

CITY OF BOULDER
PLANNING BOARD AGENDA ITEM
MEETING DATE: March 3, 2016

AGENDA TITLE: Concept Plan (case no. LUR2015-00106) proposal to redevelop the properties located at 4801, 4855, 4865 and 4885 Riverbend Rd. within the Riverbend Office Park with a new 76,000 sq. ft., 55 foot hospital building and a 5-story, 467-stall parking structure with accessory office and retail space. The new facility would house BCH's relocated inpatient behavioral health, inpatient rehab and neurology department. The proposal includes consolidating the existing properties into one 2.55-acre project site and rezoning the site from BT-2 (Business – Transitional 2) to P (Public). Changes to the existing access and circulation are also proposed.

Applicant: Darryl Brown for Boulder Community Health
Property Owner: Boulder Community Health

REQUESTING DEPARTMENT:

Planning, Housing and Sustainability

David Driskell, Executive Director

Susan Richstone, Deputy Director

Charles Ferro, Development Review Manager

Chandler Van Schaack, Planner II

OBJECTIVE:

1. Planning Board hears applicant and staff presentations.
2. Hold Public Hearing.
3. Planning Board to ask questions of applicant, the public, and staff.
4. Planning Board discussion and comment on Concept Plan. No action is required by Planning Board.

SUMMARY:

Proposal: Redevelop the properties located at 4801, 4855, 4865 and 4885 Riverbend Rd. within the Riverbend Office Park with a new 76,000 sq. ft., 55 foot hospital building and a 5-story, 467-stall parking structure with accessory commercial space. The new facility would house BCH's relocated inpatient behavioral health, inpatient rehab and neurology department.

Project Name: BCH Riverbend Medical Center

Location: 4801, 4855, 4865 and 4885 Riverbend Rd.

Size of Tract: 2.55 acres (111,322 sq. ft.)

Zoning: Business – Transitional 2 (BT-2)

Comprehensive Plan: Transitional Business

Key Issues:

Staff has identified the following key issues:

1. Is the Concept Plan proposal compatible with the goals, objectives and recommendations of the Boulder Valley Comprehensive Plan (BVCP)?

2. Are the proposed Rezoning and amendment to the BVCP Land Use Designation appropriate for the surrounding context?

I. INTRODUCTION AND BACKGROUND

PROCESS

Because there is an existing site review approval for the Riverbend Office Park, a Concept Plan review is not required for the proposed project. Given the scope of the proposed project, the applicant has voluntarily submitted an application for Concept Plan Review in order to receive feedback on the proposal prior to submitting a formal Site Review Amendment application.

The purpose of the Concept Plan review is to determine the general development plan for a particular site and to help identify key issues in advance of a Site Review submittal. This step in the development process is intended to give the applicant an opportunity to solicit comments from the Planning Board as well as the public early in the development process as to whether a development concept is consistent with the requirements of the city as set forth in its adopted plans, ordinances and policies (section 9-2-13, B.R.C. 1981). Concept Plan review requires staff review and a public hearing before the Planning Board.

Following completion of the Concept Plan Review process, the applicant has indicated that their intent is to amend the existing Site Review approvals for both the BCH Foothills campus and the Riverbend Office Park in order to remove the subject parcels from the Riverbend Office Park and incorporate the new medical center facility and parking structure into the BCH Foothills campus. Because the project would include a request for a height modification, an ordinance granting an exception to the 2015 height moratorium would be required. In order to allow for the proposed hospital use, which is prohibited in the BT-2 zone district, it will also be necessary to rezone the project site from BT-2 (Business – Transitional 2) to P (Public). This will also require a change in the BVCP land use designation for the site from Transitional Business to Public, which can be requested concurrently with the Rezoning application.

BACKGROUND

BCH will be moving all services from its Broadway location by December 2017. This will include the relocation of its inpatient behavioral health, inpatient rehab and neurology department. BCH has selected the Riverbend Office Park as the new location for the relocated inpatient behavioral health facilities due to its proximity to the existing BCH Foothills emergency room facility at the corner of Arapahoe and Foothills Parkway. Per the applicant, co-location of the emergency room with inpatient behavioral health is a significant benefit for the treatment of patients. The BCH Foothills hospital was approved in 2001 to construct up to 420,000 square feet of floor area in six phases for a period up to 10 years. Currently, the BCH Foothills hospital has been built up to 261,430 square feet with some of the later phases yet unconstructed. This figure does not include roughly 173,000 square feet for the existing parking garage. The BCH Foothills campus provides a total 993 parking spaces on the site with additional spaces anticipated in conjunction with the eventual development of the western parking lot, which was approved as deferred parking, and the subterranean parking within a new west wing of the hospital approved for construction per the 2001 approval.

As depicted below in **Figure 1**, the 2.55-acre project site is located off of Arapahoe Ave. immediately to the east of the Boulder Community Hospital Foothills campus. The site is currently the location of the Riverbend Office Park, which was originally annexed and approved as a PUD with an initial zoning designation of Industrial – Developing (“IG” under current code standards). The original approval also included a Special Review (now called Use Review) approval for an office use. Over the years, several additional use reviews were approved for additional office uses on specific sites within the PUD, and several other office uses were established or converted without the benefit of City review. In 2000, the Riverbend Office Park was rezoned from Industrial to Transitional Business in acknowledgment of the fact that the proliferation of office uses within the development, many of which were nonconforming or prohibited, had resulted in the development no longer being consistent with the Industrial zoning designation. Currently, the 12 existing one and two-story buildings within the Riverbend

Office Park contain a mix of medical/dental, professional and technical offices and personal service uses, all of which are allowed uses in the BT-2 zone district.



