Revisions to the plans and *Drainage Report* are required.
4. Page 7 of the *Drainage Report* states that **"Private streets will be designed to convey the 100-year storm event with any overtopping limited to elevations less than finished floor elevations of adjacent buildings or other occupied structures"**, but not calculations or cross sections are included. Revise the *Drainage Report* accordingly.
5. The plans show the outfall pipe of proposed detention/water quality Pond B discharging to a proposed sidewalk chase drain into the flowline of 4<sup>th</sup> Street, instead of connection to the proposed storm sewer line in 4<sup>th</sup> Street. Revise the plans. Revise the plans to show connection to the proposed storm sewer in 4<sup>th</sup> Street.
6. No outfall structure, pipe, etc. is shown for proposed detention/water quality Pond A. Sheet FIG 2.0 in the *Drainage Report* contains the note **"Detention/WQ basin outlet discharges to Mapleton Ave R.O.W."** There is an existing storm sewer inlet on the north side of Mapleton Avenue (not shown on the plans) that should be used for the outfall connection.
7. Page 2 of the *Drainage Report* states that permeable pavers will be used on site, but no permeable pavers are labeled on the engineering drawings. Permeable pavers may not be placed over existing or proposed public water or wastewater lines.
8. Based on the proposed contours areas of runoff near Building K and Building A-West (approximately one acre) will not be conveyed to proposed detention/water quality Pond A, but the drainage basin boundary line includes this area. Revise accordingly.

9. **The drainage basin boundary line of Basin C includes a portion of "3<sup>rd</sup> Street" northeast of Building G being conveyed to proposed detention/water quality Pond C, which cannot occur based on the proposed contours. Revise as necessary.**
10. The plans do not include emergency overflow release features for any of the proposed detention/water quality ponds. Of most concern is proposed detention/water quality Pond C considering the 20+ feet of retaining walls north and east of the pond. Revisions are required.
11. The plans show connection of a proposed storm sewer line in 4<sup>th</sup> Street to a storm sewer inlet that was abandoned and relocated as part of the Trailhead Subdivision project. Additionally, a capacity analysis of the downstream storm sewer system is required for the proposed connection. Revise the plans and *Drainage Report* accordingly.
12. The plans and *Drainage Report* show a proposed underground Water Quality Treatment Device for the cottages along 4<sup>th</sup> Street instead of providing surface grade water quality treatment. Clarification is necessary.
13. All of the storm sewer on-site needs to be labeled private and all public storm sewer (4<sup>th</sup> Street, etc.) needs to be labeled public.

Flood Control, Jessica Stevens, 303-441-3121

Please include the boundary of the 100-year and 500-year floodplains of Sunshine Canyon Creek on the Site Plan upon resubmittal.

Fees

Please note that 2016 development review fees include a \$131 hourly rate for reviewer services following the initial city response (these written comments). Please see the P&DS Questions and Answers brochure for more information about the hourly billing system.

Fire Protection

1. The site is located in an area considered the Wildland Urban Interface. As such the city provides guidelines for development within this area found [here](#).
2. Refer to Access and Circulation comments with regard to emergency vehicle access.

Groundwater, Scott Kuhna, 303-441-4071

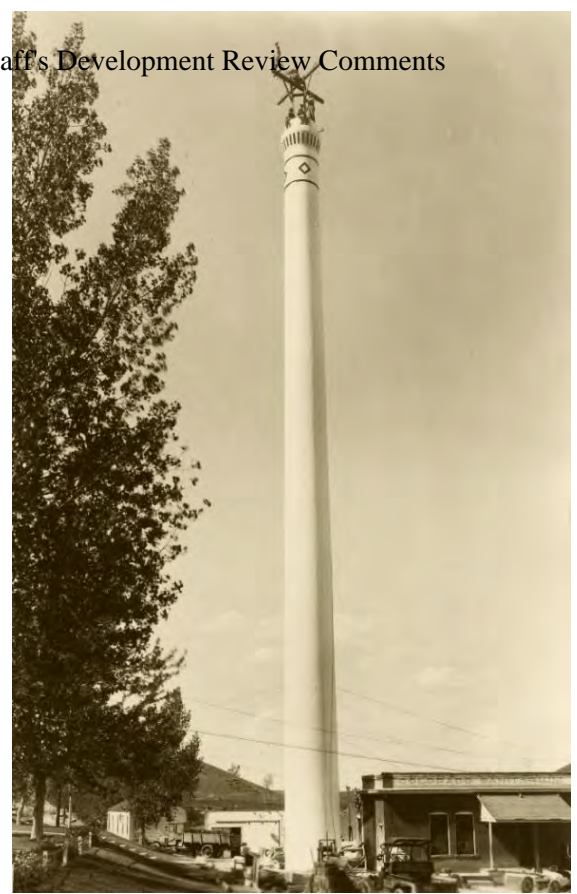
Groundwater is a concern in many areas of the City of Boulder. Please be advised that an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quality of the groundwater encountered on the site is required at this time (Site Review) to determine if treatment is necessary prior to discharge from the site. City and/or State permits are also required for the discharge of any groundwater to the public storm sewer system.

Historic Preservation James Hewat, 303-441-3207

1. As noted during Concept Plan review, staff acknowledges the detailed research the applicant has undertaken on the history of the property, tracing its evolution from sanatorium to a modern twentieth century medical facility and detailing the resulting change to the character of the property. However, staff is of the opinion that several of the buildings and structures on the property including the smokestack, the stone wall, cottages A & D, and the nurses dormitory are all eligible for landmark designation and should be appropriately preserved. The smokestack is an important and iconic feature of the property intrinsic to the history of sanatorium/hospital facility. Likewise, the cottages, nurses dormitory and stone wall are all important historic features and worthy of historic preservation. Staff does not encourage the relocation of any of these resources, but rather recommends sensitive design with them situ as a first approach.



2. **Historic preservation staff appreciates the applicant's collaborative approach to assessing the historic resources at the Mapleton Hospital site.** As noted during Concept Plan review comments staff is of the opinion that several of the buildings and structures on the property including the smokestack, the stone wall, cottages A & D, and the nurses dormitory are all eligible for landmark designation and should be appropriately preserved.
  
3. The smokestack is arguably, the most important and iconic feature of the property intrinsic to the history of sanatorium/hospital facility. In addition to being eligible for local landmark designation, staff considers that the smokestack is likely eligible listing in the National Register of Historic Places. There are numerous examples of such smokestacks being designated and integrated into redevelopment projects including, the Ohio-Colorado Smelting and refining Company Smokestack in Salida, Colorado, the Lucky Strike Smoke Stack in Richmond, Virginia, the Don Valley Brickworks in Toronto, Ontario and the Inujima Seirenscho Art Museum, Japan (images below).



**Quarry Market**  
San Antonio, TX  
**Designation: No**  
This popular shopping mall was originally the location of the Alamo Concrete plant. When demolishing most of the plant, the developer decided to stabilize and restore the old plant's five smokestacks, which have since become a powerful symbol for the shopping center.

Source: <http://www.realestate.com/case-studies/elsemo-quarry-market-development/>



**Savonnerie Heymans**  
Brussels, Belgium  
**Designation: No**  
MDW Architecture opted to retain many of the industrial features of this former soap factory complex when converting it into social housing. Pictured above is an apartment block which was built around the plant's smokestack. It is used to ventilate the apartments' underground parking area.

Source: <http://inhabitat.com/former-soap-factory-cleaned-up-into-a-sustainable-housing-project-in-brussels/>



**Evergreen Brickworks**  
Toronto, Canada  
**Designation: No**  
Once the Don Valley Brickworks, the largest brick maker in Canada, this complex was converted into an educational campus focused on sustainability. Amongst the many industrial facilities retained is the smokestack, featured as the centerpiece of an outdoor gathering area.

Source: <http://www.era.ca/project/evergreen-brick-works/>



**Riverfront Condominiums**  
Nashville, TN  
**Designation: No**  
This creative condominium complex was built around the remnants of the Kerrigan Iron Works. The smokestack from the works has been wrapped with new construction, and integrated as the focal point of the new complex's central plaza.

Source: <http://preservationresearch.com/2009/10/adaptive-reuse-of-nashville-iron-works/>



**Inujima Seirenscho Art Museum**  
Inujima Island, Japan  
**Designation: National Heritage Site**  
This small isle in the Sea of Japan was occupied by a copper refinery built in 1909. It closed around 1920, and by 2008 only a few remnants remained. These, prominently including the smokestack, were included in a new art museum constructed on the site.

Source: [http://modernheritage.com.au/mhm/heritage\\_travel/inujima-seirenscho-art-museum/](http://modernheritage.com.au/mhm/heritage_travel/inujima-seirenscho-art-museum/)



**Ohio-Colorado Smelting and Refining Company Smokestack**  
Salida, CO  
**Designation: National Register**  
An imposing, 365' smokestack is one of the few remaining artifacts of the once thriving smelter at Salida, which closed in 1922. It has been placed on the National Register of Historic Places as "a highly visible monument to the industry of mining, an industry vital to the settlement of Colorado."

Source: <http://imgallery.nps.gov/nrhp/assetDetail?assetID=9c38bf19-2838-4aaf-a490-f994b008a1d>



**Pioneer Mill Smoke Stack**  
Maui, HI  
**Designation: Local Landmark**  
This 1928 smoke stack was under threat of demolition when the rest of the sugar mill it once served was demolished around 2005. Local preservation groups stepped up to lease the stack, and spent around \$600,000 to stabilize and restore the local landmark. It is now the nexus of an interpretive history plaza.

Source: <http://historichawaii.org/2014/03/03/pioneer-mill-smoke-stack-2005-saved/>



**Hamilton Stack**  
Stanwood, WA  
**Designation: No (Local Planned)**  
Stanwood is currently planning the construction of a new park on the point once occupied by an incineration plant. Plans call for the plant's smokestack to be integrated into the park landscaping as the focus of a paved plaza and sitting area.

Source: <http://www.ci.stanwood.wa.us/parksrec/page/hamilton-landing-park-future-park>



**Boiler House Ceres**  
Eindhoven, the Netherlands  
**Designation: No**  
Originally the campus boiler house for Eindhoven Technical University, this facility was heavily renovated into a chemistry lab. One element that was preserved relatively intact was the boiler house's brick smoke stack, standing as a reference to the facility's utilitarian past.

Source: <http://architectureweek2.rising.com/browser.php?indx=845521&ast=1&item=15>



**Lucky Strike Smoke Stack**  
Richmond, Virginia  
**Designation: National Historic District**  
The American Tobacco Company complex was a series of several large tobacco product factories located in a row along the James River. After its closure, it was converted into the River Lofts, a high-end residential complex. The industrial feel of the site was maintained, including the Lucky Strike smoke stack, a familiar visual landmark.

Source: <http://www.kbsqc.com/project/river-lofts-phase-ii/>

4. The cottages, nurses dormitory and stone wall are all important historic features and worthy of historic preservation. Staff does not encourage the relocation of any of these resources, but rather recommends sensitive design with them situ as a first approach.
5. The current proposal does not show a proposed landmark boundary (ies) for the described historic resources. Providing this information will assist in assessing how the resources will be protected in relation to their context. This is especially important given the amount of new construction being shown on the site and to this end a small district or site that encompasses the identified resources should be considered. To this end, staff recommends that the applicant submit a proposed boundary (or boundaries) proposed for landmark designation.
6. Staff requests that the applicant submit renderings of the proposed designated resources including the smokestack, nursing station, cottages to better understand how the proposed development (including new construction, regrading, retaining walls, etc.) will affect context of these resources. For example, the submitted plan shows substantial terracing of the embankment just **east of the nursing station and Building B shown to be located less than 30' from that building and 15' from the existing cottage.**
7. Because the property is located immediately adjacent to the Mapleton Hill Historic District, development will effect western edge of this important historic area. The applicant has made revisions to the buildings along 4<sup>th</sup> Street from **Concept Plan, but Historic Preservation staff considers that at approximately 3,000 sq. ft. the proposed "cottages" are** significantly larger and architecturally more articulated than the average historic house at the western edge of the Mapleton Historic to which the development will directly respond.

Staff suggests that these buildings be significantly reduced in mass and scale and that the front and side setbacks of the new buildings respond to the conditions of historic houses on 4<sup>th</sup> Street and western edge of the historic district. Likewise, staff considers that the architectural detailing of these buildings be simplified to be more closely reflect the modest character of the majority of historic houses along 4<sup>th</sup> Street. To this end, reducing the houses to one story and one and one-half story (reflecting the mass and scale of the area) would be to the benefit of the historic district. The **cottages at the "Academy" are a good example of how new residential architecture can respond to the historic** character of the area. Historic preservation staff also requests that a context map of the area showing the boundary of the Mapleton Hill Historic District be included in revised submittal materials in addition to the proposed landmark boundary(ies).

Irrigation Ditches The city is interested in purchasing any interests in water or water rights associated with, or appurtenant to the Subject Property including any and all interests, be they contractual interests or otherwise, in the Silver Lake Ditch Company. Please contact Kim Hutton, Water Resources Specialist at 303-441-3115.

Land Uses Elaine McLaughlin, 303-441-4130

1. Regarding Building I: It is located within an RL-1 zoning district where **"Townhomes" and "Attached Dwelling Units" are** not permitted. Refer to the Zoning Map with the Site Plan superimposed to the right. Please clarify if the intent is to request a rezoning to **"P" to be consistent with the "Public" Land Use Designation where "Townhomes" and "Attached Dwelling Units" are permitted through a Use Review** or revise the project plans to illustrate detached residential in this location which is permitted by-right in the RL-1 zoning.
2. If only open to residents of the property, the Subacute Rehab Facility may be considered an accessory use to the congregate care use. Supplemental parking would not be required.

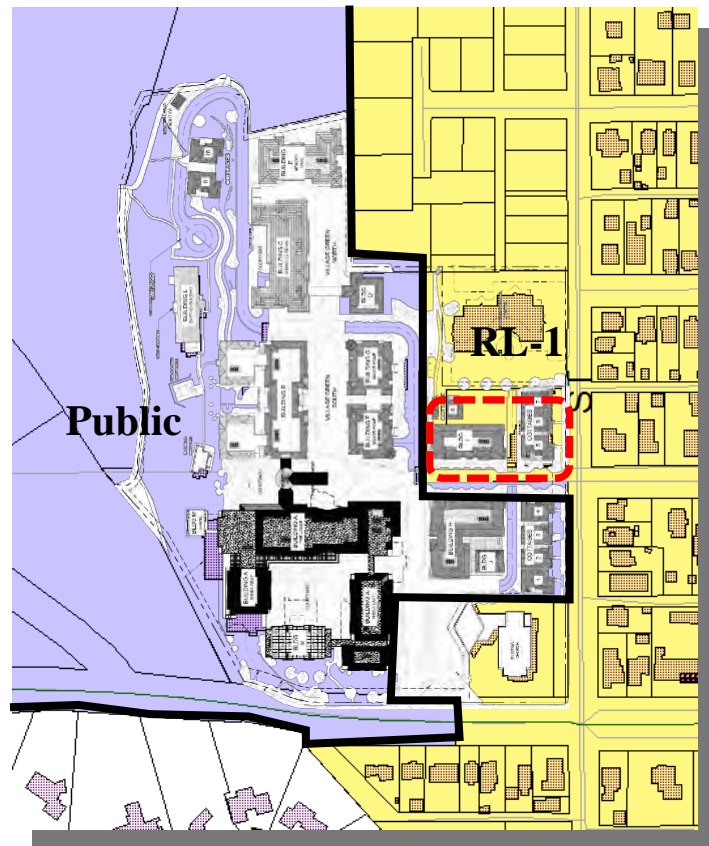
If open to the public, the applicant will need to provide detail about the operational characteristics of the use and how it **would align with the city's definition of hospital.** Per Section 9-19, B.R.C. 1981, Hospital is defined as:



*Any building or portion thereof licensed as a hospital by the Colorado Department of Public Health and Environment and used for diagnosis, treatment, surgery, and care of human ailments, including the usual and customary accessory uses and ancillary offices of a hospital.*

In addition, if open to the public, supplemental parking would be required to serve the use (1 space per 300 sf) and there will need to be a public access easement granted on the private roadways leading both to the Subacute Rehab Facility.

3. Buildings J and H and cottages 1,2,3 and 4 are shown to be located in the area of the existing parking lot serving the Seventh Day Adventist Church. Please explain in detail, what the intended shared parking agreement would be with the church once the site is redeveloped for below grade parking. How will the parking operate on a daily basis, how many spaces are earmarked for church use and specifically which days of the week and hours?
4. The site plan indicates a disproportionate amount of the usable, community open space on the higher elevations of the western half of the site. Usable, accessible open space for the residential buildings located at the eastern half of the site appear to be relegated to the porch or balconies. Staff would encourage the applicant to explore addressing the need for smaller, intimate and more accessible open space to the eastern half of site.
5. As stated during Concept Plan review, Congregate Care **Facilities located within the 'P' zoning district** require review and approval through a Use Review process. Therefore, please resubmit the application for Use Review at this time.
6. Similarly staff understands from conversations with the applicant that there is a desire to rezone the RL-1 portion of the site to Public. Please resubmit the application for rezoning at this time.



Land Uses Elaine McLaughlin, 303-441-4130

1. The Boulder Valley Comprehensive Plan policy 7.06 states, ***“The city and county, through their land use regulations and housing policies will encourage the private sector to provide and maintain a mixture of housing types with varied prices, sizes and densities to meet the housing needs of the full range of the Boulder Valley population.”***

Therefore, the applicant should indicate how the proposed project will meet this policy with regard to varied prices.

2. For staff, community members and the Planning Board to effectively evaluate comparative intensity of this proposal to other congregate care facilities in Boulder, please fill in the table below as highlighted.

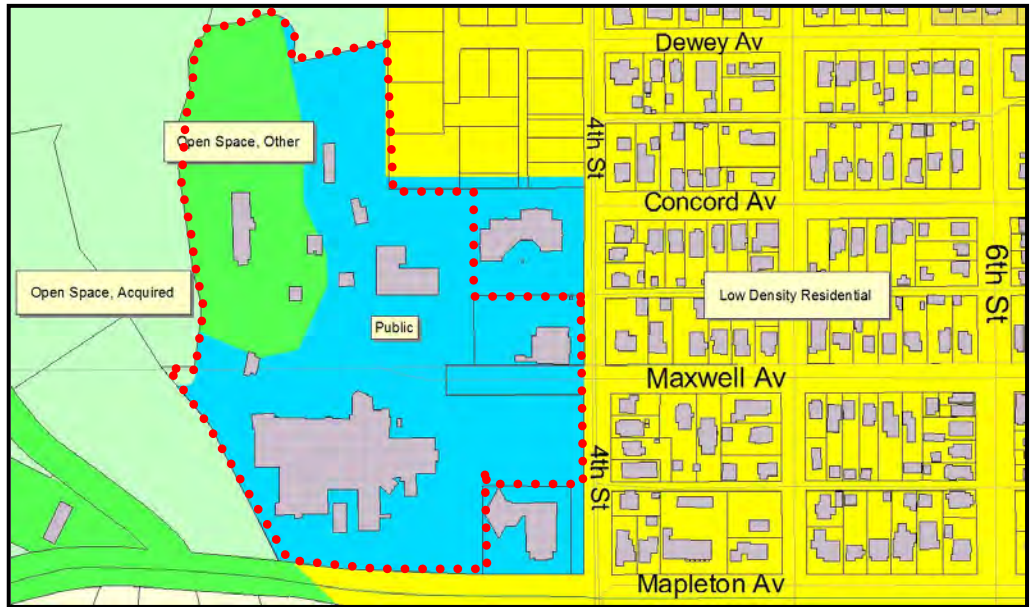
Table 1:  
Comparison of Land Use Intensity of Area Congregate Care Facilities to Proposed Project

Congregate Care Facility (with size of site /zoning)	Number of Units	Conversion Ratio	Dwelling Unit Equivalents Total	Maximum number of units per acre by right	Minimum Lot Area Per Dwelling Unit
<b>FRASIER MEADOWS (15 ac./ RH-5)</b>				27.2 du / ac	1,600 sf / du
Independent Living Units	208	3 : 1	69		
Assisted Living	32	5 : 1	5		
Skilled Nursing Units	<u>108</u>	5 : 1	<u>22</u>		
TOTAL units	348	--	96	459	15 acres = 653,400 sf lot area/ 96 units = 6,806 sf / du
<b>ACADEMY UNI HILL (3.65 ac./RL-1)</b>				6.2 du / ac	7,000 sf/du
Congregate Care	38	3 : 1	12.67		
Assisted Living	5	5 : 1	1		
Assisted Living - Temp. Support Units	2	0	0		
Single Family Bungalows	<u>9</u>	1	<u>9</u>		
TOTAL units	54	--	22.70	22.63	3.65 acres = 158,994 sf lot area/ 22.70 units = 7,004 sf / du
<b>MORNINGSTAR ASSISTED LIVING (4.9 ac/RM-3)</b>				12.4 du / ac	3,500 sf / du
Assisted Living/Congregate Care	47	5 : 1	9.4		
Memory Care	46	5 : 1	<u>9.2</u>		
TOTAL units	93	--	18.6	60.76	4.9 acres = 213,444 sf lot area/ 18.6 units = 11,475 sf / du
<b>PROPOSED ACADEMY MAPLETON HILL PROJECT (15.5 ac./P)</b>				no du / ac.	7,000 sf / du
Congregate Care (independent living without kitchens)	??	3 : 1	??	??	??
Assisted Living	??	5 : 1	??	??	??
Detached independent living with kitchens	??	1	??	??	??
TOTAL units	??	--	??	??	??

3. The Land Use Designation of Open Space – Other on the site, shown below, would need to be amended to allow the application to be consistent with the site review criteria which requires that the development is consistent with the land use map. Given that the area of the site labeled as OS-O has been developed for decades as the Nurses Dormitory, built in 1930, and with parking lots rather than open space, the location of the site where the OS-O designation is placed appears to be in error. The process to update the land use and correct the error, to be consistent with the zoning, can be processed through the BVCP update process. As a part of the process, the correction of the mapping will require referral to the Open Space Board of Trustees.



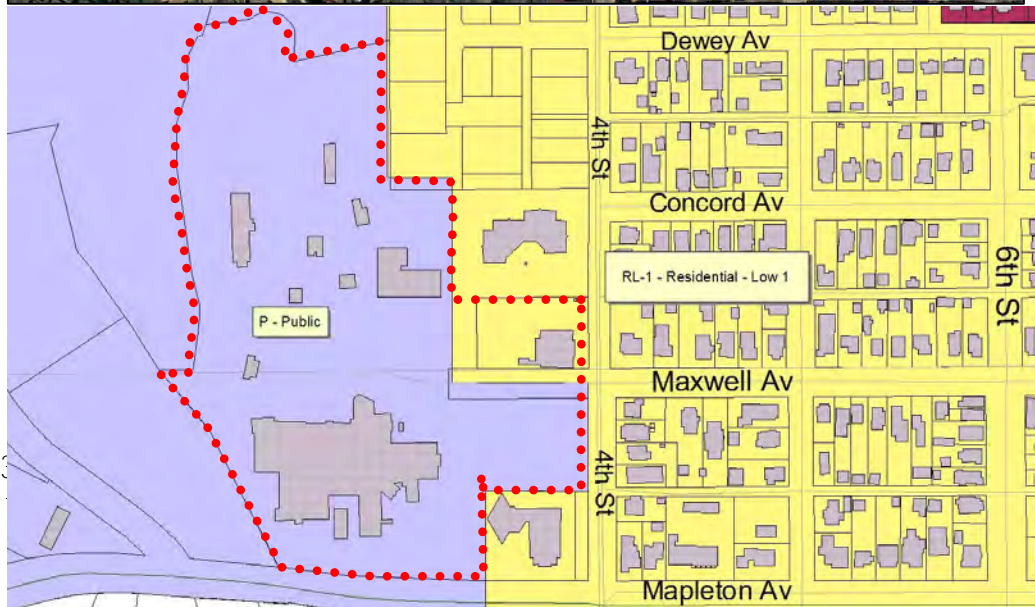
BVCP Land Use Map of the Site



Aerial Photo of Site with Open Space Designation Encircled



Zoning Map of the Site



Landscaping Elizabeth Lokocz, 3  
The project has many opportunities

Address: 311 MAPLETON AV

significant improvements to meet Site Review criteria. Staff appreciates the coordination work to date and encourages continued discussion and information sharing as the project progresses. Please respond to the following comments at the next submittal:

1. Over the course of the pre-app and concept plan, staff has commented on the internal and external street network. The following areas need revision to meet all site review and landscape standards. Please note, any standard not met must specifically be called out as a modification and present a balanced design proposal.

- a. The project correctly notes the code requirement for street trees on all streets, public or private, per section 9-9-13 (b) B.R.C. 1981. However, it does not reflect the base minimum requirement for eight-foot planting strips and detached sidewalks. While Site Review can modify this requirement, the project has many conflicts with the current reduced width and smaller trees specified. Every effort should be made to meet the requirement to produce long lived healthy trees. The width of the planting strip is directly related to soil volume and potential longevity. It is also important to note that the majority of streets and trees require relatively high canopies from the time of planting to avoid conflicts with adjacent sidewalks, parking, street overhang and sight triangles. Note that in all cases, if large maturing trees are not specified, the number of required trees increases based on size and typical spacing. In the event that specific and limited areas cannot meet the eight-foot requirement, the trees specified must still resolve current conflicts. This may result in specifying medium-large maturing trees in smaller (narrower) than typical planting strips.

As currently designed, the project does not clearly meet all site review criteria, specifically the criteria of section (C) Landscaping:

*(i) The project provides for aesthetic enhancement and a variety of plant and hard surface materials, and the selection of materials provides for a variety of colors and contrasts and the preservation or use of local native vegetation where appropriate;*

Additional information is needed on materials throughout the site with particular attention to the numerous walls. Begin to develop plan sheets illustrating materials, details, etc. and sample material boards. Final materials will need to be developed prior to Site Review approval. Overall variety of plants and use of native plants is excellent. Refine the plant list as the design develops. To successfully develop the pollinator approach, it is likely necessary to develop non-standard planting and mulch details. Staff will work with the applicant for a successful outcome.

*(ii) Landscape design attempts to avoid, minimize or mitigate impacts on and off site to important native species, healthy, long lived trees, plant communities of special concern, threatened and endangered species and habitat by integrating the existing natural environment into the project;*

While there are numerous existing trees on the site, many are not worthy of preservation based on species and conditions. Coordinate proposed utilities and grading with trees # 98, 99, and 27. Tree #138 does not appear to be on the subject property and is heavily impacted by the proposed grading plan. An exhibit illustrating the actual canopy and proposed grading impacts is needed. Removal of trees on adjacent property requires written approval from the property owner to be submitted for the application review and file.

*(iii) The project provides significant amounts of plant material sized in excess of the landscaping requirements of Sections 9-9-12, "Landscaping and Screening Standards," and 9-9-13, "Streetscape Design Standards," B.R.C. 1981;*

Staff agrees with the approach of looking at the site with typical minimum shrub and tree counts. However, per the summary table provided on sheet LP0.1 and comments below, staff concludes that the project does not meet street tree requirements. No excess is proposed for large or medium trees. Small trees are likely to change significantly after comments are incorporated. Per the plant schedule on sheet LP0.2, no size increases are proposed for any other plant material. While the design may not warrant size increases, additional detail is needed to understand if the intent of the criterion is met.

*(iv) The setbacks, yards and useable open space along public rights of way are landscaped to provide attractive streetscapes, to enhance architectural features and to contribute to the development of an attractive site plan.*

Numerous areas do not currently meet minimum streetscape standards. Site plan revision is needed and corresponding planting design. See comments below.

The pond currently in the Mapleton landscape setback shall be removed; site review criteria cannot be met under this proposed condition. Evaluate building footprint adjustments that removes the pond from the setback.

*Revise the following:*

- i. Replace the sidewalk on Mapleton with a detached walk as previously described. Large maturing trees and an eight-foot detachment are required.
  - ii. Specify only large maturing trees on 4<sup>th</sup> St. Evaluate adjusting utility service locations to better coordinate with street tree spacing.
  - iii. Revise the west side of 3<sup>rd</sup> street to meet the eight-foot detachment and large maturing trees. Reduce the planting area between the sidewalk and structure if no other alternative is feasible.
  - iv. All of the east side of 3<sup>rd</sup> street needs revision. Crimson Spire oak are not approved street trees. Some level of meaningful street tree planting is needed. At a minimum, create an opportunity at either side of the Maxwell intersection. Shift the northernmost large tree into the right of way strip. Break the continuous row of parallel parking with landscape islands (loosing parking spaces) or revise the building footprints. If loosing spaces is the preferred outcome, locate planting islands and trees between the buildings and north of cottage 8.
  - v. Adjust the sidewalk in the curve transition between Concord and 3<sup>rd</sup> to provide sufficient space for large maturing trees.
  - vi. Clarify the extent of Concord on the plan; it is unclear how 406 ft. is calculated. It is also unclear why additional trees are not proposed. Adjust the north side of Concord (in the east-west portion) to provide sufficient space for medium-large trees.
  - vii. On Maxwell, west of the alley, adjust the planting strips to meet the eight-foot width. Reduce the planting between the building and sidewalks if necessary. East of the alley, replace the specified trees with large maturing trees (north and south sides).
  - viii. Revise the Streetscape Summary table on sheet LP0.1 per the previous comments. Please add a column to the table that reflects any requested modifications and why they are being requested.
- b. Staff needs a better understanding of the alley treatment. It is not clear that eliminating required alley trees produces a high quality space. Evaluate alternatives that do not eliminate alley trees, or design the space such that alternatives substitute for trees; consider green screens, trellises, or other vertical elements. Evaluate whether the sidewalk is essential to the design.
2. Tree selections: While the plant schedule is extensive, please note the Limitations on Individual Tree Species Table (Table 3-2 in the Design and Construction Standards).
    - a. Staff encourages utilizing at least two distinct genus of tree on each block face to promote ecological resilience and prevent uniform disease susceptibility.
    - b. Limit the use of Maples and Lindens as street trees or within parking lot islands due to sunscald issues.
    - c. The two Hawthorn species selected have thorns and should not be used as street trees, especially adjacent to on-street parking, sidewalks or major pedestrian areas. They are great choices for the pollinator areas or large planting beds that will not create safety concerns for residents.
  3. The proposed grade change along 4<sup>th</sup> St. does not support the turf illustrated which will not be mowable. Consider the front yard water quality swale design at the Trailhead subdivision as a precedent as the front yards of the cottages are developed to integrate this site into the larger context of the neighborhood along 4<sup>th</sup> Street.
  4. Consider street trees along the circular entrance on Maxwell Avenue. This large expanse of pavement could benefit from the shade and pedestrian scale that street trees would provide.
  5. Open space: update the open space graphic to more accurately represent only those areas consistent with the different types of open space listed in section 9-9-11 B.R.C. 1981. Specifically:
    - a. Eliminate sidewalks or other areas of paving that have no decorative elements.
    - b. Separate open space in the right of way and provide its percentage.
    - c. Note that landscape areas that are less than two feet in width do not contribute; adjust the plan if needed.
    - d. Land area in excess of fifteen percent slope may only contribute if specifically approved through site review and must be clearly indicated on the plan.
  6. Plant List:
    - a. Please add columns to the Plant List for 1) Native/Non-Native Species, 2) Pollinator Species, 3) water usage

- b. Complete all tree quantities at the next submittal. Shrubs may continue to develop through the Site Review.
  - c. It may be helpful to break up the plant list into zones or identify some typical plant groupings for specific areas at the next submittal as the understory planting plan is developed and refined.
  - d. Per prior communication with staff, the plant list includes many of the pollinator plant species suggestions. Please refer back to the provided resources or contact staff with questions as the pollinator areas are developed and refined. Consider continuous bloom times, flower types and colors, and layering of plant types in the design of the pollinator and edge areas. Other landscape elements such as boulders, logs, stumps, etc. would offer additional pollinator habitat and interest as well.
  - e. Please note that staff will likely have additional comments after the next submittal including routing the plans to the City IPM Coordinator for review of the pollinator areas and plant list.
  - f. Staff recommends varying plant sizes and/or providing multiple sizes of some species. This is especially important within the pollinator garden areas or edges of the site that interface with the natural landscape.
7. Consider adding a wildflower mix to select seeded areas to increase plant diversity for pollinators around the site. Specify all seed mixes used on the project prior to final approval.
  8. Please accommodate urban habitat area(s), for example pollinators, and connection corridors.

#### Legal Documents

**It's possible the Avista Surgery Center site will be subject to the site review criteria because it's under the same ownership.** Staff will confirm this requirement with the applicant in the next two weeks.

#### Lot Layout

The cottages shown on the RL-1 site do not have legal lot configurations consistent with the RL-1 zoning. To establish the cottages as single family residential units, they must be shown on separate lots within the RL-1 zoning district and be subject to the Compatibility Standards of the [Land Use Code section 9-7-9, B.R.C. 1981](#).

#### Neighborhood Comments

Staff received a number of **comment letters/emails from neighbors**. They are provided as "Attachment A" and as the applicant and staff agreed, a Good Neighbor Meeting will be hosted by the applicant. Once the location and time is provided by the applicant, staff will send public notification to the neighbors within 600 feet as is required in the land use code section 9-4-1, B.R.C. 1981. **Please also note that "Attachment B" is a separate PDF of a petition signed by neighbors.**

Open Space and Mountain Parks, Bethany A. Collins (303) 413-7646  
The following comments are organized by OSMP Service Area topics.

1. Ecological Systems.

The site plan materials include the following language:

***"Permanent groundwater dewatering may be needed in the event that the building will require foundation drain system. It is understood that water quality testing is required for groundwater discharge system and groundwater treatment may also be needed."***

Groundwater dewatering can have unintended off site impacts. The city has experience with these lands affecting resources, including protected wetlands on city-owned lands managed as open space. It was also noted that the **drainage report didn't address site runoff. Consequently, staff recommends that the drainage report be updated and that** should techniques to dewater portions of the site be contemplated, the applicant be required to conduct the groundwater hydrological studies sufficient to determine water quality and proposed flows off the site.

2. Visitor Experience and Trails and Trailheads

The subject property has served as an access to city-owned lands managed as open space at least since acquisition of those lands by the city. Continuing access to these public lands would be of considerable benefit to the residents of



and visitors to Boulder.

**The city acknowledges the applicants' interest and willingness to allow for continued access to OSMP across the subject property. Thank you for including this in the site plan application materials.**

The city has identified two important trail connections that cross the site and would like to request formalized, permanent public trail easements from the applicant (approximately 15-feet in width). These include the trail connection in the northwest portion of the site, as well as the trail access **to the west of "Building M/Relocated Cottages," which was identified in the 2011 City Council-approved [OSMP West Trail Study Area Plan](#), which directed staff to develop an access point and to designate a trail in the vicinity of "Building M/Relocated Cottages" in response to patterns of visitor use.**

**The proposal to construct a restroom available to the public, labeled as "new trailhead facilities" on the site plans is likely to benefit visitors to city-owned open space lands, however staff recommends the applicant coordinate with the city regarding the specific location of this facility to account for visitor use patterns and public circulation within the site. Staff agrees with the applicant that the restroom should not be the maintenance responsibility of the City of Boulder. The party responsible is identified as the "site ownership group". It would be useful to understand exactly what the term "site ownership group" means.**

3. Ditches and Water Rights

The Silver Lake Ditch lies along the boundary of city open space lands and the subject property. Any changes to the location, extent or condition of the ditch must be coordinated with the Silver Lake Ditch Company. Changes in use of Silver Lake Ditch water, including diversions with the purpose of storage and use for site irrigation must be done in a manner consistent with applicable regulations.

4. Scenic Resources

**The applicant has requested a variance from the 35' height limit. Because of the importance of the Mt. Sanitas open space area as an iconic component of Boulder's mountain backdrop, and the level of investment by the city in the acquisition and management of the backdrop and Mt. Sanitas, staff recommends that the applicant provide a visualization of the site development that would allow for an objective analysis of the visual impacts of the proposed development upon the views to the west, especially the views of OSMP lands. Such a visualization should be provided early in the process to allow for thoughtful deliberation by the community, the potential review and input by the Open Space Board of Trustees to staff and City Council and appropriate integration with the development review process.**

5. Real Estate

As indicated above, staff recommends that public access across the site, as proposed by the applicant in the site plan materials, as well as other site access be negotiated with the city and established through recorded legal agreements to ensure protection of a specific right to cross the property in perpetuity.

As the Silver Lake Ditch forms the legal boundary between a portion of the subject property and city-owned open space, any changes to the location of the ditch cannot remove any property from city ownership without the approval of the Open Space Board of Trustees and City Council and appropriate compensation to the city.

6. OSMP Parking

The site has long provided informal parking for people seeking to access the adjacent city-owned open space. With the development of the site in accordance with the site plan, these informal public parking opportunities on the site will be lost. In a situation where levels of use of open space are more likely to increase than decrease, a net loss in parking availability for the community on the site will result in increasing parking and associated traffic in nearby neighborhoods. The city has already received comments from community members expressing concern over this potential future and asking staff to respond proactively. Staff is interested in engaging in further discussion with the applicant, community

members and other city departments to address parking needs in the area, including any opportunities that may exist at this site. The site plan was silent on this issue although the applicant indicated multiple meetings with neighbors.

Parking Elaine McLaughlin, 303-441-4130

1. The parking data table on A-1.03 was not filled out for vehicular parking. Please provide that information with regard to all uses and what is "Required, Proposed, Requested for Reduction."
2. Please provide staff with the scope of work for the required parking study prior to the consultant starting the work for **staff's review and concurrence**.
3. **Within the "Project Fact Sheet" submitted with the application**, the applicant noted that a 25 percent parking reduction is **requested but there wasn't information on how this is derived**. As shown, the parking calculations are confusing. For example, there is a request for a reduction to 180 spaces. The materials indicated they are planning to provide 366. If the required amount of parking is 373 space (as indicated by the materials), the applicant would only need a reduction of seven spaces which is less than two percent rather than 25 percent. Please clarify.
4. **As noted above under "Land Use"** - Buildings J and H and cottages 1,2,3 and 4 are shown to be located in the area of the existing parking lot serving the Seventh Day Adventist Church. Please explain in detail, what the intended shared parking agreement would be with the church once the site is redeveloped for below grade parking. How will the parking operate on a daily basis, how many spaces are earmarked for church use and specifically which days of the week and hours? In addition, if the parking that is used by the church is being redesigned to be below grade, please identify where the church patrons will park during and after construction and ensure that a representative of the church signs the Persons In Interest form.
5. If the Subacute Rehab Facility (and presumed location for the Therapy Pool) are intended to be open to the public, the parking requirement for non-residential use is 1 space per 300 square feet of floor area. Please factor that into the parking study.

Plan Documents Elaine McLaughlin, 303-441-4130

1. The land use code requires that requests for height modifications be accompanied by a 3D digital model or physical model for purposes of analyzing the height proposed. Please provide a model upon resubmittal. A digital model could be preferable given that a number of different views can be easily generated and Google Earth can be transposed into a digital model. Several views into the site are required:
  - a. View from Mapleton Avenue into the site
  - b. View from 4<sup>th</sup> Street at Maxwell Avenue into the site (or from the east up into the site)
  - c. View looking up into the site from Dewey Avenue (or from the northeast up into the site)
  - d. **View looking down into the site from Public/Open Space Trail above Building "L"**
  - e. **View of Building L with retaining walls in the foreground from Building "C"**
2. On all plans, label the use of each building along with the **building numbering (letters)**; i.e., "Building C: Subacute Rehab."
3. On Sheet A-1.03 provide the following:
  - a. In the Site Development Data Table clarify the following:
    - i. **"Unit Count for 1,000 SF Calculation" and "Eligible SF for 1,000 SF Calculation"**
    - ii. **Why is there a reference to "Building B – Option" ?**
  - b. Create a Summary Table of the number of residential units specifically qualifying as:
    - i. **"Assisted Living" with a DU Equivalency of five beds equal to one dwelling unit** and no kitchen;

- ii. **"Independent Living"** attached units with a DU Equivalency of three beds to one dwelling unit with kitchens
    - iii. **"Independent Living" detached units with a DU Equivalency** one dwelling unit to one dwelling unit with kitchens.
  - c. Fill in the Parking Table and include: Existing Parking; Required Parking; Proposed Parking for each use. Note that the SubAcute Rehab Facility as a non-residential use has a separate parking requirement of 1 space per 300 square feet of floor area.
  - d. Building's D and K are not included in calculations, while it is understood that they are non-residential, **please add them to the table and simply state "N/A" for unit count but, please indicate floor area** for those buildings, to add to the total floor area.
  - e. Building C on the table, if intended to serve the public for short term rehabilitation stays would not count as **dwelling units, if correct, state this on the table as well with an "N/A" for unit count, but please indicate the floor area** for the building to add to the total floor are.
4. On Sheet A3.02: please revise perspectives to be three dimensional.
  5. **On Sheet A4.05, label "Interior Streetscape from 3<sup>rd</sup> Street" to ensure clarity where this streetscape occurs. Consider "Ghosting-In" our outlining the foreground of the streetscape along 4<sup>th</sup> Street. However, refer to the comments under "Land Use" that indicate that the Building "I" as attached residential units and/or townhomes aren't permitted in the RL-1 zoning district.**
  6. Clarify the location of the Therapy Pool. If the pool is located within the SubAcute Rehabilitation Facility, label which pool is proposed as the Therapy Pool open to the public.
  7. **On Sheet A5.02, label swimming pool as "Pool – Resident Use Only" so it is clear which pool is proposed to be open to the public (Refer to comments under "Land Use" regarding the Therapy Pool and what can or cannot be open to the public based on the zoning.**
  8. **Explain the parking labeled as "SPA" parking. Indicate what and who the spa is intended for and where the spa is located. Is it the same as the Wellness Center open only to residents? Clarifications are required.**
  9. On Sheet A5.61, the parking is noted as **"Shared Parking" please indicate the means for sharing parking and if the Church is intended to have an ownership interest in the parking. It must be clear in the application and written description, who is intended to share the parking, which spaces are "required" as parking for which use: i.e., residential parking space; church parking spaces; and/or if any are offered to the public for trailhead use.**
  10. **On Sheet A-1.03 clarify if Building "C" is intended to be part of the Congregate Care use (in which case the pool cannot be open to the public) or if it is intended as a second principal use on the site of a "Hospital" (see comments under Land Use). If it is intended to be a "Hospital" use, there is no equivalency standard, rather the floor area is utilized to determine the parking ratio for the use. In this case, 1 parking space is required for 300 square feet of floor area.**
  11. Please ensure that all plans include legend, labels, scale and north arrow.
  12. On the Project Fact Sheet clarify or correct parking count and reduction.
  13. **Clarify adjacent to Annex L what "relocated cottages" are and where they are relocated from – the graphic appears as one cottage only, unless applicant intends to connect them. However, no plans were provided for the relocated cottages. Please provide the plans and clarify.**
  14. Show the location of equipment cabinets, transformers, and switchgear on civils and landscape drawings; ensure that the location is not near a public right of way and highly visible.

