



May 2, 2023

City of Arvada  
Attn: Jeremiah Bebo, Planner II  
Community and Economic Development  
8101 Ralston Rd.  
Arvada, CO 80002  
Email: [JBebo@Arvada.org](mailto:JBebo@Arvada.org)

**RE: 6800 Kilmer RV Storage – Site Plan and Minor Plat: Request for Pre-Application Meeting**

Dear Mr. Bebo,

Per the directive of the City, we are requesting a Pre-Application prior to our next submittal. We understand that the City would like to better understand the status of the VCUP as well as how we are addressing the previous review comments. Rather than provide a comprehensive comment response letter from the previous review, we have identified the bigger issues that we feel are of most importance to discuss.

We have further refined the site plan in the following manner:

- a. Include a 240' setback from the RN Zone District (20% Minor Modification from 300' setback requirement).
- b. Maximum outdoor storage area will not exceed 41.9% of the site (20% Minor Modification from 35% maximum).
- c. Removed the request for a Major Modification for fence height.
- d. Removed the consideration for self-storage buildings along the southern property line.
- e. Substantially increased the landscape buffer along the southern property line. The formal landscape plan will be updated with the next submittal.
- f. Added two dumpster locations.

We look forward to meeting with City staff soon to discuss the major topics identified in this letter as well as any other pertinent topics.

Sincerely,

Kristin Dean, AICP  
Senior Associate



### Storm water Comments

- Recommend an alternative approach to address water quality aside from a detention pond. Considering the existing contaminants on site, a more comprehensive design including, but not limited to, infiltration control measures (rain gardens) or a constructed wetland would be preferred.

***Response: A larger, less deep-water quality and detention pond is proposed moving forward. Efforts to minimize imperviousness of site will be taken (minimizing pavement) to reduce total required detention volume.***

### Flood Plain Comments

- Same as Kyle's comment: "The stream bank stabilization plan for Ralston Creek along your property frontage must be included with your next submittal. The plan will need to be coordinated and approved by MHFD."

Any work in a floodway must be reviewed to determine if the project will increase flood heights. An engineering analysis must be conducted before a permit can be issued. The community's permit file must have a record of the results of this analysis, which can be in the form of a No-rise Certification. This No-rise Certification must

be supported by technical data and signed by a registered professional engineer.

***Response: A bank stabilization plan will be prepared in accordance with this comment.***

### Planning Comments

- Trash receptacle location should be shown on the plans and architectural elevations included.

***Response: The revised concept plan shows two locations for trash receptacles.***

### Land division comments

- As per the last review, all areas of encroachment and overlap regarding the Croke Canal need to be resolved by the developer before approval of the Subdivision Plat.

***Response: The property line discrepancy with the Croke Canal has been discussed with canal ownership and a resolution which we feel satisfies both parties has been discussed. An easement will be granted over the portion of the Site necessary for Croke Canal maintenance to be conducted. This easement will be identified on the plat.***

### Development and Engineering comments

- Colorado Department of Public Health and Environment (CDPHE) approval of the Voluntary Clean Up (VCUP) application will be required prior to approval of the DA.



CDPHE approval of the VCUP completion signified by the No Action Determination will be required prior to certificate of occupancy issuance for the site.

A 404 permit from the Army Corps of Engineers will be required to be approved for work along Ralston Creek and the northern portion of this site. Please include a copy of this permit with your next submittal. Please reach out to me with any questions.

***Response: Terracon will coordinate 404 permitting and will provide a copy of the permit to the City. The VCUP will be submitted to CDPHE in the very near future. We will discuss the status and respond to any questions during the pre-application meeting.***

- The stream bank stabilization plan for Ralston Creek along your property frontage must be included with your next submittal. The plan will need to be coordinated and approved by MHFD.

***Response: The stream bank stabilization plan is being prepared in coordination with the owner and development team.***

- A utility report with water modeling for the reducer is required for the site.

***Response: A WaterCAD model showing the reducer will be pre prepared with the civil construction documents.***

### Landscape Comments

- Can The Landscape Islands- Can these all be made into a porous landscape system to encourage infiltration?

***Response: We will look into this with our next submittal.***

- No detention inside the flood zone will be permitted - remove extents of EDB to outside 100 yr zone.

***Response: EDB revised to be entirely outside of floodplain. Details of EDB will be shown on the Civil CDs.***

- Would it be possible to plant additional low-water use vegetation here? Or even better more trees?

"HERE" = IN THE NORTHWEST CORNER OF THE SITE.

***Response: Yes, we can plant additional, low-water use vegetation in the NW corner and also in the increased buffer adjacent to the Croke Canal.***

- This is a critical area to provide a visual buffer. Please add additional trees.

***Response: More trees will be added to increase the visual buffer.***



### Civil Engineering Comments

- The boundaries of the floodway you show here to dedicate to the city via easement do not match the

FEMA maps. Coordinate with the FEMA mapping system to dedicate exact limits of the floodway only via

an easement.

***Response: Comment noted – the floodplain linework will be reviewed and revised as necessary to match FEMA linework. An easement will be prepared which completely encompasses the FEMA floodplain.***

- SUE level 1 investigation of the site should be completed and location for all infrastructure shown as exact on the plans.