Figure 1: Vicinity Map

A variety of BVCP land use designations surround the site and reflect the diversity of land uses in the area. Most land east and north of the site are designated light industrial, whereas uses south of Arapahoe are predominantly designated medium to high density residential with low density residential neighborhoods further from Arapahoe. As mentioned above, the project site is located immediately to the east of the existing BCH Foothills campus at the corner of Arapahoe and Foothills, which has a BVCP land use designation of Public. The lands southwest of Foothills and Arapahoe owned by the University of Colorado have a Public land use designation as well. **Figure 2** depicts the surrounding BVCP land use designations.

BVCP Land Use Designation

As shown below in **Figure 2**, the project site has a BVCP land use designation of Transitional Business, which is defined in the [2010 BVCP](#) as follows:

The Transitional Business designation is shown along certain major streets. These are areas usually zoned for less intensive business uses than in the General Business areas, and they often provide a transition to residential areas.

The change in the site's land use designation from Industrial to Transitional Business in 2000 was largely to acknowledge the change in character that had resulted from the proliferation of medical and professional office uses on the site. Under the current proposal, the land use designation would need to be changed again from Transitional Business to Public, which is defined in the 2010 BVCP as follows:

Public/Semi-Public land use designations encompass a wide range of public and private non-profit 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.

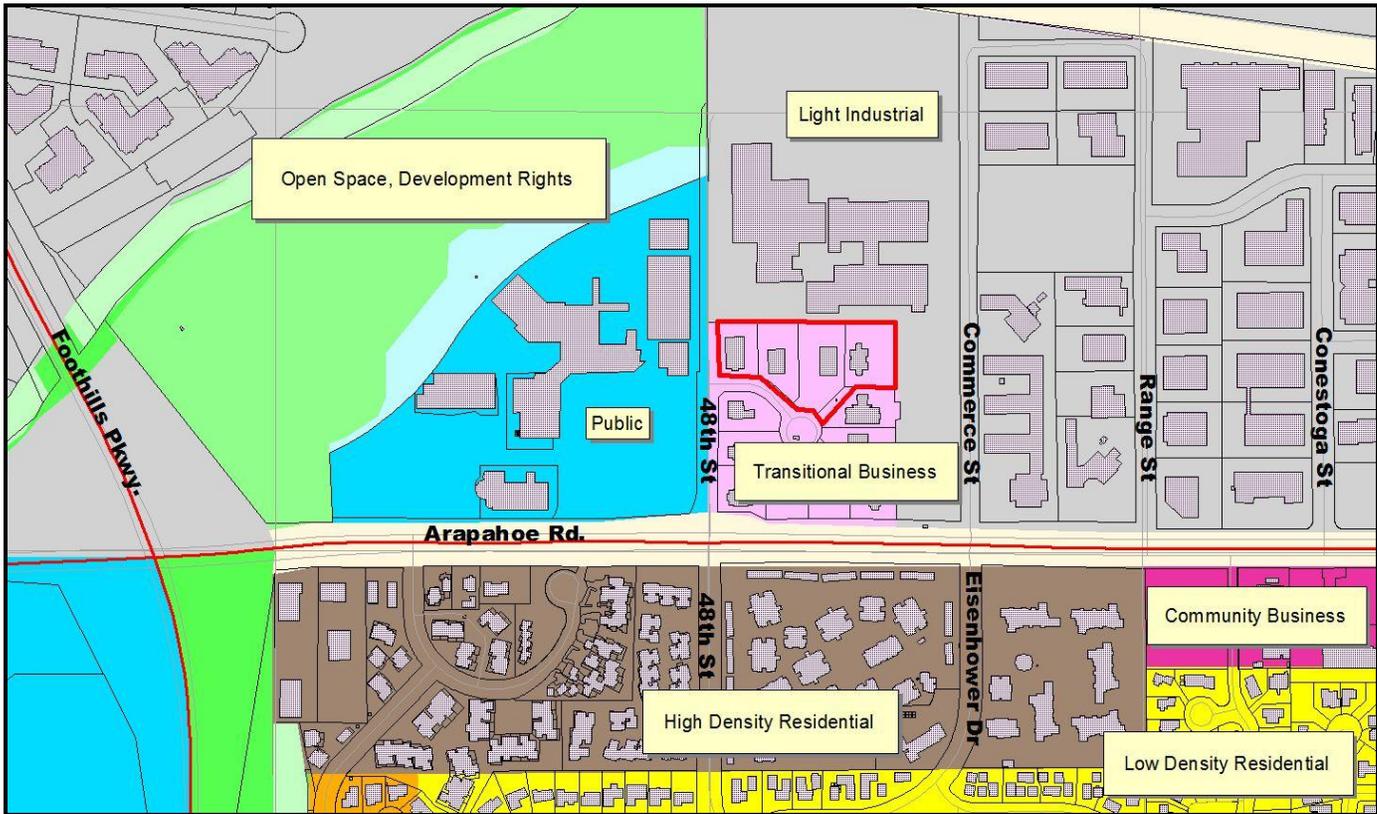


Figure 2: BVCP Land Use Map

The current proposal presents an opportunity to evaluate whether the existing land use designation for the project site should be changed to become consistent with the adjacent BCH site.

Site Zoning.