15.

As can be noted in the comparison of the Concept Plan to the proposed project on the following page, there is a distinct increase in the number and scale of the buildings from 16 to 27; staff notes that some of those buildings account for **"cottages" intended to respond to Concept Plan review comments about removing surface parking adjacent to 4<sup>th</sup> Street.** Plan comments about a grid pattern of streets and mirroring development pattern with **"cottages"** along 4<sup>th</sup> Street is a step in the right direction, it is evident that the intensity of the site has increased. However, clear metrics to evaluate this impact are not provided in the plan set. **Comment #3 under "Plan Documents"** does request clearer information to help ascertain the difference between the Concept and the Site Review. The applicant must also fill-in the summary information on the comparison below as well as provide comparison tables.

#### Review Process

1. In addition to a Site Review process, the applicant must resubmit the application materials for the rezoning and the Use Review for congregate care for routing and simultaneous review. Note that the rezoning will be subject to review by the city council.
2. Regarding parking below building H, if it is intended to have any public parking available as part of the shared parking arrangement, which staff recommends, the applicant must submit an application for a Use Review for parking as a principal use.

Survey David Thompson, 303-441-4417

Pursuant to section 9-2-6(2) of the Boulder Revised Code, 1981 an improvement survey of the land must be submitted with the re-submittal package.

Utilities Scott Kuhna, 303-441-4071

1. Per Section 5.08(D) of the City of Boulder *Design and Construction Standards (DCS)*, all distribution mains shall be looped into the existing and proposed water distribution system to ensure at least two feed sources and to maintain system strength. Redesign of the proposed water system is required.
2. Per Section 5.02(B)(4) of the *DCS*, a distribution network analysis performed through computer simulation (modeling) is required. The modeling shall identify any system impacts based on proposed demands and provide design solutions to ensure perpetuation of future water utility system growth and maintain system pressures and flow rates, without exceeding maximum pipe velocities (10 fps).





Existing Site with Approved Trailhead Plan to the North



Proposed Project with Approved Trailhead Plan to the North

- 16 interconnected buildings w/ 67 D.U. equivalents
  - 150 independent living units
  - 83 single assisted living/ short-term rehab/ skilled nursing/ memory care units (no kitchens)
- 407 parking spaces (199 garage and 208 surface spaces)
- Adaptive reuse of 2 historic buildings, relocation of 1
- Community uses including Sanitas parking, therapy pool

- Applicant must fill in this data to compare with the Concept Plan as Data Table was not clear. Refer to Plan Document comments above.

3. The plans show proposed water and wastewater mains running under 35+ of retaining walls east of Building L. Relocation of the water and wastewater mains is required. Running the mains up the extension of 3<sup>rd</sup> Street (west of Building C) could also eliminate the need for the additional dead-end water main serving Building E.
4. The plans show what appears to be a structure in the proposed utility easement at the end of Maxwell Street in the center of the drop-off. Revise accordingly or clarify.
5. The plans show proposed structures (walls and steps) in the proposed utility easement west of Cottage 8, which are not permitted.
6. **The "Worksheet for Circular Channel" in Appendix B of the *Utility Report for The Academy at Mapleton Hill (Utility Report)* references the Armory, Boulder. Revise accordingly.**
7. The Conclusion on page 5 of the *Utility Report* references the Armory Community. Revise accordingly.
8. Per city standards, trees shall to be located at least 10 feet away from existing or future utilities. The following utility lines (or trees) were identified as not meeting separation requirements.
  - Proposed trees (10) on north side of 3<sup>rd</sup> Street near Building D – proposed wastewater line
  - Proposed trees (2) north of Building B – proposed fire service and wastewater service
  - Proposed trees (3) east of Building B – proposed private storm sewer
  - Proposed tree north of Pond B – Proposed private storm sewer
  - Proposed tree north of Pond B – Proposed wastewater line
  - Proposed trees (2) south of Building I – proposed storm sewer inlet
  - Proposed trees (2) north of Building H/J – proposed storm sewer inlet
  - Proposed tree east of Building F – proposed fire service
  - Proposed tree north of Building A – proposed domestic service
  - Proposed street tree east of Cottage 6 – proposed fire service
  - Proposed street tree east of Cottage 5 – proposed fire service
  - Proposed street tree east of Cottage 4 – proposed fire service
  - Proposed street tree east of Cottage 1 – proposed fire service
  - Proposed tree west of Cottage 1 – proposed water main
  - Proposed tree southeast of Annex A-East – proposed storm sewer

### III. INFORMATIONAL COMMENTS

This section addresses issues that are for the applicant's reference but are not required to be resolved prior to a project decision or as a condition of approval. Informational Comments are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

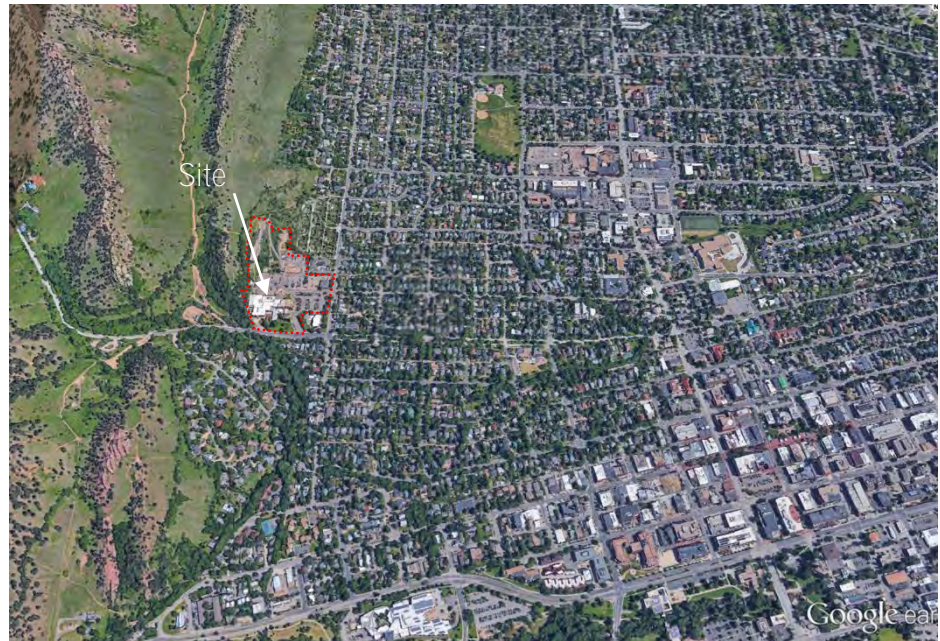
Addressing, Caeli Hill, 303-441-4161

**The City is required to notify utility companies, the County Assessor's office, emergency services and the US Post Office of proposed addressing for development projects. Please submit a Final Address Plat and list of all proposed addresses as part of the Technical Document Review process.**



Area Characteristics and Zoning History  
Elaine McLaughlin, 303-441-4130

The site is located in the western end of Central Boulder. As shown in the aerial images following, the site is predominately surrounded by single family residential as well as medical facilities and the Boulder Seventh Day Adventist Church. As is evident from the aerial photos, the site has been highly developed for decades particularly with parking lots and large footprint buildings that served the hospital. It is distinct from the surroundings in that regard and more akin to other areas of town that are also non-residential.



BVCP Land Use Designation. The majority of the project site has a BVCP land use designation of Public, which is defined in the [2010 BVCP](#) as follows:

***“Public/Semi-Public land use designations encompass a wide range of public and private nonprofit uses that provide a community service. This category includes municipal and public utility services such as the municipal airport, water reservoirs, and water and wastewater treatment plants. Public/Semi-Public also includes: educational facilities, including public and private schools and the university; government offices such as city and county buildings, libraries, and the jail; government laboratories; and nonprofit facilities such as cemeteries, churches, hospitals, retirement complexes and may include other uses as allowed by zoning.”***

There is also an area of property with a land use designation of Open Space – Other, which is defined as *“public and private land designated prior to 1981 that the city and county would like to preserve through various preservation methods including but not limited to intergovernmental agreements, dedications or acquisitions.”* There are no development restrictions associated with this designation; rather, the designation indicates *“that the long-term use of the land is planned to serve one or more open space functions. However, Open Space designations may not reflect the current use of the land while in private ownership.”* The reason for the application of the Open Space – Other designation to a portion of the project site is somewhat unclear, as the land use designation was applied in the 1970s prior to parcel-based and Geographic Information Systems (GIS) mapping. Because the subject property is privately owned and already fully developed, there was not found to be value in obtaining that area of the site for Open Space purposes. As such the land use designation of Open Space – Other will be corrected in an update in the Boulder Valley Comprehensive Plan update process.

Zoning. The project site is split-zoned, the with majority of the site being zoned Public (P), and a roughly 40,000 sq. ft. (0.91 acres) portion of the site zoned Residential – Low 1 (RL-1). The ‘P’ zoning district is defined as, *“public areas in which public and semi-public facilities and uses are located, including without limitation, governmental and educational uses.”* Per section 9-6-1, B.R.C. 1981, congregate care facilities within the “P” zone district require review and approval through a Use Review process, and are currently prohibited in the RL-1 zone.

Additional Site Characteristics. As noted in Concept Plan review the project site has a number of unique characteristics that will need to be taken into consideration during the Site Review process. Being situated at the base of Mount Sanitas, the site is impacted by very steep grades. Related to the steep grade, the site is located within a Geological Development Constraint area, specifically a Potential Mass Movement Hazard and Consolidation/ Swell Constraint area as well as a Swell

Potential Constraint area. These designations are assigned to several areas in the city that are affected by geologic constraints such as unstable soils or steep slopes. Redevelopment of properties affected by these designations requires studies to demonstrate that such properties are safe for development. Additional characteristics of the site which will inform future discussions include the Silver Lake Ditch which runs along the western property boundary as well as a soft surface trail running across the northwestern portion of the site and eventually connecting to the main Mount Sanitas trail. Per section 9-8-6(f), B.R.C. 1981, In congregate care facilities, five sleeping rooms or accommodations without kitchen facilities constitute one dwelling unit, three attached dwelling units constitute one dwelling unit, and one detached dwelling unit constitutes one dwelling unit.

Building and Housing Codes Jim Gery 303-441-3129

1. The following Building Code comments are intended to be informational only. They are provided here in order to inform the applicant of areas of concern that may require additional documentation and/or changes in plans, methods, and/or materials at the time of building permit application. These comments are intended to aid the applicant by illuminating issues as early as possible with the intention of helping the applicant **and applicants' agents avoid unnecessary permit denial** related to the information given at this time. They are not intended to be considered as approval or denial of, nor as a comment on the materials provided for the purposes of this specific Land Use Review application. Comments regarding changes necessary for approval of this application, if any, will appear elsewhere.
2. Please be advised that building comments are general in nature and based on the limited information provided for the purposes of this Land Use Review, and in no way constitute a complete or exhaustive review for compliance with any Building, Mechanical, Fuel Gas, Plumbing, Electrical, Fire Wildland Urban Interface, or Energy Code, accessibility requirements, or the Green Building and Green Points Program; nor may they be construed as approval of any existing or proposed structure for the purposes of a building permit. Documents submitted at the time of building permit application for development or redevelopment will be required to demonstrate compliance with the aforementioned Codes and ordinances and/or any other applicable laws, Codes and Standards in force at the time of application.
3. This property is located in an area identified as a steep slope lot and is in an area subject to potential mass movement; please provide a copy of a soils report and an engineered grading and drainage plan which bear the seal and signature of a Colorado licensed engineer at the time of building permit application for each permit. Any footing and/or foundation design for buildings and retaining walls should be based on the soils report findings and shall also bear the seal and signature of a Colorado licensed engineer.
4. This property is in the Wildland/Urban Interface zone. All structures built, added to or altered on this property must meet the applicable provisions of the International Wildland Urban Interface Code as amended which is in force at the time of building permit application.
5. While it may be possible, it is unclear how the corridor continuity provisions of 2012 IBC Section 1018 will be met, particularly at the openings between stories in buildings A, B, C, F, and G, generally in the area of the elevator lobbies. Demonstration of Code compliance will be required for building permit approval.
6. While it may be possible, it is unclear how single-exit multi-story buildings will be Code-compliant at buildings F and G. Demonstration of Code compliance will be required for building permit approval.

Drainage, Scott Kuhna, 303-441-4071

1. A Final Storm Water Report and Plan will be required as part of the Technical Document Review process. All plans and reports shall be prepared in accordance with the City of Boulder Design and Construction Standards (DCS).
2. Discharge of groundwater to the public storm sewer system may be necessary to accommodate construction and operation of the proposed development. City and/or State permits will be required for this discharge. The applicant is



## Attachment I - Staff's Development Review Comments

advised to contact the City of Boulder Storm Water Quality Office at 303-413-7350 regarding permit requirements. All applicable permits must be in place prior to building permit application. Additionally, special design considerations for the properties to handle groundwater discharge as part of the development may be necessary.

3. All inlet grates in proposed streets, alleys, parking lot travel lanes, bike paths, or sidewalks shall utilize a safety grate approved for bicycle traffic.
4. A construction stormwater discharge permit is required from the State of Colorado for projects disturbing greater than 1-acre. The applicant is advised to contact the Colorado Department of Public Health and Environment.

Groundwater, Scott Kuhna, 303-441-4071

Groundwater is a concern in many areas of the city of Boulder. Please be advised that if it is encountered at this site, an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quality of the groundwater encountered on the site will be required to determine if treatment is necessary prior to discharge from the site. City and/or State permits are required for the discharge of any groundwater to the public storm sewer system.

Inclusionary Housing Michelle Allen 303-441-4076

Each new residential dwelling unit developed on the property is subject to 9-13 B.R.C., 1981, "Inclusionary Housing" (IH). The congregate care rooming units are not subject to IH. The general IH requirement is that all residential developments must dedicate 20 percent of the total dwelling units as permanently affordable housing. For rental housing this requirement may be met by providing the affordable units on-site, providing comparable existing or newly built permanently affordable units off-site, the dedication of land appropriate for affordable housing or by payment of a cash-in-lieu contribution. The BVCP policies support placement of affordable units on-site.

1. Compliance with Inclusionary Housing is not a Site Review criteria however the Housing Planner can use the submitted site and floor plans to determine the IH requirement and check for conformance with IH standards. Applicant must show compliance with IH before a building permit can be issued.
2. Please provide dwelling unit information consistent with your submittal by filling out and sending the Affordable Housing Unit Data Spread Sheet for the dwelling units proposed at 311 Mapleton and a separate worksheet for the off-site units proposed to meet IH. The spreadsheet is available on-line and should be provided in an unlocked excel format.
3. Applicant has indicated that IH will be met with an off-site option. The proposed 147 dwelling units result in a requirement for 29.4 affordable units. Applicant has discussed providing permanently affordable units off-site. Applicant should review the following documents available on-line:
  - Off-site Process & Timeline for Developers
  - Financial Guarantee Policy
  - Affordable Housing Rent Chart
  - Off-site Location Review
4. Any required documents and financial security for off-site units, including the Determination of Inclusionary Housing Compliance form, Covenants to secure the permanent affordability of units, and the off-site Agreement must be received, signed and if necessary recorded prior to application for any residential building permit at 311 Mapleton.
5. Additional information about the Inclusionary Housing program and all spread sheets and forms referenced may be found on-line at <https://bouldercolorado.gov/housing/ih-program-details>.

Irrigation Ditches, Scott Kuhna, 303-441-4071

The applicant is responsible for obtaining approvals for any relocations or modifications to irrigation ditches or laterals from the impacted ditch company. This includes the crossing of any irrigation ditch or lateral for vehicular or utility purposes and the release of stormwater runoff into any ditch or lateral. The applicant is advised that revisions to any approved city plans necessary to address ditch company requirements may require reapplication for city review and approval at the applicant's expense.

Miscellaneous, Scott Kuhna, 303-441-4071

1. The applicant is notified that any groundwater discharge to the storm sewer system will require both a state permit and a city agreement. The steps for obtaining the proper approvals are as follows:

Step 1 -- Identify applicable Colorado Discharge Permit System requirements for the site.

Step 2 -- Determine any history of site contamination (underground storage tanks, groundwater contamination, industrial activities, landfills, etc.) If there is contamination on the site or in the groundwater, water quality monitoring is required.

Step 3 -- Submit a written request to the city to use the municipal separate storm sewer system (MS4). This submittal should include a copy of the Colorado Department of Public Health and Environment (CDPHE) permit application. The written request should include the location, description of the discharge, and brief discussion of all discharge options (e.g., discharge to MS4, groundwater infiltration, off-site disposal, etc.) The request should be addressed to: City of Boulder, Stormwater Quality, 4049 75th St, Boulder, CO 80301 Fax: 303-413-7364

Step 4 -- The city's Stormwater Quality Office will respond with a DRAFT agreement, which will need to be submitted with the CDPHE permit application. CDPHE will not finalize the discharge permit without permission from the city to use the MS4.

Step 5 -- Submit a copy of the final discharge permit issued by CDPHE back to the City's Stormwater Quality Office so that the MS4 agreement can be finalized.

For further information regarding stormwater quality within the City of Boulder contact the City's Stormwater Quality Office at 303-413-7350. All applicable permits must be in place prior to building permit application.

2. No portion of any structure, including footings and eaves, may encroach into any public right-of-way or easement.

Residential Growth Management System, Caeli Hill, 303-441-4161

Growth management allocations are required to construct each dwelling unit prior to building permit submittal. Please be advised that an agreement for meeting city affordable housing requirements must be in place before a Growth Management Allocation can be issued. Please contact staff directly with questions.

Signage Caeli Hill, 303-441-4161

1. Signs visible from public right-of-ways and on private property are subject to the requirements of 9-9-21, B.R.C. 1981.
2. Please note that proposed signs require separate review and permit approval. Signs will not be reviewed as a part of Site Review or Technical Document review unless a specific modification is requested and specifically called out on the plans. Section 9-9-21(k), B.R.C. 1981 allows for the standards dealing with sign setbacks from property lines, spacing between projecting and freestanding signs and sign lettering and graphic symbol height to be varied through the Site Review process; however, any proposed variations to the sign code standards must be specifically referenced in the requested variations to the land use regulations and called out on the plan set in order to be valid following approval of the application. The Applicant may also wish to create a uniform sign program to ensure continued uniformity in the future, in which case the standards found in section 9-9-21(k)(3) would apply. While it is preferable to remove all signs from the Site Review and Technical Document plan sets to avoid any potential future confusion, ghosting the images into the set with a notation that it is under a separate permit is acceptable. Please note that illustration of a sign on the plan set does not grant a modification. Please refer to section [9-9-21 B.R.C. 1981](#) for sign related requirements.

Utilities, Scott Kuhna, 303-441-4071

1. The applicant is advised that any proposed street trees along the property frontage may conflict with existing utilities, including without limitation: gas, electric, and telecommunications, within and adjacent to the development site. It is the **applicant's responsibility to resolve such conflicts with appropriate** methods conforming to the Boulder Revised Code 1981, the City of Boulder Design and Construction Standards, and any private/franchise utility specifications.
2. Final utility construction drawings will be required as part of the Technical Document Review process (which must be **completed prior to building permit application**). All existing and proposed "dry" utilities (Xcel, Comcast, Century Link, etc.) will also need to be included on the plans.
3. Maintenance of sand/oil interceptors and all private wastewater and storm sewer lines and structures shall remain the responsibility of the owner.
4. The landscape irrigation system requires a separate water service and meter. A separate water Plant Investment Fee must be paid at time of building permit. Service, meter and tap sizes will be required at time of building permit submittal.
5. The applicant is advised that at the time of building permit application the following requirements will apply:
  - a. The applicant will be required to provide accurate plumbing fixture count forms to determine if the proposed meters and services are adequate for the proposed use.
  - b. Water and wastewater Plant Investment Fees and service line sizing will be evaluated.
  - c. If the existing water and/or wastewater services are required to be abandoned and upsized, all new service taps to existing mains shall be made by city crews at the developer's expense. The water service must be excavated and turned off at the corporation stop, per city standards. The sewer service must be excavated and capped at the property line, per city standards.
  - d. Since the buildings will be sprinklered, the approved fire line plans must accompany the fire sprinkler service line connection permit application.
6. All water meters are to be placed in city right-of-way or a public utility easement, but meters are not to be placed in driveways, sidewalks or behind fences.
7. The applicant is notified that, though the city allows Xcel and Qwest to install their utilities in the public right-of-way, they generally require them to be located in easements on private property.
8. Floor drains internal to covered parking structures, that collect drainage from rain and ice drippings from parked cars or water used to wash-down internal floors, shall be connected to the wastewater service using appropriate grease and sediment traps.
9. Trees proposed to be planted shall be located at least 10 feet away from existing or future utility mains and services.

#### IV. NEXT STEPS

The applicant must secure a specific date and time for a Good Neighbor Meeting, prior to resubmittal of revisions. Following the meeting, a resubmittal of revised plans is required based upon these comments within 60 days of this

## Attachment I - Staff's Development Review Comments

comment letter to ensure that the application remains in an active status. Provide an electronic file along with seven sets of full sized plans, and two half-sized plan sets. Include revisions to any required report revisions and submit two copies of the revised documents for any reports. Provide a model as required. Upon resubmittal, schedule a meeting before the Design Advisory Board per the comments. The resubmittal must be done prior to the first or third Monday of the month at 10:00 a.m. for routing on a three- to four-week review track. The resubmittal should be accompanied by the Use Review application(s) and Rezoning Application that was previously submitted by not routed without the Site Review application.

### V. CITY CODE CRITERIA CHECKLIST

To be provided upon a review of revisions.

### VI. Conditions On Case

To be provided upon a review of revisions.



**From:** Betsey Jay [mailto:betseyjay1@gmail.com]  
**Sent:** Monday, July 18, 2016 11:29 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Catherine Schweiger <cschweiger@indra.com>  
**Subject:** 311 Mapleton Project

Hello Elaine,

Catherine Schweiger and I met with you June 20 to discuss the proposed high-end senior housing project for 311 Mapleton Ave. We want to be sure we are in the loop as the review process unfolds.

Do you know if a request for changing the zoning on a portion of the site from RL-1 to P is scheduled in the near future? We will want to participate in that hearing. Also, the developers have suggested that at end of July they will submit their plans to the Planning Department. Our community wants to be sure we know when that occurs in order to review and respond in a timely manner.

We are concerned that the developers may misrepresent and downplay the feelings of the neighborhood, so we think it's important we speak for ourselves.

Thank you for any updates you may have.

Regards,

Betsey Jay

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**From:** Betsey Jay [mailto:betseyjay1@gmail.com]  
**Sent:** Tuesday, July 26, 2016 8:36 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Catherine Schweiger <cschweiger@indra.com>  
**Subject:** 311 Mapleton

Good Morning, Elaine-

Our Mapleton Hill Steering Committee would like to know two things:

Do you anticipate that the developers for The Academy on Mapleton Hill will submit their application first week of August?

If so, what are the precise steps/timelines that follow with Staff Review? How can we get copies of the application? What are the specific opportunities for community input in the next 90 days?

Thank you,

Betsey Jay

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**From:** bella bates [mailto:[bellabates2010@gmail.com](mailto:bellabates2010@gmail.com)]  
**Sent:** Thursday, August 04, 2016 1:19 PM  
**To:** boulderplanningboard <[boulderplanningboard@bouldercolorado.gov](mailto:boulderplanningboard@bouldercolorado.gov)>  
**Subject:** Save Sanitas Warm Pool Community

I'm reaching out to you on behalf of the Sanitas Community Pool members.

The YMCA has taken over management of the formally known Mapleton Pool which was part of the Boulder Memorial Hospital on 311 Mapleton Ave. Boulder Co.

In light of the new pool schedule hours to only a **total of 4 hours** split between Monday & Tuesday. I'm reaching out to you to help problem solve with the YMCA to develop a business plan that

will make the pool profitable again. It's my understanding that at one time this pool made \$500,000 offering a wide range of programs to fit rehab for

physically challenged, family swim & specialty classes. Help us save the **BEST WARM water pool environment!**

Please read & share the attached letter that I have sent to Chris Coker, YMCA President.

Dear YMCA President Mr. Coker,

I'm writing directly to you because a serious reconsideration needs to be taken regarding the access to the Sanitas pool in Boulder.

I know that I speak on behalf of all of our pool friends, that we were relieved when YMCA took over the formerly known Mapleton Pool.

This warm therapeutic pool has been part of our community and part of our daily lives for over 20 years. Access to the Sanitas pool is for many

the ONLY TIME we can walk & move freely. Land therapy is NOT the same. Land therapy is exhausting for many with mobility limitations.

Warm water therapy gives the benefit of both exercise and maintenance. The Sanitas pool is the only HUGE indoor heated pool available.

The size of the Sanitas pool allows for multiple therapy disciplines to coexist side by side.

Myself and others have reached out to pool Director Jamie Pocock to stop reducing the hours from 5 day availability to now only "4 hours" total a week!!!!

We are all confounded by the most recent reduction in hours. Especially since folks with mobility issues do not jump into the pool to do quick laps. Our therapy is intentionally slow to loosen our muscles. Also note, when we get out the pool, "quick" showers are unfortunately not part of our DNA. Many of us take up to 45 minutes to bathe and change. And some of us have caretakers that bring us.

They to need time to shower & get dressed as well (they are faster). The current schedule is from 9am - 11am Monday & Tuesday. This schedule truly does not meet the needs of the Sanitas Pool community.

In all honesty it feels like an insult... Since the previous reduction of hours we have all been packed like sardines into the pool. As you will see based on the attached pictures, the Sanitas pool is used by many.

Mrs. Pocock referred to us as "bathers" yet we are not. Most of us are physically challenged patrons of the Sanitas pool, not the typical pool patron profile the YMCA is use to serving.

As research has shown that exercise & social interaction minimizes health issues and reduces the amount of doctor visits. The YMCA Sanitas pool is directly involved in this health

equation. When YMCA took over the therapy pool, it probably didn't realize the responsibility and impact that pool accessibility makes to our daily lives.

There are other warm pools between Denver & Longmont that run excellent programs. Unfortunately they are completely full and are not an option for us. However, I urge you and your team to explore their sustainability business model.

The local recreation centers do not have sufficiently heated water temperatures, otherwise their patrons would pass-out within 15 minutes of swimming. On the other hand, we would get stiff as a board in recreation pool.

Our muscles thrive in warm water. Our spasticity is less and our pains float away.

The nature of warm water therapy schedule is to exercise 3 days a week and rest in between.

The Monday, Wednesday & Friday 8am-12am hours would fit everyones needs.

Please reconsider extending the pool access days. We are all counting on you to live up to the YMCA mission statement:

\* For Youth Development - your young life guards will see compassion & hard work everytime one of us gets into the pool

\* For Healthy Living - every time we get into the Sanitas pool we live another day healthier

\* For Social Responsibility - whether you bit off more than you can chew, whether this pool is not profitable in \$\$\$ WE ARE HERE AND NEED YOU

BEST REGARDS

Bella & Julian ( we drive 40 minutes to exercise at Sanitas 3 days a week)



**From:** John Ezell [mailto:johnezell77@gmail.com]  
**Sent:** Tuesday, August 16, 2016 9:36 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** development at 311 Mapleton

Dear Elaine,

I am a homeowner of 30 years at 6<sup>th</sup> and Maxwell. I have reviewed the current plans for development of 311 Mapleton.

I find this development greatly out of proportion with the Mapleton Hill historic district. The number of trucks, employees, relatives and residents will vastly increase the traffic on our streets, and such a large development will negatively impact the Sanitas Valley parkland. With such a huge operation, we will lose the beautiful transition from Mapleton into Sunshine Canyon and Boulder parks.

I am in favor of development of the site, but I am against a large development designed to maximize density at the cost of our beautiful West Boulder neighborhood streets and parkland!!!!!!!!!!!!

Please scale this development for the neighborhood, not for the developers and owners.

Thanks,  
John Ezell  
2528 6<sup>th</sup> Street

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**From:** john canova [mailto:jlcanova@hotmail.com]  
**Sent:** Friday, August 19, 2016 12:47 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** Academy at Mapleton Hill

Hi Elaine,

I would like to voice my concern regarding the Academy on Mapleton Hill. I have concerns regarding the size and scope of the project and think it should be much smaller to fit into the character of the neighborhood.

Thanks Elaine,

Address: 311 Mapleton Avenue

Page 10

John Canova  
2299 4th Street

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**From:** Tim M Hogan [mailto:Tim.Hogan@colorado.edu]  
**Sent:** Saturday, August 20, 2016 4:40 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** LUR2016-00065

Ms. McLaughlin,

My wife and I have lived at 2540 6<sup>th</sup> Street for twenty years and are understandably concerned about the proposed development at 311 Mapleton. I have spent considerable time reviewing many of the documents at the Planning Department's website.

My initial impression is that behind all the wonderful language and assurances of how nice "The Academy on Mapleton Hill" is going to be, is a huge development entailing years of demolition and construction, the construction of a high end, for profit senior housing complex, resulting in a fundamental change to the nature of our neighborhood. While it is clear the city has an interest in developing the site, they also have a fundamental responsibility to its current citizens to restrain the mind-set of development interests that seek to maximize their investment. For starters, the proposed scale of the development is outlandish and needs to be reduced significantly.

I am very concerned about the impacts of the demolition and construction on the health and welfare of the neighborhood. As an employee of the university, I recently lived with the reconstruction of the student recreation center for nearly three years, and the daily impacts upon the air, the nerve-wracking din of the work, and the unforeseen rupture of water mains and electrical lines. Developers and construction companies can paint an efficient and trouble-free scenario, but Reality somehow always finds a way to upset their best laid plans.

Thank you for your consideration of these initial comments.

Tim Hogan  
2540 6<sup>th</sup> Street  
Boulder 80304

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**From:** Catherine Schweiger [mailto:cschweiger@indra.com]  
**Sent:** Monday, August 22, 2016 8:45 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** Comments LUR2016-00065 - Development Review

Elaine McLaughlin  
**LUR2016-00065 - Development Review**

August, 19, 2016

Comments are in the same order as found in the Written Statement from the applicant. If I do not address an issue it is because I am (more or less) in agreement with the applicant. These are my own comments and do not necessarily represent the comments or concerns of any group that I am associated with.



**Written Statements**

**“The Senior Wellness Center is a critical piece to this proposal. This center is to offer exceptional short-term rehabilitation and memory care to the residents of Boulder.”**

The current proposal is for 46 rehab beds down from 70 as proposed during Concept Review. I understand that this reduction was made at the request of owners at the Trailhead site. Given the number of independent care units proposed it is quite likely that few beds will be available to Boulder residents who are not also residents of this project. Does this meet the applicant's goal of providing new public benefit if the facility is large enough to serve only residents of 311 Mapleton?

**“We anticipate a construction period of 18 months from groundbreaking and are not planning on phasing the property.”** This seems quite ambitious. As a neighbor in close proximity to the construction site, I am concerned. Will the applicant be allowed to work 7 days a week? Will there be an extended work day? How will the applicant be held to a construction schedule that does not unduly impact the neighborhood?

**OPERATING**

**3. Skilled Nursing-Post Acute Rehab.** The applicant makes a strong case for the need for more “5 star beds”. The 54 skilled beds at Frasier serve the Frasier population. It is a rare occurrence that any of these beds are available to non-Frasier residents. What assurance do we have that, as a stated public benefit, any beds at 311 Mapleton will be available to the general public?

**4. Secure Memory Care** Again the proposed 12 secure memory care residences are likely to serve only the residents of 311 Mapleton and should not be presented as an important community benefit. (My mother has resided at Juniper Village in Louisville for 8 years. This facility has 52 beds and is considered an optimal size for memory care. When I moved her to Memory Care, I checked out several facilities. At that time Belle Vista was \$12,000± per month.) What will be the charge for the 12 beds at 311 Mapleton? Will they be open only to those who have “bought” into the 311 Mapleton? If the monthly cost is comparable to Belle Vista and if the beds are only open to residents who have bought in, then is this a true community benefit?

**6. Services for those living within 1500 feet...** I would like to see this service area mapped. I would like to see approximately how much the fee would be to “join” and a guarantee stated as to which services would be made available before this is considered a community benefit.

...for those not within 1500 feet

**1. Our Warm Water Therapy Pool** Please, although ancillary and subordinate, what hours will the public be able to use the pool? Please provide the maximum hours of public use possible in order for the use to remain ancillary. **Without this information it is hard to say if this will be a community benefit.**

I am less concerned about the coffee shop and the loo. If offered as public benefit we need assurance that these will in fact be available.

**4. A beautiful campus to Tour and Enjoy.** There is one amenity missing from the site plan that many of us in the neighborhood have made use of—the stair that leads up to the “Nurses Dormitory”. Please provide separate pedestrian access through to the trailhead (and loo) so that those of us who are walking do not have to take the road around.

## **INTENSITY AND ZONING STANDARD**

Please clarify! If **Section 9-8-6 (f), (1) B.R.C.** states that the average floor area per unit can not exceed 1000 SF and no single dwelling unit shall exceed 2200 SF then how can the units in the “Annex/nurses dormitory” be 2840 SF? These are not detached units. I do not find any detached units in the entire project. Floor plans seem to be missing for cottages 9 and 10. Are these units considered eligible to be larger than 2200 SF? Is the applicants logic valid? What is the reduction in unit numbers and what “extra square footage” does this logic allow? If the neighborhood would like to see a smaller development, can the applicant be held to the maximum size of 2200 SF as set out in 9-8-6...?

## **ARCHITECTURE AND SITE PLANNING**

### **Key Concepts for Overall Site Plan Intent**

The assemblage of buildings is much more that of a “campus” than a “village”. Words are important and should reflect true character rather than attempt to create something that is not really there. This is not a village. This is a high end senior resort. Much of the campus is likely to be closed to the public—it will not function as a village.

I am confused! There is discussion of mansard roofs in the text but none are shown in the elevations. Do we disregard the text mentioning mansard roofs? Gabled and hipped roof shapes forming mansard roof forms serve to maximize useable floor area given height restrictions. Mansard roof forms are generally not found in the adjacent neighborhood. Mansard roofs are found in many apartments constructed in the 60-s and 70-s. See 30th Street in the vicinity of Glenwood Avenue. A mansard roof would do little to complement the architecture of the surrounding neighborhood.

## **ARCHITECTURAL DESIGN**

With respect to the neighborhood, the design of the “cottages” fronting on 4th Street is important. In the elevations provided recently, both material choice and scale of the cottages is not compatible with the immediately adjacent historic neighborhood to the east.

### **Overall Building Design Intent**

**Use materials and colors...** Metal roofs are not generally found in the Mapleton Hill neighborhood. It is very difficult to get landmarks approval for a metal roof. Metal railings are also not part of the design vernacular in the historic district even though they may be appropriate for this project. Although appropriate especially for this site given fire risk, if the applicant does not understand these small pieces of the built environment of the Mapleton Hill Historic District, what other pieces are mis-interpreted?

The use of materials as shown in the elevations mimics Trailhead rather than being a somewhat restrained materials palette as found in most of the historic district. Trailhead, adjacent on the north boundary, does not relate spatially to this project given the change in terrain and should not be used

as reference. Furthermore, in the opinion of many in the community, Trailhead is generally considered poor design given the visual chaos resulting from the choice of materials.

Properties immediately adjacent to the east and in the historic district relate strongly to 311 Mapleton. The cottages along 4th Street should be smaller in scale and simpler in materials choice than shown in the applicants elevations if they are, in fact, intended to provide an acceptable transition to the historic neighborhood.

Finally, will the proposed composite wood siding have high fire resistance? Having been warned to prepare to evacuate on a number of occasions, I would be concerned about any sort of wood siding in this location.

**Keep buildings comfortable in scale...** The “cottages” fronting on 4th Street are not in scale with the immediately adjacent neighborhood. Most of the buildings on the site are very large in scale. Perhaps the whole project should be scaled back (except for rehab and memory care).

### **Key Concepts to Layout/Character**

**Create a village feel...** This is a campus not a village. This is an unlikely focal point for the neighborhood given that it lies on our western boundary, it is age (and income) restricted and much will not be publicly accessible.

### **SOCIAL SUSTAINABILITY**

Please define specifically those areas that will be shared spaces. Will courtyards in Buildings A and B be shared with the public?

Are resident and staff gardens large enough for food production or is this window dressing? In the landscape plan there are no “bed” areas that are large enough and flat enough to suggest that any significant food production will take place on this site.

### **LANDSCAPE NARRATIVE**

#### **Open Space Areas & Pedestrian Walkways**

As requested earlier, please provide pedestrian access up in the vicinity of the Annex so that walkers do not have to follow the road. A stair with landings would be preferable given the senior population. Please make the stair open to the public.

What are “country prairie landscape plantings.”??

#### **Preservation**

Of 152 trees on the site, it appears that 20± will be left in place. There is mention of spade digging and stockpiling trees—possibly the 9 large evergreens. I have specified spade dug evergreens on many occasions. The trees were dug, delivered and planted immediately. They were not generally over 20’ in height. Successfully moving very large trees is not easy and should not be counted on as a way to preserve large, nice trees. It is unfortunate that we do not have a Tree Preservation ordinance as there are several very good trees on the site that will be lost.

There are a couple of relatively minor revisions to the site plan that could be made to preserve a handful more of the few fine tree specimens on the property and bring the project more into compliance with the BVCP tree preservation statements:

Trees identified as 30 thru 33 are quite lovely conifers—spruce and fir. Reconfigure the parking along the Mapleton entry to the site to diagonal rather than parallel parking and eliminate the very small 9 space parking lot and the loop access drive to these spaces. This may also require a slight westward shift of Annex A or a scaling back of the mass of the structure—well worth it to retain 4 nice conifers.

Trees 61 and 60 are well shaped young lindens. 107 and 109 are handsome crabapples in very good condition. Scale down the size of cottages 4,5 and 6 (and protect the tree root zone during construction). Cottages 4 and 5 could also have the front facades facing Maxwell—a typical orientation in the neighborhood with houses fronting all block faces. If it is determined that all the structures along 4th Street are too large in scale (as they are in my opinion) for an appropriate transition to the neighborhood, then it might be possible to preserve trees 38 thru 42, another group of good trees.

## **PUBLIC BENEFIT**

The owner's have received a very large private benefit in the ability to develop this parcel as a senior housing model that will, if successful, generate revenue in perpetuity on a rather generous scale. Please make as a condition of approval, the provision of the public benefits as set out by the applicant. Please further define the nature of those public benefits in conjunction with the condition of approval. It is very disheartening when amenities offered as public benefit during the planning process never materialize (such as the movie theater at the former Camera site...).

**Open Site Design.** As a condition of approval, please request that Maxwell and Concord Avenues, Third Streets, access to the trailhead and associated pedestrian sidewalks be dedicated public right of ways.

**Bicycle and Short-Term Bicycle Parking.** As a condition of approval, request that there be generous short-term bicycle parking made permanently available.

**Wellness Center** As a condition of approval, require that the wellness center have enough beds to accommodate both the needs of the residents of 311 Mapleton and have beds available for other residents regardless of place of residency. (Is the plan for 42 or 46 beds?? How about going back to the 70 as provided in the Conceptual Plan?)

**Warm Water Therapy Pool** As a condition of approval, require that the warm water therapy pool be available to the public, perhaps with a prescription for PT, for sufficiently reasonable hours to provide for adequate PT use. Other hours may be available for “recreational use” especially for those who are elderly. State what those hours will be prior to final approval. If an ordinance is needed to let this happen, that would be a reasonable thing to do.

**Continued Trail Access** As a condition of approval, dedicate the road up to the turn-around and a new pedestrian path, replacing the existing stairway up, as a public right of way.



**Public Restroom at Sanitas Trail Head** As a condition of approval, require that the “loo” will be built, will be maintained and will be open during the hours that public has access to Open Space.

**Hosting of Special Events...** should be left to the discretion of the owners of 311 Mapleton.

**Historic Preservation and Interpretive Program** Include the smokestack in the list of structures to be preserved. It will give the “old guys” something to talk about. (I find it indicative of the mindset of the developers that they do not want to preserve the smokestack as they can not generate revenue from it...)

**The Academy ...Services to Surrounding Neighbors.** As a condition of approval, further define the nature and the cost of these proposed services. At this time, it is not possible to know if there is any “public benefit” being offered.

**Ancillary Coffee and Snack Shop** Within the constraints of city code, please include this as a condition of approval. If an ordinance is needed to let this happen, that would be a reasonable thing to do.

**HISTORIC PRESERVATION** Add trees 30-33, 60,61, 107 and 109 and possibly others to the list of “historic assets” to be preserved.

See comments on smokestack in prior discussion. Include preservation of the smoke stack as a condition of approval.

## **PUBLIC PROCESS**

Yes, the applicant has done a very good job of hosting formal meetings. We were wined and dined at the Academy. We were told that we were listened to and that our ideas were incorporated into their project. This is true to a certain extent. Except as outlined above in my requests for more information as a condition of approval, the applicant has been open with the public. On the critical side, often their presentations were poorly planned and executed. Visuals were of a quality that was quite hard to decipher. The “areas of concern” listed by the Mapleton Steering Committee were presented then mostly ignored in the presentation at the church on June 6th, 2016. In the effort to address the concerns of the Trailhead owner’s by reducing the number of beds available for Rehab, the public at large may have lost one of the significant benefits being touted by the applicant.

The applicant has been a good steward of the site except for turning off the irrigations system and putting the trees under significant stress in this very dry summer. We, as neighbors, are grateful for the promptness in addressing our concerns when they arose and for the continued public access.

**With respect to the Mapleton Hill Steering Committee being “self appointed”** this is true (and has always been true of the Mapleton Hill Steering Committee). We do not have an HOA or any other formal way of organizing this old neighborhood. I was initially asked to chair the newest

incarnation of the steering committee having previously chaired it in the mid to late '70-s and again picking up the reins after the passing of Horace and June Holmes in the early part of this century. We were once know as the "Mapleton Mob". We were successful in creating the Mapleton Hill Historic District and in preserving many of the small, densely packed houses on Maxwell and north through a downzoning—thus the apparent "high" density of our single family zoned area. The interests of the current steering committee are that this development do no harm to our neighborhood and that there is genuine public benefit derived, not only to those of us living in Mapleton Hill but to the community at large.

Respectfully  
Catherine Schweiger  
628 Maxwell Avenue

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Ken Wood  
704 Mapleton Avenue  
400 Mapleton Avenue  
Boulder, Co. 80304  
610-637-9790  
[Kenandjanwood@gmail.com](mailto:Kenandjanwood@gmail.com)

City of Boulder Community Planning & Sustainability  
Attn: Elaine McLaughlin

Re: 311 Mapleton Avenue – Academy House

Dear Elaine:

I am the owner of two properties on Mapleton Avenue. 400 and 704 Mapleton Avenue. While both properties will be impacted by the proposed development - 400 Mapleton is but 200 yards from the Mapleton Avenue entrance thus will bear the greatest impact.