***Response: SUE level 1 investigation will be conducted for utilities as necessary to construct infrastructure as shown on the Civil CDs.***

- Show and clearly differentiate the floodway limits, indicating those as being proposed as a drainage easement, and the 100 year floodplain limits on all civil sheets.

***Response: Civil Construction Documents to clearly identify floodway/floodplain limits.***

- I have extreme concerns regarding the drainage plan for this site. The VCUP proposal only includes a geomembrane to ensure commingling of potentially contaminated water is prevented only in the area of the site where the EDB is located. This leaves the entirety of the rest of the site to collect potential surface runoff that is contaminated with hazardous materials from the site's previous use and spread the pollution. As you are proposing to outfall directly into Ralston Creek this could concentrate pollution flows and spread them over vast areas where the creek flows. Neighborhood comments and concerns to the city thus far have highlighted environmental issues as a primary topic for the site. For staff to be able to recommend approval for the major modifications we would need to see this hazard mitigated. There are potential options to mitigate the risk of polluted runoff pickup.

***Response: Terracon has provided additional information below. While acknowledging the concerns, surface run-off is not expected to be impacted by subsurface landfilled material. Prior creek sampling did not identify contaminants of concern.***

- The site could create a permeable paver system rather than the gravel driveways using the same separating membrane between it and the polluted soil as the EDB proposes and provide an under drain under the permeable paver system to filter water to the EDB. This would ensure a total separation of the fresh runoff from the polluted soil while providing extra treatment to the runoff as required by the state MS4 program. This same method could also be accomplished by hard-



scaping such as with asphalt roadways and concrete channels which would all filter to the EDB without allowing runoff to interact with the soil while still providing detention/WQ.

***Response: Terracon will evaluate the potential use of permeable paver system in conjunction with an underdrain with the owner and the development team.***

- The site could instead encourage maximum infiltration into to soil below. Groundwater is traditionally more stable and could potentially filter pollutants out over longer periods of time while suspended in the soil. This would also prevent the direct runoff to Ralston Creek as it proposed now. You could accomplish this by incorporating multiple porous landscape gardens (rain gardens) throughout the site, incorporate a permeable paver system for drive lanes, keep as much native seed landscaped areas as possible, etc.

***Response: The site is proposed to be almost entirely a gravel roadway/parking surface, which will allow for more infiltration than a standard paved site would.***

- The site could interchange the EDB with a constructed wetland system. Constructed wetlands have been shown to be extremely effective at treating polluted waters in a natural way through vegetation uptake and settling. A constructed wetland system could actually improve the overall site quality over time by collecting and removing polluted soil contaminants via runoff. This could be a huge benefit to the site long term and could aid with the neighbor's concerns as you will be improving the site's environmental quality over a long term period.

***Response: Terracon will evaluate the feasibility of a constructed wetland with the owner and the development team.***

- Please schedule a meeting with me to discuss some drainage options [kgillitzer@arvada.org](mailto:kgillitzer@arvada.org). Any drainage plan will need to have approval by CDPHE through the VCUP entry.

***Response: Terracon will schedule a meeting to discuss drainage options. Please invite KGillitzer to the Pre-application meeting.***

- The geotechnical report recommended significant levels of fill removal and placement of engineered fill. How will you accommodate these recommendations. Has this grading plan accounted for the large anticipated variations in depths from existing conditions? A profile for all surface conditions types including the RAP surface, the building structures, and the cobblestone islands needs to be provided showing anticipated fill removals and placements of new materials as outlined in the geotech report. Range points on the profiles should match elevations on the grading plan.

***Response: The number of buildings on the Site has been reduced to only the on-site office building. The on-site office building has been relocated to an area with minimal landfill material underneath it. Any necessary over excavation as identified by the geotechnical report will be conducted. Consultation with the geotechnical engineer on the necessity to over excavate for the unpaved site road/parking surfaces will be conducted, and any necessary solutions will be implemented and discussed in the reports/plans.***



- Due to the contamination on site, a liner will be required for the pond area. Please include this in details and include the method for attachment (anchor to concrete wall, j-hook, etc.). Please note that this liner will need to be inspected by the City prior to backfilling with CLEAN fill. This clean fill will need to be tested.

*Response: Comment noted, pond liner will be discussed in the civil plans and reports.*

### **MDHF Comments**

- Based on the proposed pond outfall tie-in location, it appears the limits of construction shown in the development plan will have to be extended to accommodate outfall stabilization work. We'll continue to review as design progresses but have no objection with the outfall location.

*Response: Comment noted.*

- This is a repeat comment: We need more information before we can agree with the proposed bank stabilization approach and extents. We request that you develop and provide a condition assessment document that clearly describes the existing bank conditions along the proposed development site and that includes photographic and/or survey evidence for the areas of concern that will be stabilized. The available aerial imagery and LiDAR data is not sufficient to determine the proper stabilization extents and should be supplemented with field data. Additional bank stabilization may be necessary depending on the location of the proposed detention facility pipe outfall to Ralston Creek. We'll need to revisit that area once HKS has progressed the design a bit further. We're happy to discuss what's needed with an assessment document. We understand the applicant is working to address this request and we will close this comment upon review of the requested condition assessment document.

*Response: Terracon will contact the City to obtain a better understanding of what information will need to be included in the assessment document. We would like to discuss this further at the pre-application meeting.*