The project site is zoned BT-2 (Business – Transitional 2). The BT-2 zone district is defined as “*Transitional business areas which generally buffer a residential area from a major street and are primarily used for commercial and complementary residential uses, including without limitation, temporary lodging and office uses*” (section 9-5-2(c), B.R.C. 1981). Please see **Figure 3** below for a zoning Map of the site and surrounding area. As part of this project, the applicant would request a rezoning of the project site from BT-2 to P (Public) in order to allow for the proposed hospital use, which is prohibited in the BT-2 zone district but allowed by right within the P zone district per section 9-6-1, B.R.C. 1981. As discussed above, this would also require a change to the underlying BVCP land use designation.

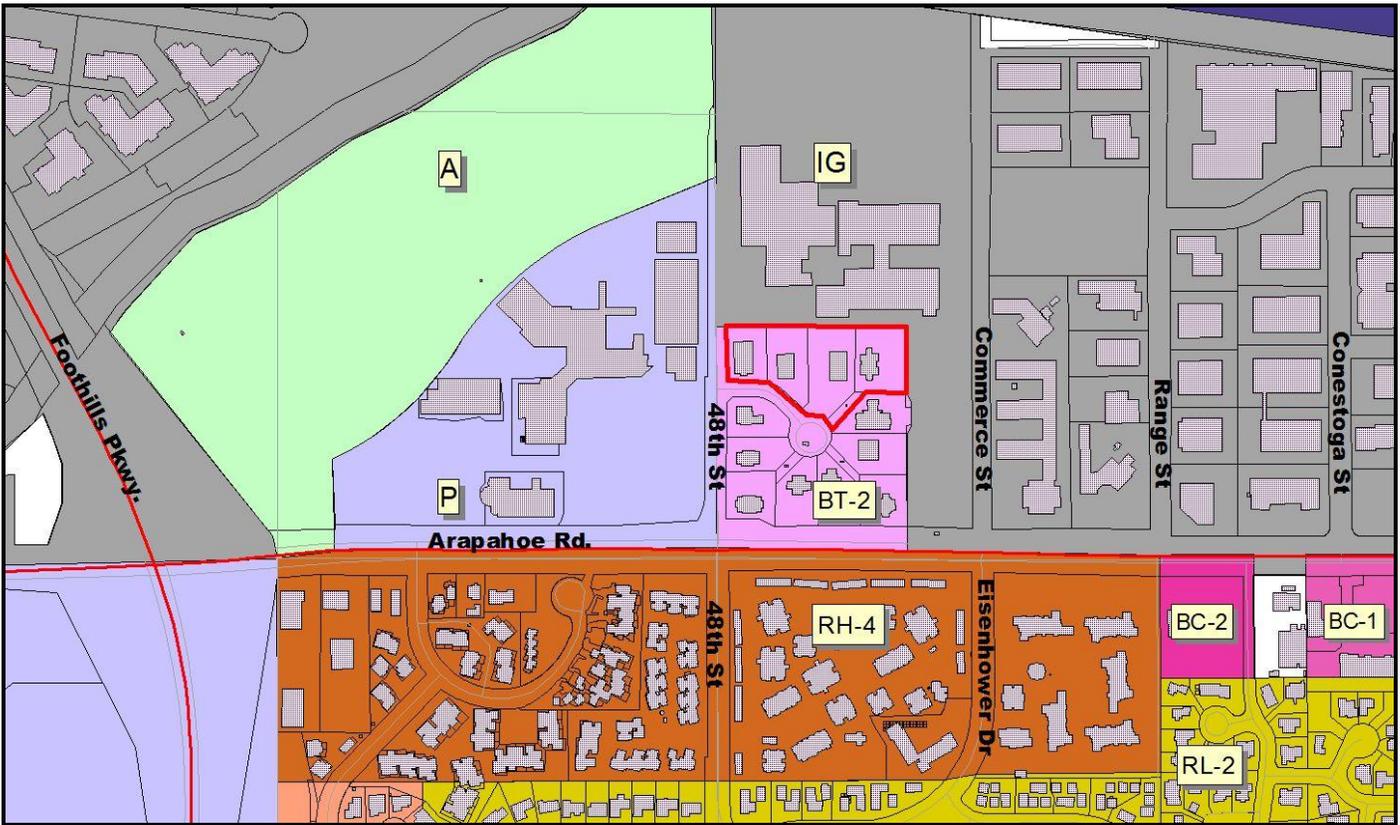


Figure 3: BVCP Land Use Map

Additional Site Characteristics

The project site has a number of unique characteristics that will need to be taken into consideration during the Site Review process. As shown below in **Figure 4**, the site is impacted by the 100-year floodplain and as such any new development will require a floodplain development permit. In addition, because the proposed facility is considered a critical facility per section 9-16, B.R.C. 1981, an Emergency Management Plan would be required.