I have read all 30 some pages of the written statements and would like to offer my support for this project based on the following:

1. We all know that it is difficult or nearly impossible to get an absolute consensus from all parties due to the large number of people impacted by this development and the needs of the developer. Thus we ask ourselves "Has the developer been forthcoming, honest and open to suggestions?"
2. From my experience I would say yes. I have attended open sessions hosted and presented by the developers when I have been in town and feel the developers have encouraged community member input and has been open to suggestions.
3. The completed project will be offering services that are needed in the Downtown area, Mapleton Hills and North Boulder. These include additional Independent Living, Assisted Living, Skilled Nursing services, a Senior Wellness Center and limited public access to the warm Water Therapy Pool

4. The developers have proposed open space areas, community trail access and a possible coffee and sandwich shop open to the public (great for hikers & bikers). The developers have also proposed to install a men's and women's bathroom on the Mt. Sanitas trailhead which will benefit all trail hikers.
5. Will living at this facility be costly? Yes, but so are most well managed Senior Care facilities. Also, as we all know, Boulder is a very expensive town to call home.
6. Will it generate vehicle and pedestrian traffic? Of course, but what development would not? It has been a Hospital a Medical Rehabilitation Center and a Sanitarium. All of these have generated vehicle and foot traffic.
7. Further, the developers are offering community members some access to its services and programs – this is truly a plus. I would ask for a modification of the developer's proposal to offer services to those living within 1,500 feet of the development. Such as increase the boundary to the following: 9<sup>th</sup> Street to the East, Mountain View/Spruce to the South and Dewey Street to the North. Or an alternative would be 2,500 feet from its most Easterly, Northern and Southern footprint. 1,500 feet does not offer much of a foot print. I would think it is about 300 to 400 feet alone to the eastern side of intersection at 4<sup>th</sup> Street & Mapleton Avenue.

In summary, I think the developers have done a great job in meeting with the community members, encouraging community input, and listening to and addressing the needs and concerns of our community. This is not a public project it is being built by private investors who risk their capital in making what appears to be a substantial improvement to our community. It will continue a long tradition of the site being utilized to provide a health care environment for others. Will everybody be happy no? But I do think most of us will be pleased, including city officials, and the developers with the end result. Consensus on a project such as this in our very open community is not likely. I think we are quite fortunate that the investors are also community members.

To conclude, The Planning and Sustainability committee has performed professionally and is to be congratulated in moving and listening to community members and the developers in trying to shape a design and usage that accommodates and satisfies community members the developers as well as the city of Boulder. And, we can be grateful to the local community members who are also investors in this project. There is some satisfaction in a community when community members invest locally. These investors also have a stake in our community. So to the investors and committee members thank you for your patience and input in coming up with this development and I support and encourage its approval.

Ken Wood

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**From:** David Adamson [mailto:david@eco-build.com]

**Sent:** Saturday, August 06, 2016 12:34 PM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Cc:** Cropley Charley <health@charleycropley.com>; Alan Delamere <wadelamere@comcast.net>; Phil Delamere <phil@sunoneness.com>

**Subject:** 311 Mapleton-Affordable low and middle income housing priority in Boulder

Hi Elaine.

I am trying to get up to speed on [proponent's plans](#) (I assume this is most current?) at 311 Mapleton and what options there are to put this current for profit, high end housing proposal on a site zoned "public" better into compliance with the existing BVCP and with what community priorities are (as identified in Housing Boulder process and in the Housing Boulder Survey: more affordable/diverse housing types).

Address: 311 Mapleton Avenue

I am wondering if you would have a few minutes to advise us about how to successfully advocate to locate both inclusionary housing and middle income housing on site to prevent further segregation of housing by income in Boulder. Other goals include minimizing above or below grade parking and single car trips from the project and integrating it beautifully into its spectacular ecotone setting. 342 parking spaces are a lot; this project seems like a great opportunity to depend rather on car sharing, public transportation, and taxi-ride sharing services.

These were concerns mentioned by Planning Board at the November 2015 meeting but I don't immediately see any response in these directions by the proponent but may be missing something. High end senior housing was specifically not a priority of Housing Boulder so overall I am wondering how this continues to be an acceptable thrust of a project on perhaps the largest tract of developable land in Boulder.

Our board will soon consider how or whether to helpfully involve Goose Creek Neighborhoods in this project.

Thanks and I look forward to your counsel!!

David Adlai Adamson  
Executive Director  
Goose Creek Neighborhoods  
815 North St Boulder CO 80304  
(303) 545 6255 [www.GooseCreekNeighborhoods.com](http://www.GooseCreekNeighborhoods.com)

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**From:** Rebecca Trafton [mailto:rebeccatrafton@gmail.com]  
**Sent:** Wednesday, August 17, 2016 5:13 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Rebecca Trafton <rebecca.trafton@gmail.com>; Catherine Schweiger <cschweiger@indra.com>; Betsey Jay <betseyjay1@gmail.com>  
**Subject:** Re: 311 Mapleton-- several specific questions re setback

Hello Elaine,

Thank you so much for the 4 plans relating to the "cottages" 1-7, fronting 4th Street.

I would like to clarify three things which confuse me:

1) In the architectural plans, a square footage is cited for the first floor and another square footage is cited for the second floor.

Is it the case, then, that the "cottages" 1-7 range in square footage from 2935- 2,970 square feet?

This does not synch with square footages cited elsewhere in the plan.

(It is important to note, however, that the cottages across the street on 4th, ranging from 1,038 to 1,600 (my own palatial home!)

It is these small homes which the cottages are designed to face and which should be used to define what is architecturally appropriate along 4<sup>th</sup> Street and as the public face of what is the largest complex to be built anywhere on Mapleton Hill, far larger than the original hospital complex at its most built up.

2) There are two pages labeled "Site Plan Submittal LA, 1 and 2.)



These trees (are there shrubs) on this plan are not labeled. Do these circles represent real plants? Are there really this number of trees planned for this project?

3) The elevation drawing includes a South (but not a North) elevation.

This elevation drawing notates 5,4890 twice for finished floor elevation.

It does NOT cite elevation for the street curb or for the sidewalk.

These are important grade points as they determine the visual height of the buildings from across 4th Street.

4) The elevation drawing also notates the height of "Cottage" 5 as 28' (11' + 17') to the very top of the chimney.

This information differs from that on A-3.03, "Building Height Calculations" where the chart reveals that "Cottage 5" has a building height of 34'.

A difference of 6' in a building represented as 28' high is a significant percentage.

How are we to understand this contradictory information?

Lots to study, lots of opportunity for confusion.

I truly appreciate your support as I draft my letter of concern.

With sincere thanks,

Rebecca

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**From:** Gary Kushner [mailto:garlynn.kushner.445@gmail.com]

**Sent:** Monday, August 15, 2016 3:18 PM

**To:** michaelbosna@me.com; McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Subject:** 311 Mapleton Project - Comments, thoughts and suggestions.....

First off, I would like to thank the developers and architect for taking the time to meet with the neighborhood and keeping us up to date on their plans.

The following comments are in an effort to see if the project can be made a little more congruent with the neighborhood, open space, church, and Trail Head.

Make some buildings with flat roofs - Building L already has a flat roof, as does the existing hospital, which will set a precedent.

Buildings E, C, B and possibly A could also have flat roofs. Use these buildings for "living roofs" similar to the one at Boulder Community Hospital on Arapahoe.

This would accomplish a number of goals.

1. ease the transition from Open Space
2. reduce power consumption
3. ease the view from the Trail Head project down below
4. create different roof lines to match into the existing neighborhood
5. it would make a wonderful area for the residents of 311

i.e. Potted pines could hide the mechanical systems, a reflecting pool similar to the one on top of the new Room and Board building in Cherry Creek.

Wood pergolas with solar panels on top, would create shaded seating areas.

Creates places for such things as: evening talks on the stars and solar systems, play cards, meet with friends, have drinks, relax with a book, plan you're next vacation, watch the sunrise, flatirons views, watch the fireworks!

Cottages 1-7: Some of these should be reduced in size, creating a mixture more closely relating to those directly across the street (helps to ease the transition into the neighborhood). Remove one altogether to increase some green area around the homes. I did not see the plans for these buildings, however I hope they all have front or side porches along 4th so we can meet and talk to our new neighbors. Increase setback from 4th for Cottages 1 & 2, and 5 & 6, to allow the mature pines and crabapple trees more space.

Remove Building J, not sure what this is as there are not plans attached, however it looks like Building H is looking down on it. Removing it would ease the transition into the existing church. Landscaping this area instead would add more green space.

Switching the positions of Building I and Cottage 8 would also decrease the massing as you transition into the neighborhood. Building I could also become a "living roof" for use by the residents of that building.

The main entrance into the project should be off Mapleton.

Reasons:

The address is 311 Mapleton.

Maxwell is a narrow street often blocked with deliveries, construction vehicles from projects on Maxwell, etc.

Emergency vehicles already use Mapleton most times.

Overall, I would like to see the project decreased somewhat in size, with the massing of buildings increasing in size as they progress onto the property.

Is it possible to see a topographic plan of the site as it will exist after all cut and fill is completed? I would like to be assured that we do not create another massive cut into the earth, as has happened recently.

Another thought....does all parking need to be underground? Having permeable surface parking with trees and pergolas to shelter some of the areas, creates more open space on the surface and eliminates the necessity for some of the cut, fill and hauling from the site. It would also reduce the over-all cost of the project.

I would like to mention some of the features I really like about this project.

1. The water features used through out the project.
2. The electric car share program.
3. Saving many of the existing trees
4. The use of atriums in the buildings
5. The site being used for congregate care, rehab and memory care, this is needed in Boulder.
6. With the proliferation of airbnb's, and rentals in town, permanent neighbors will be a welcome addition.
7. Large windows though out the project.

Lynn and Gary Kushner

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-----Original Message-----

From: Katherine Martin [mailto:kmeichler21@gmail.com]

Sent: Tuesday, August 16, 2016 11:06 AM

Address: 311 Mapleton Avenue

Page 21

To: McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

Subject: 311 Mapleton parking

At 300 parking spaces for staff, residents, visitors and community (Sanitas hikers etc.) parking is still inadequate. As I live near 5th and Dewey the overflow is likely to hit my street.

Sent from my iPhone

**From:** Alan Delamere [mailto:wadelamere@comcast.net]

**Sent:** Friday, August 26, 2016 1:05 AM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Cc:** Gershman, Mark <GershmanM@bouldercolorado.gov>; Davison, Mark <DavisonM@bouldercolorado.gov>; transportation@bouldercounty.org

**Subject:** 311 Mapleton OSMP parking

Elaine,

Attached is my letter on the very major neighborhood problem that the City will be faced with when public parking is no longer available on the 311 Mapleton site.

I have been discussing this problem with Open Space Staff so I am forwarding a copy of my letter to them.

Sincerely,

Alan delamere

525 Mapleton Ave

303-447-2780

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Elaine McLaughlin  
Planning Department  
City of Boulder  
1777 Broadway,  
Boulder, CO 80302

24<sup>th</sup> August 2016

Dear Ms McLaughlin,

Reference: LUR2016-00065 311 Mapleton

Subject: OSMP Parking problem

In reviewing all the documentation we find little information on available public parking,

The site has been used as overflow parking for Open Space users. The only limitation was a request that the public do not use the upper parking lot between 8 and 5pm Monday through Friday.

How much public parking will be available on site? The design shows 214 underground parking spaces and about 44 spaces on 3<sup>rd</sup> and Maxwell. 7 spaces in a new small Church lot.

We are seeing use of Open Spaces increasing at a significant rate. The rate of increase is the unknown parameter to us and OSMP. OSMP have recently installed a person counter on the south ridge of Mt Sanitas but have no historical data. Last February, we witnessed cars driving our block, 5<sup>th</sup> to 6th searching for a parking space. This has never happened before in winter.

The Mt Sanitas/Red Rocks Open Space is an extremely desirable hiking area. It has been made more desirable by the construction of the Lions Lair trail to the back of Sanitas. The main parking place, south of the entrance to Sunshine Canyon, and the small parking lot at the entrance to the Sanitas Valley have been overloaded for years particularly on Saturday and Sunday morning resulting in street parking on Mapleton and Sunshine Canyon. This summer, shoulder parking on Sunshine has been eliminated by "No Parking Tow Away" signs posted by Boulder County because of pedestrian danger. Now there is parking for only 6 cars about ¼ mile further up the canyon.

The 311 Mapleton site has been the primary overflow parking site. In the satellite photograph, attached, you can see the parking situation very clearly. The upper lot in the NW corner has been heavily used. About 100 satellite photos are readily available from Digital Globe covering from 2003 to Jan 2016. They cover most days of the week making them a good record to measure the changing parking activity.

A major area of concern is parking during the construction phase. We will have OSMP uses as well as churchgoers looking for street parking in our neighborhood. Here is another "Chautauqua" problem about to happen.

This potential problem should be solved before the site plan is approved.

How could it be solved?

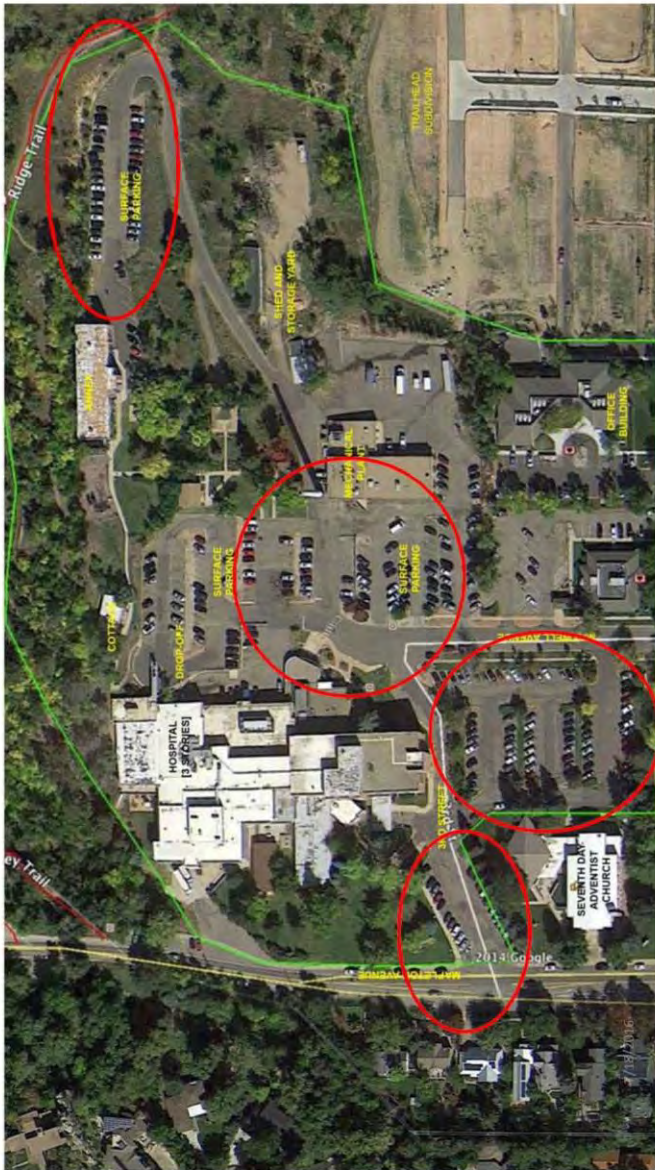
Part of the site was designated Open Space other so the City should consider buying it. While we all like to respect private ownership, acquisition of this site was done quietly with no opportunity given the City for Open Space acquisition. There was no public offering of the site for sale. The newly formed group of investors who bought, privately re-sold it to Mapleton Investments for a profit of about \$2M without any public offering or offer to the City.

We desperately need a large portion of the site for public parking.

Sincerely,

Alan Delamere 525 Mapleton Ave 303-447-2780  
Sheila Delamere





**Satellite Photo of 311 Mapleton site**

Red circles show parking for Church and Open Space

Note that the upper parking lot is full.

Photo probably take on a Saturday morning at about 11am

Note the chimney is a sun dial

**From:** Phil Delamere [mailto:phil@sunoneness.com]  
**Sent:** Friday, August 26, 2016 9:58 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** 'Betsey Jay' <betseyjay1@gmail.com>; Catherine Schweiger <cshweiger@indra.com>; 'Joel Smiley' <joelsmiley@me.com>; 'Randi Stroh' <randistroh@earthlink.net>; 'Gary Kushner' <garlynn.kushner.445@gmail.com>; 'Japhet De Oliveira' <japhet@boulder.church>; 'Kevin Lambert' <kevin.lambert@gmail.com>; 'Nancy Kornblum' <nancygornblum@gmail.com>; 'Rebecca Trafton' <rebecca.trafton@gmail.com>; 'Wendy Baring-Gould' <wbaringgould@comcast.net>; 'Mija Strong' <mijastrong@yahoo.com>; 'Jim Murphy' <jdmurphy303@gmail.com>; 'Alan Delamere' <wadelamere@comcast.net>  
**Subject:** 311 Mapleton Net-Zero

Elaine,

I'm submitting this letter in support of Net-Zero Energy Consumption of the proposed 311 Mapleton Site. Many Developers in Boulder are dropping the ball and the next level of mandating needs to be implemented or preferably let this project set an example of how Net-Zero building benefits us all.

Phil Delamere  
303 909-6441

Elaine McLaughlin  
26<sup>th</sup> August 2016  
Planning Department  
City of Boulder  
1777 Broadway,  
Boulder, CO 80302

Phil Delamere  
2740 4<sup>th</sup> St  
Boulder, Co 80304  
phil@sunoneness.com

Dear Ms McLaughlin,

Reference: LUR2016-00065 311 Mapleton

Subject: 311 Mapleton Net-Zero

### **Net Zero Energy 311 Mapleton**

**"The entire city of Boulder will eventually be Net Zero,"** David Driskell Director of Planning. This is a staggering goal for Boulderites to achieve. How do we start heading towards that goal? The only way to move forward is to mandate that all new construction must be "net zero" because retrofitting to "net zero" will be extremely difficult

A net zero building, is a building with zero net energy consumption, meaning the total amount of energy used by the building on an annual basis is roughly equal to the amount of renewable energy created on the site, or by renewable energy sources elsewhere. These buildings consequently contribute less overall greenhouse gas to the atmosphere than similar non-net energy buildings.

The development at 311 Mapleton buildings useful life should easily exceed 150 years or more. Solar energy has become the lowest cost form of electrical generation in 2016. **All energy requirements can be met through on-site solar generation.**

Let us use the 311 Mapleton site as an example of reaching "net zero". As planned this development will have very little solar. The developer has planned for a potential of 6% on-site solar generation. They plan to have available for maximum solar 13,500 sq ft of roof area on flat roofs hidden from the public's view. The architectural roof designs can be reconfigured to allow for layout of solar panels on ideal south facing roofs.

Accommodating 300 residents 144 employees and numerous other site users, the year energy consumption will be 4,800,000 Kilowatt hours and a maximum of 350,000 kwhr will be produced under the developer's possible locations of proposed solar arrays.

It should be in the developer's best interest to reduce future costs of their energy bills. Today solar costs about \$0.06 to \$0.10 for on-site generation if they incorporate solar in their energy plan. This price is not subject to inflation over the 25 + year life expectancy for the system.

The 311 Mapleton development can be a leader in setting a standard for all future Net Zero construction for Boulder. It is easier to design roof structures on new buildings to accommodate solar now rather than retro fitting post construction making a daunting task trying to fit panels on non-conforming roofs. Boulder Development and Planning needs to start moving Boulder off

hydrocarbon based fuel sources with all new construction today. We are blind-sided by cheap energy and abundant sources of fuel today and our current plan reflects cheap hydrocarbon fuel costs to continue. We are living in a warming planet and 311 can set a new standard in taking steps to help curtail a warming planet.

The biggest public benefit to the citizens of Boulder from this development is for a commitment to attempt to achieve "Net Zero" as a shining example of our way forward.

**From:** Alan Delamere [mailto:wadelamere@comcast.net]  
**Sent:** Friday, August 19, 2016 10:20 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>; Driskell, David <DriskellD@bouldercolorado.gov>; Thompson, David <ThompsonD@bouldercolorado.gov>  
**Cc:** Kevin Lambert <kevin.lambert@gmail.com>; boulderplanningboard <boulderplanningboard@bouldercolorado.gov>  
**Subject:** 311 Mapleton letter on Traffic Study

Elaine,

Attached is our letter on the traffic study for project : LUR2016-00065 311 Mapleton.

David Driskell and David Thompson,

We are addressing you both as we consider that the traffic Study is far from satisfactory. While even the name of the submitted document is not called a "Traffic Study".

We do not expect your staff just to check off the Trip Generator document as an accepted submission. Our major concern is your lack of consideration of the noise impact on our neighborhood. As trucks accelerate from intersections they produce excessive noise and dust disturbing the tranquility of our neighborhood. As you must be well aware we have been subject to these disturbances with the development of the Trailhead sub-division. We tried to work with your staff on the parameters for the traffic study and our input was totally ignored. We only got a copy of the parameters on 5<sup>th</sup> August after persistent reminders.

Please put yourselves in the position of living in the neighborhood when you review our letter and the developers input. After you have completed your personal review, we would like to meet with you both and discuss this further.

Sincerely,

Kevin Lambert  
Alan Delamere



18<sup>th</sup> August 2016

Elaine McLaughlin  
 Planning Department  
 City of Boulder  
 1777 Broadway,  
 Boulder, CO 80302

Dear Ms McLaughlin,

Reference: LUR2016-00065 311 Mapleton

Subject: Traffic Study

We have reviewed document “31\_Trip Generator\_Trip Distribution.pdf” and find it deficient in meeting the requirements of “Traffic Impact Study (section 2.02 of the DCS) and our neighborhood concerns.

While this document has been produced by a professional company, it is deficient in the following ways:

1. There is no reference to the study parameters required by City document “Mapleton Hill TIS Parameters.pdf“. This document states: “At a minimum, three day, twenty-four hour street counts must be obtained for the following street segments in both directions: Mapleton Ave east of 4th Street , Maxwell Ave east of 4th Street, 4th Street north of Maxwell Ave, 4th Street south of Mapleton Ave”.
2. Only two days of data was supplied taken in May 2015 when the Hospital site was partially active. These days were Wednesday and Thursday May 27<sup>th</sup> and 28<sup>th</sup>. Missing was any data taken on a Saturday or Sunday.
3. In addition, data was supplied in figure 3b that showed daily vehicle counts taken in May and June 2016. These data are incomplete and confusing. Site access is complete for 7 days a week but 4th, Mapleton and Maxwell are only partially covered.
  - a. Site 1 traffic is probably Open Space parking
  - b. Sites 2 and 3 are probably Open Space parking, residents, church and contractors. Are there time details available?
  - c. Site 4 would be a combination for tenants and Open Space parking.
  - d. Site 9 traffic is probably dominated by Trailhead construction.
  - e. The 2016 numbers did not separate turning vehicles.
4. The synchro report (28 pages) give the impression of detailed research. It produces more questions than answers.
  - a. It appears to focus on traffic from the motorist’s point of view rather than that of the neighbors. Wait times at the intersections is not as important as acceleration noise from large trucks at each intersection.
  - b. The format of the pages is vaguely consistent but the line items are variable.
  - c. The source of the data is not referenced. One could assume that some of it originated from the 2015 Counter Measures Inc data sheets. Please clarify.

- d. Of particular concern is the fixed heavy vehicle traffic number of 2% used in most of the pages. Where does this number come from? We are currently being subjected to conversation killing noise from heavy vehicles going to the Trailhead site.
  - e. What is the basis of the estimate for the 2018 predictions? How much construction traffic is included?
  - f. Would some members of staff please translate these 28 pages into some format that is understandable from the neighbors' point of view?
5. This study does not address the various phases of the development - demolition, land re-shaping, hole digging, construction, final use. How can the staff accept such an incomplete report? It should include:
- a. Number of vehicle journeys,
  - b. Size of vehicles
  - c. Routing
  - d. Timing
  - e. Noise mitigation plan
  - f. Dust mitigation plan
  - g. Safety mitigation plan
6. Mapleton Avenue was not designed for heavy traffic it was designed for the comfort and convenience of the residents. In the 30's the residents had it paved with concrete for their comfort and convenience (ref. a late neighborhood who was on the committee). It is just happenstance that it can carry a heavy traffic load. The steep section west from Broadway is of particular concern because of excessive noise from large trucks grinding up the hill.
7. Maxwell Avenue was the primary access road to Sunshine and Gold Hill and the Sanitarium. It was never designed to have cars parked either side of the street. On a bike, it is the easiest street to ascend Mapleton Hill. When it was designed, it was the easiest route for a horse and cart. Today it is incompatible with a 25mph speed limit.

Neighborhood concerns were ignored in writing the traffic study parameters. We request that Staff thoroughly review this traffic study and decide if it is compliant with neighborhood concerns as well as City code.

A new responsive Traffic Study is required.

Sincerely,

Alan Delamere 525 Mapleton Ave 303-447-2780

Kevin Lambert 403 Mapleton Ave, 303.881.0503



-----Original Message-----

From: Rebecca Trafton [mailto:rebeccatrafton@gmail.com]  
Sent: Thursday, August 25, 2016 2:34 PM  
To: McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
Cc: Alan Delamere <wadelamere@comcast.net>; Betsey Jay <betseyjay1@gmail.com>; Randi Stroh <randistroh@earthlink.net>; Wendy Baring-Gould <wbaringgould@comcast.net>; Catherine Schweiger <cschweiger@indra.com>; Rebecca Trafton <rebecca.trafton@gmail.com>  
Subject: 311 Mapleton-- Letter of concern about the proposed "Cottages"

Dear Elaine,

I am truly grateful to you for all the support you have provided me and my neighbors as we seek to understand the proposal for development at 311 Mapleton and the regulations and practices of the Planning Department.

My particular area of focus— amidst a host of concerns— is the proposed “cottages” which are directly across the street from my small historic cottage at 2424 Fourth Street.

I attach my letter of concern, with sincere thanks for your attention to this matter.

With gratitude,  
Rebecca

To Elaine McLaughlin

[McLaughlinE@bouldercolorado.gov](mailto:McLaughlinE@bouldercolorado.gov)

Reference: LUR2016-00065 311 Mapleton

August 25, 2016

Dear Elaine,

I am writing to express my deep concern about the proposed project at 311 Mapleton and specifically about the “cottages” planned for 4<sup>th</sup> Street. A small stretch of 4<sup>th</sup> Street— 5 houses between Mapleton and Maxwell—is within the Historic District, adding diversity to the Mapleton Hill Historic District and neighborhood. These cottages are protected by the Landmarks Board. The proposed “cottages” at TAOMH address these small cottages. The existing cottages should not have to face over-sized residences, artificial in appearance, closely spaced, formally landscaped and sitting high above the street. I will address these concerns and more in the letter that follows.

In the Land Use Review Application the developers state: “We have listened to the suggestions of Planning Staff, Planning Board and City Council and we are designing the campus to feel more like part of the neighborhood along its eastern and southern edges.” *It is simply not the case that what is proposed for 4<sup>th</sup> Street looks or even feels like part of this neighborhood.*

***Historical context:*** According to the Historic Overview in the Application, by 1906 seven cottages had been built on the grounds of the Sanitarium. The narrative describes these cottages as designed to “follow the topography, ensuring ease of movement between different buildings.” The diagram accompanying the Historic Overview shows these cottages. Each cottage is separated from its neighbor by a space as almost as great as the width of the cottage itself. By 1919, three more cottages were added in a line behind the first row, twice as far from that original row of cottages as the depth of the cottages themselves. These were ***true*** cottages, not large homes identified as cottages! Additionally, the developers’ “cottages” do not offer “ease of movement.” In 2 instances the “cottages” are only 5’ apart! The other separations are 9’6,” and fully paved.

***Architectural and Landscaping Plans:*** However it is difficult to ascertain fully the specifics of the proposed “cottages.” The plans were made available to citizens on Wednesday, August 17<sup>th</sup>, 16 days after the application was submitted, August 1st. Even with this extra time for preparation of plans, there are numerous contradictions and omissions. Most offensive is the document labeled: “Mapleton—Site Plan Submittal—LA 2016-07-28, page 2.” This document has absolutely no legend, labels, scale or North arrow. It communicates no information. The only other landscape plan (LP1.2) covers

only one of 5 landscape areas of the 15-acre site. These omissions are a *red flag* since they indicate that due care and diligence have not been paid in order to provide information that allows the City of Boulder and the residents of this neighborhood, not to mention those immediately impacted along 4<sup>th</sup>, to ascertain the true impact of what is being proposed. Exactly what is planned for these "cottages" and the surrounding landscape? Why have the necessary details been withheld?

**Square Footage:** "Cottages" 1- 7 will range in size, according to the recently submitted architectural plans, from 2,935 square feet to 2,970 square feet. These "cottages," almost 3,000 square feet apiece (for just one couple and ultimately a single individual!) in no way match the existing cottages along the east side of 4<sup>th</sup> Street. The design of this group of over-sized dwellings simply is not "addressing the existing neighborhood with smaller and more intimate buildings along 4<sup>th</sup> Street," as the Application states.

**Height:** Although the "Elevations Cottages" plan (A-6.06) indicates "cottage" heights of 28'- 31', the Building Height Calculations table (A-3.03) lists heights for these "cottages" as ranging from 34-0' to 35-6." This contradiction means that we cannot know which figure is accurate. Taken in conjunction with the existing site conditions, including a difference in elevation of more than 3-6" from 4<sup>th</sup> Street to finished floor elevations, neighbors can anticipate walls *which reach up to 39' above street level !* In addition, the "cottages" are spaced so closely as to be almost connected. With so little interstitial space the effect will be that of a "Berlin Wall" of buildings almost 40' in height, running 10' from the south property line all the way to Maxwell and beyond, ultimately to the Trailhead subdivision. This is an aggressive affront to 3 cottages across the street that are all less than 30' tall, spaced between 16-25' apart from each other. The reality of the neighborhood size and height indicates that the developers' claim to complement this context should be treated with suspicion.

**Existing trees:** Although the Landscape Plan (LP 1.2) covers only the space between the property line just south of "Cottage 1" and Maxwell Street (omitting "cottages" 5-7,) the landscape architect's intent is evident: in front of the "cottages" facing 4<sup>th</sup> Street 5 young trees, set in a straight line within a bed of lawn, will replace 8 existing mature trees, irregularly spaced. This is a loss of quantity and canopy both. At a time when Boulder is losing a significant percentage of its tree population because of emerald ash borer, all citizens should be concerned. In addition, because the silver maples of Mapleton Avenue, planted in 1895, are beginning to fail, the immediate neighborhood faces great loss of trees. Throughout the 15+-acre site, tens of healthy trees identified as being in either "good" or "excellent" condition in Table T10.1 are being removed.

### **Landscape Buffer:**

In "Design Characteristics of Units," the developers describe a "landscape buffer with soft walking path." A "buffer" is defined as "a dense and tall massing of vegetation designed to screen or soften." (*Landscape Architectural Standards*) From the incomplete landscape plans submitted, no indication is given concerning what the developers understand this buffer to be, its height, width, and composition, nor how a "soft walking

path” is to be incorporated. If a true landscape buffer is to be created, its width must be generous and vegetation must be closely spaced if the buffer is to be diminished by the introduction of a “soft walking path.”

At one point in their narrative the developers suggest their willingness to reflect existing neighborhood landscaping. The developers write, “The landscape plantings associated with the design along the perimeter of the property intend(s) (sic) to compliment (sic) the organic tree spacing and nature of the surrounding development with a multitude of different deciduous canopy trees proposed and varying plant material that has seasonal interest.” The incomplete Landscape Plan (LP1.2) shows neither “a multitude” nor an “organic spacing.” In no way does it represent a buffer to ameliorate the tall “cottage” walls that stand close to the sidewalk, which they tower above. A properly constructed buffer is an excellent idea and should be developed seriously, perhaps even to the extent of creating a 20-25’ deep shaded area parallel to 4<sup>th</sup> Street with seating for both neighborhood residents and the residents of this project to enjoy.

This leads me to *my two greatest concerns*:

***Concern # 1: Size of the Academy “cottages” relative to their immediate neighborhood:*** The homes on the east side of 4<sup>th</sup> Street are small cottages, small-scale apartments, and an old farmhouse. These are humble dwellings relative to those of the greater Mapleton Hill neighborhood, to which they add diversity and interest. It is these small homes that the TAOMH “cottages” are designed to face. The existing historic cottages should be used to define what is architecturally appropriate along 4<sup>th</sup> Street and should be a model for the public face of what is the largest complex to be built anywhere on Mapleton Hill, far larger than the original hospital complex at its most built up.

It is important to recognize that Trailhead is neither part of the Mapleton Historic District nor within the Mapleton Hill neighborhood. According to that subdivision developers’ promotional materials, (“23 single family home lots nestled between the Mapleton and Newlands neighborhoods”) is a unique neighborhood. It should not be considered a precedent. Trailhead’s “custom homes” average almost 4,500 square feet, with 5 bedrooms and 5 bathrooms. These huge homes consume almost all of the lots on which they are situated. These bloated structures have no relationship to the 4<sup>th</sup> Street’s role within the historic district.

***Concern # 2: Relationship of each cottage to its site:*** The Application presents a Neighborhood Density Exhibit (# 2) which lists the lot size of some (though far from all) residential sites on Mapleton Avenue from 4<sup>th</sup> to 9<sup>th</sup> Streets, as well as certain properties on Maxwell, 5<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> Streets. *The exhibit presents 26 sites overall, however only 4 properties are on 4<sup>th</sup> Street.* The exhibit has a column designated “Building SF” but does *not* offer the square footage of a single home. Were this information available, it would be possible to calculate the relationship of the size of each building to the size of its lot. The existing cottages have small footprints relative to the size of their lots. In contrast, when a large home consumes the majority of the site on which it sits, the effect of an entire group of homes differs dramatically. As our



neighborhood has witnessed with the development of Trailhead, this is quite shocking. The 4<sup>th</sup> Street "cottages" of TAOMH are spaced between 5' and 9'-6" from one another and consume most of the lots on which they sit. This is a valuable negative example for TAOMH "cottages" and should be heeded attentively.

The Academy's design approach does *not* speak to a period in history in Boulder when the Sanitarium site was developed and the surrounding homes on 4<sup>th</sup> Street were constructed. It speaks instead to the wealth, extravagance, and greed of a full century later. The Site Review Application's attempts to justify its proposal are at best misleading if not deceptive. The Application states: "As the original complex was a grouping of buildings ranging in size from a central four-story hospital building to smaller outbuildings and cottages, so does this proposed project use the same variety of size to create the village feel." We have no way of knowing how these "cottages" "suggest a village," nor how they represent the "design excellence" of the project that the proposal claims. These "cottages" are *not* "the most direct representatives of TAOMH's fabric of the surrounding historic neighborhood," as the proposal asserts. They are *in no way* "smaller and more intimate" as opposed to, for example, my own cottage which is less than 1,600 sq. ft. and faces the massive structures proposed. The TAOMH "cottages" do not reflect the two adjacent houses to my north, which are 1,038 sq ft and 1,122 sq ft respectively. These Academy "cottages" do not seem to "establish a strong edge to the surrounding neighborhood" unless what is meant by "strong edge" is something incommensurate with the neighborhood. Seven of the 9 houses on 4<sup>th</sup> Street facing this project are under 1,600 square feet. What we do know is, the Academy's seven 4<sup>th</sup> Street "cottages" are far beyond anyone's reasonable understanding of either a "cottage" or a "village feel." Rather than complementing 4<sup>th</sup> Street, these "cottages" of TAOMH present an aggressive façade to the street, an affront to the neighbors *and* to the many residents of Boulder and visitors to our neighborhood who traverse 4<sup>th</sup> Street each day.

My neighbors and I are alarmed and offended. We cannot understand how the plans for the development which include "cottages" so large, sitting so high above the road, consuming such a great percentage of the site on which they sit, can be presented as "intimate," or as a good interface with our neighborhood. Boulder and the Mapleton Hill Historic District deserve something better. This proposal seems to have been created within a rush to development. It is our hope that the City will not participate in such a rush and the pressure it generates to ignore the genuine respect to its neighborhoods that the City of Boulder has displayed historically as one of its most distinctive and defining characteristics.

We urge you to consider this aspect of the Academy plan with special care. We believe it is critically important that the interface with the surrounding neighborhood, on all sides, be thoughtful and respectful.

With sincere thanks,  
 Rebecca Trafton  
 2424 Fourth Street  
 Boulder, CO 80304  
 rebecca.trafton@gmail.com



**From:** Alan Delamere [mailto:wadelamere@comcast.net]  
**Sent:** Friday, August 26, 2016 12:48 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Abby Daniels <abby@historicboulder.org>  
**Subject:** 311 Mapleton Historical

Elaine,

Attached is my letter on reviewing the historical section of the submitted documents.

Note that there are three documents the letter and two attached pdf files to be attached to the letter.

Sincerely,

Alan Delamere

525 Mapleton Ave  
303-447-2780

Elaine McLaughlin  
Planning Department  
City of Boulder  
1777 Broadway,  
Boulder, CO 80302

25<sup>th</sup> August 2016

Dear Ms McLaughlin,

Reference: LUR2016-00065 311 Mapleton

Subject: Historical

We have reviewed document "History SanitariumMemorandum\_Final\_7\_16\_15.pdf"

This report is very well done with a lot of very useful research. However there are a few areas that need more work and clarification.

1. **Section 1 Summary page 9.** The report defines post 1940 as not being historically significant. This seems to be a very narrow viewpoint that does not fit well with Boulder's history. Some of us had major historical events when our children were born at Memorial Hospital. Surely anything over 50 years is historical.
2. **Section IV General Recommendations** appears to be a sales paragraph telling the developer what he needs to hear. This site is definitely historic in that its history shows at every turn. It has evolved over the last century in many different ways. It is directly connected to the historic structures and paths on the hogback west of the site. See the attached PowerPoint appendix.
3. **Smokestack** information conflicts with an article in the Camera in 1910 (see article). A famous Smokestack designer was in Boulder to replace the metal smokestack, that had been blown down, with a concrete smokestack. One can disagree with the historical significance finding on page 13.
  - a. "Association with a person?" Yes, How about Jiles Fulton?
  - b. "Embodies distinctive design/construction of the period" Yes, Concrete brick-lined smokestack was state of the art in the early 20<sup>th</sup> century.
  - c. "Informational potential?" Yes it has significance educational importance. As a reminder of the dirty fossil fuel era, why tall smokestacks enable combustion and have the advantage of dispersing pollutants at a high level. Today it is a surveying landmark (see photos at end) and I have used as a sundial in aerial and satellite images (see photo 2). It also has the potential for use as a transit telescope that could be used in schools and university.
  - d. "Architectural significance?" Yes, Concrete brick-lined smokestack was state of the art in the early 20<sup>th</sup> century.
  - e. "Environmental significance?" Yes, It was highly visible when it was built and is still highly visible. (I have seen it from the Dry Creek trail east of Baseline Lake. Photo 3)
  - f. "Location?" Yes the current smokestack has existed at its current location since before 1927.
  - g. "Feeling?" Yes it has feeling – some people love it.
  - h. "Association?" Yes, It is one of the remaining objects that are directly associated with the sanitarium

- i. The report claims that the smokestack should be removed because it replaced the original metal smokestack. This seems to be an irrelevant comment as the Smokestack has been part of Boulder's history for more than 90 years.
  - j. Specific recommendations page 28. "Is it significant?" Yes, because of items 2.a through 2.i above. Long term maintenance is minimal if the surrounding soil is not excavated. Repointing of the lower section of the interior brick would help long term preservation. Repointing the upper artistic portion of the smoke stack may be occasionally a nice thing to do.
4. The Stone wall is very significant because in combination with the beautiful lilac bushes it is an environmental treasure. Planting new lilacs will take years to develop to the splendor of the existing lilacs.
  - a. "Environmental significance?" Yes. It is the support of beautiful lilacs.
  - b. "Feeling?" Yes. It breaks up the harshness of modern construction.
5. The report omitted mention of the historic tunnel that connects the Power house to the hospital building. This should be visited by Planning staff, surveyed and recorded in the Historical Report.
6. The Church on the site was built in 1949 and should definitely be regarded as an historic landmark. Early this year the developers offered to buy the church and, fortunately, the Church refused their offer. We find it offensive to think of the Church being razed for development.
7. Other buildings on the site have been dismissed in the Report as not being historically significant. In our Mapleton Historic district we have many houses of the same vintage that are considered historically significant. One could consider the two affordable houses (cottages B & C) and portions of the hospital building as being historic.

My conclusion is that Winter & Company did a good job for the developers

Sincerely,

Alan Delamere 525 Mapleton Ave 303-447-2780

Attachment 1 camera\_1910\_smokestack.pdf

Attachment 2 Sanitarium Hogsback Connection.pdf

Figure 1 Article in Boulder Camera 1910

1910

## SMOKESTACK IS TO BE PUT UP AT SANITARIUM

**Stack Will Be of 133-Foot  
Height; To Cost About  
\$3,500; Of Concrete**

A 133-foot cement smokestack will be completed at the Colorado Sanitarium within the next few weeks at a cost of between \$3,000 and \$3,500. Jiles Fulton, stack-builder for the Heiney Chimney Co., of Chicago, Ill., is doing the work.

Although, in these days of high aeronautics and heart-strangling antics in the high altitudes of the ambulant atmosphere, it is still a slight impediment to the normal act of breathing to watch a human being do a jig, so to speak, on the iron skeleton of a sky-scraper or even on the narrow rim of a cement smokestack.

Jiles Fulton isn't exactly a jig dancer, but he knows how to make himself at home at the top of a slender cylindrical stick of cement two or three hundred feet high.

Fulton began as an apprentice in smokestack building when he was fifteen years of age, and since that time he has built many big stacks in different parts of the United States. Before coming to Boulder he finished a 300-foot stack in one of the New England states.

At the top of his giant white cauldresticks, Fulton scampers around at his work like a mouse. He works a few feet below the iron-frame top of the cylinder and climbs to the top of an iron ladder that swings by ropes from a projecting beam. And he goes up it with the similar sturdiness of a seasoned seaman.

It is understood that Fulton's company has a contract for a 230-foot stack near Boulder which will probably be started as soon as the Sanitarium stack is finished.

The Sanitarium stack is 9 feet 2½ inches, outside measurement, at the base. It will be five feet and a fraction of an inch, inside measurement, at the top. It will have a 1 3-16 inch taper every 1¼ feet.

The small iron stack, which is now being used at the Sanitarium, blew over a few months ago. The new stack will have a draft and volume sufficient to pull smoke for several additional boilers which, it is understood, are to be installed at the Sanitarium-food plant.

# Sanitarium Hogsback Connection

Alan Delamere 2015

“Secret Steps” up to irrigation ditch behind  
“the Cottage”



2



## Bridge over irrigation ditch



3

## How many people can sit on the bridge?



4



## Intriguing Arch leads where?



6

## More places to sit



7



Even more



8

Shelter house named "The Fort" by our kids



9



# “Barbeque” site once had a chimney



10

# Cistern - site has water rights



11

## Trail into valley

- Initially went from saddle
- went east of hogback
- And crossed into valley
- Original stone work can be seen at places

12

## Observations

- Who did all this work?
  - Recovering patients of the Sanitarium?
- When was it done?
  - Post WW 1?
- Where can we find out more?