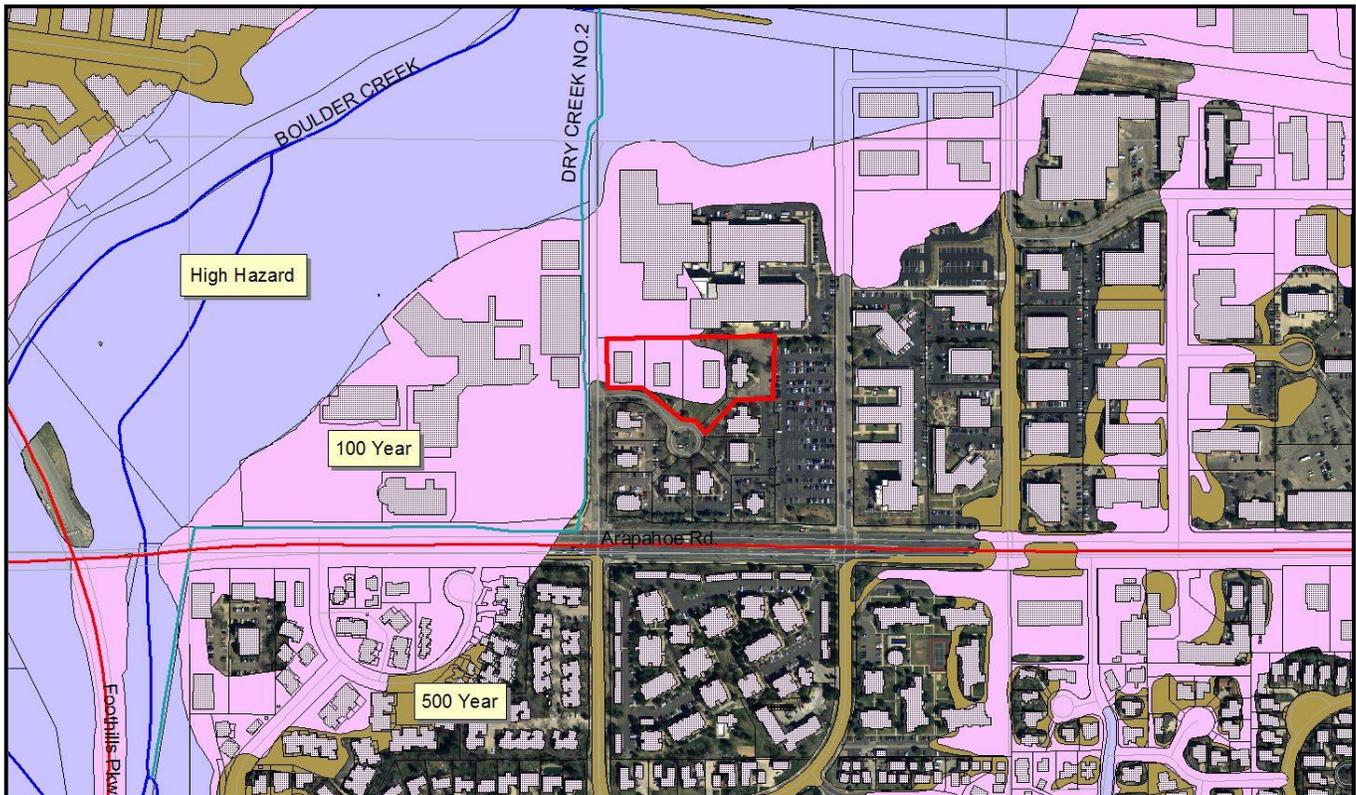


Figure 4: Floodplain Map

It is also worth noting that the Federal Emergency Management Agency (FEMA) is considering the adoption of updated floodplain maps for Boulder Creek. These maps were previously adopted by the Boulder City Council on Sept. 18, 2012, but have not yet been incorporated into FEMA's Flood Insurance Rate Maps. FEMA held an Open House meeting to present the proposed mapping on Wednesday, Sept. 16, 2015.

The new floodplain mapping was adopted by City Council on Sept. 18, 2012 and is currently regulatory. FEMA began reviewing the mapping on Oct. 30, 2012. Final project documentation was submitted to FEMA in September 2013. In November 2013, FEMA indicated that they accepted the results of the study and will be adopting the new mapping through the Physical Map Revision process, which is a multi-year process. The process was delayed due to the September 2013 flooding. FEMA released Preliminary Flood Insurance Rate Maps (FIRMs) on July 23, 2015. These maps are available on FEMA's website: <http://msc.fema.gov/portal>

The new FIRMs are anticipated to become effective in December 2016, although this schedule is subject to change. Please see the link to the FEMA fact sheet for more information. The existing floodplain mapping and the revised floodplain mapping are both regulatory until FEMA adopts the new mapping. For additional information please visit: <https://bouldercolorado.gov/flood/boulder-creek-floodplain-mapping-update>.

II. PROJECT DESCRIPTION SUMMARY

The proposed Concept Plan is for redevelopment the properties located at 4801, 4855, 4865 and 4885 Riverbend Rd. within the Riverbend Office Park with a new 76,000 sq. ft., 55 foot hospital building and a 5-story, 467-stall parking structure with accessory office and retail space. The new medical center would house BCH's relocated inpatient behavioral health, inpatient rehab and neurology department. The proposal includes consolidating the existing properties into one 2.55-acre project site and rezoning the site from BT-2 (Business – Transitional 2) to P (Public). Changes to the existing access and circulation are also proposed.



Figure 5: Proposed Site Plan

As shown in **Figure 5**, the proposed site plan would reconfigure the north side of the Riverbend Office Park, including replacing the existing office buildings with two new buildings and reconfiguring the existing access and circulation to accommodate the proposed hospital use while maintaining access to the other properties within the development. The medical center building is sited on the west side of the property, to provide a visual link to the main Foothills Hospital campus. A parking garage containing 467 parking spaces is located on the east side of the property with accessory commercial space proposed at the ground floor level. Per the applicant's written statement (see **Attachment A**), the parking volume is intentionally above the minimum required parking of 1 space per 300 sq. ft. to support occasional overflow from the Foothills Hospital Campus.

The primary access point would remain in its current location off of 48th St., with a new access to be added to the north side of the property for ambulance traffic entering the facility. The proposal includes narrowing Riverbend Rd. by removing existing on-street parallel parking and adding a new landscape strip and detached sidewalk. Sidewalks have been provided on-axis with the existing Foothills Campus paths to provide a visual and physical connection across 48th street to the main hospital campus. The development also proposes adding curb 'bulb-outs' at the intersection of 48th St. and Riverbend to make the crosswalk more visible and encourage a reduction in vehicle speeds. 13 new surface parking would be provided on the new loop road within the development. This one-way loop road is intended to provide a clear traffic pattern to all of the Riverbend outlots and has also been designed to potentially connect to Commerce Dr. through the adjacent Ball property to the east. A curb-protected landscape island is proposed to allow pedestrian circulation to the north and south via marked crosswalks. An additional 10 surface parking spaces are proposed in a new surface lot to the east of the loop road, and 5 accessible spaces are shown in the drop off zone in front of the medical center building. Per staff's initial review comments (see **Attachment B**), the proposed access and circulation will require additional refinement at time of Site Review.

In addition to the proposed landscaping along Riverbend Rd., the proposal includes adding new landscaping to the parking access and drop off areas as well as around the perimeters of the buildings. A landscaped courtyard garden is provided between the medical center building and parking garage. The courtyard is intended to provide a healing setting for patients, families and visitors, and will provide paved connections between the medical office building and parking garage, and neighboring facilities.

In terms of building design, the new proposed buildings are intended to respond to the existing BCH Foothills campus architecture while also providing a unique identity to the new facility. Per the applicant's written statement,

"The medical center facade will be articulated by punched openings and ribbon windows composed in a way to balance the three stories and provide appropriate daylighting needs for the interior spaces. The main lobby entry and the west corner of the building have been articulated with glass volumes and copper elements which establish a simple hierarchy in the design. Horizontal roof planes organize the massing and provide shading for the interior spaces. These roof planes playfully overlap to emphasize the horizontal and end at the main entry volume. The architecture at the main entry is expressed as vertical overlapping volumes which stretch up to meet the sky uninterrupted, establishing its prominence within the entire building language" (Sheet CP.3 of Concept Plan Package, included as **Attachment A**).

In terms of materials, brick, copper and glass will be the dominant materials on the medical center building and the parking garage will be primarily concrete and brick with artistic metal panel screens. The medical center building would be 3 stories tall, with a largely transparent southern façade made primarily of glass with upper story copper and brick elements on either side. The first floor accessory commercial uses in the parking garage would consist of storefront glass, making the whole frontage of the development largely transparent at ground level. Refer to **Figures 6-8** for architectural renderings of the proposed project. Refer to **Attachment A** for project plans and the full applicant submittal.



**Figures 6 – 8:
Architectural renderings of
the proposed project as
seen from Riverbend Rd.**



It is worth noting that the current proposal would involve a request for a height modification to allow for both of the buildings to exceed the 35 foot height limit for the P zone district. This applicant has requested that this Concept Plan review process be used to provide feedback from staff, Planning Board and City Council as to whether a request for a height modification would be supportable through the Site Review process. On September 14, 2015, city council gave a 'nod of five' to BCH acknowledging that the proposed project would include a request for two buildings to exceed the height limit and that the Concept Plan review process is the appropriate process through which to receive feedback on such a request. Following

Concept Plan review, a Site Review would be required as well as an ordinance to allow for the exception to the height moratorium. The video from that meeting can be found [here](#).

An analysis of the Concept Plan Review criteria as found in section 9-2-13, B.R.C. 1981 is included below, followed by a discussion of the key issues identified by staff. The analysis is intended to help guide the board's discussion of the project; however, the board may choose to identify additional key issues for discussion if desired.

III. Concept Plan Review Criteria for Planning Section 9-2-13(e), B.R.C. 1981

CONCEPT PLAN REVIEW AND COMMENT Section 9-2-13

(g) Guidelines for Review and Comment: The following guidelines will be used to guide the planning board's discussion regarding the site. It is anticipated that issues other than those listed in this section will be identified as part of the concept plan review and comment process. The Planning Board may consider the following guidelines when providing comments on a concept plan:

- (1) Characteristics of the site and surrounding areas, including, without limitation, its location, surrounding neighborhoods, development and architecture, any known natural features of the site including, without limitation, mature trees, watercourses, hills, depressions, steep slopes and prominent views to and from the site;**

The project site is located in East Boulder near the intersection of 48th Street and Arapahoe Avenue, just east of the Boulder Community Hospital Foothills Campus (shown below in **Figure 9**). The Foothills Campus site, owned by Boulder Community Hospital, is the location of the Boulder Community Foothills Hospital, which was constructed as a branch hospital providing medical services to an expanded area and to take pressure off the main hospital on Broadway, which is considered at capacity. The existing hospital site is nearly 50 acres in size and contains large areas designated for environmental preservation with wetlands and open space areas around Boulder Creek, which runs on the north side of the site and adjacent to the Ball Aerospace property to the north and east.