**From:** Randi Stroh [mailto:randistroh@earthlink.net]  
**Sent:** Friday, August 26, 2016 12:17 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** 311 Mapleton

August 26, 2016

Elaine McLaughlin  
Planning Department  
City of Boulder  
1777 Broadway  
Boulder, Colorado 80302

Dear Elaine:

My name is Randi Stroh, and I live at 821 Mapleton Avenue. I have lived in Boulder on the west edge of town since 1973. I have been involved in several public processes over the years, including the formation of the Mapleton Hill Historic District and the creation of the Dairy Center for the Arts as a founding Board member. I have a long commitment to civic engagement, and want to contribute my experience to the very significant issues and problems at hand about the future of the Boulder Memorial Hospital site. I am currently a member of the Mapleton Hill Steering Committee primarily because of this debate.

Living in this neighborhood has taught me that Mapleton Hill does not just belong to those of us who live there. It has many other identities, all of which come together in a rich fabric of uses and purposes. The neighborhood is a primary destination for people interested in Boulder and Colorado history, both Boulder citizens and visitors to the City alike. It is a place where these groups come to walk, bicycle, enjoy the old trees and the Mapleton median, look at architecture from another time, stroll the dirt alleys, sit on the bench at 4th Street - get away for a while from the more urban environments nearby. It is the oldest part of Boulder, and in some ways, it functions like a park. It also is a principal transition into western edge Open Space and the mountains which start at the mouth of Sunshine Canyon. Mapleton Hill has a sense of place, and it is definitely a City amenity. With that perspective, my concerns about the current development proposal really do transcend concerns about my own home and my lifestyle. I do believe I have a right to protect my way of life, but I also know that deliberations and eventual decisions about the future of this very significant site involve many factors.

The street grid on Mapleton Hill essentially pre-dates the automobile. It was built for horse and buggy, and pedestrian use. In 1906, there were 27 registered cars in all of Boulder, and the maximum speed limit was 6 mph (Boulder History Museum). There is a natural carrying capacity for vehicular traffic in this grid. There will be various models and formulas used to calculate what that capacity is, and some subjective opinions about what that load can reasonably be. But the City has recently started expanding the parking zone system in the neighborhood because of overflow traffic from downtown during the week, and increasingly, overflow traffic from Mt. Sanitas on the weekends. The rate of growth is outpacing the infrastructure to support it. This really isn't sustainable, and it is inappropriate and unacceptable to impose these impacts on this old neighborhood. I believe the City has the responsibility to address this issue for residents, visitors, and for preserving the history of Boulder. And I believe the City and/or Open Space has to acquire part of this site for public parking, no matter what is ultimately developed there.

I was also on the Board of the Friends of Mt. Sanitas for many years, which was formed out of concern for the future of the former Boulder Junior Academy site, now the Trailhead project on 4th Street adjacent to the Hospital site. Attached is a copy of the Junior Academy Area Plan, which was the result of years of neighborhood and concerned citizen engagement in the public process. The Plan, approved by both Planning Board and City Council in 2009, outlines in detail the criteria and parameters which were intended to govern development of that site. Neighborhood compatibility was the core spirit of this Plan, and the stated objective in the Plan was a purposeful extension of the Mapleton Hill character and architecture. Many of us do not understand how the disconnect between the Area Plan and the the reality of Trailhead actually happened, and I will be doing further research into that. The contrast between the Plan and the build out is too dramatic and startling, and its proximity to 311 Mapleton matters in the current debate.

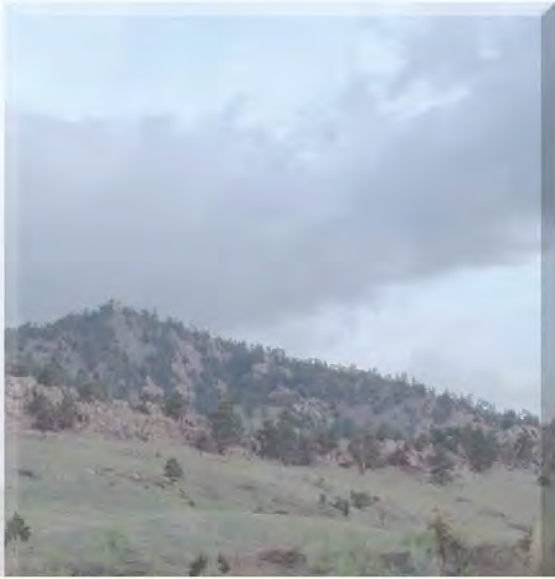
Please know I share the concern that Mapleton Hill as it currently exists not be overpowered by how 311 Mapleton is developed. It is impossible to develop this site without impacting its surroundings, but it needs to be done in a sensitive way, much more sensitively than the current proposal. The City's Neighborhood Compatibility Ordinance was also passed in 2009, and while it was not structured to govern large commercial proposals like this one, it was indeed formulated to help strengthen and preserve existing neighborhoods. I, and many that I know, want to see that tools like the Area Plan and Neighborhood Compatibility really work in tangible ways. And both should affect the thinking about 311 Mapleton, because of its transitional location and prominence.

I know you are receiving many comments on several facets of this site and this proposal. So, I will stop here. I am one of the people who will be fully engaged in this process as it moves forward, and I look forward to working with you.

Thank you and best wishes,

Randi Stroh  
[randistroh@earthlink.net](mailto:randistroh@earthlink.net)  
303-545-2170

# Junior Academy Area Plan



Prepared by:  
City of Boulder Department of Community Planning & Sustainability

Approved by City Council on October 27, 2009  
and by Planning Board on November 19, 2009

## Background

At its meeting of January 13, 2009, Planning Board and City Council approved a public process to address comprehensive plan land use designations, zoning, housing types, massing, site access and circulation patterns for the 5.84 acre site of the former Junior Academy located at 2641 Fourth Street. The area planning process was recommended to address City Council's desire for a public process for redevelopment sites that have been used historically for public or semi-public uses such as schools and churches, and to address the inconsistency between the Comprehensive Plan land use designations and zoning.

Three public workshops and an open house were conducted in January-April, 2009 to help develop a plan that addresses community concerns and objectives.



Figure 1: Site Analysis Diagram

## Site Analysis

The site is bound by Dakota Place to the north, Fourth Street to the east, the Mapleton Medical Center to the south, and city open space to the west. A trailhead located immediately north of the site provides access to the open space.

Topographically the site is defined by a steep slope to the west with significant views toward the north-west corner of the site and more limited views toward the Mapleton Medical Center. The north edge of the site is defined by the trail head and trail segment while the south edge is defined by a drainage ditch. The east edge, facing onto the established residential neighborhood is defined by a hillside rising upward from Fourth Street to the more level benched portion located toward the center of the site.

## Plan Objectives

**Community Engagement** - Engage community members in the area planning process, particularly those in the surrounding neighborhood.

### Sensitive Infill

- Support and strengthen the surrounding neighborhood through appropriate building scale and height; compatible character, architecture, site design and density of new development; and sensitively designed and sized rights-of-way.
- Define the acceptable amount of infill and redevelopment with standards for design quality in order to avoid or adequately mitigate negative impacts and enhance the benefits of additional infill and redevelopment.

Continued



## Access Plan

Site access options are limited due to terrain and adjacent property ownership. Steep terrain and city Open Space to the west preclude the possibility of vehicular through access, any access proposed to the south in alignment with Concord Avenue would require negotiation with the adjacent property owner, and access possibilities to the north are limited due to the steep grade of Valley View Drive/ Dakota Place and the location of an existing public trail. Therefore, all available access options are served by 4th Street on the east side of the property. Two alternatives for principal site access are illustrated in Figures 7 and 8.

- **Option 1:** A primary access in alignment with Dewey Avenue along with a secondary emergency only access near the north or south edge of the property, or
- **Option 2:** Two primary accesses in alignment with the alleys on the east side of 4th Street.

Option 1 would provide less points of conflict between pedestrians, bicyclists, and vehicles. It would also provide alignment with the existing intersection, meeting vehicle driver expectations. Option 2 would add an additional conflict point, but also may disperse traffic on 4th Street and slightly decrease the amount of traffic on Dewey. In order to enhance pedestrian and bicycle access through the site, both options would require pedestrian and bicycle access in alignment with Dewey.



Figure 7: Access Option 1



Figure 8: Access Option 2

**From:** Jerry Shapins [mailto:jshapins1@gmail.com]  
**Sent:** Friday, August 26, 2016 12:37 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** 311 Mapleton Comments

Dear Ms. McLaughlin and members of Planning Board,

I am a neighbor who has observed this site for many years while walking the neighborhood and adjoining open spaces. I am also one of the board members for Goose Creek Neighborhoods who are currently advocating for more affordable and equitable housing to be built in strategic locations throughout Boulder. We also have trying to broadcast a more creative and proactive process for development that will result in healthier more accessible more compact and denser neighborhoods that support a more sustainable and vernacular urbanism in Boulder.

After reviewing the plan submittal for 311 Mapleton, and informally discussing this with a few neighbors, I would like to offer the following comments for consideration. And thank you so much..city staff and the development team for your hard work preparing the recent application so that the broad city communities can understand what is intended. It looks like lots of great progress has been made!

### ***Site Plan and Landscape***

Regarding the overall site development pattern, the team has done a good job to translate lots of previous community comments, and has created a site plan that is more legible, intuitive to access, and which minimizes impacts from vehicles. That's really good. There are what appears in plan to be really inspiring view corridors through the space that connects the neighborhood to the site and the remarkable hillside backdrop. The variety of landscaped outdoor rooms should be enjoyed by many, and the collection of these different spaces appear to offer safe and comfortable experiences for all. But these plans do not show the intended spatial character... Perhaps that is the next submittal where sketches can illustrate the various levels of the pedestrian experience. It would be great for all of to see various levels of the user experience via informal simple sketches that show the proposed characters of the spaces. The strength of this plan will be strongly tied to the experience of the landscape features. These features will provide the inspiration and healing to future residents, but how do these spaces also accommodate visitors and neighbors? A more inclusive and community beneficial public realm will make the project a special place. A vibrant idea of a public realm here should be given serious consideration; the health of the residents and their quality of life will be strengthened by opportunities to interact with visitors...families, neighbors, students etc. Engaging visitors neighbors and residents together should be a key focus of how the many spaces are designed. It will be great to see the "walk through the district" .

### ***Architecture***

The architectural plans and illustrative site plan show the exhausting array of intended functionality but it is hard to evaluate the design character without a complementary architecture idea related to those myriad conditions. This feels like a gap. And the previous plans described an intended local architecture that is hard for me to understand re beyond mere "theming". I am also wondering and skeptical about the merits of this architecture. It seems to be a collection of practical and reasonable parts that do not make an elegant tapestry or whole. The parts seem heavy, uncreative, and mimicking what they think the community wants re nostalgic history. The design team should reach out to achieve a better and more sophisticated design to establish a unique, modest and inspiring local vernacular that is more contemporary and responsive to cultural and site conditions than what is shown. This is not a historic district so why so much contrived contextuality? I think that the project is being guided to overreact to the Mapleton Hill Neighborhood "nimby" rather than imagining what architecture is best to establish a new neighborhood of a broader demographic of seniors and families and

community who represent an intended social ecology here. Others have suggested more simple modest and timeless features that fit both the mountainous setting and the rich historic vernacular. The architecture could merge those ideas to create a more forward looking village that is both complex and unified. Another approach would be to be much more expressive re the sustainable design features and form. Actively demonstrating and providing significant solar capture and transparent daylighting could be a wonderful asset and feature; capturing and using storm water runoff from rooftops to streets to natural surfaces could become a landscape aesthetic; and using energy sensitive and perhaps recycled colorful contemporary cladding and building surfaces could express a unique response to the site and place and time. WHY NOT? And creating this character as an architectural portal at the edge of the city, connecting open space to city at a key city edge..... this is so special that the buildings and site and program should aggressively reflect and inform others of this iconic position as a City gateway.

### ***Engaging the Community/Local Development Partnerships***

To achieve real community benefit and to achieve a more village like organic character developed over a phased time period, perhaps the master developer should partner with a few non profits. BHP or others could possibly provide a more affordable housing model for seniors and others; another could provide unique health related services; another could integrate the local arts community . And there may be others. I know the application alludes to this, but it should become a primary attribute of the program and design as a complementary aspect of enriching the future land use. Perhaps a city subsidy could influence this outcome. Finding an innovative way to create a partial community driven development would be a worthwhile endeavor to consider. This model is currently being explored for the former BCH Broadway site by Goose Creek Neighborhoods.

### ***Sustainable Access***

It appears that the site plan is patterned to accommodate a variety of access systems. The connection of roads to key drop offs or other transfer points seems to allow future bus or transit stops. I assume that the multiple shuttle services will help residents to connect to the community bus system or to provide access to City retail and cultural destinations. These bus stops should be attractive, comfortable and appropriate signatures of car free access. The walking environment too should minimize vertical barriers to pedestrians and help to establish comfortable , safe and attractive paved surfaces to encourage walking. The site plan includes large subsurface parking space. Of coarse this is great to keep over scaled parking spaces out of site....but the provision perhaps goes too far and encourages single occupancy vehicle use. With less parking available, users would be encouraged to move about Boulder in other ways. These other ways need to be initiated and developed by the City of Boulder. A bus with a 10 minute headroom should connect 311 via MH to the bvrc and downtown. The city must commit to this infrastructure change and lead by showing a deeper investment via transit. This is what we can do.

### ***Retail /Mixed Uses***

A robust yet practical retail component could strengthen the relationship of 311 to the community. Including more maker space, cafe, sandwich shop, gifts yoga, health, art studio etc intended to attract a local clientele and to also meet resident needs would be great. Creating a significant critical mass and local character could strengthen the village idea. And doing this around a gateway perimeter feature or internal commons would be effective

### ***The Smokestack***

The existing smokestack because of its height and location is a unique city landmark because it visually locates in city context the 311 site and the associated legacy of past land uses. It is a cultural landscape icon in the City. It is seen from across the open space system and urban neighborhoods, and it could be a very special marker for the site. It could be modestly adorned with text or colored stripes to establish its new role as an

artistic community marker and relic. Adding a graphic element to a height that is practical for a cherry picker would make this a possible site based art feature and a welcome creative contribution to the cityscape. And keeping this historic feature would distinguish the character of the planned development.

Thank you so much for considering these comments and being open to my comments and the comments of other community members.

Respectfully Submitted ,

Jerry Shapins, Board Member  
Goose Creek Neighborhoods  
Downtown Management Commission

Sketch &Place  
[jerryshapins.tumblr.com](http://jerryshapins.tumblr.com)  
644 Dewey Avenue  
Boulder, Colorado 80304

720-839-6280

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### **Overwhelming Size and Scale**

The developers of the overly ambitious senior care facility are proposing to create a "village" at the most important piece of land in Boulder, situated in Boulder's crown jewel neighborhood of wonderful Victorian homes, at the foot of the mountains. Conceptually, some of the neighbors are in agreement that a senior care facility on the property is a good use of the most magnificent piece of developable land left in Boulder, but our argument is how the scale is not compatible with the surrounding area, creating insurmountable adverse impacts, and eroding the character of the neighborhood. What is proposed is a city and not a village that will house 300 people on 15 acres of land. A project of this scope and size would destroy the historic character of the Mapleton Hill Historic District. To be compatible with our neighborhood, the project should be 1/2 the proposed size. The return on investment is projected to be absolutely enormous with a \$500,000 buy-in and \$7,000-15,000 rent per month for each of the 300 residents. Taking into account that it is expensive building and running such a facility, cutting down the size of the project would still enable a very handsome return on investment, instead of insanely huge returns! The impact of the present size and scale of the proposed project is not only overwhelming but would also ruin the quality of life for Mapleton Hill for present and future generations.

scale, Scale, SCALE! Why does it have to be so large? The current scale of the project absolutely dwarfs the entire neighborhood. The developers say they want the project to complement the scale, size, feel, and architecture of the existing neighborhood, but instead, we are presented with a plan that shows 32 over-size buildings (counting buildings that are connected via walkway as two buildings instead of one building, which I feel is misleading). The initial plan was for 15 buildings. What happened? It appears that 90% of the 15 acres will be covered with buildings when significant open green space was promised. What happened to that idea?

the site. Why not use it as inspiration? It was loved by all. The roof lines, the turrets, the large windows, the multiple wrap-around porches were inviting and welcoming .....unlike the designs that have been presented to us.

### **311 Mapleton Main Entrance**

One of the very worst design decisions is to make Maxwell Ave. the main entrance to the project. Maxwell is a very small residential street that is a very integral part of creating "neighborhood" in Mapleton Hill, whereas Mapleton Ave. is a wide, busy thoroughfare designed for the traffic of access the Sunshine Canyon, Gold Hill, Ward, Brainard Lake Recreation Area, and the gateway to the Indian Peaks Parks and Trails, and all mountain access. Mapleton Ave. served as the gracious entrance to the Mapleton Hospital and it further up the road served the Mapleton Hospital as the comprehensive service entrance (included all services) as it should retain that function quite nicely for the senior care facility. It is worthwhile mentioning that the front of the Mapleton Hospital created and maintained a significant expanse of beautiful mature trees and an expanse of lawn and flowers. (They did not feel it necessary to build on every square inch of land for profit. Quality of life meant more.) Mapleton Ave. is a boulevard and can handle the extra volume. Maxwell cannot. There is no reason to destroy this traditional entrance. Leaving the main entrance on Mapleton also preserves the large pines to the west of the church which would be a significant loss to the neighborhood if torn down. The project name is 311 Mapleton and this should be the main entrance to proposed project. The roadway is 4 lanes wide with additional turn lanes in front of the existing church on Mapleton and 4th Streets and the front of the existing hospital. It is an obvious and logical decision to make Mapleton the entrance to the project!

### **Public Benefit**

Although the site is zoned "P" for public benefit, there is essentially no real public benefit to the proposed development. The proposed benefits for the public are token and not of use. After talking to neighbors, the feelings are that an on-site coffee shop and cafe for hikers and passersby would only increase traffic and not be a benefit to the neighborhood. The residents of

### **Size of Cottages Not Compatible**

The developers say the buildings will reflect the size of current homes in the neighborhood, but we are presented with 7 (SEVEN) "Cottages" that face 4th Street of 3,000 sq. ft. each that show zero land around each "cottage." How can a residence be called a "cottage" if it is 3,000 sq. ft? This is only one example of misleading use of words to sugar-coat giant structures! They are designed to be 35 ft. tall (3 stories) when existing surrounding houses are 25 feet (2 stories) maximum! Nothing in the size and height of the cottages resembles the surrounding neighborhood! To keep the size, height, and number of houses to resemble the existing neighborhood, there should be only 4 (FOUR) houses total of no more than 2,100 sq ft. on 4th Street and 1-2 stories. Many magnificent trees in the front of the houses will be destroyed for the construction when the houses could be moved a few feet back to preserve the landscape to enhance the current neighborhood feel. The existing Academy has homes that reflect the size and scale of the existing neighborhood with lawns and mature trees and landscape, like their neighboring surroundings. Why is that idea not repeated here in the most protected and revered neighborhood of Mapleton Hill?

### **Height Variances**

The developers have turned a blind eye to the fact that they are requesting to build higher than the neighborhood while they are on a hill that is above the neighborhood so their buildings will tower over everything else. The argument that the existing hospital building is 55 ft. and they can use that benchmark for the height of all their buildings is spurious at best. This is another issue that erodes confidence in the developers motives and ruins the quality of life for the neighborhood.

### **Architecture**

The designers of the senior care facility have the opportunity to create a truly worthwhile, viable, beautiful facility that is a true reflection of the best of the Victorian and Post-Victorian Era to resemble the unique character of Mapleton Hill. So far, sadly, this has not been done. The original sanitarium building was a true gem of the Victorian Era, and it would fit perfectly on

the senior care facility have their coffee and cafe needs taken care of on site.

A public bathroom is not needed on the site as there is a public bathroom at the trailhead at the parking lot on Mapleton and across the street at the parking lot trailhead for Red Rocks which is extremely nice and maintained by the city.

The site has historically been designated as "for the good of the public" via the original sanitarium by welcoming residents of Boulder, and all subsequent users since 1896. It appears that the developers are building an exclusive country club for only the most wealthy of all seniors, which will not be open to the public. The neighborhood has always had access to the Sanitas Trailhead via the existing stairs to the Nurse's Annex and on the paved road to the Annex. Access to the the Sanitas trailhead does not appear on the plans. Eliminating access would present a hardship to the neighborhood and right of "Public Use" that has been established for 120 years.



**From:** Rebecca Trafton [mailto:rebeccatrafton@gmail.com]  
**Sent:** Friday, August 26, 2016 3:59 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Rebecca Trafton <rebecca.trafton@gmail.com>  
**Subject:** Cottages on 4th Street-- and proposed "cottages"

Dear Elaine,

According to the maxim, one picture is worth a thousand words. I hope so!

Below I have pasted two photographs of cottages on 4th Street. (#2424 is my own, a little gem of 1550 square feet.)

Beneath them you can see the hulking, two-story, almost 3,000 square feet “cottages” that the developer proposes, describing them as “smaller” and “to match the neighborhood.”  
Really?

As I head out to my cottage garden, I wonder what I shall see henceforward on the slope above my house— a view that offers me Mount Sanitas.  
Oh, my!

Have a good weekend.  
Thank you so much for your consideration.

Rebecca







Rebecca Trafton  
2424 Fourth Street  
Boulder, CO 80304

cell: 434-249-3376  
[rebeccatrafton@gmail.com](mailto:rebeccatrafton@gmail.com)

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**From:** Rebecca Trafton [mailto:rebeccatrafton@gmail.com]  
**Sent:** Friday, August 26, 2016 3:48 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Rebecca Trafton <rebecca.trafton@gmail.com>  
**Subject:** a few photographs of 311 Mapleton- trees

Hello Elaine,

I'm attaching a photograph of a magnificent blue spruce, listed on the Tree Inventory as EXCELLENT, that the landscape architect stated at the June 6th meeting could be transplanted.  
Really?



So many things to consider.

Because I coordinate our neighborhood effort to maintain the Mapleton Median, I am so aware of how precious each and every tree is.

I also know the ferocity of the winds that whip off Sanitas at times. Could a transplanted tree with a compromised root ball really stand firm?

With thanks for your consideration,  
Rebecca

Rebecca Trafton  
2424 Fourth Street  
Boulder, CO 80304

cell: 434-249-3376  
[rebeccatrafton@gmail.com](mailto:rebeccatrafton@gmail.com)



**From:** Rebecca Trafton [mailto:rebeccatrafton@gmail.com]  
**Sent:** Friday, August 26, 2016 3:51 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Rebecca Trafton <rebecca.trafton@gmail.com>  
**Subject:** Trees slated for removal along 4th Street

Dear Elaine,

The existing landscape screen is shown below from both East and West.

All these trees are slated to be removed, to be replaced (according to the incomplete landscape plan) by two shade trees planted in a rectilinear border of lawn.

The applicant describes a “landscape buffer.....” It is unfortunate that the existing buffer will be destroyed.



With thanks for your consideration,  
Rebecca

Address: 311 Mapleton Avenue

**From:** Kevin Lambert [mailto:kevin.lambert@gmail.com]

**Sent:** Friday, August 26, 2016 3:21 PM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Cc:** Stuart Schare <sschare@gmail.com>; Katarina Stahl-Schare <kat.schare@gmail.com>; Krista Torvik <krista.koranda@gmail.com>; sandy brine <sandybrine@gmail.com>; chris brine <chrisbrine@gmail.com>; Chika <chikalambert@gmail.com>

**Subject:** 311 Mapleton - Traffic Demand Management Plan - community feedback

Hi Elaine,

Thanks for taking the time to review and consider input from the neighborhood regarding the planned development. I'm writing in reference to the Travel Demand Management arena.

Having reviewed document "32\_TDM Plan.pdf" myself and others find it disappointingly vague.

**First, areas we view favorable in terms of the objectives outlined:**

1. 20% alternative mode of transport reduction is a step in the right direction.
2. Private on-call shuttle.
3. B-Cycle station on site.
4. Lots of bicycle parking.
5. Showers for employees on site.
6. Electric car sharing for residents.

**However, many questions as a result:**

1. **20% reduction assumption:** There are two users of the site: the residents, and the staff/contractors. The residents will make 3.44 trips per day (table 2 of "31\_Trip Generator\_Trip Distribution.pdf"). Reducing that number by 20% hardly addresses the problem. A much higher goal should be set. The employees, administrative staff and contractors travel is not addressed except for the two employee dwelling units that show 6.66 trips/day. How many trips per day are done by all the others involved, and based on their work hours, home locations, etc., how much alternative mode reduction can be expected of them? We find the 20% reduction inadequately supported.

2. **Bike commuter assumptions:** The assumptions regarding bike transport adoption at this location are non-trivial, and therefore deserve scrutiny. The least steep and demanding bike route is up Maxwell but that is a gentle but demanding grade. And for any public transport users accessing from downtown Boulder station (as mentioned in the document), it still requires significant uphill riding. Myself and other avid cyclists enjoy the climbing required to reach this area, but for the average bus/bike commuter, it is uninviting.

When the Boulder Hospital-affiliated facilities were fully operational, we were there weekly for appointments for our daughter. I specifically recall the lack of bicycles in use, and when talking with

various staff at the time, I also recall how it was untenable for them given the location, hence car-based transport.

All of us are huge fans of bikes as alternative transport, but for all the bike commuters I know in the neighborhood, the benefit is *leaving* the neighborhood on the downhill to reach work, and sweating it on the uphill when coming home. I'm skeptical of high bike use adoption at The Academy on Mapleton Hill given the reverse dynamic.

Have any members of the City Staff ridden a bike to the site? We would be glad to host a bike ride for the Staff from the B station at Ideal Market to the site. The plan calls for 132 bike parking places. It sounds fantastic, but is a probably excessive waste of space and money.

3. **B-Cycle Station onsite:** Who will use the B station at the site? People who drive to the site and then want to ride up Sunshine Canyon (too heavy for that route) or elsewhere? The employees during their lunch hour (back and forth if they want to eat out in the Ideal Market area or downtown?)? Perhaps visitors to residents in the neighborhood would be the most likely users. Is the City subsidy worth it? Again, a big fan, but skeptical of the rate of adoption given the location and context.

4. **Bus Transport - exaggerated impact:** The mentioning of bus transportation in the TDM plan is impractical. The nearest bus stops are on Broadway and Pearl - a 10 minute brisk walk. Even the heavy users of RTD (my family included) do not make use of that. We tend to drive to Park 'n Rides or bike to the downtown station to use the necessary routes. This also deserves further scrutiny.

5. **Electric Car Sharing - concept with the most potential:** The electric car sharing for residents needs clarification - this sounds promising. If there are enough electric cars available, the Academy residents will not need to bring cars to the site. In fact, if Uber, Lyft and other services are considered, plus the potential trend of driverless cars (per the recent news of Pittsburg and Uber [here](#) [link embedded]), the vast underground parking plan could be virtually eliminated. Given Boulder's [Climate Change Commitment](#), it would be remiss of the City not to consider the significant design implications and improvements that could be addressed if this strategy is delved into further. The developers would benefit from a less costly and time consuming construction phase as well!

### **The Top Concern regarding the TDM Report:**

Simply: It does not address the development phase of the project. During the development for Trailhead, and even the water main fix at 4th and Mapleton two years ago, the development and construction traffic was overwhelming. How can the impact of development travel be reduced? The developers and the City owe it to this unique location (i.e. bordering Open Space in an old neighborhood) to scrutinize this topic in depth.

As a side note, it would be good to get clarity on this assumption from page 2 regarding traffic volume growth rate overall:

1. The projected 2018 background traffic volumes are based on an annual growth rate of about one percent for two years.

Given the growth in Boulder County, and the increasing popularity of the Sanitas hiking area (even more so as word spreads about the Lion's Lair trail - an additional location attracting hikers via their cars), is a 1% growth rate a correct assumption?

Thanks for taking the time to consider our input, and do let us know if you'd like to do a bike ride to try out a "day in the life" to get a sense of the commute context alluded to above.

Sincerely,

Kevin (& Chika) Lambert  
403 Mapleton Ave., 303-881-0503

Also:  
Stuart & Katarina Schare  
665 Maxwell Ave., 303-263-2251

Chris & Sandy Brine  
409 Mapleton Ave., 910-352-1567

Krista Koranda & Chris Jorvik  
834 Maxwell Ave.

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**From:** Murray McCollum [mailto:murraymccollum@yahoo.com]  
**Sent:** Friday, August 26, 2016 3:10 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** 311 Mapleton Project

Ms. McLaughlin,

My name is Carolyn Murray McCollum, and I have lived at 2530 4th Street in Boulder since 2001. The only reason I bought this tiny house was for the view from my front porch. I have done a major remodel on this house over several years only to make it a more livable and enjoyable house - not to flip and sell.

I am writing to express my concern about the development planned directly in front of my house and the impact it will have on my view and, really, the quality of life for all of us in our 4th St. and Maxwell community.

Background into my concern. When I bought my home it was designated 'non-contributing,' allowing me to remodel as I pleased. At the time of my remodel application, the Planning Council decided to change the status of my house to 'contributing,' disallowing me to create a second story addition. (Perhaps, if I had had the time and money, I could have changed this decision, but I'm one of the middle class residents that the city purports to want to keep in Boulder.)

All this is to relate why I am concerned about this new impending Development. It once again appears that money will trump the residents in this area who, like me, appreciate the open feeling of the neighborhood and the view of the foothills. By allowing the 311 property to be built up to higher levels and allowing taller buildings, it will block the foothill view for many of us.

There are also the considerations of the 24-hour traffic and the lighting pollution that a project of this magnitude will have on the neighborhood.

Please re-consider an appropriate public use of this property for all citizens. Should this project go through, my most reasonable option will be to either sell my home and leave the area or turn it into one more rental in this area.

Address: 311 Mapleton Avenue

Page 63



Best Regards,  
Murray

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**From:** Diana Stroyls [mailto:dianastroys@gmail.com]  
**Sent:** Friday, August 26, 2016 3:55 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** Increasing regret over "The Academy at Mapleton Hill"

Dear Ms. McLaughlin,

I am writing to express my exceptional concern and growing disdain over the proposed senior residential development facility slotted for 311 Mapleton Ave.

My name is Diana Stroyls and I live in the epicenter of that facility's development: 403 Maxwell Ave., the corner of Maxwell and 4<sup>th</sup> Street. My concerns are numerous, and are both personal and community/Boulder-centric in nature.

I chose my current dwelling because of the incredible, unmatched views and its quiet yet supportive, community-oriented neighborhood. I chose it because of my instant access to the beauty that both Sanitas and Sunshine Canyon offer, and also because I found a place in Boulder that I could afford to live. Candidly, I hit the jackpot.

However, it's clear that the enormous and exorbitantly priced senior residential facility will shatter every one of the good reasons I – and most others in this neighborhood – live here. Never mind the years of construction, of incessant “back-up beeping” of land movers (something I already tolerate with the current million-dollar residential homes being built across the street), the exponentially increased traffic and noise that come with this “great” idea. Never mind the 24/7 delivery trucks and commercial vehicles that will use my front yard as their entryway to and exit from the facility once it's up and running.

Without doubt, this facility will force me from my home. But what might just trump all of these horrendous “developments” is the fact that this facility is in no way A) public (the caveat in the proposal saying that it is is a silly, deceptive loophole) or B) in the spirit of what Boulder is all about.

We have options for this space and I implore you and City Council to consider them over this misguided and poorly executed proposal. Boulder is home of world-class athletes and fitness devotees and we're recognized worldwide as such. One option for this space would be to turn it into a cutting edge, environmentally sound, world-class training and health facility – one that is the envy of the world – and open to all. Not just the ultra rich.

Whatever we choose, let's not sacrifice the unmatched views, the powerful sense of community, and the high-end reputation that this historic part of Boulder offers. Please listen to the people you represent. We have the opportunity to turn this space into something remarkable; let's not opt for forgettable. That would be shortsighted and tragic.

Thank you,

Diana Stroyls  
403 Maxwell Ave.  
Boulder, CO 80304  
919-423-9572

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**From:** Mike Murphy [mailto:mike.murphy@pobox.com]  
**Sent:** Tuesday, August 30, 2016 1:57 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** 311 Mapleton

Dear Ms McLaughlin:

We would like to register our concerns regarding the proposed redevelopment of the Mapleton Hospital site.

While the idea of an Academy-type development on this site is fine to us, we understand that the proposed facility will be huge, having 25 buildings, 300 residents, 144 employees, and 366 parking spaces. It will, of course, operate 24 x 7, with employees commuting to the site daily and with frequent visitors, emergency

Address: 311 Mapleton Avenue

Page 64

vehicle visits and vendor deliveries. We are concerned that at this scale, it will irreparably degrade the character of the quiet residential Mapleton Hill neighborhood. Furthermore, the neighborhood is a designated historical district with all sorts of restrictions on homeowners that are intended to preserve the neighborhood's existing, attractive character, and we most certainly do not want to see that degraded.

We would like to see a significant reduction in the scale of the project.

First, we feel a reduction in scale is necessary to minimize the negative impact on the peace and quiet of our neighborhood. Many of us moved here for just that aspect of the neighborhood, and it would be a shame and unfair to see that disappear forever. As one, small example, a poorly selected and sited commercial air conditioner cycling on and off can create very annoying noises, including at awful, penetrating frequencies that carry for blocks. Please do not make us live with closed-up windows to protect our sanity. There must be hundreds of such environmental considerations. Please identify and analyze them thoroughly to ensure that this facility will be a good neighbor. And once the facility is completed and operational, there will be a considerable increase in daily traffic over what we now see, and we would ask that you take steps to have that similarly carefully assessed so as to not create a permanent traffic and parking nightmare for the neighborhood (including vehicle noise and sirens!) and for the many hikers visiting Mt Sanitas.

Second, we feel that the density of the build-out should be consistent with the site's existing and historical density. We would like to have the buildings not loom over Mapleton and 4<sup>th</sup> Streets, and to have the density be such as to preserve trees, grass and garden space. We would like to avoid the redeveloped site looking like an out-of-place, high-density urban complex crowding upon the neighboring streets. We are disappointed in how the Trailhead development turned out in this respect, despite numerous site plans, architectural and elevation drawings and assurances from the developer. Specifically, the Trailhead houses along 4<sup>th</sup> both loom over the street and appear to passers-by and immediate neighbors to be crammed together, lacking anything like the amount of lawn-garden area of the surrounding houses. Please do not let this happen to the lovely old Mapleton Hospital site, which also has wonderful old trees that contribute greatly to the sense on reasonable density and elbow-room on the site. Let's not lose that feel and street-appeal.

Third, we would ask you to ensure that the design complements the existing architectural styles of the immediate neighborhood. No industrial modern, please.

Forth, though temporary, the site preparation and construction phases will create a multiple-year, huge impact on the neighborhood in terms of blocked streets, additional heavy-truck traffic, loud and perhaps very loud noise, perhaps even at early and late hours and on weekends, and increased parking demand. Scaling back the project would somewhat mitigate all of these. And at whatever scale, please take all necessary action to control the magnitude of the impact on the neighborhood, including traffic circulation rules and restrictions, so as to make it as tolerable to neighbors as possible. We would ask you to consider how you would like such a development going on in your own neighborhood.

We respectfully request that you, other staff and all relevant elected officials responsively consider our neighborhood's interests as the project moves forward. Thank you.

Regards,

Mike Murphy and Claudia Murphy  
530 Concord Ave.  
Boulder, CO 80304



## CITY OF BOULDER Planning and Development Services

1739 Broadway, Third Floor • P.O. Box 791, Boulder, CO 80306-0791  
phone 303-441-1880 • fax 303-441-3241 • email [plandevlop@bouldercolorado.gov](mailto:plandevlop@bouldercolorado.gov)  
[www.boulderplandevlop.net](http://www.boulderplandevlop.net)

### CITY OF BOULDER LAND USE REVIEW RESULTS AND COMMENTS

DATE OF COMMENTS: Dec. 5, 2017  
CASE MANAGER: Elaine McLaughlin  
PROJECT NAME: Academy on Mapleton Hill  
LOCATION: 311 MAPLETON AV  
COORDINATES: N04W08  
REVIEW TYPE: Site Review, Use Review, Rezoning  
REVIEW NUMBER: LUR2016-00065, LUR2017-00027 and LUR2017-00028  
APPLICANT: MICHAEL BOSMA  
DESCRIPTION: Application for a congregate care facility consisting of attached Assisted Living units; attached Independent Living Units; and detached independent living units. Proposal also includes a warm water therapy pool. Intended as a full continuum of care including independent living, assisted living, short term rehabilitation and memory care.

IDENTIFIED MODIFICATIONS TO THE LAND USE REGULATIONS:  
Section 9-7-1, Height per Ordinance 8028

#### I. REVIEW FINDINGS

The project plans have evolved well over the course of the review process. From the Concept Plan review that provided guidance to refine the layout of the plan, to the initial site review that was refined to move the Memory Care and Long-Term Rehab care to areas lower on the site. Through the process, the applicant has addressed many key issues including the need to reduce the intensive regrading of slopes and use of large retaining walls; the need to refine building design for compatibility in the context through direction provided by the Design Advisory Board; and establishment of a more "village-like" orientation of the buildings rather than a campus appearance. With these broader key issues resolved, there are several remaining key issues for revisions related to access and circulation, building design details, density calculations for attached dwelling units, and location of the floodplain boundary. Please also refer to comments raised by members of the public and as found in the attached comment letters.

#### II. CITY REQUIREMENTS

This section addresses issues that must be resolved prior to a project decision or items that will be required conditions of a project approval. Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Access/Circulation David Thompson, 303-441-4417

1. Following-up on staff's previous comment, please revise sheet C3.2 to show the relocation of an existing utility pole with a street light to accommodate the proposed detached sidewalk along 4<sup>th</sup> Street.
2. Following-up on staff's previous comment, please revise sheet C3.2 to show the relocation of the existing Avista Surgery Center sign to a location outside of the 15' x 15' sight triangle.

3. Staff doesn't support the proposed crosswalk on private access Drive "B" because the location of the skewed curb-ramps increase the crossing distance for pedestrians and the proposed trees to be planted adjacent to the curb-ramp will impact the line of sight between motorists and pedestrians. In support of meeting the site review criteria for circulation, please revise the pedestrian crossing to address these comments.
4. Please either revise the site plans or demonstrate a line-of-sight is being provided between vehicles exiting the underground garage at building "D" and vehicles accessing the garage as the site plans do not label the height of the wall. Also, in applying a passenger turning vehicle template, the widths of the drive aisle for the parking lot and the access drive for the garage couldn't accommodate two passenger vehicles egressing and accessing the garage at the same time. Please address these comments in support of meeting the site review criteria for circulation and parking.

Traffic Impact Analysis (TIA) / Transportation Demand Management (TDM) Plan

5. Following-up on staff's previous review comment, please revise the traffic impact analysis to discuss the anticipated changes in the ADT volumes on Mapleton, Maxwell and 4<sup>th</sup> Street due to traffic estimated to be generated by the project.
6. Given the distance between the site and the CTN corridor along Broadway, staff doesn't concur with the anticipated 20% trip reduction for the site. Please revise the TIA / TDM Plan to provide additional justification supporting a 20% trip reduction.
7. Please revise the TDM Plan to include the Avista Surgery Center employees as part of the Academy TDM Plan.
8. TDM Plan - Page 1 / Existing Alternate Modes Description – please provide more justification to support this sentence "The site is well-positioned to make good use of many of these existing opportunities".
9. TDM Plan - Page 1 / Existing Alternate Modes Description – consider adding the following sentence "There is the opportunity to share trips with Via".
10. TDM Plan - Page 7 / TDM Strategy for Commercial Space – revise "The site is located within the CTN Buffer" to read "the site is located just over a half-a-mile for the CTN corridor".
11. The TDM Plan for the residential units must include unbundled parking for the residential units except for those units with attached garages and the memory care.
12. TDM Plan - Page 12 / Table 4 – please revise the table to replace "within CTN buffer" to "adjacent to CTN corridor"
13. TDM Plan - Page 12 / Table 4 / Ratio of MOV Mode Share – "revise the last sentence for employees"

Building Design Elaine McLaughlin, 303-441-4130; Kalani Paho, 303-441-4248

1. The Site Data Table submitted as part of the RR2 submittal identifies specific unit sizes that are assigned a conversion factor for density. With this specific information, staff notes that there are a number of the attached units that are larger than is permitted to allow the conversion factor of 3:1 for the attached congregate care units. As noted, the applicant is allowing a conversion factor of 3:1 for attached units that are planned to exceed 1,200 square feet within buildings A, B, F, G and L. Note that this is not consistent with the requirements of Land Use Code section 9-8-6(f)(1)(b), B.R.C. 1981 that requires *attached* Congregate Care dwelling units to be no greater in size than 1,200 square feet with an average of



1,000 square feet for attached units overall; in that code section it specifies what does and doesn't count toward floor area for attached units. While the *detached* congregate care units such as the H, J, M and R cottages correctly assume a 1:1 conversion ratio, there is no code provision for *attached* units larger than 1,200 square feet to simply count as a 1:1 density. In order for *any* attached units to use the 1:3 conversion ratio, all of the attached units must meet that criteria. Staff notes that some of the units that are as large as 2,400 square feet would likely become two units; thereby increasing the overall number of units on the site. The density of 6.2 du's per acre can be built within this 'P' zoned site. Please revise the units and the overall Site Data Table.