Figure 9: BCH Foothills Campus from corner of 48th & Arapahoe

Currently, the project site is the location of the Riverbend office park, which consists of twelve individual properties containing a variety of professional and medical office uses. The park is arranged as a series of 2-story office buildings arranged around a cul-de-sac with surface parking provided on each lot. The site is surrounded by large, mature trees, which gives it a somewhat secluded feel. The character of the area surrounding the site is somewhat eclectic, with the hospital facilities immediately to the west and the large, industrial buildings of the Ball Aerospace campus immediately to the north and east. The site is bordered on its east side by a large surface parking lot serving Ball Aerospace. The area across Arapahoe to the south consists of high density residential development characterized by 2 to 3-story buildings setback from the street with detached parking garages along the major frontages. The project site as seen from within Riverbend Office Park at the existing roundabout is shown in **Figure 10** below, with the Ball Aerospace building in the background. **Figure 11** shows the project site as seen from Commerce St. across the Ball Aerospace parking lot to the east of the site.



Figure 10: Project Site from within Riverbend Office Park



Figure 11: project site as seen from Commerce St. across the Ball Aerospace parking lot to the east

- (2) **Community policy considerations including, without limitation, the review process and likely conformity of the proposed development with the Boulder Valley Comprehensive Plan and other ordinances, goals, policies, and plans, including, without limitation, sub-community and sub-area plans;**

The proposed project presents a number of community policy considerations. First, the proposed project would require rezoning the subject properties from BT-2 (Business – Transitional 2) to P (Public) in order to accommodate the proposed hospital use, which is prohibited in all zoning districts except for the P zone district.

Rezoning. The Rezoning Criteria are found in [section 9-2-18](#) of the Boulder Revised Code, and are listed below. Applications for a rezoning are required to meet one of the following six criteria.

Criteria: The city's zoning is the result of a detailed and comprehensive appraisal of the city's present and future land use allocation needs. In order to establish and maintain sound, stable and desirable development within the city, rezoning of land is to be discouraged and allowed only under the limited circumstances herein described. Therefore, the city council shall grant a rezoning application only if the proposed rezoning is consistent with the policies and goals of the Boulder Valley Comprehensive Plan, and, for an application not incidental to a general revision of the zoning map, meets one of the following criteria:

- 1) *The applicant demonstrates by clear and convincing evidence that the proposed rezoning is necessary to come into compliance with the Boulder Valley Comprehensive Plan map;*
- 2) *The existing zoning of the land was the result of a clerical error;*
- 3) *The existing zoning of the land was based on a mistake of fact;*
- 4) *The existing zoning of the land failed to take into account the constraints on development created by the natural characteristics of the land, including, but not limited to, steep slopes, floodplain, unstable soils and inadequate drainage;*
- 5) *The land or its surrounding environs has changed or is changing to such a degree that it is in the public interest to encourage a redevelopment of the area or to recognize the changed character of the area;*
or
- 6) *The proposed rezoning is necessary in order to provide land for a community need that was not anticipated at the time of adoption of the Boulder Valley Comprehensive Plan.*

BVCP Land Use Map Change. Rezoning from BT-2 to P would also require a change to the BVCP land use designation for the subject properties from Transitional Business (TB) to Mixed Use Business (MUB) Changing the BVCP land use designation on Lot 2 from Public (P) to Community Business will require a BVCP future land use map amendment. BVCP amendment procedures can be found at:

<https://www-static.bouldercolorado.gov/docs/ii-amendment-procedures-1-201307121131.pdf>.

BVCP land use map changes may be considered at any time as part of a rezoning request. Either way, the application must meet all of the following criteria to be eligible for a BVCP land use map amendment:

- 1) *The proposed change is consistent with the policies and overall intent of the comprehensive plan.*
- 2) *The proposed change would not have significant cross-jurisdictional impacts that may affect residents, properties or facilities outside the city.*
- 3) *The proposed change would not materially affect the land use and growth projections that were the basis of the comprehensive plan.*
- 4) *The proposed change does not materially affect the adequacy or availability of urban facilities and services to the immediate area or to the overall service area of the City of Boulder.*
- 5) *The proposed change would not materially affect the adopted Capital Improvements Program of the City of Boulder.*
- 6) *The proposed change would not affect the Area II/Area III boundaries in the comprehensive plan.*

Staff finds that there are several community policy considerations related to the proposed rezoning and land use map change. Specifically, the current proposal raises questions as to the long-term desired character of the site and surrounding areas, and whether it is appropriate to consider the requests as part of a single project or whether there should be a more comprehensive discussion regarding the office park and surrounding area as a whole. Given that the office park contains 12 properties which share access from Riverbend Rd., staff finds that any changes to the zoning and land use on the project site (which consists of the 3 northernmost properties) should take the future development of the other 9 properties to the south into consideration to the extent possible.

Overall, if the rezoning and land use map change are approved and the project moves forward, staff finds that the proposed hospital use would be largely consistent with the “P” Land Use Designation for the site, as well as with many of the general goals found in Chapter 5, “Economy” and Chapter 8, “Community Well-Being,” particularly those related to quality of life and provision of services to populations with special needs. There are also several BVCP Policies that apply to the project which will require additional information at the time of Site Review in order for staff to determine consistency.

Please see staff’s analysis of **Key Issue #1** below for a detailed discussion of the project’s conformance with BVCP Policies.