2. Similarly, building "N" is currently a duplex, which under the land use code constitutes a "detached" dwelling unit, therefore, correct the conversion factor from 3:1 to 1:1. Similarly, Building O is a detached dwelling unit but is calculated at a 3:1 conversion factor.
3. There appears to be several typos within the Site Data Table for cottages R5, R6 and R7. For example, while the Site Data Table notes the first floor of R5 to be 2,049 square feet, the actual floor plans scale to approximately 1,470 square feet as shown below. Please correct the table to ensure that it aligns with the floor plans.
4. Provide a notation on sheet A-4.15, on the areas noted as "blue" areas of the roofs, that they will be pre-wired for solar panels.
5. On all building elevations, provide floor to floor height measurements. Note that cross-sections through the building would help to convey the intended ceiling height for the units.
6. As noted from a previous comment, for each wing of Building A to be considered as a separate building with an internal connection, per 9-7-5(d)(1)(B), B.R.C. 1981; each wing must function as a separate building per the building code. Therefore, please provide details that demonstrate the wings of Building A will be constructed as separate buildings including fire door separation and separate HVAC or other building code requirements.
7. Overall, please clarify the "stone masonry" composition. Is it intended as authentic stone or cultured stone? Please provide a material sample on the boards already submitted.
8. Building A: Please provide a cross-section through Building A to help illustrate the existing to proposed topographic changes.
9. Building A West: A6.02 material key labels are missing. While the A West building is similar to the A East building there are subtle differences. Please clarify.
10. Building B: provide a sample of the cladding material on the boards already submitted.
11. Sheet A-8.04 indicates that building A as "precast", but the material call out indicates cementitious board. Please clarify.
12. Buildings F and G include two options. Please eliminate an Option. For reference, Option 1 addresses DAB comments to provide a roof form to this building.
13. On the solar shadow analysis, please label the building points to the corresponding shadows points; label the hypothetical fence; and label the smokestack shadow. Ensure each building in the analysis is labeled.
14. Sheet A-8.05, materials don't match on key, if the intent is to illustrate where the cross-sections are drawn in relation to the perspective, please label the perspective as "location key for reference only."
15. A-9.01 label as "illustrative view only" and remove notation.
16. There are several refinements and potential changes that are required to be addressed as a part of a Technical

Document Review with input from the Design Advisory Board:

- a. With regards to Building A East, Staff recommends review and refinement of the window fenestration patterns, window types and the rhythm and pattern of wall materials. Building A East (A6.02/Elev. 2) - currently the garage entry bay plays a prominent role along the façade with the fenestration and arch windows drawing attention to a secondary bay unnecessarily. Staff recommends fine tuning the design of this elevation to the deemphasize the garage entry bay.
- b. Building A North (A-6.01/Elev. 1&2), please review and refine the proportioning of the anchor corner tower form and wrap around porch. Review and refine the 1<sup>st</sup> Floor square window patterning, balance, and relationship to the 2-3<sup>rd</sup> floor windows across the bay.
- c. Building B – Explore the upper floor secondary material options, e.g. cementitious panel, stucco, etc. Review and refine where the reglets/control joints, or panel junctions, will occur in relation to the fenestrations and building bays.
- d. Buildings F & G – review and refine the roof form, fenestration, and differentiation or similarity between the two sister buildings, e.g. similar vs. dissimilar, etc.
- e. Cottages H and J, please review and refine the parapet extension. Currently the parapet extension appears to be of a lattice type construction.
- f. Cottages R, please review and refine the subtle details of the following:
  - i. R7 (A-6.10/Elev.2): the balance of the paired windows across the hipped roof projecting bay.
  - ii. R10 (A-6.10/Elev. 10): the transition of the primary hipped roof form to the eyelid dormer.
  - iii. R4 (A-6.09/Elev. 2): the roof transition in the complex hipped roof bay/hipped 2<sup>nd</sup> floor porch canopy and the "Front" readability.
- g. In general, review and refine the material assignment and façade planar relief, e.g. wall cladding/window casing proud of window frame, the masonry string course and other accent bands, the planar relief in the base and top accents (water table/cornice details), and window finish/color.

Drainage Scott Kuhna, 303-441-4071

Per previous comments from city staff, the plans show pavers near the cottages along 4<sup>th</sup> Street (east of Building D), and in the drop-off area for Building A, on top of public water and wastewater mains. Pavers may not be placed over existing or proposed public water or wastewater lines.

Engineering Elaine McLaughlin, 303-441-4130

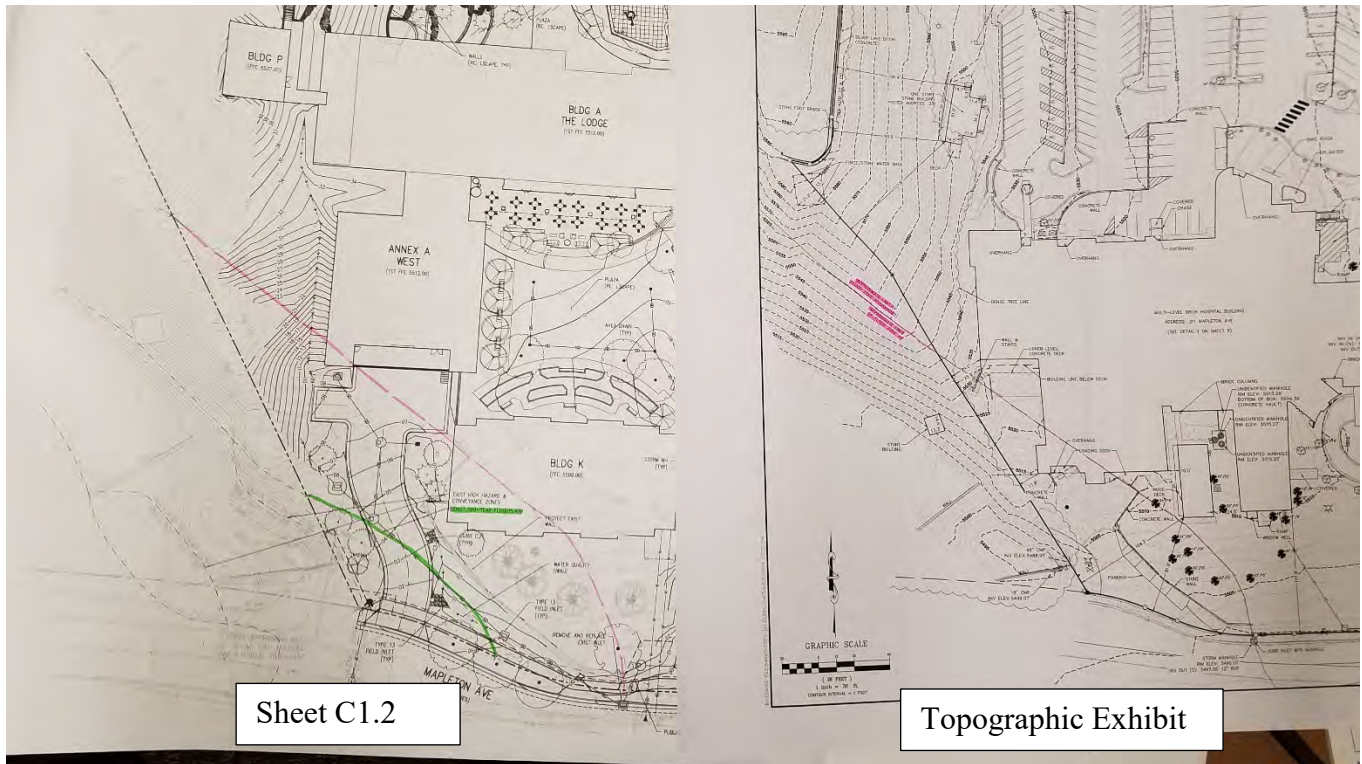
On sheets C1.7 to C1.10, the applicant provided an exhibit that illustrates areas of cut and fill. In making findings for a site review criterion, staff must indicate how "cut and fill is minimized" and balance that finding with other site review criteria. The applicant has provided an "Earthwork Calculations" summary that indicates the net result of the cut and fill is approximately 9,342 cubic yards. Staff requests the applicant provide the calculations in cubic yards of cut for the below grade parking structures. There is Site Review criteria that also looks at ensuring well-designed buildings and landscaping be the dominant visual features of a site plan and not parking. To help decision makers evaluate the balance of these two criteria, please help identify the grading extent to ensure below grade parking that will reduce the visual appearance of vehicles on the site.

Fees

Please note that 2017 development review fees include a \$131 hourly rate for reviewer services following the initial city response (these written comments). Please see the P&DS Questions and Answers brochure for more information about the hourly billing system.

Flood Control, Alysha Geiger, 303-441-4053

1. The limits of the 100-year floodplain, high hazard and conveyance flood zones for this property show on the civil sheets do not match the floodplain boundary shown on the Topographic Exhibit. The 100-year floodplain shown on the Topographic Exhibit impacts more of the site than what is shown on the civil sheets, as shown in the image below. The pink line shown on Sheet C1.2 below shows the approximate limit of the 100-year floodplain as scaled from the Topographic Exhibit, the green line is what is called out as the 100-year floodplain in the civil plan set.



2. The property is located within the 100-year floodplain of Sunshine Canyon Creek. Buildings A, B, K, P, Annex A West, Annex A East, Annex A North, and the parking garages under these structures are located in the 100-year floodplain. Since the buildings all appear to be structurally connected they are all considered to be in the 100-year floodplain requiring elevation of all levels, including the below grade parking structures to a minimum of two feet above the base flood elevation, where no base flood elevation is defined the lowest floor shall be two feet above the highest adjacent grade. The structures may be considered separated structures if they are able to meet the Building Code criteria for a separated structure including the required fire separation, structural independence, and separate utilities serve the structures. The design as proposed will prohibit the installation of the below grade parking structures under these buildings.
3. The City of Boulder has adopted floodplain regulations for critical and lodging facilities that impact this project. The regulations require critical facilities to develop an Emergency Management Plan that addresses activities and procedures for effective response from flood and disaster events when the site meets redevelopment criteria or by January 1, 2019. Information on the ordinance can be found on the City of Boulder website at [www.bouldercolorado.gov/flood/critical-facilities-lodging-facilities-ordinance](http://www.bouldercolorado.gov/flood/critical-facilities-lodging-facilities-ordinance).

Fire Protection, David Lowrey, 303-441-4356  
As previously noted:

1. Neither the fire code, the wildland fire code nor the building code have requirements on occupancy concerning where it can be located as it relates to 311 Mapleton development. There are requirements that specify construction, fire sprinklers, fire alarm as well as other requirements based on the occupancy.
2. Boulder Fire Rescue does not have concerns with what has been proposed at this location (Senior living, assisted living as well as full care facility). Between the construction requirements, fire sprinklers, alarm notification as well as emergency planning the occupants have a very safe building(s) including the threat from wildland fire.

3. If a wildland fire did occur, it is more than likely that we would have the occupants of these buildings "protect" in place. In other words, we probably would not evacuate them based on their mobility status. Based on the buildings construction, some defensible space, emergency response access to preform structure protection the safest location would be to leave residents in place.

#### Irrigation Ditches

The city is interested in purchasing any interests in water or water rights associated with, or appurtenant to the Subject Property including any and all interests, be they contractual interests or otherwise, in the Silver Lake Ditch Company. Please contact Kim Hutton, Water Resources Specialist at 303-441-3115.

#### Land Uses Phil Kleisler, 303-441-4497

Staff must make findings of consistency with the following Site Review criterion. At this time, the findings are that the property project meets this criterion:

*(A) The proposed site plan is consistent with the land use map and the service area map and, on balance, the policies of the Boulder Valley Comprehensive Plan.*

In previous comments to the applicant, staff noted that the existing Open Space – Other (OS-O) designation was likely a mapping error but that the process to amend the error was through a BVCP land use map change. Since that time, and as the applicant is aware, staff conducted further research and determined that the existing OS-O designation is indeed a mapping error that likely was the result of incorrect mapping of the Silver Lake Ditch, first evidenced in early Boulder Valley Comprehensive Plan (BVCP) maps. Subsequent land use maps were then printed with the incorrect depiction of the Silver Lake Ditch. The erroneous alignment of the ditch nearly identically coincides with the depiction of "Open Space – Other" on the land use maps. Documentation around the time the city purchased open space to the west also indicates the desire for Open Space acquisition to be "west of the Silver Lake Ditch." Additional information about staff's analysis may be found in the July 12, 2017 [update to the Open Space Board of Trustees](#) (see page 33).

Exhibit B, Section E of the BVCP states that "if a discrepancy is found to exist within the Boulder Valley Comprehensive Plan that is clearly a drafting error, mapping discrepancy or a clerical mistake, either the city or the county, after a referral request to the other agency, may correct such error." Staff is processing this error correction by changing the existing BVCP designation of 'Open Space – Other' to 'Public' concurrently with consideration of the development applications; this will align that area of the site with the existing Public zoning designation. The Planning Board and City Council are the decision-making bodies for correcting the mapping error (hearing date is to be determined). Staff is sending a referral to Boulder County staff in early December and will share their response with the applicant.

The BVCP defines the Open Space – Other and Public land use designations as follows:

#### Open Space – Other (OS-O)

This designation applies to other public and private land designated prior to 1981 that the city and county would like to preserve through various preservation methods, including but not limited to intergovernmental agreements, dedications or acquisitions. By itself, this designation does not ensure open space protection.

#### Public (PUB)

Characteristics and Location: PUB land use designations encompass a wide range of public and private non-profit uses that provide a community service. They are dispersed throughout the city.

Uses: This category includes municipal and public utility services (e.g., the municipal airport, water reservoirs and water and wastewater treatment plants). It also includes: educational facilities (public and private schools and the university); government offices, such as city and county buildings, libraries and the jail; government laboratories;



and nonprofit facilities (e.g., cemeteries, places of worship, hospitals, retirement complexes) and may include other uses as allowed by zoning.

A congregate care facility is an allowed use in the Public zoning district through Use Review.

Landscaping Elizabeth Judd, 303-441-3138

The project continues to improve and progress through the review process. Many of staff's previous concerns have been addressed. The following specific areas require revision for the final document set. Please keep in mind additional comments should be expected at the Technical Document Review and will require changes to the plans. See the informational comments for areas that are likely to receive additional comments; note that this is not an exhaustive list.

Update the Landscape Summary on sheet LP0.1 to reflect the following accurate code requirements:

- a. There are minor language inconsistencies between Ch. 3 of the DCS and section 9-9-13 B.R.C. Streets with a 6' tree lawn require medium sized trees spaced 25-30' on center. Please update the chart accordingly.
- b. Note #1 states that private drives do not have landscape requirements; this is incorrect per section 9-9-13(b) B.R.C. 1981 which clearly states all streets public and private are required to provide street trees. Remove the statement.
- c. The chart including the private drives fails to take into account that they are double sided and includes only half of the required number of street trees for two of the three streets as currently shown. If additional trees are feasible, add them and update the number. If not, add a column to the chart with a brief explanation of why meeting the requirement is not possible. This might include grade change, utility conflicts, programmatic goals for the specific user population, etc. Be as specific as possible and add this as a requested modification. Given the overall effort to provide a high quality design this is a supportable modification, but needs to be clearly documented for future reference.

Legal Documents Julia Chase, City Attorney's Office, Ph. (303) 441-3020

The Applicant will be required to sign a Development Agreement, if approved. When staff requests, the Applicant shall provide the following:

- a) an updated title commitment current within 30 days; and
- b) Proof of authorization to bind on behalf of the owners.

Neighborhood Comments

A number of comment letters were received during this review track and are provided in Attachment A. Additional comment letters received after this review track will also become part of the public record, and public comments are taken throughout the review process and up until the public hearing which the applicant should also note. As a point of clarification on an email staff sent to Councilmember Mirabai Nagel in response to her questions about the notification and sign posting, please note that a typo indicated that public notification was sent via "email" upon receipt of applications. That should read that public notification was sent via "mail" to several hundred property owners each time an application was received: Concept Plan in 2015; followed by Site Review application in 2016; and Use Review and Rezoning in 2017. In addition, public notification was sent for two different Good Neighbor Meetings in the form of written, mailed notification and emailed to others who had asked to be provided notification via email. Please note that the applicant should respond to the neighborhood comments by topic area in the response to comment letter.

Open Space Bethany Collins, 303-413-7646

1. **Ecological Systems** - During concept plan, applicant was asked to consider certain BVCP sections specifically related to the site's location on the western edge of the city, including the management of wildlife-human conflicts. Please provide information on proposed management.
2. **Ditches and Water Rights** - In addition to resolving the ownership and encroachment issues associated with the water storage tank/facility (see Real Estate section), Applicant will need to coordinate their proposed use of the facility utilizing

their Silver Lake Ditch rights for storage and irrigation with the Silver Lake Ditch company and consistent with applicable regulations (including the proposed backup use of municipal water for irrigation).

3. **Facilities and Infrastructure** - As the applicant has noted, there is a water storage facility spanning the property line between OSMP land and their private site. Since at least 2001, OSMP has performed all management and enforcement related to this facility and true ownership needs to be researched and the property line will need to be adjusted accordingly via a lot line adjustment.

Also, there are two bridges across the Silver Lake Ditch which pose management and enforcement issues if kept in its split ownership state and staff requests the entirety of both bridges be under City ownership and management control. Staff proposes to do lot line adjustments to clean up these encroachment and management issues – water tank footprint to the applicant and the bridges to the City.

4. **Access to City Property** – If applicant desires continued access point(s) for its residents and the public to/from the private site onto the adjacent City-owned open space, please detail the proposed location(s) and management of the proposed access(es) in the site plan documents, draft Management Plan and Good Neighbor Policy.

Parking David Thompson, 303-441-4417

1. Please revise the overall parking plan sheet to show and remove from the parking space table the spaces that will be used by the vehicles owned by the Academy and the spaces that will be used to park the electric "shared" vehicles as discussed in the site's parking analysis.
2. In accordance with 9-9-6(d)(3)(B) B.R.C. 1981 please revise the site plans to provide a parking turnaround space in the parking lot serving the Avista Surgery Center.
3. On Sheet A-4.21 please revise the diagram to show where the 32 standard / accessible spaces are being provided.
4. On Sheet A-4.21 please revise the table to show the different types of parking being provided in front of the Avista Surgery Center as shown on the overall parking plan sheet.

#### Bicycle Parking

5. Please revise the overall parking plan to add a single inverted "u" bicycle rack between buildings "O" and "N" to meet the short-term bicycle parking requirements for both buildings per Table 9-8 of the B.R.C.
6. Please revise the architectural sheets for buildings "L", "N", "O" and the "M" cottages to include long-term bicycle parking being provided at the individual units with two spaces being provided for each unit per Table 9-8 of the B.R.C.
7. Please revise the Overall Parking Plan Sheet to remove the number of bike parking spaces being provided for the private garages because there's no requirement to provide bike parking per Table 9-8 of the B.R.C. 1981.
8. Following-up on staff's previous review comment, please revise the site plans to summarize how the short-term and long-term bicycle parking is being allocated between the employees, visitors and residents at the different buildings. Once this is shown staff will be able to review the proposed parking and provide either concurrence or additional comments.

9. Following-up on staff's previous review comment, please revise the plans to show the short-term and long-term bicycle parking requirements are being met for the Arvista Surgery Center following the criteria / standings found in section 9-9-6(g) B.R.C. 1981.
10. On Sheet A-4.21 please revise the overall parking plan sheet to revise the note to read "All long-term bike spaces will be enclosed in an area by a chain link fence with a locked gate with adequate lighting per section 9-9-6(g)(4) of the Boulder Revised Code.
11. Pursuant to section 9-9-6(g)(4)(D) of the B.R.C. 1981, please revise the site plans to demonstrate the long-term bicycle parking meeting the criteria for adequate clearance around the racks in order to give cyclists room to maneuver and to prevent conflicts with parked cars.

#### Parking Study

12. Following-up on staff's previous comments:
  - Please revise Table 1 of the parking study to use the parking requirements found in Table 9-1 of the Boulder Revised Code for the Cottages R1- R7, Cottages J1-10 and the apartment units.
  - Table 1 of the parking study must be revised to include the parking requirements for the existing medical office building and the subacute rehab facility that will be open to the public.
  - Please revise the parking analysis to address the parking demands for the for the proposed marketing events to be hosted by the facility

Utilities Scott Kuhna, 303-441-4071

1. The water main design at the north end of the site shows a distribution main looping back onto itself at a cross. This is not a loop and it does not ensure at least two feed sources to maintain system strength. Please contact staff regarding changes to the alignment. Changes to the water model will also be necessary.
2. The *Utility Report for The Academy at Mapleton Hill (Utility Report)* shows in the water modeling output data that pipe P-2 has a velocity of 11.24 fps, where a maximum of 10.0 fps is allowed. Off-site improvements (upsizing existing mains) may be required. See comment above regarding water model.

#### III. INFORMATIONAL COMMENTS

This section addresses issues that are for the applicant's reference but are not required to be resolved prior to a project decision or as a condition of approval. Informational Comments Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Access / Circulation, David Thompson, 303-441-4417

1. The applicant should consider design enhancements for the mid-block pedestrian crossings to improve the design of the crossing which might include the signing and striping of the crosswalk, lighting the crosswalk to improve visibility at nighttime or a raised crosswalk to lower the speeds of vehicles / trucks.
2. Staff will be drafting a condition of approval to require a construction site parking and access management plan be submitted to and accepted by the city prior to the issuance of any demolition or building permits for this site. At a minimum this plan will need to address parking needs for construction and hauling routes related construction traffic.

Addressing, Gabby Hart, 303-441-4159

Each new building is required to be assigned a street address following the city's addressing policy. Please prepare a separate Address Plat, which includes a basic site plan, including north arrow, streets and street names and building footprints identified with the proposed addresses. One hardcopy and one digital copy (PDF format) should be submitted to P&DS staff for routing and comment alongside the Final Plat for this project. The city is required to notify utility companies, the County Assessor's office, emergency services and the U.S. Post Office of proposed addressing for development projects. This is considered part of the technical document review process for a project of this size and scope and is in addition to the final plat approval.

Architectural Inspections, Elaine McLaughlin 303-441-4130

Note that at the time of building permit inspections, architectural inspections will be performed as a part of the regular building permit inspection process to ensure high quality outcomes in new buildings and landscaping. The "rough architecture" and the "final architecture" inspections for buildings approved as a part of a discretionary site or use review will require that building architecture, materials and window details are consistent with details approved in discretionary review plans.

Drainage, Scott Kuhna, 303-441-4071

1. A Final Storm Water Report and Plan will be required as part of the Technical Document Review process. All plans and reports shall be prepared in accordance with the City of Boulder Design and Construction Standards (DCS).
2. Discharge of groundwater to the public storm sewer system may be necessary to accommodate construction and operation of the proposed development. City and/or State permits will be required for this discharge. The applicant is advised to contact the City of Boulder Storm Water Quality Office at 303-413-7350 regarding permit requirements. All applicable permits must be in place prior to building permit application. Additionally, special design considerations for the properties to handle groundwater discharge as part of the development may be necessary.
3. All inlet grates in proposed streets, alleys, parking lot travel lanes, bike paths, or sidewalks shall utilize a safety grate approved for bicycle traffic.
4. A construction stormwater discharge permit is required from the State of Colorado for projects disturbing greater than 1-acre. The applicant is advised to contact the Colorado Department of Public Health and Environment.
5. Page 7 of *The Academy at Mapleton Hill Preliminary Stormwater Report (Drainage Report)* states that "Private streets will be designed to convey the 100-year storm event with any overtopping limited to elevations less than finished floor elevations of adjacent buildings or other occupied structures". Calculations and cross sections are required to be included in the Final Report at time of Technical Document Review.

Groundwater, Scott Kuhna, 303-441-4071

Groundwater is a concern in many areas of the city of Boulder. Please be advised that if it is encountered at this site, an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quality of the groundwater encountered on the site will be required to determine if treatment is necessary prior to discharge from the site. City and/or State permits are required for the discharge of any groundwater to the public storm sewer system.

Historic Preservation, James Hewat (303) 441-3207

Applicant has attached landmark designation applications in the last submittal for the 1930 Nurses' Dormitory, the c. 1910 frame building ("Cottage A"), the 1940 flagstone building ("Cottage D") and a "historic stone wall fragment." To complete these applications, please submit the signed applications to a Project Specialist along with the following information:

- Maps showing the proposed landmark boundary for each landmark;
- Current photographs of each building/structure;



- A fee of \$25 per application.

To reiterate staff's previous comments, the smokestack is arguably the most important and iconic feature of the property, intrinsic to the history of sanatorium/hospital facility. In addition to being eligible for local landmark designation, staff considers that the smokestack is likely eligible listing in the National Register of Historic Places. There are numerous examples of such smokestacks being designated and integrated into redevelopment projects including, the Ohio-Colorado Smelting and refining Company Smokestack in Salida, Colorado, the Lucky Strike Smoke Stack in Richmond, Virginia, the Don Valley Brickworks in Toronto, Ontario and the Inujima Seirenscho Art Museum, Japan. Staff encourages the applicant to submit a landmark designation application for the smokestack and an area surrounding it as part of the Site Review process.

Inclusionary Housing, Michelle Allen 303-441-4076

Applicant has reaffirmed that they intend to meet the inclusionary requirement with off-site affordable senior independent living units to be located at 1665 33rd St. (receiving site). Acceptance of off-site affordable units is dependent on the following factors:

- Approval of the off-site location; COMPLETED
  - Successful completion of site review;
  - Agreement on the number and details of the off-site units;
  - Timing; concurrency with the sending site;
  - Provision of security to ensure performance;
  - Execution of required documents; and
  - Successful completion of all required inspections.
1. Affordable rental units required by IH must be owned all or in part by a Housing Authority or similar agency. Applicant may petition the division of housing for an Alternative Method of Compliance to own and operate the affordable units privately. A letter entitled "Partnering with For Profit Developers" was sent to the applicant on Oct. 25, 2017. It included a list of items that must be addressed to consider such a request. If the applicant would like the city to consider private ownership, please respond to the letter for a determination by the Deputy Director of housing.
  2. The following are required prior to building permit submittal for the sending site:
    - a. Land Use Review
    - b. Inclusionary Housing Agreement for Newly Constructed Off-site Affordable Units (the "Off-site Agreement"). This Agreement documents the requirements and responsibilities of the sending site developer and what must be provided when on the receiving site.
    - c. Determination of Inclusionary Housing Compliance - Documents the IH requirement for the sending site
    - d. Receiving site location approval.
  3. The following are required prior to building permit issuance for the sending site:
    - a. Financial Guarantee - security is provided to ensure the affordable units are completed. For details concerning the financial guarantee please see the full policy available on-line at: [www.boulderadffordablehomes.com](http://www.boulderadffordablehomes.com).
    - b. Payment of funds to the city for the housing inspector as agreed to in the Off-site Agreement.
  4. The following are required prior to building permit submittal for the receiving site:
    - a. Land Use Review
    - b. Determination of Inclusionary Housing Compliance - Documents the IH requirement for the receiving site.
    - c. Livability Review – city acceptance of check-list I
    - d. Deed-restricting Covenants for all affordable units
  5. The following are required prior to building permit submittal for the receiving site:
    - a. Cash-in-lieu - if applicable

- b. Livability Review – city acceptance of check-list II
- 6. Satisfying the inclusionary requirement with cash-in-lieu remains an option. Cash-in-lieu is due prior to receipt of a residential building permit. Cash-in-lieu amounts are adjusted annually on the first of July and the amount in place when the payment is made will apply.

Irrigation Ditches, Scott Kuhna, 303-441-4071

The applicant is responsible for obtaining approvals for any relocations or modifications to irrigation ditches or laterals from the impacted ditch company. This includes the crossing of any irrigation ditch or lateral for vehicular or utility purposes and the release of stormwater runoff into any ditch or lateral. The applicant is advised that revisions to any approved city plans necessary to address ditch company requirements may require reapplication for city review and approval at the applicant's expense.

Landscaping Elizabeth Judd, 303-441-3138

At the time of Technical Document review the following areas will require refinement and may result in changes to the plans:

1. More detailed existing and proposed grading information around existing trees to be preserved is needed. Minor adjustments should be expected. A separate tree preservation plan with standard notes and details from Ch. 3 of the Design and Construction Standards (DCS) will be required and shall include ongoing irrigation needs, winter watering, fencing, etc. Proposed transplanting also needs highly detailed timing and coordination for success and shall be included on the plans.
2. Comments regarding plant selections including refinements to tree species selections and diversity will be provided. The plant list provided will be refined as complete selections are provided. Considerations to tree species include, but are not limited to:
  - a. Reduce the overall number of *Quercus*,
  - b. Review *Tilia* locations and removing them from full southern sun and planting strips where they are susceptible to sun scald,
  - c. Potentially increase some species such as Kentucky coffeetree,
  - d. Focus on native plants on the western edge of the project,
  - e. Review and revise *Juniperus* locations to account for their high fire danger,
  - f. General considerations around growing conditions and species selection.
3. Utility and tree coordination is likely to be refined and minor adjustments to both may result.

Miscellaneous, Scott Kuhna, 303-441-4071

1. The applicant is notified that any groundwater discharge to the storm sewer system will require both a state permit and a city agreement. Please contact the City's Stormwater Quality Office at 303-413-7350. All applicable permits must be in place prior to building permit application.
2. No portion of any structure, including footings and eaves, may encroach into any public right-of-way or easement.

Open Space Bethany Collins, 303-413-7646

1. **OS-O BVCP Designation** - As indicated in the site plan documents, a portion of the site carries an OS-O BVCP designation. Please see other comments related to the correction of this error under "Land Uses," but also note that OSMP continues to review the site plan documents through an "open space purposes" lens without considering the land use designation. The City has no identified acquisition priorities in Area I of the BVCP and remains focused on the BVCP acquisition area and other designated acquisition areas of the adopted Open Space and Mountain Parks Acquisition Update 2013-2019 plan, unless other specific direction is received from the OSBT and/or City Council.
2. **Visitor Experience / Trails and Trailheads** - The applicant has agreed to the dedication of a permanent public access easement for the Dakota Ridge Trail which is supported by staff and is currently in draft form, although it remains

the City's preference to acquire this area in fee as City ownership would allow clearer management, maintenance and enforcement responsibilities of this trail area than a trail easement.

Without fee ownership, the City has requested that the easement area extend from the southern/eastern boundary of the trail to the northern/western property line of the site since this area will become the management, maintenance and enforcement authority of the City and would otherwise cut the remaining corner off from the site's private management efforts.

OSMP staff also notes and supports the intention of the applicant to restore the network of existing social trails on the site to better direct pedestrian flow appropriately within/around the private site to accommodate intended future management and use.

Residential Growth Management System, Sloane Walbert, 303-441-4231

The City of Boulder's Residential Growth Management System (RGMS) caps annual residential growth at 1% per year and is managed through an allocation process. The adopted code language can be found in Section 9-14, "Residential Growth Management System", B.R.C. 1981. All projects that include residential units, including those that meet the exemption criteria, must apply for and receive growth management allocations prior to building permit application. In order to apply for a growth management allocation, an agreement for meeting city affordable housing requirements must be in place. Allocation issuance can take up to 2 weeks. A RGMS allocation application may be found at: <https://www-static.bouldercolorado.gov/docs/PDS/forms/350.pdf>.

Please note also, that if new addresses are required for the project those addresses will have to be in place prior to submittal for growth management allocations and subsequent building permits.

Review Process Elaine McLaughlin, 303-441-4130

On Nov. 5, 2015, the Planning Board reviewed the Concept Plan for the proposal. A link to the Planning minutes are provided [here](#). There were 17 members of the public who spoke, 12 indicated support for the project but with concerns that ranged from traffic to affordability. Five members who spoke in opposition, indicated concerns that ranged from construction traffic to affordability. The minutes include a summary of the discussion provided by Chair Bryan Bowen as follows:

***"Chair B. Bowen gave a summary of the Board's recommendations. Since this is a Concept Review, no action is required on behalf of the Planning Board. Overall, the Board expressed support for the proposed use given the site's history and context, but expressed a desire to see more diversity of housing and incomes by perhaps obtaining a partner institutionally, more permeability to make it desirable to the public, more of a "village" as opposed to a "campus" feel, better connectivity and improving access to Open Space, and less emphasis on surface parking. The Board also expressed an interest in keeping with the historical context in terms of massing and materials. Having a strong design focus on the public realm was encouraged. In addition, there was an interest on behalf of the Board to continue the street grid and to having buildings that front along 4<sup>th</sup> Street in the historic pattern. A strong interest was encouraged in a TDM plan. There was a willingness to consider height modifications. The Board also expressed strong support adding community service uses such as a new therapy pool and potentially other amenities such as a coffee shop and/or restaurant. Environmental sustainability with the buildings should be considered and analyzed."***

Following Planning Board's discussion, on Dec. 1, 2015 the City Council considered, but did not call-up, the Concept Plan. In general, council stated that Planning Board's comments were thorough and informative to the process. The council did place emphasis on comments made by the board including the need to refine the "boxy" architecture and the need to review the price point; although, it was acknowledged by members of council that the council cannot control the market value of the price point. A link to the council discussion is found [here](#).

On Aug. 9, 2017, the Design Advisory Board reviewed the Site Review application in a four-hour meeting, the meeting minutes are available [here](#). In attendance were five members of the public who spoke in opposition to the proposed project. There were three DAB board members present: Jim Baily, Lauren Folkerts, David McInerney, along with the Planning Board ex-officio member Bryan Bowen. In general, the board indicated that the site and building design, the internal circulation, open space areas, mass and scale, and the move toward a more village-like character has improved through the

process. The main recommendations included preserving the trees adjacent to the church, revisiting the design on Building F & J, and addressing environmental/green building aspects of the proposal. The board recommended the project moved forward to Planning Board and would welcome reviewing the fine-grain architectural details and materiality again in Technical review.

The applicant is notified that prior to Technical Document application, the applicant will be required to update the existing cross-access and parking easement with the church. In addition, to document the church's use of parking on the 311 Mapleton Site a Use Review will be required prior to Technical Review for Parking as a Principal Use.

Utilities, Scott Kuhna, 303-441-4071

1. The applicant is advised that any proposed street trees along the property frontage may conflict with existing utilities, including without limitation: gas, electric, and telecommunications, within and adjacent to the development site. It is the applicant's responsibility to resolve such conflicts with appropriate methods conforming to the Boulder Revised Code 1981, the City of Boulder Design and Construction Standards, and any private/franchise utility specifications.
2. Final utility construction drawings will be required as part of the Technical Document Review process (which must be completed prior to building permit application). All existing and proposed "dry" utilities (Xcel, Comcast, Century Link, etc.) will also need to be included on the plans.
3. Maintenance of sand/oil interceptors and all private wastewater and storm sewer lines and structures shall remain the responsibility of the owner.
4. The landscape irrigation system requires a separate water service and meter. A separate water Plant Investment Fee must be paid at time of building permit. Service, meter and tap sizes will be required at time of building permit submittal.
5. The applicant is advised that at the time of building permit application the following requirements will apply:
  - a. The applicant will be required to provide accurate plumbing fixture count forms to determine if the proposed meters and services are adequate for the proposed use.
  - b. Water and wastewater Plant Investment Fees and service line sizing will be evaluated.
  - c. If the existing water and/or wastewater services are required to be abandoned and upsized, all new service taps to existing mains shall be made by city crews at the developer's expense. The water service must be excavated and turned off at the corporation stop, per city standards. The sewer service must be excavated and capped at the property line, per city standards.
  - d. Since the buildings will be sprinklered, the approved fire line plans must accompany the fire sprinkler service line connection permit application.
6. All water meters are to be placed in city right-of-way or a public utility easement, but meters are not to be placed in driveways, sidewalks or behind fences.
7. The applicant is notified that, though the city allows Xcel and Qwest to install their utilities in the public right-of-way, they generally require them to be located in easements on private property.
8. Floor drains internal to covered parking structures, that collect drainage from rain and ice drippings from parked cars or water used to wash-down internal floors, shall be connected to the wastewater service using appropriate grease and sediment traps.
9. Trees proposed to be planted shall be located at least 10 feet away from existing or future utility mains and services.



IV. NEXT STEPS

Please provide a resubmittal of plans based upon the comments herein *prior* to the start of a review track, generally the first and third Monday of the month. Please note that there is one submittal track only for the month of December on Dec. 4<sup>th</sup>. Otherwise, the application revisions will be processed beginning on January 8<sup>th</sup> the first review track of the new year of 2018.

V. CONDITIONS ON CASE and

VI. CITY CODE CRITERIA CHECKLIST

To be provided upon a review of revisions.

**Attachment A:  
Comments Received During this Review Track**

-----Original Message-----

**From:** Judy Stone [<mailto:judystone@comcast.net>]  
**Sent:** Friday, December 1, 2017 11:29 AM  
**To:** McLaughlin, Elaine <[McLaughlinE@bouldercolorado.gov](mailto:McLaughlinE@bouldercolorado.gov)>  
**Subject:** Citizen Comment on 311 Mapleton

I have lived in this neighborhood for more than 50 years. I am very concerned about the size and impact of the memorial hospital project. Could there please be more consideration and review about the size of this project. It is imperative that the character of this neighborhood be maintained Thank you Judy Stone  
624 Concord Ave

Sent from my iPad

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**From:** Judy Stone [<mailto:judystone@comcast.net>]  
**Sent:** Friday, December 1, 2017 3:49 PM  
**To:** McLaughlin, Elaine <[McLaughlinE@bouldercolorado.gov](mailto:McLaughlinE@bouldercolorado.gov)>  
**Subject:** Re: Citizen Comment on 311 Mapleton

Some additional thoughts. We have been enduring for three years the trailhead subdivision impacts on our streets noise in traffic etc. Adding another 3 to 5 year project on top of us at this point is somewhat intolerable. And the hordes of people coming and going once the projects are done is significant and the streets aren't well-maintained to handle that

Sent from my iPad

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**From:** Dorsey Delavigne [<mailto:ddelavignejr@gmail.com>]  
**Sent:** Friday, December 1, 2017 6:44 AM  
**To:** McLaughlin, Elaine <[McLaughlinE@bouldercolorado.gov](mailto:McLaughlinE@bouldercolorado.gov)>  
**Cc:** [phil@mapletonhill.org](mailto:phil@mapletonhill.org); Mike Marsh <[mgmarsh1@juno.com](mailto:mgmarsh1@juno.com)>  
**Subject:** Citizen Comment on 311 Mapleton

Good morning

I agree with all the [Mapletonhill.org](http://Mapletonhill.org) comments and objections and have the further comment. Will any of these units be "affordable" or is the development only for rich people with, in the words of Ms. Young, the affordable units off loaded from the Mapleton site and jammed down down the throats of nearby neighborhoods?

Thanks,  
Dorsey Delavigne  
3094 Ouray St.  
Boulder

Sent from my iPad

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**From:** Catherine Schweiger [<mailto:cschweiger@indra.com>]  
**Sent:** Thursday, November 30, 2017 2:38 PM  
**To:** McLaughlin, Elaine <[McLaughlinE@bouldercolorado.gov](mailto:McLaughlinE@bouldercolorado.gov)>  
**Subject:** 311 Mapleton

November 30, 2017  
Elaine McLaughlin  
Re: 311 Mapleton

Comments are in the same order as found in the Written Statement from the applicant. If I do not address an issue it is because I am (more or less) in agreement with the applicant. These are my own comments and do not necessarily represent the comments or concerns of any group that I am associated with.

### **Written Statements**

#### **INTRODUCTION**

**“The Senior Wellness Center is a critical piece to this proposal. This center is to offer exceptional short-term rehabilitation and memory care to the residents of Boulder.”**

The current proposal is for 41 rehab beds down from 70± as proposed during Concept Review. Given the number of independent care units proposed it is quite likely that few beds will be available to Boulder residents who are not also residents of this project. Does this meet the applicant's goal of providing new public benefit if the facility is large enough to serve only residents of 311 Mapleton?

Memory care has been reduced to 10 beds and is also highly unlikely to be available to anyone but residents who have bought in to this project.

**“We anticipate a construction period of 18 months from groundbreaking and are not planning on phasing the property.”** This seems quite ambitious. As a neighbor in close proximity to the construction site, I am concerned. Will the applicant be allowed to work 7 days a week? Will there be an extended work day? How will the applicant be held to a construction schedule that does not unduly impact the neighborhood?

#### **OPERATING DETAILS**

**Employees.** The applicant anticipates up to 80± employees during day shift. Given that the detached units have 2-3 bedrooms, will there be additional private hire employees?

#### **INTENSITY AND ZONING STANDARD**

**Density** Please clarify! If **Section 9-8-6 (f), (1) B.R.C.** states that the average floor area per unit can not exceed 1000 SF and no single dwelling unit shall exceed 1200 SF, then how does code allow some dwelling units that are all part of the same congregate care facility to exceed that limit by a grossly significant amount? The applicant goes to great length rationalizing the legitimacy of larger units. (It makes my head hurt to read through this section!) At the very least, please scale back the size and massing of the “cottages” on the west side of 4th Street. They are not “compatible” with the homes on the east side of 4th in the adjacent historic district. In the long term, if this is the sort of project allowed by current code, then serious consideration needs to be given to changing the code. When it was implemented a couple of decades ago, the intent was to serve a population in need of small scale, reasonably priced accommodations rather than an opportunity for developing resort style senior living facilities.

**Project Height and Massing** Code does not allow grandfathering in height of buildings that are demolished—the argument that former buildings exceeded the height limit therefore new buildings should also be allowed to exceed the limit is disingenuous. The height of building A could be reduced if third floor units were incorporated into the “mansard” roof line and the extraneous tower eliminated. Granted this would remove some opportunity for solar panels. Given the rapid changes in solar technology this would be a reasonable trade off for a more attractive building. Something is not quite right with the proportions of building A as proposed and the tower appears to be an unfortunate attached appendage. Please rework Building A to both reduce the height and to improve the design of the building.

#### **ARCHITECTURE AND SITE PLANNING**

##### **Site Plan**

The assemblage of buildings is much more that of a "campus" than a "village". Words are important and should reflect true character rather than attempt to create something that is not really there. This is not a village. This is a high end senior resort.

### **Circulation and Site Organization**

Pedestrian circulation in the northwest portion of the site needs work! A winter shadow analysis showing the walk from the "nurses dorm" over to the main buildings would be useful. Although the drive up to the "dorm" will be closed to traffic a separate walk with stairs through the slope below the dorm should be developed to provide another route for residents to the main facilities. Further terracing of the slope could also provide more useable open space even if just as a small sitting garden or two.

## **ARCHITECTURAL DESIGN**

### **Overall Building Design Intent**

**Use materials and colors...** There are too many materials used on the facades of most of the buildings! The Hotel Boulderado, a much loved, large building has just one main material on its four story facade. Mapleton School has just one material on its three story historic facade. Building A has at least four materials resulting in a visual cacophony! The height and mass of a building is not visually diminished by a change of materials and the design is not enhanced (as evidenced by recent practice in this community). Two of the most attractive newer larger scale buildings are ones designed by Wolf/fLyon on West Pearl and North Broadway (both housing a Spruce Confection). Please use these as reference for a better building design. Building C is simple and totally acceptable. Buildings A, B, F and G need further work. Simplify, simplify, simplify!!!

The homes in Mapleton Hill can be characterized as having either brick, stone or lap siding as their facades with simple porch detailing in wood and simple shingle detailing in the roof gables. The "cottages" are a mishmash of materials reminiscent of Trailhead. Please make these simpler in materials to better fit with the historic neighborhood.

**Keep buildings comfortable in scale...** The "cottages" fronting on 4th Street are not in scale with the immediately adjacent neighborhood. They are described as story and a half but are not. Reduce the height of these structures by making most story and a half rather than story and three quarters as shown in the "cottage" elevations provided by the applicant.

### **Key Concepts to Layout/Character**

Improve the walkability in the northwest portion of the site. See below.

## **LANDSCAPE NARRATIVE**

### **Open Space Areas & Pedestrian Walkways**

As requested earlier, please provide pedestrian access up in the vicinity of the "nurses dorm" so that walkers do not have to follow the road. A stair with landings would be preferable given the senior population. Please make the stair open to the public.

Given that much of the site is either steep slope or built out, handling surface drainage is problematic. Detention/retention "ponds" do not function as open space as detailed in this proposal. Could further thought be given to creating useable spaces in these areas?

Only 16.9% of this site is "useable" open space as proposed. This is a difficult site with a generally north/south orientation of topography. Given the orientation, height and density of most of the buildings, much of the site will be in full shade during winter months. Of particular concern is the siting of the Memory Care "garden" on the north side of a two story building. During the eight years that my Mom was in Memory Care she could most often be found simply sitting in the sun. There would be no winter sun here for her. Where are sun pockets so senior residents can be outside and comfortable on a sunny winter day? It would be interesting to see an overlay of the shadow analysis over useable open space for the entire site to aid in determining if the requirements of the BVCP for useable open space, with a mix of sun and shade, are met.

Much is made in the written comments of orchards, vegetable gardens and a farm-to-table concept. None of this is reflected in the landscape plan. Accomplishing this would require extensive terracing of steep slopes which would provide more useable open space but would also conflict with preserving existing vegetation.

### **Preservation**

Of 152 trees on the site, it appears that only a few will be left in place. Of those, a detention pond immediately adjacent to the row of large conifers west of the church may jeopardize their longevity. How will the shallow root zones of these trees be protected? If the cottages along 4th Street are made smaller, can the row of boundary conifers north of the church be retained?

### **PUBLIC BENEFIT**

The owner's have received a very large private benefit in the ability to develop this parcel as a senior housing model that will, if successful, generate revenue in perpetuity at a rather generous scale. Please make as a condition of approval, the provision of the public benefits as set out by the applicant. Please further define the nature of those public benefits in conjunction with the condition of approval. It is very disheartening when amenities offered as public benefit during the planning process never materialize (such as the theater at the former Camera site...).

**Open Site Design.** As a condition of approval, please request that Maxwell Avenue, Third Streets, access to the trailhead and associated pedestrian sidewalks be open on a permanently available basis subject to night time limitations. Clarify if the easement proposed by the applicant accomplishes this.

**Bicycle and Short-Term Bicycle Parking.** As a condition of approval, request that there be generous short-term bicycle parking made permanently available.

**Wellness Center** As a condition of approval, require that the wellness center have enough beds to accommodate both the needs of the residents of 311 Mapleton and have beds available for other residents regardless of place of residency. Do a certain number of beds need to be designated as available to the public? Does the number of beds need to be increased? Should some of the units in Buildings A,B, F and G be reduced in size so that additional re-hab beds might be located within those buildings to serve residents in those buildings? When my Mom was in re-hab after a hip replacement, she found great comfort in being easily able to return to her apartment for an hour or two.

**Warm Water Therapy Pool** As a condition of approval, require that the warm water therapy pool be available to the public, perhaps with a prescription for PT, for sufficiently reasonable hours to provide for adequate PT use. Late afternoon and evening hours, as proposed by the applicant, may not adequately serve the public. Other hours may be available for "recreational use" especially for those who are elderly. State what those permanently available hours will be prior to final approval.

**Continued Trail Access** As a condition of approval, dedicate the road up to the turn-around and a new pedestrian path, replacing the existing stairway up in the northwest portion of the site, as a permanent easement serving hikers coming from the east and south of the site as well as users from Trailhead coming from the northeast.

**Historic Preservation and Interpretive Program** Include the smokestack in the list of structures to be preserved. It will give the "old guys" something to talk about. (I find it indicative of the mindset of the developers that they do not want to preserve the smokestack as they can not generate revenue from it per their written statement...)

**The Academy ...Services to Surrounding Neighbors.** As a condition of approval, further define the nature and the cost of these proposed services. At this time, it is not possible to know if there is any "public benefit" being offered.

### **HISTORIC PRESERVATION**

See comments on smokestack in prior discussion

The smokestack is iconic and, as such, should be preserved!

### **General comments on compliance with the Boulder Valley Comprehensive Plan**

The BVCP states that there will useable open space with a mix of sun and shade. It is not clear that there will be much useable open space during the winter months. The private open spaces associated with most of the dwelling units are miserly and there are no large courtyards associated with the "cottages" as stated in the applicants written comments!

There should be no adverse impact to natural features. Protect the urban forest. Most of the existing trees will be removed. Several that remain, to the immediate west of the church, are likely to be impacted by the detention pond. Spade digging and storing large trees is difficult and can not be relied upon to preserve large specimens. As proposed the

boundary trees north of the church will be removed. Scale back the "cottages" on 4th in order to preserve this row of conifers.

Preserve the smokestack as a historic feature.

Provide permeability—both visual and pedestrian.

Open space provides a relief to density—again scale back "cottages" on 4th so that there is more spacing between the buildings as is typical in the adjacent historic district.

Provide trail access through the site as well as at the northwest corner, convenient to Trailhead.

I question the adequacy of food production at this site, as proposed.

Respectfully  
Catherine Schweiger  
628 Maxwell  
Boulder

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November 29, 2017

City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, CO 80306-0791  
Attention: Ms. Elaine McLaughlin, Senior Planner

Re: The Academy on Mapleton Hill, 4<sup>th</sup> Street "Cottages"

Dear Ms. McLaughlin:

As a resident of 4<sup>th</sup> Street, I appreciate the opportunity to respond once again to the proposed design of the Academy's 7 "cottages" on 4<sup>th</sup> Street.

From the outset, the developer has expressed a strong intention to respect both the neighborhood and the history of the site. This third submittal responds to written concerns of both staff and neighbors by presenting designs of "cottages," some of which are smaller, shorter, and more architecturally compatible than earlier proposed designs. Three of the 7 "cottages," however, have increased in size substantially (See table below), bringing the total square footage of the 7 "cottages" to 16, 845 square feet, **significantly more than the 14, 646 of the buildings of the prior submittal.** Are these really cottages? Are they instead large single-family homes masquerading as friendly, small homes? It is important to note that these homes are built for a single couple--maximum -- in residence.

R5	1,738	2,827
R6	1,738	2,811
R7	1,738	2,774
	-----	-----
Total	14,646	16,845

This new proposal includes more specific verbiage than before. The design will, the proposal states, "create rhythm along the streetscape at 4th Street to mimic the patterns found across the street."

Address

Item 5B - 311 Mapleton



This invites me, one who lives across the street, to take note: On the east side of 4<sup>th</sup> between the alley and Maxwell there are 4 residential structures. One is a single-family home. Three are structures with multiple dwelling units. The 4 structures are of different:

- sizes
- styles
- heights, and
- each sits at a different distance from the street and at different distances from adjacent structures.

In dramatic contrast, the proposed design on the street's west side presents essentially a wall of seven same-sized, similarly scaled and detailed buildings. These sit exactly the same distance from the street with identical spacing between buildings. At an average size of 2,406 square feet, these buildings are more than 150% the size of my true cottage across the street!

**In no way does this row of 7 similar structures "mimic the patterns found across the street." It does not "create rhythm." By its own description, this proposal presents, " a gateway of single-family cottages."**

This "gateway" of 7 buildings sits considerably higher than the structures across the street, each new building at least 4' higher than the crown of the road. This "gateway" wall dominates in every sense.

Is this good design? Architectural historians state that our built environment is an expression of the values of our culture. With this small piece of the design for *The Academy, Boulder's Boutique Retirement Community*, the developers' values are blatantly evident. The developers either do not have the desire or the expertise to do what they say they want to do. To a neighbor the lack of sincerity and honesty seems, at the very least, most unfortunate.

I beg our planning department staff and board to examine carefully the entire submission for "Boulder's Boutique Retirement Community," beginning with this small but important face to the street. There is considerable dishonesty in this small piece of the project alone. I believe it is but "the gateway" to a proposal that is flawed in numerous ways. I hope that our

planners and citizen representatives will predicate their decisions based upon *what is best for all Boulder citizens*, now and for generations to come.

With sincere thanks,

Rebecca Trafton

2424 Fourth Street  
Boulder, CO 80304  
434-249-3376  
[Rebecca.trafton@gmail.com](mailto:Rebecca.trafton@gmail.com)

City of Boulder  
Planning and Development Services  
P.O. Box 791, Boulder, CO 80306-0791  
Attention: Ms. Elaine McLaughlin, Senior Planner

November 29, 2017

Re: The Academy on Mapleton Hill: Safety and Well Being of Future Residents

Dear Ms. McLaughlin:

I am writing to express concern over the design of the proposed project as it relates to the safety and well being of its future residents. It seems a range of decisions have been made to increase the overall density and scale of the project to maximize profit at the expense of careful consideration of the needs of individuals in congregate care. My concerns arise as I compare the design of the current proposal to that of Casa Dorinda, a similar facility in Montecito, California, where my mother lived for the last ten years of her life. The two facilities are similar in price point and size, but their designs demonstrate very different levels of attentiveness to providing for the well being of their elderly residents.

### **Safety**

#### Casa Dorinda

The vast majority of living units are located in two story buildings scattered throughout the campus. There are approximately 20 independent living units per building, with ten on each floor. Though each building has an elevator to serve the top 10 units, there is a firm policy that only completely ambulatory people are permitted to live on the second floor, so that in the even of fire, electrical failure, or other hazard, residents could exit safely via the stairs. Individuals with canes or walkers are required to live in first floor units so they can exit on their own or be assisted by staff as needed.

#### The Academy

By contrast, the majority of units in this project are located in much larger buildings on the second and third floors. In the case of the building with 56 units - many with 2 bedrooms - which can imply individuals or couples with greater independence but not necessarily complete mobility – perhaps 80 individuals would have to be evacuated under emergency conditions by means of only two elevators. In the building housing individuals needing greater care, there are 41 units on the 2nd and 3<sup>rd</sup> floors, and again, two elevators. This plan assumes that the pared down night staff will be able to get everyone out safely and is far from realistic. It seems clear that the project's emphasis has been placed on maximizing the built environment to create more units in bigger buildings while giving less attention to the safety of future residents.

### **Access to the Outdoors**

#### Casa Dorinda

Every unit, including those in the acute care facility, had a lovely patio or balcony suitable to seat 4 – 6 people comfortably for conversation, cocktails or supper. Many residents had their own gardens with vegetables, flowers and small trees and spent considerable time in these lovely outdoor living spaces. The buildings were oriented to take advantage of southern exposures, and most were sun filled and bright.

In addition, there was a lovely gently graded walking path of about a mile around the facility which was used by many residents as part of their daily routine. The paths between buildings were paved, level, and covered so residents could move easily and safely between buildings during the day or evening.

#### The Academy

By contrast, the buildings run primarily north to south, meaning few will benefit from a southern exposure. Many of the public seating areas will be in shadow much of the day – including that for the Memory Care unit. Units do have balconies but the majority are well under 100sq. feet, and will be inadequate to encourage outdoor leisure or entertaining. In addition, the site is hilly and steep, with no opportunity for comfortable walking for the less robust, or anyone using a cane or walker. The Sanitas trail cannot be imagined to be of use to most of the Academy residents, and little other accommodation has been provided for outdoor exercise. Sidewalks between buildings are not covered, and in rain or snow, will be extremely difficult to navigate. Again, little attention seems to have been given to the residents' need for outdoor exercise or leisure, both considered to be essential for healthy aging. The developers seemed to have designed this project using rather standard commercial criteria rather than thoroughly engaging the needs of their aging population.

### **Size and Scale of Units**

#### Casa Dorinda

All units are designed to be on one floor and of modest size and scale. The vast majority of the units were contiguous in the 20 unit buildings described above, with a few one story free standing “casita” bungalows edging the large communal lawn. The one bedroom units were under 800sq ft, and the largest 2 bedroom units were under 1500sq ft. The size, scale and easy proximity were appropriate and manageable for older people interested in simplifying their lives and activities.

#### The Academy

By comparison, though the units in Buildings A and B maintain a reasonable size, others far exceed what is desired or required for senior housing or congregate care. The large apartments or houses are isolated on the north edge of the property in a perimeter “country club” of units which are not integrate into the community as a whole. Their scale qualify them as luxury housing even by Boulder standards; they are far from any communal facilities and will be difficult or impossible to reach on foot in bad weather.

In conclusion, it seems clear to me that this project is designed primarily for profit – taking advantage of the congregate care density formula, maximizing the number, size and scale of the units, and stretching the rules to build additional detached large stand alone units. Unfortunately, the consequence of these decisions is that the facility will not provide a safe and appropriate environment for elder citizens. There are many models of best practice the developers could have drawn on. I reference only one here, because I came to know it intimately and respect its concern for its residents in every aspect of its design and maintenance. I feel that the current proposal falls far short of this mark, and I hope the staff and Planning Board will evaluate it carefully from the prospective of the safety and well being of its future residents.

Thanks you so much,

Sincerely,

Wendy Baring-Gould  
536 Maxwell Avenue

City of Boulder  
 Planning and Development Services  
 P.O. Box 791  
 Boulder, Colorado 80306-0791  
 Attention: Ms. Elaine McLaughlin, Senior Planner

November 28, 2017  
 Via: Email  
 USPS

Re: Building Height Code Violation for proposed development-The Academy at Mapleton Hill, 311 Mapleton. Reference BRC9-2-14.(c)(2)(C).

### Summary

All buildings in Public Zones are limited to three stories and a maximum height of 35'. The only exception that pertains to this site is found in Site Review (BRC 9-2-14.(c)(2)(C)) which allows for a modification if the topography of the site creates a hardship and prevents the applicant from building the number of allowed stories by code (See Exhibit A). The applicant has proposed Building A North to have an actual height of 48.5' (the applicant incorrectly shows the actual height to be 46.5'-see Exhibits C and D). The topography adjustment allowed by code increases the allowed height of this building to 37'. **The applicant's proposed height exceeds this by 11.5' and is a direct violation of city code.** See detailed analysis below.

### Building A North

The total slope in grade within the footprint of Building A North after proposed cut and fill is 2' (see attached architectural drawings in Exhibit B). This 2' slope defines the topographical hardship for this building and when added to the 35' allowed height results in a maximum height for this building of 37'. The actual proposed height is as follows:

First floor including 2' drop to Ballroom	14.5'
Second floor	11.0'
Third floor	11.0'
Roof to top of tower	12.0'
	-----
Total Actual Height	48.5'
	-----
Slope from edge of building to lowest point within 25' radius	5.8'
	-----
Total height defined by code	54.3'
	=====

As can be seen from the attached architectural drawings showing all four elevations of Building A North, the finished slope affecting this building is a total of 2'. This adjustment is the only increase allowed by code. In the height narrative (see Exhibit E), the applicant refers to the existing 64' high building which will be demolished...this height has no bearing on the height allowed by code for new construction. They also make reference that the additional height variance is required to "create long lasting

architectural features”, “due to the extreme change in grade throughout the property, which creates a hardship for development, resulting in less open space and inferior design elements”, and to have “a high quality of design and avoid such elements as flat roofs”, however the only height exception allowed by code for Building A North is the 2’ of topography affecting that building. The code is specific in allowing an adjustment to prevent hardship of not being able to build the number of stories allowed because of topography. In Building A North this adjustment is 2’. There are no provisions in the code to allow height variances for the other issues mentioned by applicant. If such provisions exist, please provide us with specific code references that allow such increases. The height code violation is summarized below:

Building height as measured per code	54.3'
Less topography low point 25' from perimeter of building footprint	(5.8')
	-----
Actual height of proposed building	48.5'
	-----
Less maximum building height for 3 stories allowed in Public Zone	(35.0')
Adjustment for finished slope of site affecting building	(2.0')
	-----
Total height allowed by code	(37.0)'
	-----
Height in excess of that allowed by Boulder Revised Code	11.5'
	=====

The applicant is planning changes to the natural topography of the site in order to level certain areas by cut and fill. While the code discourages extensive alterations to the topography and encourages design that conforms to the natural contours of the land, some changes are allowed. The Planning Department has allowed some of the topography issues to be resolved by cut and fill. These new contours are reflected as the finished grade on the architectural plans in Exhibit B and any request for height variance would be limited to the affect of the topography after these changes are made. If for example, the city allowed a topography hardship to be resolved by topography changes which resulted in a completely flat finished grade for the construction site, the applicant would not be allowed a height variance. They would be limited to 35' just like any other applicant building on a flat construction site.

Building A North exceeds the height allowed by the Boulder Revised Code by 11.5'. The applicants reasons justifying this variance are not supported anywhere in the code and accordingly must be rejected. We ask the Planning Department to closely review other buildings in the application to ensure they are also not violating the BRC.

The 311 Mapleton site sits at the foot of Mt. Sanitas which forms the mountain backdrop both revered and protected over the years by the citizens of Boulder. The height variances requested to create long lasting architectural features should not come at the expense of the even longer lasting beauty of our mountain backdrop. While certain architectural features will certainly enhance the development, they should be achieved by reducing density and having pitched roofs enclose the third floor (consistent with the



surrounding district) not built on top of the third floor as proposed. This would enhance the development by conforming to the character of adjoining homes including those in the Mapleton Hill Historic District. Additionally, the substantially reduced height would lessen the impact on the adjoining Sanitas Open Space. Our current code prevents the height variances being requested.

Mt. Sanitas open space is a legacy to those citizens that fought to create and protect the mountain backdrop that defines our city. BRC 1-1-14 states "In enacting an ordinance the city council intends that the public interest be favored over any private interest". If the Planning Department continues to support the height variances proposed by the developers of 311 Mapleton, they will not only be violating the code, but also the intention of the code enacted on behalf of the citizens of Boulder by previous city councils.

Sincerely,

Russell Henriksen  
645 Concord Ave.  
Boulder, Co. 80304

Roger Koenig  
909 Mapleton Ave.  
Boulder, Co. 80304

Betsey Jay  
429 Mapleton Ave.  
Boulder, Co. 80304

Alan Delamere  
525 Mapleton Ave.  
Boulder, Co. 80304

Randi Stroh  
821 Mapleton Ave.  
Boulder, Co. 80304

Wendy Barringgould  
536 Maxwell Ave.  
Boulder, Co. 80304

C.C. Jim Robertson

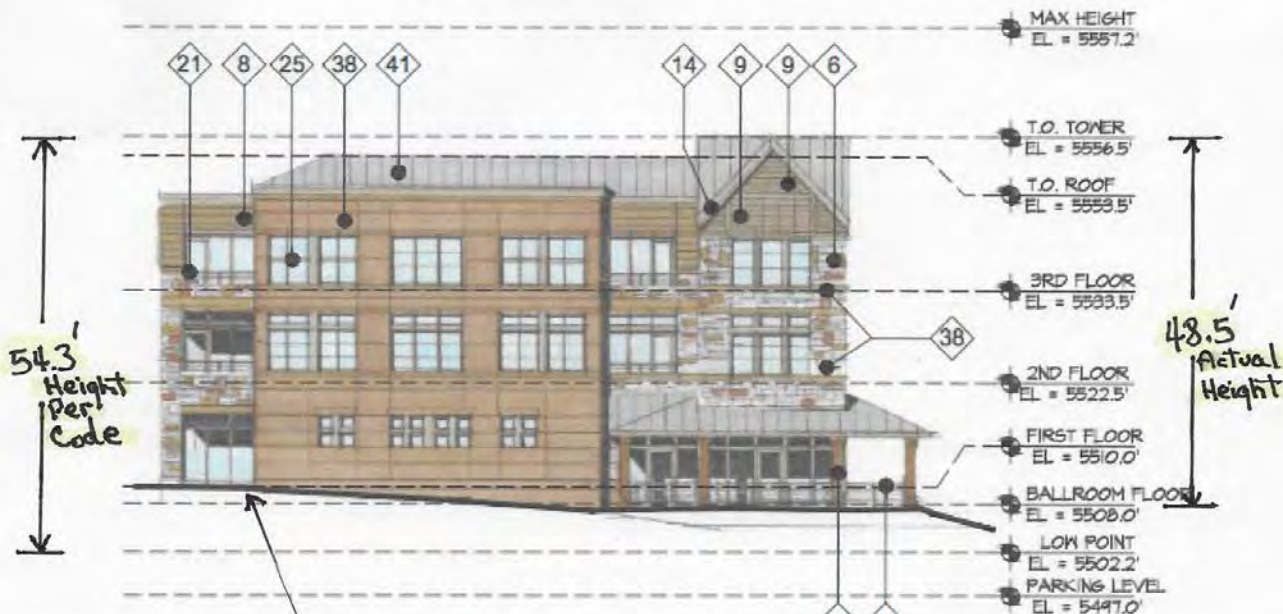
Exhibit A

B.R.C. 9-2-14.(c)(2)(C):

- (c) Modifications to Development Standards: The following development standards of B.R.C. 1981 may be modified under the site review process set forth in this section:
- (1) 9-7-1, "Schedule of Form and Bulk Standards" and standards referred to in that section except that the standards referred to as "FAR Requirements" may not be modified under this paragraph and are subject to Section 9-8-2, B.R.C. 1981 and the maximum height or conditional height for principal buildings or uses, except as permitted in paragraph (c)(2) below.
  - (2) The maximum height or conditional height for principal buildings or uses may be modified in any of the following circumstances:
    - (A) For building or uses designated in Appendix J "Areas Where Height Modifications May Be Considered."
    - (B) Industrial General, Industrial Service, and Industrial Manufacturing districts if the building has two or fewer stories or if the height is necessary for a manufacturing, testing or other industrial process or equipment.
    - (C) In all zoning districts, if the height modification is to allow the greater of two stories or the maximum number of stories permitted in Section 9-7-1 in a building and the height modification is necessary because of the topography of the site.
    - (D) In all zoning districts if at least forty percent of the floor area of the building is used for units that meet the requirements for permanently affordable units in Chapter 9-13, "Inclusionary Housing," B.R.C. 1981.
    - (E) For emergency operations antenna. <sup>1</sup> □

Exhibit B

page 1 of 2



2 BUILDING A NORTH - EAST ELEVATION  
1/16" = 1'-0"



1 BUILDING A NORTH - SOUTH ELEVATION  
1/16" = 1'-0"

2' Slope



Exhibit B



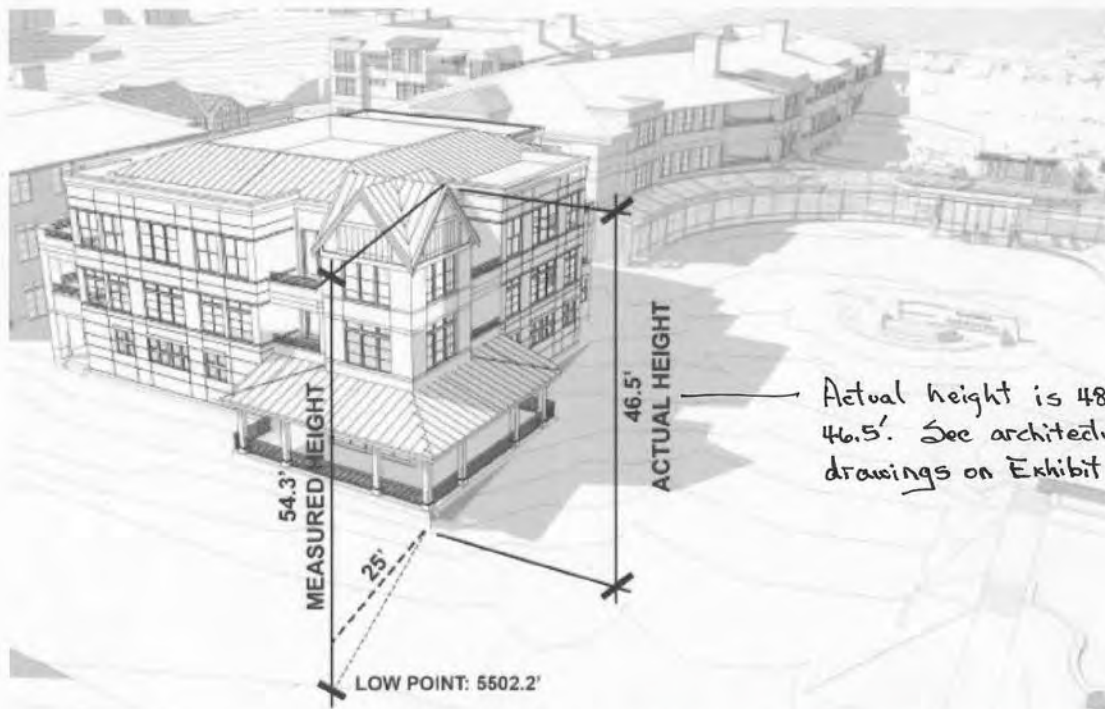
4 BUILDING A NORTH - WEST ELEVATION  
1/16" = 1'-0"



3 BUILDING A NORTH - NORTH ELEVATION  
1/16" = 1'-0"

2' Slope

Exhibit C



**2** BUILDING A - NORTH  
NTS





Exhibit E

Note: BRC 9-2-14.(a) shown in entirety on page 2 of this Exhibit says "to ensure compatibility with existing structures and established districts , to assure that the height of the new building is in general proportion to the height of existing, approved , and known to be planned or projected buildings in the immediate area..." Read in entirety, it is clear the code wants to ensure new buildings are compatible with buildings in the area. Since their plans include demolishing the hospital, this structure is irrelevant to the height issue.

Additionally, it should be noted that there is no reference by the applicant to the statutory height limit of 35' in Public Zones.

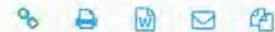
**(ii) The height of the buildings is in general proportion to the height of existing buildings and the proposed or projected heights of approved buildings or approved plans or design guidelines of the immediate area;**

The existing hospital measures 64 feet in height currently, which is non-conforming, even considering any type of height variance. **The highest proposed building height on the site is Building A which will measure 54 feet** and is located in roughly the same location. No building on the site is more than 3 stories and the **additional height is used to create long lasting architectural features**. As seen in the City's conversations on height restrictions performed in 2015, the staff review comments and the fact that we cannot even build to the max number of stories allowed by code, the Mapleton site was deemed appropriate for building height modification. **This modification should be considered due to the extreme change in grade throughout the property, which creates a hardship for development, resulting in less open space and inferior design elements**. The heights of the buildings proposed for TAOMH vary in height in relation to the footprint of the buildings, but we are only requesting a height variance to a few of the larger structures and some of our smaller cottages that are a single story. The first structure is the "A" Building. This is the center of operations and amenities for the congregate care community. The Building A is broken up into four building components that have stepped finished floors to respond to existing grade. The second building for which a height exemption is requested is the "D" building. This building fronts east-west access drive where the drive climbs to the round-about. The loss of height due to grade is 13 1/2'. The third building height variance occurs on the northern 'plinth,' where the smaller J Cottages occur. Cottages J4, J5 and J6 experience a loss of grade of 29', 15.5' and 22', respectively, due to the relocation of the homes to the existing asphalt drive and the proximity of very steep slopes dropping to the east.

A Building Height Analysis Plan has been submitted as part of the Site Review package to better describe each building's finish floor, lowest point historically measured out 25 feet from building footprint, the measured height and the actual height to better inform the heights exercise due to the extreme slopes found throughout the site. **This additional height is also required to propose a high quality of design and avoid such elements as flat roofs**. If the sloped roof version of Building F and G is preferred, due to the site slope the roof of Building G will exceed height by 3'. As can be seen again, we are committed to design excellence and feel the strategic locations of these buildings will feel less impactful than what currently exists today or from the perimeters of the site.

Source:  
Applicant's  
Narrative  
on  
Height  
Sheets  
A-1.04  
A-1.05



Exhibit E**9-2-14. - Site Review.**

- (a) Purpose: The purpose of site review is to allow flexibility and encourage innovation in land use development. Review criteria are established to promote the most appropriate use of land, improve the character and quality of new development, to facilitate the adequate and economical provision of streets and utilities, to preserve the natural and scenic features of open space, to assure consistency with the purposes and policies of the Boulder Valley Comprehensive Plan and other adopted plans of the community, to ensure compatibility with existing structures and established districts, to assure that the height of new buildings is in general proportion to the height of existing, approved, and known to be planned or projected buildings in the immediate area, to assure that the project incorporates, through site design, elements which provide for the safety and convenience of the pedestrian, to assure that the project is designed in an environmentally sensitive manner, and to assure that the building is of a bulk appropriate to the area and the amenities provided and of a scale appropriate to pedestrians.

To: Elaine McLaughlin, Senior Planner  
Planning Department  
City of Boulder  
1777 Broadway  
Boulder, CO 80302

November 28, 2017  
(via email)

Dear Elaine:

We are registering our concern and belief that the plans submitted for the proposed redevelopment of [311 Mapleton Avenue](#) fail to meet Use Review Criteria 9-2-15 B.R.C. d. 5 which says:

**Character of Area: The Use will not change the predominant character of the surrounding area.**

The 311 Mapleton site is not a typical infill site. It is a critical land buffer. It sits directly across the street from the western edge of the Mapleton Hill Historic District, a neighborhood governed by Historic District provisions and requirements. 311 also sits on the eastern edge of one of the most widely used Open Space parcels in the City, and contains a smaller parcel which has been designated OS-O in the Boulder Valley Comp Plan for at least 40 years. The entire site also lies within Boulder's Wildland Urban Interface, a Community Wildfire Protection Plan.

311 provides a critical buffer in the western edge of Boulder. This western edge has been a key focus of planning and preservation efforts ever since the Enchanted Mesa success and the creation of the Open Space system. Wildlife including bear, deer, coyotes, and mountain lion regularly cross this site. BVCP 3.09 says "the City will promote wildlife and **land use** management practices to minimize conflicts with residents and urban land uses..." A development of this magnitude would inevitably create conflict with wildlife. The physical integrity of the western edge of Boulder has always been valued as a key ingredient in giving the City its defining character.

Mapleton Hill does not just belong to those of us who live here. It has many other identities, all of which come together in a rich fabric of uses and purposes. It is predominantly a residential neighborhood, but it is also home to the Boulder Seventh-day Adventist Church at 4th Street, and the Mapleton Early Childhood Center at 9th. These places welcome diverse communities and are central to the culture of Mapleton Hill.

This neighborhood is a destination for people interested in Boulder and Colorado history, both citizens and visitors alike. It is a place where people come to walk,

bicycle, enjoy the old trees and the Mapleton median, look at architecture from a different time, stroll the dirt alleys, sit on the bench at 4th Street- get away for a while from the more urban environment nearby. It is in the oldest part of Boulder, and in many ways, it functions like a park. Mapleton Hill has a sense of place, and it is definitely a City amenity.

The street grid on Mapleton Hill essentially pre-dates the automobile. It was built for horse and buggy, and pedestrian use. In 1906, there were 27 cars registered in all of Boulder, and the maximum speed limit was 6 mph (Source: Boulder History Museum). There is a natural carrying capacity for vehicular traffic in this grid, and the proposed project will "adversely effect traffic" with heavy construction vehicles and then institutional delivery trucks and 24/7 commuting of 100+ employees,

Current residents park along the streets because many older homes lack garages. Weekend hikers on Sanitas already pose additional pressure for parking. There has always been peaceful coexistence with the Church and Boulder Community Hospital (the previous owner of 311), regarding public use of available parking. The proposed loss of all public parking with no current plan to replace it would have significant and permanent impact on both residents and visitors. It would irrevocably change how this property has functioned in the neighborhood for decades.

The issues of scale, density, and height of this project make it inappropriate for the proposed location and increase the degree of nonconformity with the surrounding area resulting in a project that is non-compliant per 9-2-15 B.R.C. (a) Therefore, this proposed new "City on the Hill" most definitely changes the "predominant character of the surrounding area" and should be denied in the Use Review process.

Thank you,

Randi Stroh 821 Mapleton Avenue

Betsey Jay 429 Mapleton Avenue Unit B

Susan Rosewell-Jackson 421 Mapleton Ave. Unit B



City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, Colorado 80306-0791  
Attention: Ms Elaine McLaughlin, Senior Planner

November 28, 2017  
via e-mail

Regarding: Site and Use Review for 311 Mapleton  
Wildland Fire Hazard: Need to protect applicant site under BVCP and Public Safety

Dear Elaine,

The City of Boulder has adopted the Boulder Valley Comprehensive Plan (BVCP) by resolution. Section 3.16 of the 2010 BVCP defines **Hazardous Areas** as follows: "Hazardous areas that present danger to life and property from flood, forest fire, steep slopes, erosion, unstable soil, subsidence or similar geological development constraints will be delineated, and development in such areas will be carefully controlled or prohibited."

The current application for development at the 311 Mapleton site is for a large congregate care facility. The 311 Mapleton site has frequent modern experience as a wildland fire hazard, and is situated on Boulder's designated "Wildland Urban Interface" in the North Central Zone of "The City of Boulder Structure Protection Plan 2012."

The 311 Mapleton property was subject to mandatory evacuation from wildfires in March of 2017 and twice during 2010. Please reference the Guest Opinion (copy attached) which I wrote for the Daily Camera on April 2, 2017.

We believe that the City must exercise its obligations to protect our public safety in the Site and Use Review process. BVCP Section 3.16 provides City discretion to prohibit the proposed congregate care development on this Hazardous Area (as defined by BVCP). The site is subject to frequent forest fire hazards and evacuations, compounded by the difficulty of fire protection due to steep slopes and lack of road access at the west and north sides of the property. Reference to these unique site hazards can be found in the Boulder 2012 Structure Protection Plan under the North Central Zone tab.

Boulder's Structure Protection Plan is based on international fire code. **For most cities in the U.S., a proposal for development of a congregate care nursing facility on a designated wildland fire interface would be strictly prohibited by code** - due to added public safety risk and the burden to protect by local governments. Elderly care nursing facilities require very special considerations for fire protection and evacuation, due to ambulatory and memory impairments of their residents. It would be unreasonable and irresponsible of Boulder Planning staff to inflict such a large added public safety and evacuation risk on our Boulder City and County emergency services resources and tax payers. The development proposal use review should be rejected on criteria of incompatible use.

Lessons learned from the tragic loss of elderly residents during the recent 2017 Santa Rosa wildfires should be applied to our local Boulder development policies.

Sincerely,  
Roger Koenig, 909 Mapleton Avenue  
Citizens for Sanitas, A Colorado Non-Profit  
C.C. James Robertson, Planning Director

## Guest opinion

# Does a congregate care facility belong near wildfire territory?

By Roger Koenig

In September of 2010, a large wildfire threatened the city of Boulder from our western open space and mountain forest periphery — The Fourmile Canyon Fire. From lessons learned, Boulder Wildland Division created a detailed plan for the defense of our city in a 156-page "Structure Protection Plan 2012." This firefighting plan designates the western periphery of Boulder as an "urban wildland interface" — requiring unique fire protection planning, response and evacuations as a line of defense.

The Boulder Structure Protection Plan served our west Boulder community well on March 19, 2017 — as a plan to successfully manage the Sunshine Canyon Fire. City, state, county and regional firefighting organizations contained the fire under moderately windy conditions. There was neither loss of life nor homes. Firefighting costs are estimated to exceed \$725,000. It could have been much worse. Fire trucks from Denver were in Boulder to defend our homes, along with Colorado National Guard and U.S. Army aircraft. Thank you all!

Our designated urban wildland interface serves as a line of fire defense between the densely-populated city residential and commercial buildings and our mountain open space — which is subject to frequent wildfires on steep terrain. Over a dozen mountain wildfires have occurred in our foothills immediately west of Boul-



Roger Koenig / Special to the Daily Camera  
Area closure notice at 311 Mapleton Avenue on March 19, 2017, during Sunshine Canyon Fire

der in the past 30 years.

Wildland fires are a constant hazard to our city. However, our Boulder building codes make no mention of our urban wildland interface designation. City of Boulder building code requirements are out of date, and inconsistent with our fire Structure Protection Plan 2012. Update is needed. The urban wildland interface experiences frequent fire hazards, and should be treated as such in our codes.

Our joint city and county Boulder Valley Comprehensive Plan policies (3.16) require that development in such areas be carefully controlled or prohibited to protect buildings in "hazardous areas" from forest fire. Compliance with Boulder Comprehensive Plan policy has been adopted by the city of Boulder and is required in the development site review process. City officials should uniformly enforce this policy.

Our wildland urban interface in the north central zone now has a new developer proposal for a large commercial "congregate

care" retirement community (over 300 residents, patients, employees) — proposed to be developed at 311 Mapleton Avenue.

This development proposal is currently in planning review and is to be resubmitted soon. It is on the urban wildland interface and is subject to mandatory fire evacuation. As stated in our Structure Protection Plan, fire defense and evacuation are restricted by the steep terrain, fuel sources and lack of site access to the mountainous west side of the property. Is this the best location for a large new retirement and elderly nursing care development?

The currently developed portion of the 311 Mapleton property was under mandatory evacuation during the Sunshine Canyon Fire (per the Structure Protection Plan). It was also evacuated twice in 2010, during the Fourmile Canyon and Dome fires. Yet there are no Boulder codes requiring a fire evacuation plan for the 300+ elderly residents/patients and care providers proposed to

occupy the 311 Mapleton development. Under current Boulder code, an evacuation plan would be required only after the facility is built, and would be approved (or not) by the fire marshal at that time.

Over four acres of the 15.7-acre 311 Mapleton property have been designated as "open space—other" in the Boulder Valley Comprehensive Plan, since 1977. The developer proposes to build new residential and commercial facilities on this open space. This portion of the 311 Mapleton property should retain its open space—other designation to protect our city and Mount Sanitas trails, rather than add to our wildland fire hazard. A decision to continue, or remove, this 40-year-old open space designation is before the Boulder Open Space Board of Trustees. A designation change would require modification of the Boulder Valley Comprehensive Plan in a public process.

Do high-density "congregate care" facilities for elderly patients belong on an urban wildland fire interface? Do they belong on our protected open space?

Please write your opinion to the Boulder Planning Board and City Council and attend future public reviews of "The Academy on Mapleton Hill" development proposal. The decision to be made is an irrevocable legacy for our city and public safety.

*Roger Koenig lives in Boulder and is a member of the local group Citizens for Sanitas.*

City of Boulder  
 Planning and Development Services  
 P.O. Box 791  
 Boulder, Co. 80306-0791  
 Attention: Elaine McLaughlin, City Planner

November 30, 2017  
 Via: Email  
 USPS

Re: Intensity Standard Code Violation -The Academy at Mapleton Hill, 311 Mapleton Ave.

**Density Proposed by Applicant**

Current zoning on the property allows 6.2 dwelling units per acre or 97.77 dwelling units for the entire 15.77 acres. Approximately 1.06 acres of the site is under a long term land lease and is not part of the current development application. After removing this portion of the site, there is 14.71 acres being proposed for development and at 6.2 dwelling units per acre, applicant would be allowed 91.2 dwelling units.

Applicant has proposed developing the following on the 14.71 portion of the site:

Detached (cottages and duplexes)	19
Attached dwelling units (with kitchens)	104
Sleeping Rooms (without kitchens)	52
	---
Total	175
	=====

Applicant has applied for a congregate care adjustment of 5:1 for sleeping rooms (units without kitchens) and 3:1 for attached units with kitchens. They have assumed they are eligible for the 3:1 congregate care adjustment on all attached units under 1,200 Sq. ft. in size and two of the detached units (Cottages N and O). The applicant has made the following congregate care adjustments for intensity limits established in Table 8-1 of the code:

	Total	Adjustment	Total As Adjusted
	---	-----	-----
Attached Units < 1,200 Sq. Ft.	80	3:1	26.40
Attached Units > 1,200 Sq. Ft.	22	1:1	22.00
Sleeping Units	52	5:1	13.40*
Detached Units	17	1:1	17.00
Detached Units (N & O)	2	3:1	.66
Guest Rooms	2	—	-0-
	---		-----
Totals	175		79.46
	=====		=====

\*Applicant incorrectly calculated 10 (5:1) rooms without kitchens in Building D as 5 equivalent units rather than 2.



### **Congregate Care Intensity Standard Adjustments**

The code allows an increase in intensity standards for congregate care developments if the project meets certain standards required by BRC 9-8-6.(f) (See Exhibit A).

Prior to 2012 there were no standards, other than simply being a congregate care facility, to receive the 3:1 density bonus. In April of 2012 City Council passed Ordinance 7832 to address concerns about the types of development projects eligible for the congregate care facility density bonus (see Executive Summary of Ordinance 7832-City Council Meeting Date April 17, 2012 in Exhibit B). The City Council Executive Summary states that the purpose of the ordinance was to address concerns about the types of projects eligible for the congregate care density bonus.

The ordinance set standards for a project to be eligible for the congregate care density bonus that included " A minimum project size of ten congregate care units (before applying the bonus); and, A maximum average congregate care unit size limit of 1,000 square feet (not including garage space) and a maximum individual unit size of 1,200 square feet."

The first reading (City Council Meeting Date January 17, 2012-Exhibit C) states that "The proposed ordinance will continue to provide the congregate care density bonus for projects that meet the new minimum requirements.". It is clear from the initial reading and other comments throughout the minutes of council that the standards must be met for the project to qualify for the density bonus.

This is consistent with the Planning Board recommendation to City Council (Planning Board Minutes-November 17, 2011-Exhibit D) in a motion by M. Young, seconded by A. Brockett, and approved 4-0 with 2 absent that recommended:

1. "Adding a minimum project size requirement of ten congregate care units to qualify for the congregate care density bonus."
2. "Adding a maximum average congregate care unit size limit of 1200 square feet to qualify for the congregate care density bonus."

The first reading of Ordinance 7832 also addressed council's concern with large private units:

"A maximum average congregate care unit size would discourage large private units and encourage utilization of the allowable building space for common amenities and/or a higher number of units. A limit on unit size may also address neighbor concerns about overall building size, although existing bulk standards are the most appropriate means for limiting building size. To some extent, this requirement might also facilitate relative affordability and help serve a greater number of potential residents." (see Exhibit E)

The above insight by council in 2012 was prescient and reflected the sentiment of many



in the community today that the proposed development will be an exclusive enclave for the wealthy. The emphasis by council to limit large private units was partially accomplished by limiting the average attached dwelling to 1000 sq. ft., but also by limiting any single dwelling to 1200 sq. ft. This limitation clearly was intended to be applied to the entire development, including both attached and detached units, to prevent the benefit of increased density being used to subsidize large private units.

Ordinance 7832 was passed by City Council on April 3, 2012 by a vote of 7-0 with 2 absent.

The current application for 311 Mapleton does not meet either standard required for the 3:1 congregate care bonus... "The average dwelling unit floor area for attached congregate care facilities shall not exceed 1000 sq. ft. per unit, and no single dwelling unit shall exceed 1200 square feet."

The current application includes 17 detached dwellings in excess of 1,200 sq. ft. and 22 attached dwellings in excess of 1,200 sq. ft. The average attached dwellings floor area is 1,361sq. ft. as follows:

Building	# of Units	Sq. Ft.	
A Main	20	22,486	
A North	8*	9,060*	
A West	8	10,098	
A East	26	29,489	
B-1	9	10,785	
B-2	9	10,740	
B-3	6	12,516	
D**	2	1,812	
F&G	8	16,708	
L	6	15,120	
Total	102	138,814	Average = 1,361 sq. ft.

\* Excludes 2 guest rooms totaling 760 sq. ft.