East Arapahoe Transportation Plan. The city is also working on land use and transportation projects in the area that the applicant should be aware of and the city would welcome BCH’s participation in. First is the East Arapahoe Transportation Plan. The city’s transportation staff has preliminarily identified the Arapahoe street section in front of Boulder Community Health, Foothills campus as a focus area for more detailed analysis as part of a larger plan for multimodal improvements along the corridor. The city is also currently assessing policy and regulatory changes to better accommodate ancillary land uses and redevelopment near the foothills campus but does not have a detailed scope and schedule yet. More information about the project can be found here: <https://bouldercolorado.gov/goboulder/east-arapahoe-transportation-plan>

Height Modification. On March 31, 2015, City Council approved a height ordinance that establishes a two-year period during which modifications to the by-right height for new buildings will only be considered through the Site Review process in specific parts of the city or in particular circumstances. As the applicant is aware, the project site is not included in the list of exempted areas; therefore, a request to exceed the 35 foot height limit for the zone district would require a new ordinance by council. Clearly, whether the proposed project should be granted a de facto exemption from the height ordinance is a significant policy consideration that warrants further discussion as the project plans progress. Please see staff’s analysis of **Key Issue #2** below for further discussion of this topic.

(3) Applicable criteria, review procedures, and submission requirements for a site review;

As stated above, a Site Review application would be required and would be subject to all the criteria in Section 9-2-14(h) of the Land Use Regulations. Submission requirements would be the same as any other Site Review and would have to satisfy the requirements of sections 9-2-6 and 9-2-14(d). Development of the site would also have to be found consistent with the Design and Construction Standards (DCS).

Applications for Site Review are submitted to the Planning and Development Services Center and are reviewed through the Land Use Review process. SUltimately, if the project is designed to include a height modification request, a public hearing and recommendation by the Planning Board followed by approval of an ordinance by City Council would be required.

(4) Permits that may need to be obtained and processes that may need to be completed prior to, concurrent with, or subsequent to site review approval;

In addition to the required Concept Plan and Site Review, the applicant will be required to complete the following processes:

- Rezoning/ Land Use Map Change – to rezone the property from BT-2 to P and change the BVCP land use designation for the site from Transitional Business to Public. These processes may be run concurrently and follow the standard land use review process. A rezoning requires a recommendation by the Planning Board followed by approval of an ordinance by City Council.
- Subdivision – a subdivision is required in order to consolidate the three existing properties into one property to allow for the proposed development. The subdivision process follows the standard land use review process and is a staff-level subject to call-up by the Planning Board. A subdivision must be completed prior to approval of a building permit application.
- Ordinance – to request a height modification to allow for the proposed building to exceed the 35 foot height limit for the BT-2 zone. The ordinance does not have a separate review process and must be requested through the Site Review process. Approval of an ordinance requires a recommendation by Planning Board followed by two readings at City Council.
- Technical Document Review – following Site Review and Rezoning approval, if approved, the applicant is required to submit an application for Technical Document (TEC doc) Review prior to application for building permit. The intent in the TEC doc review is to ensure that technical details are resolved such as drainage and transportation issues that may require supplemental analyses.

(5) Opportunities and constraints in relation to the transportation system, including, without limitation, access, linkage, signalization, signage, and circulation, existing transportation system capacity problems serving the requirements of the transportation master plan, possible trail links, and the possible need for a traffic or transportation study;

The proposed project presents an opportunity to improve existing circulation patterns within the site as well as pedestrian safety at the intersection of 48th St. and Riverbend Rd. In addition, the proposed one-way loop drive within the development has been designed to potentially provide a connection to Commerce St. through the Ball Aerospace property to the east if that property is redeveloped in the future or an agreement with Ball is obtained. While the applicant has not indicated that there are any concrete plans to provide this connection, the potential for a connection is worth noting, as it would greatly improve circulation and connectivity in the broader area.

As discussed in staff's initial review comments to the applicant (included as [Attachment B](#)), staff has identified several issues with the project's access and circulation as proposed. Staff has also identified additional documentation that will be required in order to evaluate the proposed project's transportation impacts. Additional information on the proposed parking structure and how it will fit into the broader parking plan for the existing hospital will be required.

(6) Environmental opportunities and constraints including, without limitation, the identification of wetlands, important view corridors, floodplains and other natural hazards, wildlife corridors, endangered and protected species and habitats, the need for further biological inventories of the site and at what point in the process the information will be necessary;

The site is impacted by the 100-year floodplain, and as such a floodplain development permit will be required for all development within the 100-year floodplain. Please see staff review comments under "Flood," included as [Attachment B](#), for additional information.

As mentioned above, there are numerous healthy, mature trees located on the site. These will need to be taken into consideration as project plans move forward. Additional detail is provided in the staff review comments under “Landscaping” in [Attachment B](#).

(7) Appropriate ranges of land uses; and

Given the project site’s proximity to the existing Boulder Community Hospital Foothills Campus emergency room facility as well as the hospital’s overall need to relocate existing facilities from the Broadway campus, staff acknowledges the project site as an appropriate location for the proposed hospital use. As mentioned above, the applicant will be required to complete a rezoning and BVCP land use map change in order to allow for the proposed use. During these processes, the applicant will be responsible for demonstrating that the proposed rezoning and land use map change meet the applicable review criteria. The proposed rezoning and land use map change should also include a discussion of the existing and proposed uses located on the site as well as a discussion of surrounding uses in order to determine the appropriateness of the range of land uses proposed.

Additional information on the proposed accessory uses and parking garage will be required at time of Site Review. It should be noted that retail uses as a principal use are prohibited in the P zoning district, and that the uses will need to meet the definition of “Accessory Use” found in section 9-16 of the Boulder Revised Code in order to be approvable. In addition, detailed information on the proposed parking garage will be required in order to determine whether it may be considered a second principal use. It should be noted that a parking garage as a principal use is only allowed in the P zone district pursuant to a Use Review approval.