\*\* Two employee units

As a result of not meeting the standards required for a project to receive the 3:1 density bonus, the applicant is requesting approval for the following:

	Total	Adjustment	Total As Adjusted
Attached Units	102	1:1	102
Sleeping Units	52	5:1	10.4*

Detached Units	19	1:1	19
Guest Rooms	2	-	-0-
	---		---
Total	175		131.4
	====		=====

#### Summary

Density of dwelling units requested by applicant	131.4
Less: dwelling units allowed by code	(91.2)*
	-----
Number of dwelling units in excess of allowed intensity by BRC	40.2
	=====

\* Excludes portion of site under long term land lease.

The applicant has requested 40.2 dwelling units over the number allowed by BRC and accordingly the application should be rejected.

A similar report was prepared and sent to you on April 27, 2017 based on the architectural plans in the previous application. Despite the concerns in the April 27th report showing that the proposed density violated code, the staff formal response to the applicant on May 5, 2017 (See Exhibit F) was that staff had calculated the dwelling unit equivalencies per the land use code section 9-8-6, BRC 1981 to be 77 equivalent units based on 182 units proposed. The 3:1 bonus on attached units reduced the actual number of attached units from 93 down to 31.

We urge you to readdress this issue to ensure the applicant is in compliance with code. Compliance requires that the average attached dwelling unit be less than 1000 sq. ft. and no single dwelling, either attached or detached, be over 1200 sq. ft. if the 3:1 bonus is used, otherwise the applicant is limited to 91.2 dwellings in the development proposal.

Russell Henriksen  
645 Concord Ave.  
Boulder, Co. 80304

Randi Stroh  
821 Mapleton Ave.  
Boulder, Co. 80304

Wendy Barringgould  
536 Maxwell Ave.  
Boulder, Co. 80304

Alan Delamere  
525 Mapleton Ave.  
Boulder, Co. 80304

Betsey Jay  
429 Mapleton Ave.  
Boulder, Co. 80304

Exhibit A  
BRC 9-8-6 (f)

The screenshot shows the City of Boulder website interface. At the top, there is a blue header with the text "CITY OF BOULDER COLORADO" on the left, a search bar in the center, and "NOTIFICATIONS", "SIGN IN", "HELP", and "Select Language" on the right. Below the header, the breadcrumb navigation reads "Boulder, Colorado - Municipal Code / TITLE 9 - LAND USE CODE / Chapter 8 - Intensity Standards". On the right side of this navigation bar, there are links for "SHOW CHANGES" and "MORE". A vertical sidebar on the left contains several icons. The main content area displays the following text:

(f) Congregate Care Facility: In congregate care facilities, five sleeping rooms or accommodations without kitchen facilities constitute one dwelling unit, three attached dwelling units constitute one dwelling unit, and one detached dwelling unit constitutes one dwelling unit.

(1) A congregate care facility that is built or the use is established after October 31, 2013, and uses the dwelling unit equivalency of three attached dwelling units to constitute one dwelling unit shall meet the following additional standards:

- (A) The facility shall include a minimum of ten attached congregate care dwelling units.
- (B) The average dwelling unit floor area for attached congregate care facilities shall not exceed one thousand square feet per unit, and no single dwelling unit shall exceed one thousand two hundred square feet. The average dwelling unit floor area shall include the floor area within the attached dwelling unit and associated storage areas and shall exclude common areas and garages.

(2) A congregate care facility built or the use is established prior to October 31, 2013, may use the definition of *congregate care* to define the use classification and the average floor area per dwelling units for attached and detached dwelling units in effect when the congregate care facility was built or the use was established.

Exhibit B



**CITY OF BOULDER  
CITY COUNCIL AGENDA ITEM**

**MEETING DATE: April 17, 2012**

**AGENDA TITLE:**

Fourth reading and consideration of a motion to adopt Ordinance No. 7832 amending Title 9, "Land Use Code," B.R.C. 1981, regarding standards for congregate care facilities.

**PRESENTERS:**

Jane S. Brautigam, City Manager  
Paul J. Fetherston, Deputy City Manager  
David Gehr, Deputy City Attorney  
David Driskell, Executive Director of Community Planning and Sustainability  
Susan Richstone, Deputy Director of Community Planning and Sustainability  
Charles Ferro, Land Use Review Manager  
Marie Zuzack, Planner

**EXECUTIVE SUMMARY**

The purpose of this item is for City Council to consider adoption of an ordinance amending the Boulder Revised Code, 1981 (B.R.C.) to address concerns about the type of development projects eligible for the congregate care facility density bonus (**Attachment A**).

The draft ordinance in **Attachment A** includes the following code changes approved by council on April 3, 2012, for facilities to qualify for the congregate care density bonus:

- A minimum project size of ten congregate care units (before applying the bonus); and
- A maximum average congregate care unit size limit of 1,000 square feet (not including garage space) and a maximum individual unit size of 1,200 square feet;
- A requirement to provide three out of the five services listed in the congregate care definition (meal service, transportation, housekeeping, linen and organized activities); and
- A requirement that at least 80 percent of the occupied units of a congregate care facility eligible for the density bonus be occupied by at least one person who is 65 years of age or older.



Exhibit D

**M. Young** and **B. Holicky** requested language changes to item (h)(2)(F)(v) to add the words "safe and vibrant" and "human scale". And requested a change to (h)(2)(F)(xii) to read "authentic detailing and materials such as stone, brick, wood, metal or similar products."

On a motion by **W. Williford**, seconded by **A. Brockett**, the Planning Board approved 4-0, with 2 absent (**A. Shoemaker** and **D. Powell**), recommend approval of the proposed changes to section 9-2-14, "Site Review," B.R.C. 1981, as amended with changes to (h)(2)(F) (v) and (xii).

B. Public hearing and recommendation to City Council on proposed amendments to Title 9, "Land Use Code", Boulder Revised Code, 1981, regarding definitions and use standards for congregate care facilities.

**Staff Presentation**

**M. Zuzack** presented the item to the board.

**Board Discussion**

The board discussed changing the minimum size to congregate care facilities. **A. Brockett** and **M. Young** were in favor, **W. Williford** agreed, but not enough to change it in the meeting and **B. Holicky** would not support the change.

**M. Young** recommended changing the age to 65 to be in line to the Social Security Administration. **W. Williford** and **A. Brockett** did not agree as to allow for age diversity.

On a motion by **M. Young**, seconded by **A. Brockett**, the Planning Board approved 4-0, with 2 absent (**A. Shoemaker** and **D. Powell**), recommend to City Council approval of the proposed amendments to Title 9, "Land Use Code," B.R.C. 1981, regarding the Use Standards for congregate care facilities. Draft amended code language is provided in Attachment C of the memo dated November 17, 2011 and reflects the following proposed changes, with a consideration of a minimum size requirement for the common areas:

1. Adding a minimum project size requirement of ten congregate care units to qualify for the congregate care density bonus.
2. Adding a maximum average congregate care unit size limit of 1200 square feet to qualify for the congregate care density bonus.

**7. MATTERS FROM THE PLANNING BOARD, PLANNING DIRECTOR, AND CITY ATTORNEY**

- A. Update on Junction Place and the Pearl Multi-way Boulevard – **S. Assefa** updated the board on the project and timeline for the item coming to the board.
- B. Landmarks Board Ex-officio Member – **W. Williford** will be the board member for the December 7<sup>th</sup> meeting and the board will appoint an ex-officio member when the full board is present.
- C. December 15<sup>th</sup> Meeting – staff discussed with the board there will be a need for everyone to attend the rest of the December 15<sup>th</sup> meeting due to the other items.
- D. **B. Holicky** will send out an email regarding the City Council letter to see who will draft it, the board will send their topics in and then the small group will meet to draft it.

**8. DEBRIEF/AGENDA CHECK**

## Exhibit E

- One detached dwelling unit counts as one dwelling unit.

Additionally, under the Use Standards section (9-6-3(f)), there is a higher limit on occupancy per dwelling unit for a congregate care facility, as follows:

- Six occupants, including staff, are allowed per one dwelling unit (in comparison to the usual three unrelated occupants per dwelling unit).

A project with a mixture of unit types, such as independent living units with kitchens and assisted living units without kitchens, is considered a congregate care facility as a whole, provided it meets the definition, with the appropriate bonus amount calculated for each unit type.

### **Proposed Occupancy Equivalency Requirements**

Currently, there are no requirements for receiving the additional congregate care units or rooms other than that the facility meets the definition of congregate care. To help ensure that projects receiving the additional rooms or units fulfill key features of congregate living—opportunities for social interaction among residents and access to services, the following requirements are proposed:

#### **1. Minimum number of units**

A proposed project would be required to include a minimum number of congregate care units (including any existing congregate units) to get the density bonus. This would help create a “critical mass” of residents for building community. It would also facilitate the financial feasibility of providing organized social activities, communal meals and other services, of which two are required to meet the congregate care definition. As mentioned above, two downtown congregate care projects included so few units that they likely offered residents few, if any, social opportunities and services.

**Ten units** is a reasonable minimum that honors the intent of co-locating services while not appearing overly restrictive. Congregate care facilities in Boulder currently range in size from 54 units to 252 units. Proposals for smaller senior facilities could occur under the “residential care” or “group home” definition, which allows up to eight or ten occupants, respectively, per dwelling unit.

#### **2. Maximum average unit size**

A maximum average congregate care unit size would discourage large private units and encourage utilization of the allowable building space for more common amenities and/or a higher number of units. A limit on unit size may also address neighborhood concerns about overall building size, although existing bulk standards are the most appropriate means for limiting building size. To some extent, this requirement might also facilitate relative affordability and help serve a greater number of potential residents.

Based on the size of a typical two bedroom unit, an overall average unit size limit of **1,200 square feet** has been proposed. This would include personal living and storage space, but not garage space.



Exhibit F

Land Uses: Density, Elaine McLaughlin, 303-441-4130

1. The application submitted with the Use Review appears to be inaccurate as it states:

Project will consist of 79 Dwelling Unit Equivalents. Due to congregate care density bonuses we are requesting 131 Independent Living units with kitchens. Of these 131 dwelling units, proposal is taking advantage of the 3:1 density bonus on 95 units which is allowed to us by the congregate care density bonus code. Within the memory care building we have 10 dwelling units without kitchens at a 5:1 density bonus for a total of 2 additional for a total of 70 Dwelling unit equivalents within the congregate care use. The remaining 36 congregate care units count as 1:1. This is a total of 86 dwelling unit

Note that staff calculates the following Dwelling Unit Equivalencies per the land use code section 9-8-6, B.R.C., 1981 Please correct the application per the below table and revise in the application materials:

	Equivalency Standard	Number of rooms or units	Equivalency Conversion	Unit Count per Equivalency
<b>Total Rooming Units</b> (Buildings C and D)	5 rooms = 1 du	51	51 / 5=10.2	10
<b>Independent Living Units (IL) &lt; 1,200 sf</b> (Buildings A and B)	3 units = 1 du	95	93 / 3=31.0	31
<b>Independent Living Units (IL) &gt; 1,200 sf</b> (Buildings F, G, H, J1-10, L, M, N, O)	1 unit = 1 du	36	36 / 1=36.0	36
<b>Totals</b>	--	<b>182</b>	--	<b>77</b>

*Per Land Use Code section 1-1-22(a) "Rounding Rule" Unless otherwise specifically provided, if it is necessary under this code or any ordinance of the City to determine which whole number a computed fractional number represents, it shall be presumed to represent the lower.*

----- Original message -----

From: "Nagle, Mirabai" <[NagleM@bouldercolorado.gov](mailto:NagleM@bouldercolorado.gov)>

Date: 11/19/17 8:44 PM (GMT-07:00)

To: Council <[council@bouldercolorado.gov](mailto:council@bouldercolorado.gov)>, HOTLINE <[HOTLINE@bouldercolorado.gov](mailto:HOTLINE@bouldercolorado.gov)>

Subject: 11-21-17 Meeting

Hello,

I would like to give a heads up, that I will be bringing up 3 items during Matters from Mayor and City Council.

1. 311 Mapleton public process for new proposal that was delivered Nov. 8th. 2017.
  - a. 3 week public comment period should start after the public notification is posted and after all documents and drawings are publicly available on the city's website and in a form that is easily readable.
  - b. All comments that were in the previous development proposals need to be included in the new proposal. Some of them have apparently been excluded from this new proposal
  - c. The developer needs to follow the process and post a notification sign on the site of the proposed development.

2. ADU's – in reference to the information that went out to the public.
  - A. Where is the economic analysis of the effect on the next purchaser/owner? How much will the addition of an ADU increase the price for the next owner?
  - B. How will rents remain affordable?
  - C. What are the effects to other home owners and their property value? Will their property taxes increase due to increase in value of homes with ADU's?
  - D. What is community benefit, especially if these units are rented at market rate and create increased traffic/parking issues to the neighborhood.
3. Boulder Rural Fire Department
  - a. BRFD voted to end discussions with the City on Wednesday 11/15/17. When was Council going to receive this update? What are the next steps, if any, or is this issue concluded?

Kind regards,  
Mirabai Nagle

---

**From:** McLaughlin, Elaine  
**Sent:** Monday, November 20, 2017 3:57:23 PM  
**To:** Nagle, Mirabai; Council; HOTLINE  
**Subject:** RE: 11-21-17 Meeting for 311 Mapleton

Good Afternoon Mirabai-

Thank you for the concerns you posted on the Hotline regarding the 311 Mapleton development review process. To help address the concerns, it may be best to provide some background. The site has three active applications: the first is a Site Review which began over a year ago, followed by a Use Review application and a Rezoning application for a single lot along 4<sup>th</sup> Street. Prior to that, in late 2015, a Concept Plan review application was also submitted. Public notification was sent via email and posted to the city's website for all four applications received, consistent with our land use code under section 9-4-3(b) ,B.R.C. 1981. In addition, public notification was sent for two different Good Neighbor Meetings.

Currently, the applications are in a review period for the third resubmittal for revisions to the applications. There is a standard three-week review track in which application materials are reviewed by the Development Review Committee (DRC), comprised of a number of *staff* disciplines from engineering, transportation, landscaping, urban design, housing, open space and planning. Because of the Thanksgiving holiday, we've extended that review time to a four week review track in this case. As we've indicated in all our written public notification that's been sent on each application and as we've noted in the two Good Neighbor Meetings that have occurred on the applications, public comment is taken *throughout* the review process. The standard three-week development review track is to ensure that DRC staff can respond to applications in a thorough and timely manner. Because public comment is accepted throughout the review process and up until a decision is rendered in the public hearing, any public comments received on an application are not limited to the review track timing.



The city's development review website has all materials provided by the 311 Mapleton applicant in an electronic format. At present, electronic submittal of materials are not required, but when we receive them in that format, they are posted on-line. When staff receives public comments, they are also uploaded to the website. When public comments are received during a review track, they are provided at the end of the DRC comment letter. When public comments are received separately from a review track, they are posted as a separate file. Because of concerns expressed by some of the neighbors last week about documents that did not appear on the website, staff is in the process of double checking to ensure that all items have been uploaded.

Regarding sign posting, a neighbor recently made staff aware that the two signs that had been posted on the site since the applications were first received had disappeared. Staff notified the applicant who will be reposting signs today. As has been known to happen, the posted signs can be subject to vandalism and weather.

I hope this helps address your questions. Please feel free to contact me for any further questions.  
Best regards-

**Elaine McLaughlin**  
Senior Planner



**City of Boulder**  
**Planning, Housing and Sustainability**

ph. 303-441-4130

[mclaughline@bouldercolorado.gov](mailto:mclaughline@bouldercolorado.gov)

Department of Planning, Housing + Sustainability  
1739 Broadway | PO Box 791 | Boulder, CO 80306  
[Bouldercolorado.gov](http://Bouldercolorado.gov)

---

**From:** Nagle, Mirabai

**Sent:** Tuesday, November 21, 2017 11:06 AM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>; Council <council@bouldercolorado.gov>; HOTLINE <HOTLINE@bouldercolorado.gov>

**Subject:** Re: 11-21-17 Meeting for 311 Mapleton

Hi Elaine,

Thank you for your response. Here are the comments I have received back from the community.

Please see below.

Best,  
Mirabai

The response from Elaine McLaughlin has a few problems as follows:

1. The developer has not maintained a posting of public notification on the property regarding the development, as required by 9-4-3. This is their responsibility. There is no evidence of "vandalism and weather" to excuse lack of public notification during an extended period of months. The public development review date should be reset to the time of new posting, today November 20, if in fact the

- developer has now complied. Why would this developer get special privilege not to follow the posting requirements that all other applicants are required to follow?
2. BRC 1981 code says nothing of providing public notification via e-mail. This is not a compliant notification. To whom was this sent and when? The standard practice of the city for major development applications is publication in the Boulder Daily Camera. Why has there been no publication of the development application notice?
3. The development has been rejected twice by the city and is presumed dead by much of the community. The new submission is very different from previous ones and initiates new Use Review and a new Rezoning Application, which the applicant has just submitted. This triggers requirements of mail and public notification again, which have not been met. The last mailing was in March 2017. The new Use Review application is substantially different since that time. The applicant now asserts that the open space designation is a mapping error and as such does not legally exist on the property. This is a major restatement of land use. Their assertion is refuted by citizen research and letters. Notification is required.
4. The City did not have significant portions of the application posted on their web site until an errata list was created by Alan Delamere and submitted to staff. Correction was accomplished only on November 17. From the public's perspective, the application was incomplete until November 17. What the City did or did not have from the applicant on November 6 (the calendar start) is unknown. The calendar needs to be reset until at least the date the application was complete, November 17. Why would this applicant be allowed special privilege to accelerate review of a major development with many required documents missing?
5. As far as we can tell, the city accepted an altered public comment file that deleted many citizen letters. City staff should maintain their own public input files, and not rely on those edited by a developer, for obvious reasons of bias and fraud. When will staff reinstate all of the public comments collected regarding this development?

Get [Outlook for iOS](#)

**From:** Alan Delamere [mailto:wadelamere@comcast.net]  
**Sent:** Friday, December 1, 2017 12:45 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Robertson, Jim <RobertsonJ@bouldercolorado.gov>  
**Subject:** Construction Development Phase Impacts

City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, Colorado 80306-0791

November 30th 2017

Attention: Ms Elaine McLaughlin, Case Manager  
Regarding: Site and Use Review for 311 Mapleton LUR2016-00065, LUR2017-00028 and Lur2016-00027

**Construction Development Phase Impacts**

Dear Elaine,

On May 3<sup>rd</sup> we submitted the attached letter and the content of is fully applicable today. We feel that no one on staff has any interest in addressing our concerns. The letter from David Thompson of 9/1/2017 was a totally unsatisfactory response that did not in any way help.

The more that we study the developers plans, the worse the development phase construction traffic problem gets.

In August we calculated that earth moving required 28,000 5 cu yd truck journeys. Currently, we are at >30,000 earth moving truck journeys and are only starting the analysis. The truck traffic consists of moving stuff off-site – earth, demolition debris and moving materials onto the site such as concrete, pipes, drywall, timber, etc. Site workers pick-up trucks are a big factor at the Trailhead site and the numbers look 10X higher for 311. See the separate email addressing the facts behind the massive 311 Development.

We have been trying to get construction development phase impacts into the assessment process for the past two years with the tedious chain of emails and meetings in which we requested development phase impacts be required.

Why is this more important to us than it is to your staff? Because we will have to live with the traffic impacts on a day to day basis.

Our city code is totally deficient in establishing rules for the construction development phase in residential neighborhoods. In the absence of definitive code, the City Council Mandate BRC 1.1.14 states that “In enacting an ordinance the city council intends:

- (e) that the public interest be favored over any private interest.”

We naively assumed that the Traffic Impact Study (TIS) parameters would be designed by staff to deal with all aspects of the development. We notice that the TIS is not included in the 311 documents on the city website and that David Thompson’s review of last year is also missing.

Sincerely,

Alan Delamere 525 Mapleton Ave 303-447-2780

Kevin Lambert 403 Mapleton Ave, 303-881-0503



Upper parking lot April 8<sup>th</sup> 2017 at 11am



Mapleton Ave is breaking up 6th and Mapleton 4/27/2017



City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, Colorado 80306-0791

May 3, 2017

Attention: Ms Elaine McLaughlin, Case Manager  
Regarding: Site and Use Review for 311 Mapleton LUR2017-00027

**Development Phase Impacts**

Dear Elaine,

We have been trying to get development phase impacts into the assessment process for the past 15 months with the tedious chain of emails and meetings in which we requested development phase impacts be required. The full list is available on request. In summary, we present the chain of events.

1. Chandler Van Schaack., 311 Case manager, presented a slide at a neighborhood meeting in January 2016 that contained the following statement: “ *Traffic Impact Study (section 2.02 of the DCS) required at Site Review. The consultant will work with staff to determine study parameters prior to initiating the study.* ”
2. We responded with the following in March 2016:

Here is a list of our expectations for the study requirements.

1. The development phase of the project be included. That means demolition, land re-shaping, hole digging, construction as well as final use.
2. Detailed data on existing traffic flow, amounts on 4<sup>th</sup> (N&S), Mapleton, Maxwell, Alpine. Specifically time of day, Weekends as well as work days.
3. Noise levels of existing traffic
4. Estimates of the various phases of the development – demolition, land re-shaping, hole digging, construction, final use.
  1. Number of vehicle journeys,
  2. Size of vehicles
  3. Routing
  4. Timing
  5. Noise mitigation plan
  6. Safety mitigation plan
3. We got no information until after the developer submitted the plans. The Traffic Impacts Study parameters did not include our concerns.
4. We submitted our assessment of the developers traffic Impacts assessment. See attached letter.
5. We asked for a copy of the staff report on the traffic impacts and we received a draft just before having a meeting with staff on October 7<sup>th</sup>. This report has never been published on the website. Alan met with Don Altman and discussed the traffic impacts. He had not seen the staff report. The big surprise at our

meeting with staff was that they have no requirements to assess development phase traffic. We asked for them to find a way to include it.

6. In an email to David Driskell on October 19<sup>th</sup> 2017 we asked that he include development phase impacts for the 311 re-submission. We got no response.
7. In the current submission the TIA is basically identical to the submission of last summer. We will revise our letter of last year after further study of the new data that we have been obtaining this week.

We are still suffering from the development traffic impacts from the Trailhead development and are not happy with the prospect of 10's of thousands of large truck journeys disrupting the tranquility of our neighborhood. The new plans are more difficult to calculate truck loads because of the extensive re-grading that appears in the current drawings. For example, in examining the C drawings in the planning department, we could not find an E-W section drawing through Building A lodge.

Mapleton Ave is breaking up with the heavy truck traffic, see photo. It was never designed for anything other than a quiet residential street. It is not the arterial road that it might appear to be. Over the past couple of years large sections have been replaced with the damage caused by large trucks going to the trailhead development.

There is another major impact of this development is the loss of Open Space Parking. Current Open Space use is increasing dramatically faster than population growth. The rate of increase is not known but we neighbors and users of the Sanitas Valley have been observing the growth. The Centennial parking lot only provides about 30%. The overflow is on the 311 site and the neighborhood streets. See photo of the upper lot taken on a recent Saturday morning. No traffic measurement have been made on Saturday and Sunday morning. The public have had unlimited access to the 311 site for at least the 50 years that Alan and family have lived on Mapleton Avenue. (For a year or so the hospital asked the public not to use the upper parking lot M-F 8am to 5pm.) Where will the church users park during the development phase?

We recommend rejecting the Use Review to decrease traffic and parking impacts.

Sincerely,

Alan Delamere 525 Mapleton Ave 303-447-2780

Kevin Lambert 403 Mapleton Ave, 303-881-0503

Jacqueline Muller 639 Mapleton Ave 303-443-1082



Upper parking lot April 8<sup>th</sup> 2017 at 11am



Mapleton Ave is breaking up 6th and Mapleton 4/27/2017

Letter submitted in August 2016

18<sup>th</sup> August 2016

Elaine McLaughlin  
Planning Department  
City of Boulder  
1777 Broadway,  
Boulder, CO 80302

Dear Ms McLaughlin,

Reference: LUR2016-00065 311 Mapleton

Subject: Traffic Study

We have reviewed document "[31\\_Trip Generator\\_Trip Distribution.pdf](#)" and find it deficient in meeting the requirements of "[Traffic Impact Study](#) (section 2.02 of the DCS) and our neighborhood concerns.

While this document has been produced by a professional company, it is deficient in the following ways:

1. There is no reference to the study parameters required by City document "Mapleton Hill TIS Parameters.pdf". This document states: "At a minimum, three day, twenty-four hour street counts must be obtained for the following street segments in both directions: Mapleton Ave east of 4th Street , Maxwell Ave east of 4th Street, 4th Street north of Maxwell Ave, 4th Street south of Mapleton Ave".
2. Only two days of data was supplied taken in May 2015 when the Hospital site was partially active. These days were Wednesday and Thursday May 27<sup>th</sup> and 28<sup>th</sup>. Missing was any data taken on a Saturday or Sunday.
3. In addition, data was supplied in figure 3b that showed daily vehicle counts taken in May and June 2016. These data are incomplete and confusing. Site access is complete for 7 days a week but 4th, Mapleton and Maxwell are only partially covered.
  - a. Site 1 traffic is probably Open Space parking
  - b. Sites 2 and 3 are probably Open Space parking, residents, church and contractors. Are there time details available?
  - c. Site 4 would be a combination for tenants and Open Space parking.
  - d. Site 9 traffic is probably dominated by Trailhead construction.
  - e. The 2016 numbers did not separate turning vehicles.
4. The synchro report (28 pages) give the impression of detailed research. It produces more questions than answers.
  - a. It appears to focus on traffic from the motorist's point of view rather than that of the neighbors. Wait times at the intersections is not as important as acceleration noise from large trucks at each intersection.
  - b. The format of the pages is vaguely consistent but the line items are variable.
  - c. The source of the data is not referenced. One could assume that some of it originated from the 2015 Counter Measures Inc data sheets. Please clarify.
  - d. Of particular concern is the fixed heavy vehicle traffic number of 2% used in most of the pages. Where does this number come from? We are currently being subjected to conversation killing noise from heavy vehicles going to the Trailhead site.



- e. What is the basis of the estimate for the 2018 predictions? How much construction traffic is included?
  - f. Would some members of staff please translate these 28 pages into some format that is understandable from the neighbors' point of view?
5. This study does not address the various phases of the development - demolition, land re-shaping, hole digging, construction, final use. How can the staff accept such an incomplete report? It should include:
- a. Number of vehicle journeys,
  - b. Size of vehicles
  - c. Routing
  - d. Timing
  - e. Noise mitigation plan
  - f. Dust mitigation plan
  - g. Safety mitigation plan
6. Mapleton Avenue was not designed for heavy traffic it was designed for the comfort and convenience of the residents. In the 30's the residents had it paved with concrete for their comfort and convenience (ref. a late neighborhood who was on the committee). It is just happenstance that it can carry a heavy traffic load. The steep section west from Broadway is of particular concern because of excessive noise from large trucks grinding up the hill.
7. Maxwell Avenue was the primary access road to Sunshine and Gold Hill and the Sanitarium. It was never designed to have cars parked either side of the street. On a bike, it is the easiest street to ascend Mapleton Hill. When it was designed, it was the easiest route for a horse and cart. Today it is incompatible with a 25mph speed limit.

Neighborhood concerns were ignored in writing the traffic study parameters. We request that Staff thoroughly review this traffic study and decide if it is compliant with neighborhood concerns as well as City code.

A new responsive Traffic Study is required.

Sincerely,

Crystal Reports

Kevin Lambert 403 Mapleton Ave, 303.881.0503

City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, Colorado 80306-0791  
Attention: Ms. Elaine McLaughlin, City Planner  
Subject: "Neighborhood street hazards from proposed 311 Mapleton hillside removal."

In the attached document we have attempted to quantify the scale of the 311 Development in terms of neighborhood traffic during the construction phase.

With the proposed project public safety and road hazards becomes an issue putting the neighborhoods from 4th Street to Broadway at risk. The proposal shows the removal of a very large portion of the 311 Mapleton site - for deep underground parking and cut-and-fill retaining walls up to 30 feet.

Roughly 15,000 large earth moving (15 cubic yard) and 2400 concrete (10cubic yard) truck journeys are proposed on limited sight distance streets such as 9th Street, 4th Street and single vehicle turn-outs such as Broadway to 9th on Mapleton Avenue. Access via Maxwell is prohibited and other residential streets are not able to carry large, continuous truck traffic.

These numbers are shown in the attached calculations. It must be recognized that these are just the tip of the iceberg as there are a large number of "to be determined (tbds)" in the tables. For every truck there will be many pickup trucks on site.

It would be irresponsible to approve such a long duration commercial construction project in an historic neighborhood. No plan has been proposed or reviewed by city traffic engineering or the public to accomplish such a massive project on our limited residential streets. This is negligence from both the developer and the city.

The applicant should propose a development that is suited to the contours of the existing site, rather than excavate and destroy the geology in a designated mass movement hazard in order to force high density commercial buildings and parking into a steep hillside. Removing such a large amount of the site is not sustainable or supportable by the limited residential street access.

In the event that staff should feel inclined to approve this development, it is essential that the attached report be completed and verified by staff and shared with the public and the Planning Board.

Sincerely,

Alan Delamere	Roger Koenig	Russell Henriksen
525 Mapleton Ave	909 Mapleton Ave	645 Concord Ave
Boulder, CO 80304	Boulder, CO 80304	Boulder, CO 80304

c,c Jim Robertson

City of Boulder  
Planning and Development Services  
P.O. Box 791  
Boulder, Colorado 80306-0791  
Attention: Ms. Elaine McLaughlin, City Planner  
Subject: "Neighborhood street hazards from proposed 311 Mapleton hillside removal."

Below we have attempted to quantify the scale of the 311 Development in terms of neighborhood traffic during the construction phase.

With the proposed project public safety and road hazards becomes an issue putting the neighborhoods from 4th Street to Broadway at risk. The proposal shows the removal of a very large portion of the 311 Mapleton site - for deep underground parking and cut-and-fill retaining walls up to 30 feet.

Roughly 15,000 large earth moving (15 cubic yard) and 2400 concrete (10cubic yard) truck journeys are proposed on limited sight distance streets such as 9th Street, 4th Street and single vehicle turn-outs such as Broadway to 9th on Mapleton Avenue. Access via Maxwell is prohibited and other residential streets are not able to carry large, continuous truck traffic.

These numbers are shown in the attached calculations. It must be recognized that these are just the tip of the iceberg as there are a large number of "to be determined (tbds)" in the tables. For every truck there will be many pickup trucks on site.

It would be irresponsible to approve such a long duration commercial construction project in an historic neighborhood. No plan has been proposed or reviewed by city traffic engineering or the public to accomplish such a massive project on our limited residential streets. This is negligence from both the developer and the city.

The applicant should propose a development that is suited to the contours of the existing site, rather than excavate and destroy the geology in a designated mass movement hazard in order to force high density commercial buildings and parking into a steep hillside. Removing such a large amount of the site is not sustainable or supportable by the limited residential street access.

In the event that staff should feel inclined to approve this development, it is essential that the attached report be completed and verified by staff and shared with the public and the Planning Board.

Sincerely,

Alan Delamere	Roger Koenig	Russell Henriksen
525 Mapleton Ave	909 Mapleton Ave	645 Concord Ave
Boulder, CO 80304	Boulder, CO 80304	Boulder, CO 80304

c.c Jim Robertson

The following pages have been formatted to keep tables on one page.

## The Facts behind the Massive 311 Development

### Summary

The scale of the 311 Mapleton is massive. This report is an attempt to define "massive" with factual data. While many people are appalled at the size of the development, quantifying scale needs significant analysis. The people of Mapleton hill have witnessed one massive development in the removal of the Boulder Junior Academy and the build of the Trailhead subdivision. The proposed 311 Mapleton development is very much bigger than Trailhead so the question is how much bigger? The following is an attempt to determine the scale of the development in terms of construction activity.

The real neighborhood impacts are the construction development phase of the project from traffic, noise and dust. This report is a preliminary attempt to quantify the traffic impacts. A cut and fill presentation to the Design Advisory Board in August showed 28,000 truck journeys of 5 cu yards trucks for earth removal. At that meeting the developers suggested using **15 cu yards trucks** to reduce the amount of journeys. In the plans submitted on November 6<sup>th</sup> more detail of the site design have been presented and are used in this first order estimate.

Table 1 Truck summary minimum

Activity	Volumes cu yds	Weight tons	truck size	Number truck loads
Deconstruction	tbd			
Surface re-shaping	10,800	13,851	15 cu yds	720
Hole digging	76,341	81,500	15 cu yds	5,433
Trenching	tbd			
Concrete -garages/foundations	9,822	19,889	10 cu yd	982
Concrete - stairwells	63	128	10 cu yd	6
Concrete -Elevators	389	788	10 cu yd	39
Concrete - road, curbs, side walks	1887	3,821	10 cu yd	189
Pipes - water	tbd			
pipes - sewer	tbd			
pipes - interior	tbd			
pipes - land drains	tbd			
Lumber - 2x4	tbd			
lumber - sheet	tbd			
Drywall	tbd			
Stone fill	tbd			
Road base	tbd			
Electric wiring	tbd			
Miscellaneous materials	tbd			
Total truck loads				7,369
Total truck joumeys				14,739



Notice the number of unknowns. The real traffic impact will be significantly higher. If smaller sized trucks are used the number of journeys will be higher. Contractor pickup truck journeys need to be estimated as they have proved to be a very large impacts for the trailhead development.

**Deconstruction Phase**

This phase includes tearing down existing structures, removing the existing roadways and parking lots, re-shaping the entire area as is shown in drawings C1.6-C1-10. No estimates for this phase are available except that shown for cut and fill for the re-shaping.

EARTHWORK CALCULATIONS:	
CUT	- 32,707 CUBIC YARDS
FILL	- 23,225 CUBIC YARDS
NET	- 9,342 CUBIC YARDS

Fig 1 From drawings C1-6-C1.10

It is not clear what the plans are for re-using or removing the existing two tunnels from the power building.

**Hole Digging Phase**

For every new building the foundation holes are estimated in table 2. The garage holes estimates are reasonable accurate but the foundation holes need more detailed design so are just rough estimates. Cottages J are complicated because they are built partially into the hillside. Drawings C1-6-C1-10 show hatched areas for the existing buildings and there may be some volume gain from existing holes after surface transformation.



Fig 2 15 cu yards dump truck

Table 2 Earth volume removal from site

Building	Foundation	Shape	length feet	width feet	mean depth feet	Volume cu yds
A east	Garage	rectangular	80	80	14	3319
A west	Basic	rectangular	80	190	3	1689
A main+ A North	Garage	sloping	80	300	21	18667
B1/2	Garage	rectangular	72	200	12.5	6667
Garage Entry	ramp	complex	60	20	10	444
B3	Basic	rectangular	100	72	3	800
C	Garage	rectangular	120	180	15	12000
D	Garage	rectangular	60	80	15	2667
tunnel	Garage	rectangular	60	240	15	8000
F/G	Garage	sloping	80	200	7	4148
H	Basic	rectangular	56	50	5	519
j	Basic	Complex	50	168	5	1556
K	Basic	Swimming pool	38	22	5	155
M	Basic	rectangular	30	100	3	333
R Cottages 1-4	Basic	rectangular	50	150	5	1389
R Cottages 4-7	Basic	rectangular	50	120	5	1111
P chapel	Basic	rectangular	35	40	3	156
					sub-total	63,618
					Fluff factor 20%	12,724
					total	76,341
					5cu yds trucks	15,268
					15 cu yds trucks	5,089
					Earth mass tons	81,590

Total volume of earth to be removed from site – 76,000 plus the 9,000\*1.2 from the site cut/fill drawing = 87,000 cu yards or 17,400 fifteen cubic yard truck loads or 34,800 truck journeys.

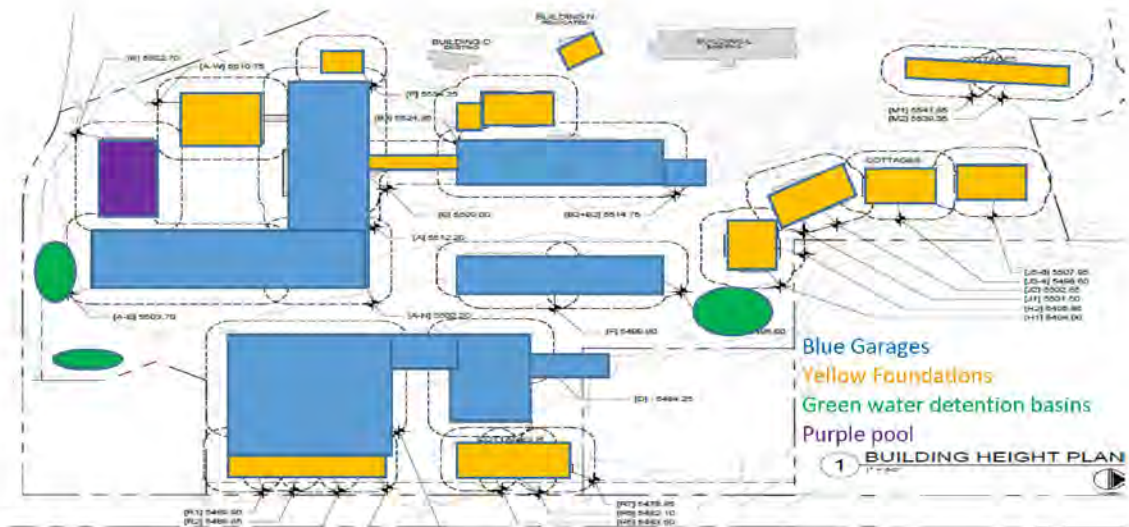


Figure 3 Site excavations range from deep for garages to shallow for basic foundations without basements

**Concrete estimate**

Table 3 Concrete estimate for garages and foundations

Building	Foundati on	Shape	length feet	width feet	mean depth feet	area	walls	Volume concrete cu yds
A east	Garage	rectangular	80	80	14	6400	320	407
A west	Basic	rectangular	80	190	3	15200	540	958
A main+ A North	Garage	sloping	80	300	21	24000	760	1510
B1/2	Garage	rectangular	72	200	12.5	14400	544	909
Garage Entry	ramp	complex	60	20	10	1200	160	80
B3	Basic	rectangular	100	72	3	7200	344	457
C	Garage	rectangular	120	180	15	21600	600	1356
D	Garage	rectangular	60	80	15	4800	280	307
tunnel	Garage	rectangular	60	240	15	14400	600	911
F/G	Garage	sloping	80	200	7	16000	560	1008
H	Basic	rectangular	56	50	5	2800	212	181
J	Basic	Complex	50	168	5	8400	436	535
K	Basic	Swimming pool	38	22	5	836	120	56
M	Basic	rectangular	30	100	3	3000	260	195
R Cottages1-4	Basic	rectangular	50	150	5	7500	400	478
R Cottages 4-7	Basic	rectangular	50	120	5	6000	340	383
P chapel	Basic	rectangular	35	40	3	1400	150	92
total								9822
10 cu yd trucks								982
Mass concrete tons								19,889



Figure 4 10 cu yard concrete truck

Table 4 Stairways and Elevators

Building	floors	Shaft height	passenger elevators	walls linear ft	Concrete volume cu yds	Freight elevators	walls linear ft	Concrete volume cu yds
A east	3	50	1	24	22			0
A west	3		0		0			0
A main	3	50	2	24	44	1	30	28
A north	3	50			0	1	30	28
B1/2	3	50	1	24	22			0
B3	2	40	1	24	18			0
C	3	50	3	24	67			0
D	3	50	1	24	22			0
F/G	3	50	2	24	44			0
H	3				0			0
L	3 existing		1					
j	2				0			0
K	1				0			0
M	1				0			0
R Cottages 1-4	2	30	4	24	53			0
R Cottages 4-7	2	30	3	24	40			0
				Sub-total	333		sub-total	56
						<b>Total elevator shaft</b>		<b>389</b>

The total concrete for stairways it could be as high as 63 cu yards depending on detailed shaft and stair designs



Table 5 Roads

Road	length ft	width ft	area sq ft
A	510	42	21,420
B	810	42	34,020
B+	465	20	9,300
B++	435	20	8,700
D	150	20	3,000
	area sq ft		76,440
	8 inch concrete		50,960
	concrete cu yds		1,887

Table 6 Total amount of concrete

Area	concrete
garages foundations	9822
Elevator shafts	389
stair ways	62
roads	1887
side walks	tbd
retaining walls	tbd
Manholes	tbd
drainage channels	tbd
misc	tbd
total cu yards	12,160
<b>Concrete trucks 10 cu yd</b>	<b>1,216</b>
Mass concrete tons	24,624.78
<b>CO2 content tons</b>	<b>3,903,484</b>



Figure 5 A building underground parking requires a 30 foot retaining wall with revetments to restrain mass movement

## **Pipes**

This utilities and storm water reports show vast amounts of sewer and water pipes being required. In the utility report a number of 800ft of 8inch PVC pipe is shown in two tables. It appears that one might be water and the second sewer for a total of 16,000 feet. 20 ft lengths gives 800 pipes or a stack of pipes 8ft wide by 67 ft high – maybe 12 truck loads. The amount of storm water, fire hydrant and building internal pipes needs to be determined.

## **Other materials**

TDB

### **Contractor pickup trucks**

For every truck load of material many contractors are required with their attendant pickup trucks. It will be a large number and an estimate is necessary to complete the traffic picture.

## **Conclusions**

**Staff and /or the developers should complete this preliminary report to show what the true impact of this development is on the residential neighborhood.**



Figure 6 Concrete everywhere Hotels at 28<sup>th</sup> and Canyon show need for extra concrete support pillars



Figure 7 Use more axles to decrease load on delicate road surfaces.

**From:** Leonard Segel [mailto:LSegel@hcm2.com]  
**Sent:** Friday, December 1, 2017 3:28 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** Citizen Comment on 311 Mapleton

Greetings Elaine:

I hope your week is going well.

I'm writing a brief note to say that I like the overall direction of the Academy on Mapleton Hill.

The design looks nicely and appropriately scaled for the neighborhood. The density is good with abundant open spaces.

This seniors' community will be a great addition to Mapleton Hill and Boulder.

.....Len

**Leonard Segel, AIA, LEED BD + C**

**hord | coplan | macht**

303 607 0977 main | 303 222 2158 direct  
lsegel@hcm2.com | www.hcm2.com

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-----Original Message-----

**From:** janet gustafson [mailto:gustafs.jan@gmail.com]  
**Sent:** Saturday, December 2, 2017 7:27 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Subject:** Old Memorial hospital

I have lived in Boulder for 38 years, watching it grow and change. Up until more recent years I have applauded those that have worked hard to maintain the integrity of our city. All too suddenly what I loved about this city changed with huge apartment blocks exceeding the height limit and bringing more density into our city. To get across town now becomes a long drive. To centralize growth and create an urban center around 28th, 30th, and Arapahoe is one thing, but then to encroach on quiet neighborhoods creating the same traffic nightmare, exceeding height limitation, creating parking problems, forgoing open space concerns, and increasing density is unforgivable. Why?

Years and years ago water was stolen from the west slope to hydrate the front range. I was in the Colorado sand dunes area many years back when people there were up in arms about the east slope trying to take their water. I know that endless pursuit of water continues as we grow. We are setting ourselves up for an ecological disaster as we deprive more and more areas of their water to feed the watering needs of all the new people settling here.



Boulder was an aware, educated, fit community. Being so we should see and prevent what happens when growth overwhelms all other concerns. Why are we allowing Boulder to lose its character?

The plan for the old Memorial Hospital needs serious revision. Like so much that is happening to this once small city, it is an exercise in gluttony that violates the principles that made Boulder special.

Jan Gustafson  
1040 Dellwood Ave.

Sent from my iPad

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**From:** Brian Spear [mailto:bbspear@gmail.com]  
**Sent:** Sunday, December 3, 2017 2:12 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** boulderplanningboard <boulderplanningboard@bouldercolorado.gov>; Kathleen K Spear <kkspear@gmail.com>  
**Subject:** Comments on 311 Mapleton

Dear Ms. McLaughlin:

We have been following the discussion regarding the proposed construction of the Academy at Mapleton Hill (311 Mapleton Ave.) and as concerned Mapleton Hill residents we would like to provide some additional comments. We reside at 745 Mapleton Ave (the corner of Mapleton and 8<sup>th</sup>), in close proximity to the site.

Development at the 311 Mapleton site, given its size, location, and beauty, is inevitable, as will be the accompanying stress and disruption. We are of the opinion that the creation of a retirement community at the old hospital site will have an overall positive effect on the neighborhood and on the city of Boulder. We believe also that the plan laid out by the developers appears to be appropriate and responsible, with certain reservations.

Some points we have considered are:

- Much as we and others might like hospital site to remain undeveloped, this is not a realistic option. The question to consider is not "If there is going to be development?" but "What will the development be?" Given the size of the property and the potential uses under current zoning, a retirement community seems to be among the most benign and positive uses.
- Once the Academy is open and functioning, it should be a positive component to the Mapleton Hill neighborhood. It will be residential and quiet, with minimal daily disruption compared to other possible uses.
- Over the next decade, the many current "active retired" residents of Boulder will be in need of housing that is more structured and supportive than remaining in their current homes. The Academy is one potential destination for these individuals.

We nonetheless have some concerns about the new construction:

- Traffic on Mapleton Ave. is problematic now and will only get worse. Many drivers do not respect the speed limits, even near Mapleton School. This is especially the case for commercial and construction vehicles. The addition of construction traffic for the 311 Mapleton property will only exacerbate this problem. It will require that both the city and the construction company rigorously enforce the traffic rules in the area. The same will hold for Maxwell, 4th Street and other thoroughfares.
- Adequate parking should be provided for people using the Mt. Sanitas and Red Rocks trails both during and after construction.

We are pleased to have had the opportunity to make this statement on the project, and to make it clear that not everyone in the Mapleton neighborhood is opposed to the Academy project. We would be happy to offer additional comments if requested.

Sincerely,

Brian and Kathy Spear

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**From:** Alan Delamere [mailto:wadelamere@comcast.net]

**Sent:** Monday, December 4, 2017 6:35 PM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Cc:** Robertson, Jim <RobertsonJ@bouldercolorado.gov>; Winfree, Tracy <WinfreeT@bouldercolorado.gov>; russell henriksen <russellhenriksen@hotmail.com>; Roger Koenig <rogerkoenig@yahoo.com>; randistroh@earthlink.net; Wendy Baring-Gould <wbaringgould@comcast.net>

**Subject:** RE: Open space impacts from 311 Mapleton development Minor correction duplicate text removed

Elaine,

We have two major issues with the 311 Mapleton development that we have been systematically addressing without meaningful response from Staff.

**The Loss of OS parking.** The public have used the 311 Mapleton site for parking virtually unrestricted for more than 50 years. The use of [Sanitas](#) Open Space is increasing at more than double every 10 years. Closing off 311 Mapleton will place an increasing burden on the neighborhood and trail users.

We have expressed concern over the loss of OS parking for the last two years. In response, we have been told that a new Master Plan is being developed and that the parking issue will be addressed within it

Unfortunately the very real opportunity of solving the problem may have been lost by the time the Master Plan is implemented in 2020. The time to address a plan for parking at the Dakota Ridge trail system is now, while the project for 311 is under review. The OSMP staff's decision to ignore this pressing issue at this critical time seem irresponsible and negligent.

**The loss of Open Space – Other.** This portion of the site has been designated for potential OS acquisition following a 1970 petition to Boulder City Council by the Dakota Ridge Committee. It has been legally ratified and mapped as OS-O as part of the BVCP since at least 1977.

Planning staff tried on January 11, 2017 to have the OS-other designation removed by the OSBT in public process, but OSBT challenged staff to address several questions and issues before their deliberations. Staff did not subsequently report back to OSBT on these issues.

In the May 5<sup>th</sup> site review staff report staff stated in their findings that the OS-O designation at 311 Mapleton was not a mapping error.

In July 2017, Planning staff claimed that the entire OS-O designation is a mapping error and declared their intention to remove it through notification to the County, under advice of the Boulder City Attorney. Staff have chosen not to comply with public process requirements for modifying BVCP land use designations, despite written and oral statements made by the Planning Director, Susan Richstone, on January 11 explaining such requirements.

Citizens for Sanitas disputed staff's new mapping error assertion with a detailed research report that included the OS-O designation history and mapping references from the time of the 1970 Dakota Ridge Committee petition to present. Both staff and OSBT have refused to respond to three Citizen's formal letters and research reports regarding our findings.

Staff have led the developers to believe that they can build a commercial complex on the OS-other portion of the property, in violation of the BVCP. Boulder has adopted the BVCP by resolution. It is legally binding. The developer's beliefs regarding their intention for commercial development of an Open Space designation are documented in their most recent application. Planning staff have not commented.

The public and former City Councils agreed that the entire Dakota Ridge, from Mapleton to Linden, was worthy of Open Space designation. They ratified and mapped this understanding following the Dakota Ridge Committee petition in 1970. There is an existing portion of the Dakota Ridge trail, trail head and public Access from West Maxwell that is on the OS-O designation at 311 Mapleton.

As explained by former City personnel, there has never been a problem with the public freely using the Dakota Ridge trail and it's access under both hospital administrations, so acquisition was not an OS priority.

When the developers bought the site the OS-other was clearly identified in the deed and contributed to its relatively low purchase price. Staff's recent assertion of a mapping error is inconsistent with the deeds and records for the property. The developer did not dispute this designation, nor find any mapping errors, when they acquired the property. The Boulder Community Hospital also didn't dispute the OS-O designation and if they thought there was an error they had a fiduciary responsibility to correct it before selling the property because of the increase in price that would have resulted from the designation being removed.

We request that the erroneous staff document produced for the July OSBT be removed from the current 311 Mapleton development case file. We further request that the OSBT conduct a public hearing regarding the facts and use of this Open Space designation. Such public hearing is directed by the OSBT charter and BRC1981.

Sincerely,

Roger Koenig 909 Mapleton Ave, Boulder CO 80304

Alan Delamere 525 Mapleton Ave, Boulder CO 80304

Russell Henriksen 645 Concord Ave, Boulder CO 80304

Randi Stroh 821 Mapleton Ave, Boulder CO 80304

Wendy Baring-Gould 536 Maxwell Ave, Boulder CO 80304

Cc Jim Robertson

Tracy Winfree

---

**From:** russell henriksen [mailto:russellhenriksen@hotmail.com]

**Sent:** Monday, December 4, 2017 3:49 PM

**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>

**Cc:** alan delamere <wadelamere@comcast.net>; randistroh@earthlink.net; rogerkoenig@yahoo.com; betseyjay1@gmail.com; WENDY BARINGGOULD <wbaringgould@comcast.net>

**Subject:** 311 Mapleton Zoning Change

Elaine,

In your May 5, 2017 response to the 311 application, you note that "the applicant has demonstrated clear and convincing evidence that the proposed rezoning is necessary to come into compliance with the BVCP map". It is my understanding that individual decisions regarding how a property is zoned are made by the city and that the BVCP is not determinative in that regard. If this is not correct, please advise.

The current application by the developers includes a zoning change from LR-1 to Public for a portion of the site along 4th.

Attached is a current zoning map for the area. 4th Street is an important street for both Mapleton Hill and Newlands as it is the last through North/South street on the western side of our neighborhood. The entire neighborhood from Iris to Spruce Street along 4th is currently zoned LR-1, with the exception of a small section of the the 311 Mapleton site and the Seventh Day Adventist Church which have historically been zoned Public.

The adjoining Trailhead neighborhood just to the north of the area requested for re-zoning was zoned both Public and RL-1 prior to the Trailhead development. The city reviewed this development and decided the best option was to rezone the Public zoned portion of the parcel to RL-1. This was consistent with zoning along 4th in the Newlands and Mapleton Hill neighborhoods, and was consistent with the historic use of the area west of 9th in the Mapleton Hill and Newland neighborhoods, with the exception of the Boulder Community Hospital site and Seventh Day Adventist site which have historic roots back to the early development of Boulder.



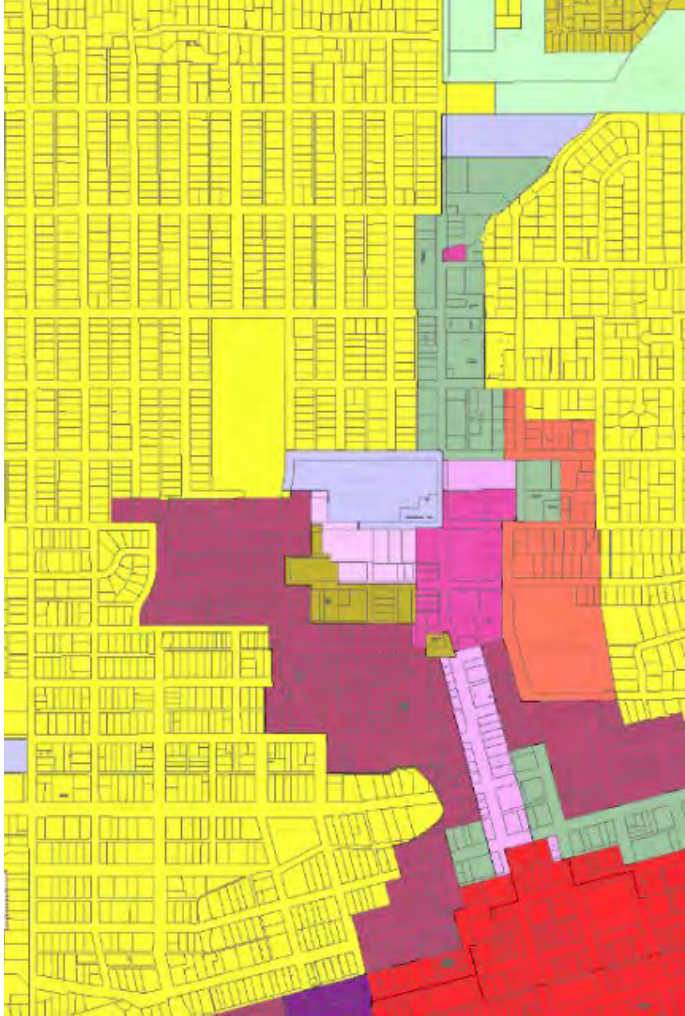
Attached is a 1998 map I photographed at the Carnegie Library. It was prepared by Open Space and Planning Staff. At that time the portion of the 311 site requesting the change in zoning and the southern portion of Trailhead were both zoned Public. Since 1998, both have been rezoned to RL-1. These changes were made by the city and reflect their best efforts to determine the type of development that should be allowed on property adjoining our residential neighborhoods.

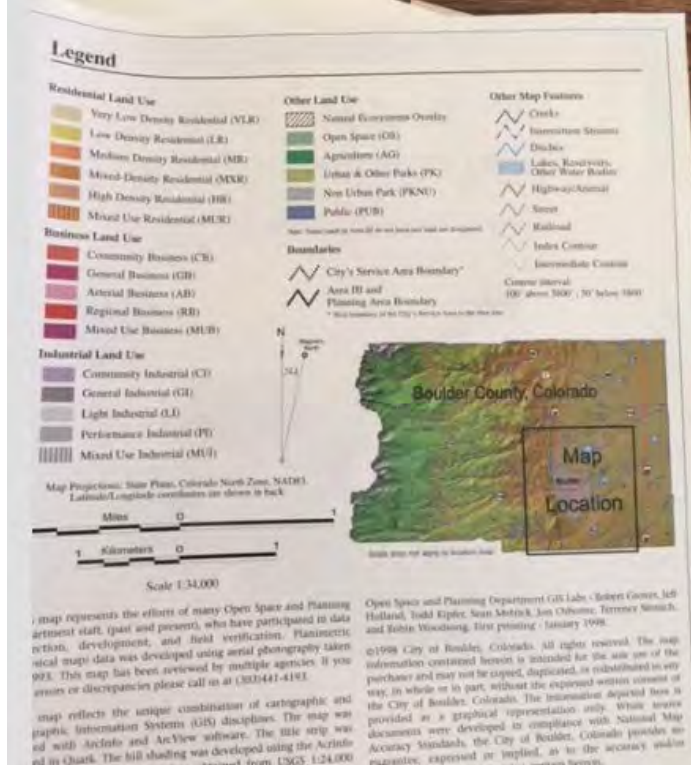
The public has relied on the current RL-1 zoning for years in making decisions on housing purchases. In addition, the recent trend of the adjoining property to the North (Trailhead) being rezoned by the city from Public to RL-1, and the historic use of land in the Mapleton Hill and Newlands neighborhoods all support denying any request to change the zoning of this portion of the 311 site. The historic reasons for the existing Public zoning on the majority of the 311 site do not extend to this parcel as the city has previously reviewed the zoning on this portion of the property and changed it from Public to RL-1. Staff should not support the developer's request to change it simply to conform to the BVCP. The current zoning is RL-1 and this zoning was and should be determined by the City of Boulder not the BVCP. Accordingly, this request should be denied.

Please include this in the public record.

Sincerely,

Russell Henriksen  
645 Concord Ave.  
Boulder, Co. 80304





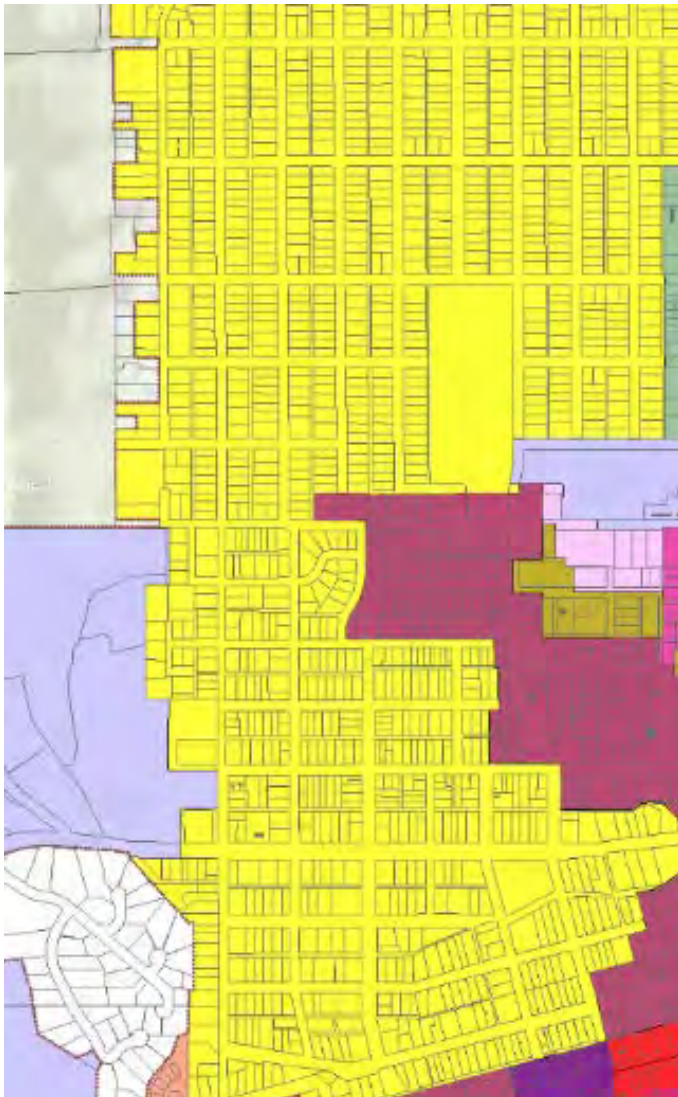
**From:** russell henriksen [mailto:russellhenriksen@hotmail.com]  
**Sent:** Monday, December 4, 2017 7:48 PM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** alan delamere <wadelamere@comcast.net>; randistroh@earthlink.net; rogerkoenig@yahoo.com; betseyjay1@gmail.com; WENDY BARINGGOULD <wbaringgould@comcast.net>  
**Subject:** Re: 311 Mapleton Zoning Change

Elaine,

I incorrectly stated that the Seventh Day Adventist Church was zoned Public in my email below. As the Zoning Map shows it is zoned RL-1. I also attached a larger map of the area that makes it easier to locate the 311 project. Apologies for the error. Please include this correction in the public record.

Best Regards,

Russell





**From:** Sheila Delamere [mailto:sdelamere@juno.com]  
**Sent:** Thursday, November 30, 2017 11:56 AM  
**To:** McLaughlin, Elaine <McLaughlinE@bouldercolorado.gov>  
**Cc:** Robertson, Jim <RobertsonJ@bouldercolorado.gov>  
**Subject:** 311 Mapleton Development

Elaine McLaughlin  
Planning Department  
City of Boulder  
1777  
Broadway,

27<sup>th</sup> November 2017

Dear Ms McLaughlin,

Reference: LUR2017-00027 311 Mapleton

Subject: Use Review 311 Mapleton

Elaine,

*BVCP 2010 III p 68 states that*

*“Public/Semi-Public Land Use Designations Public/Semi-Public land use designations encompass a wide range of public **and private nonprofit** uses that provide a community service. .... and **nonprofit facilities such as cemeteries, churches, hospitals, retirement complexes** and may include other uses as allowed by zoning.”*

This parcel of land is designated public and can be used for **non-profit private** use. There is no benefit to our neighborhood by building such an over-sized facility. 311 is very much a money making proposition for contractors and owners. The planned Academy is in an inappropriate location because of the enormous size built into a steep hillside. The residents would be at risk because of the on-going fire hazards. We have been advised to evacuate our Mapleton home twice in the past few years.

Having studied the current plans, it appears that there is insufficient space between buildings to allow trees and other vegetation to grow, particularly on 4<sup>th</sup> St. This is not in keeping with the neighborhood yards. The setbacks in our neighborhood are highly variable and in many cases equal to the height of the houses. The buildings on Maxwell in the plan are up to the sidewalk with no setback.

With the developers removing all but two of the mature trees, it will take 20 to 30 years for small trees to reach maturity. The suggestion of transplanting mature trees suggests a magical new technology.

The excessive amount of heavy construction vehicles during the construction of the Trailhead sub-division created noise and vibrations rendering my front porch un-useable. The size of 311 Mapleton as planned will make a much greater amount of traffic. The road surface of Mapleton Ave is breaking up and will require extensive repairs during and after the construction phase.

Over the past few years there has been a big increase in the cars parking for Open Space outside our house between 5<sup>th</sup> and 6<sup>th</sup> streets. Also this is happening on weekdays with the available parking at the Centennial lot and on Mapleton at the Sanitas trail head being full. The overflow parking is on the 311 site and our local streets. The loss of the parking on the 311 site will result in another “Chautauqua problem”.

What should be done? Deny the USE for such a massive development, acquire Open Space parking on the site, scale back the buildings to modest size and have large setbacks equal to at least building heights.

Sincerely,

Sheila Delamere 525 Mapleton Ave  
303-447-2780

[Sdelamere@juno.com](mailto:Sdelamere@juno.com)

cc Jim Robertson, Planning Director





CITY OF BOULDER  
Planning and Development Services

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CITY OF BOULDER  
LAND USE REVIEW RESULTS AND COMMENTS

DATE OF COMMENTS: March 6, 2018  
CASE MANAGER: Elaine McLaughlin  
PROJECT NAME: THE ACADEMY ON MAPLETON HILL  
LOCATION: 311 MAPLETON AVENUE  
COORDINATES: N04W08  
REVIEW TYPE: Site Review  
REVIEW NUMBER: LUR2016-00065, LUR2017-00027 and LUR2017-00028  
APPLICANT: MICHAEL BOSMA  
DESCRIPTION: SITE REVIEW, USE REVIEW, REZONING – Applications for a congregate care facility consisting of a total of 95 residential units which includes independent living units along with memory care units. Use Review required for Congregate Care Use and to provide parking as a principal use below grade to share parking with the Seventh Day Adventist Church. Rezoning request is requested for the **RL-1 zoned properties to be rezoned to “P”** to come into compliance with the BVCP Land Use designation.  
REQUESTED VARIATIONS FROM THE LAND USE REGULATIONS: Height (per Ordinance 8028)  
Rear Yard Setback (Units H1&2)

#### I. REVIEW FINDINGS

The comments from the previous submittal appear to have been addressed. However, findings for consistency with the Site and Use Review criteria will be made once the applicant submits corrections to the project plans as noted herein. **Please refer to “Next Steps”** below.

#### II. CITY REQUIREMENTS

This section addresses issues that must be resolved prior to a project decision or items that will be required conditions of a project approval. Requirements are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area (so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

##### Fees

Please note that 2018 development review fees include a \$131 hourly rate for reviewer services following the initial city response (these written comments). Please see the P&DS Questions and Answers brochure for more information about the hourly billing system.

Fire Protection / Emergency Access David Lowrey, 303.441.4356

The private road leading up to Building L appears to have bollards in the middle of the street. This is not acceptable for a primary access to this building. Fire Dept. does not support the bollards and cannot approve them in this location.

Historic Preservation Marcy Cameron (303) 441-3209

1. Completion of the Landmark Designation Applications: Four Landmark Designation applications (the Nurses' Dormitory, “Cottage A,” “Stone Cottage D” and a “historic stone wall fragment”) were submitted as an attachment to the Land Use Review Case in August 2017. To be considered completed applications they must be submitted with photographs and proposed boundary(ies) through a Project Specialist with the fee of \$25 per application paid.

2. Proposed Landmark Boundaries: The Site Plan dated 1-16-2018 ("Site Review #4) shows a proposed boundary around the footprint of the three buildings. Staff supports the proposed boundary around the stone wall but considers the proposed boundaries around the buildings and smoke stack should be expanded to protect the context around those resources. Refer to Attachment A for reference on recommended boundaries.
3. Smokestack: As has been expressed on several occasions, staff considers the smokestack to be an important and iconic feature of the property intrinsic to the history of sanatorium/hospital facility and staff considers an application to landmark the smokestack and a portion of land around it (see illustration above) should be submitted for consideration by the Planning Board, Landmarks Board and City Council.
4. Nurses' Dormitory, "Cottage A," "Stone Cottage D: Staff recommends that these buildings be designated as one site to protect spaces between and around those and preserve the historic context of these resources. A recommended condition of the Site Review approval is **the applicant's submittal of three completed applications to landmark: 1. the Nurse's Dormitory, Cottage A, Stone Cottage D, 2. The Stone Wall, and 3. the Smokestack, per policy 2.33 Preservation of Historic and Cultural Resources of the Boulder Valley Comprehensive Plan.** Staff recommends that these applications be submitted as soon as possible so that a designation hearing can be scheduled. This will allow the Landmarks Board to review the proposed landmarks and boundary(ies) in the context of the larger re-**development of the property, thereby, concurrently informing the Planning Board's** review.

Please note that the historic preservation ordinance (9-11-5(a)) states that once a completed application made by the property owner is received, a public hearing must be heard by the Landmarks Board between 60 & 120 days of the application date. The Landmarks Board will make a recommendation to the City Council as to whether it considers the proposed landmark (s) eligible for designation. Subsequently, the City Council reviews the landmark application(s) and votes whether, or not, to designate by ordinance.

Legal Documents Julia Chase, City Attorney's Office, Ph. (303) 441-3020

The Applicant will be required to sign a Development Agreement, if approved. When staff requests, the Applicant shall provide the following:

- a) an updated title commitment current within 30 days; and
- b) Proof of authorization to bind on behalf of the owners.

Open Space Bethany Collins, 303-413-7646

1. Facilities and Infrastructure: As the applicant has noted, there is a water storage facility spanning the property line between OSMP land and their private site. Since at least 2001, OSMP has performed all management and enforcement related to this facility. Ownership and use of this cistern needs to be researched and the property line will need to be adjusted accordingly via a lot line adjustment.

Also, there are two bridges across the Silver Lake Ditch which pose management and enforcement issues if kept in its split ownership state and staff requests the entirety of both bridges be under City ownership and management control. Staff proposes to do lot line adjustments to clean up these encroachment and management issues – water tank footprint to the applicant and the bridges to the City. The applicant has agreed to this proposal in concept which will require additional surveying and deed drafting.

2. Parking and Access: The site has historically been used informally for parking for visitors wanting access to the adjacent city-owned open space. The City continues to receive comments from community members expressing concern over the loss of parking on the site and City staff intend to keep the conversation going as planning efforts assessing public use and parking and transportation issues in this area continue.

There are three access points from the private site onto the adjacent city open space lands that will be open to the residents and the public. The southwest and northwest access points will be included in the Public Trail Easement to be conveyed to the city and **will be managed and enforced by the city. The northern access point will be subject to the applicant's Management Plan and terms of the Good Neighbor Policy. It is staff's understanding that the applicant intends to permit pedestrian flow to/from/through the private site, subject to the management plan for this site, as a means of keeping this northern access point a viable option for the public to access adjacent city open space.**

2. Visitor Experience / Trails and Trailheads: The applicant has agreed to the dedication of a permanent public trail easement for the northwest corner of the property including the Dakota Ridge Trail corridor as well as for lands along the Silver Lake Ditch that would include the existing **informal social trail**. **Although it remains the City's preference to acquire this area in fee as City ownership would allow clearer management, maintenance and enforcement responsibilities of this trail area, the Public Trail Easement is supported by staff and is currently in draft form.**

OSMP staff also notes and supports the intention of the applicant to restore the network of existing social trails on the site to better direct pedestrian flow appropriately within/around the private site to accommodate intended future management and use.

Parking Analysis David Thompson, 303-441-4417

1. Please revise the parking analysis to call it a Parking Management Plan and include a date for the plan.
2. Please revise the Parking Management Plan and Site Plan to include the existing parking spaces behind the Avista Surgery Center.
3. Please revise the Parking Management Plan to discuss the expected parking demand associated with the Health & Wellness Center and Activities that will be open to the public.

Parking Bicycle David Thompson 303-441-4417

1. On sheet A-4.24 please revise the bike parking data table to remove the bicycle parking requirements for congregate care facility because this site also includes other uses such as independent living. Additionally, please move the medical use requirement to be under the row for the Avista Surgery Center.
2. On sheet A-4.24 please revise the number of short-term bicycle parking spaces to match what is being shown on the plan sheet.
3. On sheet A-4.24 please revise "B.R.M.C." to read "B.R.C."
4. Please revise the site plans to relocate the four (4) short-term bicycle spaces along the Private Access Drive "B" to group them with Building "C" so that the bicycle parking can be shared between Building "C" and the Church.

Plan Documents Elaine McLaughlin, 303-441-4130

1. On sheet OS0.1, the Open Space Plan, please provide a tally of the total open space area within the legend, rather than an overall Site Acreage Tally.
2. On sheet A-1.08, **Site Development Data Table**, correct the label for Building "L" from "Annexed" to "Annex" and/or remove that term and use the name "Former Nurses Dormitory."
3. On sheet A-1.08, Site Development Data Table, for reference purposes, place a square footage tally for all below grade parking areas.
4. On all site plan sheets, label all proposed setback lines shown as "proposed."
5. Provide clearer graphic symbols on the Tree Inventory Plan to clearly communicate the trees planned for removal. As shown, the **Legend doesn't definitively match the symbols on the plan.**
6. Provide a separate survey of **just the property intended for rezoning from 'RL-1' to 'P' for reference in the rezoning ordinance to be prepared.** The current survey is of the entire site and needs to be specific to just the RL-1 sites.
7. Revise the rezoning application to clearly state the specific properties that are intended to be rezoned to come into compliance with the Land Use designation.

## Attachment I - Staff's Development Review Comments

8. On the Management Plan for the Use Review, please remove any reference to the Academy on the Hill. Because this is a contract that will run with the use, please be specific as possible about the operations of the congregate care facility. In addition, separate out specific sections in the management plan for the operation of the Memory Care portion and the Health and Wellness Rehabilitation portion for clarity. As currently presented, the Health and Wellness written statement must become part of the management plan with specific details on the operations such as hours of operation, etc. Similarly, please incorporate the two separate statements of: the Good Neighbor Policy and the Emergency Evacuation Plan statement into the final Management Plan.
9. Please provide a date on the Management Plan.
10. In addition to the preliminary letter of agreement signed by the church and applicant, recently provided to staff by the applicant, for **the use of the parking below Building 'C'** – please provide a separate, dated Management Plan for the parking structure. While the Parking Analysis does provide an analysis of the shared use of the parking, a separate Management Plan must be provided since it would be **"Parking as a Principle Use" for those days where the church uses the parking** as it is off-site to their property. This management plan should also identify how the parking will be managed for the rehab/hospital use of Building C, share with the church.
11. **On the site plans please replace "handicap" with "accessible"**

Transportation Demand Management (TDM) Plan David Thompson, 303-441-4417 and Elaine McLaughlin, 303-441-4130

1. On Table 4, please revise the table to include the requirement to participate in evaluations.
2. **On Table 4, please revise the package elements to read "The applicant has prepared a parking management plan for the site."**
3. On both Tables 2 and 4 - For the short-term and long-term bicycle parking, please revise the information to give the number of spaces that are available for the commercial use / employees.
4. On both Tables 2 and 4 – Bike Enhancements - **Please remove "and the applicant is providing more bicycle parking then required by code"**
5. **On Table 2, please remove the "exceeds" short-term and long-term bicycle cells from the table.**
6. **On Table 2, please combine the "managed on-street parking" and unbundled parking" into one item which discusses the parking management plan and that the parking will be unbundled.**
7. To evaluate consistency with the Use Review criteria for the Congregate Care Use, please provide a brief summary table of the trip generation of several by-right uses (those uses that are permitted without a Use Review) within the 'P' zoning district of: a hospital on the site, a public or private school, and detached single family residential units based on ITE (Institute of Transportation Engineers) standards that compares the trip generation impacts to that of the proposed congregate care use.

### III. INFORMATIONAL COMMENTS

This section addresses issues that are for the applicant's reference but are not required to be resolved prior to a project decision or as a condition of approval. Informational Comments are organized by topic area so that each department's comments of a similar topic are grouped together. Each reviewer's comment will be followed by the reviewer's department or agency and telephone number. Reviewers are asked to submit comments by section and topic area so that the comments can be more efficiently organized into one document. Topics are listed here alphabetically for reference.

Access / Circulation David Thompson, 303-441-4417

The applicant should consider design enhancements for the mid-block pedestrian crossings to improve the design of the crossing which might include the signing and striping of the crosswalk, lighting the crosswalk to improve visibility at nighttime or a raised crosswalk to lower the speeds of vehicles / trucks.

Architectural Inspections, Elaine McLaughlin, 303-441-4130

Note that at the time of building permit inspections, architectural inspections will be performed as a part of the regular building permit inspection process to ensure high quality outcomes in new buildings and landscaping. **The "rough architecture" and the "final**



architecture" inspections for buildings approved as a part of a discretionary site or use review will require that building architecture, materials and window details are consistent with details approved in discretionary review plans.

Drainage, Scott Kuhna, 303-441-4071

1. A Final Storm Water Report and Plan will be required as part of the Technical Document Review process. All plans and reports shall be prepared in accordance with the City of Boulder Design and Construction Standards (DCS).
2. Discharge of groundwater to the public storm sewer system may be necessary to accommodate construction and operation of the proposed development. City and/or State permits will be required for this discharge. The applicant is advised to contact the City of Boulder Storm Water Quality Office at 303-413-7350 regarding permit requirements. All applicable permits must be in place prior to building permit application. Additionally, special design considerations for the properties to handle groundwater discharge as part of the development may be necessary.
3. All inlet grates in proposed streets, alleys, parking lot travel lanes, bike paths, or sidewalks shall utilize a safety grate approved for bicycle traffic.
4. A construction stormwater discharge permit is required from the State of Colorado for projects disturbing greater than 1-acre. The applicant is advised to contact the Colorado Department of Public Health and Environment.
5. Page 7 of *The Academy at Mapleton Hill Preliminary Stormwater Report (Drainage Report)* states that **"Private streets will be designed to convey the 100-year storm event with any overtopping limited to elevations less than finished floor elevations of adjacent buildings or other occupied structures"**. **Calculations and cross sections are required to be included in the Final Report at time of Technical Document Review.**

Flood Control Alysha Geiger, 303-441-4053

The Topographic Exhibit stamped and signed by the Surveyor John Guyton on 8/4/2017 shows the correct limits of the flood zones that impact this property. This has been transferred to the Civil plans correctly as well, and all proposed structures are planned to be located outside of the 100-year floodplain.

Please note that as part of Technical Document review, a subdivision plat shall be completed and include dedication of a flood conveyance easement for that portion of the property which is in the conveyance zone of the 100-year flood zone of Sunshine Canyon Creek as depicted on the current floodplain maps. No encroachments, including retaining walls or fences will be allowed in this easement, section [8-6-3](#) of the Boulder Revised Code, 1981.

Groundwater, Scott Kuhna, 303-441-4071

Groundwater is a concern in many areas of the city of Boulder. Please be advised that if it is encountered at this site, an underdrain/dewatering system may be required to reduce groundwater infiltration, and information pertaining to the quality of the groundwater encountered on the site will be required to determine if treatment is necessary prior to discharge from the site. City and/or State permits are required for the discharge of any groundwater to the public storm sewer system.

Inclusionary Housing, Michelle Allen, 303-441-4076

Staff notes that a Concept Plan review hearing is scheduled for the Planning Board to review the proposal for a permanently affordable senior residential development at 1665 33<sup>rd</sup> Street. The applicant has worked with the division of housing with the intent to provide the required inclusionary housing affordable units for 311 Mapleton at 1665 33<sup>rd</sup> and completed the steps expected for an off-site solution. While progress on the off-site location has been positive, staff notes that the applicant would be allowed to default to cash-in-lieu should the development at 1665 33<sup>rd</sup> not proceed or some other circumstance makes the provision of affordable units at that site untenable. Prior to residential building permit submittal at 311 Mapleton, the applicant is required to satisfy inclusionary housing either by meeting the requirements for off-site units which include but are not limited to the execution of deed restricting covenants, an off-site agreement and provision of financial security or through a cash-in-lieu contribution. Typically, the inclusionary approach cannot be financed and therefore finalized until entitlements are secured consequently, the timing of the inclusionary commitment is in line with city expectations.

Irrigation Ditches, Scott Kuhna, 303-441-4071

The applicant is responsible for obtaining approvals for any relocations or modifications to irrigation ditches or laterals from the impacted ditch company. This includes the crossing of any irrigation ditch or lateral for vehicular or utility purposes and the release of stormwater runoff into any ditch or lateral. The applicant is advised that revisions to any approved city plans necessary to address ditch company requirements may require reapplication for city review and approval at the applicant's expense.

Landscaping Elizabeth Judd, 303-441-3138

At the time of Technical Document review the following areas will require refinement and may result in changes to the plans:

1. More detailed existing and proposed grading information around existing trees to be preserved is needed. Minor adjustments should be expected. A separate tree preservation plan with standard notes and details from Ch. 3 of the Design and Construction Standards (DCS) will be required and shall include ongoing irrigation needs, winter watering, fencing, etc. Proposed transplanting also needs highly detailed timing and coordination for success and shall be included on the plans.
2. Comments regarding plant selections including refinements to tree species selections and diversity will be provided. The plant list provided will be refined as complete selections are provided. Considerations to tree species include, but are not limited to:
  - a. Reduce the overall number of *Quercus*,
  - b. Review *Tilia* locations and removing them from full southern sun and planting strips where they are susceptible to sun scald,
  - c. Potentially increase some species such as Kentucky coffeetree,
  - d. Focus on native plants on the western edge of the project,
  - e. Review and revise *Juniperus* locations to account for their high fire danger,
  - f. General considerations around growing conditions and species selection.
3. Utility and tree coordination is likely to be refined and minor adjustments to both may result.

Land Use: Open Space – Other Phil Kleisler, 303-441-4497

Regarding the Open Space – Other designation on the site, staff finds the designation to be the result of a drafting error, mapping discrepancy or clerical mistake. As you know, staff has received a referral response from the Boulder County Land Use Department, a recommendation from the Open Space Board of Trustees (OSBT) and a decision by the Planning Board on this topic. Because the decision on the error is a two-body decision, the mapping error will also be considered by the City Council. A summary of this process is as follows:

1. Boulder County Referral: Comments were received on December 29, 2017 and January 4, 2018. County staff confirmed that the Silver Lake Ditch was incorrectly mapped in the past, including in a Drumm map from 1955 that shows the ditch location further to **the east than its actual location. County staff found that staff's conclusion that the OS-O designation was an error based on its alignment with the previous incorrect mapped location of the ditch is plausible.** However, county staff did not find evidence that the incorrect ditch mapping is the definitive cause of the OS-O Land Use map designation. Therefore, county staff did not conclude that the OSO Land Use designation is clearly a map error.
2. Open Space Board of Trustees: On February 14, 2018, the OSBT held a public hearing to provide a recommendation about the land use map error and input to the Open Space Mountain Parks staff about areas of the site that should be prioritized for acquisition as a means for protecting open space purposes. At that time, the OSBT unanimously approved a motion about the **mapping error: "Planning Board and City Council that it concludes that the OS-O designation of a portion of 311 Mapleton is probably but not clearly a mapping error."** Please see Open Space Mountain Parks comments for information pertaining to the other related input by the OSBT.
3. Planning Board: On March 1, 2018, the Planning Board voted 4-2 to find that a discrepancy exists within the Boulder Valley Comprehensive Plan regarding the land use map designation on the 311 Mapleton property that is clearly the result of a drafting error, mapping discrepancy or a clerical mistake and to correct the land use map and designate the entire 311 Mapleton property as Public.
4. City Council: **On March 5, 2018, under "Matters"** - the City Council requested that staff bring forward the question of whether the land use map designation is the result of a map error under a special hearing for April 3, 2018.

Legal Documents Julia Chase, 303-441-3020

Prior to a building permit application, the Applicant shall submit a separate Technical Document Review application for a Final Plat,

subject to the review and approval of the City Manager and execute a subdivision agreement meeting the requirements of Chapter 9-12, "Subdivision," B.R.C. 1981 and which provided for the following:

- The elimination of the parcel lines for Parcel B (excepted from Parcel A at Rec. No. 2172778).
- The dedication, to the City, of all right-of-way and easements necessary to serve the development.
- A financial guarantee, in a form acceptable to the Director of Public Works, in an amount equal to the cost of constructing all public improvements necessary to serve the development.
- The construction of all public improvements necessary to serve the development.

Miscellaneous, Scott Kuhna, 303-441-4071

1. The applicant is notified that any groundwater discharge to the storm sewer system will require both a state permit and a city agreement. Please contact the City's Stormwater Quality Office at 303-413-7350. All applicable permits must be in place prior to building permit application.
2. No portion of any structure, including footings and eaves, may encroach into any public right-of-way or easement.

#### Neighborhood Comments

Staff received a number of comments since the last submittal. The comments are provided as Attachment B – which is a separate PDF attachment. Any comments received after the date of this comment letter will be sent under separate cover and/or collated into the memo to be sent to Planning Board.

#### Review Process

The Planning Board hearing for the Use Review, Site Review and Rezoning Applications is tentatively scheduled for April 19, 2018. The City Council is then scheduled to consider the 1<sup>st</sup> Reading of the Rezoning Ordinance for the two RL-1 parcels, along with call-up consideration on May 8, 2018. The 2<sup>nd</sup> Reading of the Rezoning Ordinance by the City Council and the potential call-up of the Site and Use Review applications are scheduled for June 19, 2018.

Utilities, Scott Kuhna, 303-441-4071

1. The applicant is advised that any proposed street trees along the property frontage may conflict with existing utilities, including **without limitation: gas, electric, and telecommunications, within and adjacent to the development site. It is the applicant's** responsibility to resolve such conflicts with appropriate methods conforming to the Boulder Revised Code 1981, the City of Boulder Design and Construction Standards, and any private/franchise utility specifications.
2. Final utility construction drawings will be required as part of the Technical Document Review process (which must be completed **prior to building permit application**). **All existing and proposed "dry" utilities (Xcel, Comcast, Century Link, etc.) will also need** to be included on the plans.
3. Maintenance of sand/oil interceptors and all private wastewater and storm sewer lines and structures shall remain the responsibility of the owner.
4. The landscape irrigation system requires a separate water service and meter. A separate water Plant Investment Fee must be paid at time of building permit. Service, meter and tap sizes will be required at time of building permit submittal.
5. The applicant is advised that at the time of building permit application the following requirements will apply:
  - a. The applicant will be required to provide accurate plumbing fixture count forms to determine if the proposed meters and services are adequate for the proposed use.
  - b. Water and wastewater Plant Investment Fees and service line sizing will be evaluated.

## Attachment I - Staff's Development Review Comments

- c. If the existing water and/or wastewater services are required to be abandoned and upsized, all new service taps to existing mains shall be made by city crews at the developer's expense. The water service must be excavated and turned off at the corporation stop, per city standards. The sewer service must be excavated and capped at the property line, per city standards.
  - d. Since the buildings will be sprinklered, the approved fire line plans must accompany the fire sprinkler service line connection permit application.
6. All water meters are to be placed in city right-of-way or a public utility easement, but meters are not to be placed in driveways, sidewalks or behind fences.
  7. The applicant is notified that, though the city allows Xcel and Qwest to install their utilities in the public right-of-way, they generally require them to be located in easements on private property.
  8. Floor drains internal to covered parking structures, that collect drainage from rain and ice drippings from parked cars or water used to wash-down internal floors, shall be connected to the wastewater service using appropriate grease and sediment traps.
  9. Trees proposed to be planted shall be located at least 10 feet away from existing or future utility mains and services.

### IV. NEXT STEPS

The applications are tentatively scheduled for a public hearing before the Planning Board on April 19, 2018. Therefore, please provide responses to these comments herein as corrections, directly to the case manager. In the corrections, provide a response to comment letter and digital files. To retain that tentative Planning Board date, please provide the resubmittal of corrections no later than March 22, 2018.

### V. CONDITIONS ON CASE FOR THE SITE and USE REVIEW APPLICATIONS

To be provided in the Planning Board memo.

### VI. CITY CODE CRITERIA CHECKLIST

To be provided in the Planning Board memo.

Attachment A: Recommended Landmarks Boundaries