(8) The appropriateness of or necessity for housing.

Not applicable, as no new housing is proposed as part of this development.

Key Issue #1: Is the proposed concept plan compatible with the goals, objectives and recommendations of the Boulder Valley Comprehensive Plan (BVCP)?

Overall, staff finds the proposed Concept Plan to be largely consistent with the goals, policies and objectives of the 2010 Boulder Valley Comprehensive Plan (BVCP). Specifically, staff finds that the proposed hospital use would be largely consistent with the “P” Land Use Designation for the site, as well as with many of the general goals found in Chapter 5, “Economy” and Chapter 8, “Community Well-Being,” particularly those related to quality of life and provision of services to populations with special needs, . The tables below offer an initial analysis of the project’s consistency with BVCP policies, and are intended to provide potential discussion points for the Planning Board during their review of the project.

BVCP Policy	Excerpt from BVCP	How the Proposal is <u>Consistent</u> with BVCP Policies
<p>1.03 Principles of Economic Sustainability</p> <p>1.04 Principles of Social Sustainability</p>	<p>1.03 – “... strive to develop and maintain a healthy, adaptable economy that is vital to the community’s quality of life and high level of services...”</p> <p>1.04 – “...strive to promote a healthy community and address social and cultural inequities by...ensuring the basic health and safety needs of all residents are met...”</p>	<p>The project represents a needed expansion of a vital community health institution. The relocation of facilities from the North Broadway BCH campus to the Foothills campus has created a need for additional facilities in close proximity to the Foothills campus. A BVCP land use change and rezoning appear to be the most logical path forward to accommodate the proposed development.</p> <p>Better enabling a concentration of BCH-related uses near the Foothills campus will help ensure the community’s basic health needs are being met, and continued high quality of life.</p>
<p>2.03 Compact Development Pattern</p>	<p>“...ensure that development will take place in an orderly fashion, take advantage of existing urban services, and avoid, insofar as possible, patterns of leapfrog, noncontiguous, scattered development...”</p>	<p>The request will enable a concentration of BCH-related land uses for a more contiguous development pattern near the Foothills campus. Without enabling this concentration of land uses, BCH-related uses (e.g., medical offices) may, over time, locate in a more disconnected, spread out pattern from the Foothills campus.</p>
<p>2.17 Variety of Activity Centers</p>	<p>“... support a variety of regional, subcommunity and neighborhood activity centers where people congregate for a variety of activities such as working, shopping, going to school or day care, accessing human services...”</p> <p>“Good multimodal connections to and from activity centers and accessibility for people of all ages and abilities will be encouraged”</p>	<p>Enabling a concentration of BCH related land uses near the Foothills campus supports BVCP goals and policies around accessibility to activity centers.</p>
<p>2.21 Commitment to a Walkable and Accessible City</p>	<p>“promote the development of a walkable and accessible city by designing neighborhoods and business areas to provide easy and safe access by foot to places such as neighborhood centers, community facilities, transit stops or centers, and shared public spaces and amenities”</p>	<p>East Arapahoe is a multimodal corridor, with an active transportation planning project underway (see comments below under BVCP policies in Chapter 6). Many land uses typically ancillary to a hospital decide to locate there due to numerous trips back and forth to the hospital (e.g., doctor rounds, referrals, etc.). Enabling a better concentration of these uses will also support a reduction in vehicle miles traveled.</p>
<p>2.22 Improve Mobility Grid</p>	<p>“The walkability, bikeability and transit access should be improved in parts of the city that need better connectivity and mobility, for example, in East Boulder. This should be achieved by coordinating and integrating land use and transportation planning and will occur through both public investment and private development.”</p>	<p>Enabling a better concentration of these uses will also support a reduction in vehicle miles traveled.</p>

BVCP Policy	Excerpt from BVCP	How the Proposal is <u>Consistent</u> with BVCP Policies
6.01 All-Mode Transportation System 6.02 Reduction of Single Occupancy Auto Trips 6.05 Accessibility 6.06 Mobility Services	6.01 – “safe and convenient connections between modes” 6.02 – “support greater use of alternatives to single occupancy automobile travel” 6.05 – “develop a complete all-mode transportation system that accommodates all users, including people with mobility impairments, as well as youth, older adults and low income persons” 6.06 – “increase their support for mobility services for older adults and people with disabilities to reflect the expected increases in these populations”	The East Arapahoe Transportation Plan project is currently underway. The Plan’s purpose is to “address existing and future transportation needs in the East Arapahoe Corridor, including local and regional travel, and facilitate safe travel and access by people using all modes—walk, bike, transit, and auto”. The Plan’s conceptual design alternatives include enhanced multimodal facilities that would integrate well with an intensification of the Foothills campus for BCH-related uses. The section of East Arapahoe in front of the Riverbend Office Park and Foothills campus is getting particular attention in assessing opportunities to integrate land use and transportation planning.
6.09 Integration with Land Use	In multimodal transportation corridors, “develop a highly connected and continuous transportation system for all modes identify locations for mixed use and higher density development integrated with transportation functions through appropriate design”	
8.01 Providing for a Broad Spectrum of Human Needs	“develop and maintain human service programs that provide for the broad spectrum of human needs”	
8.07 Physical Health	“strive to ensure that this community continues to be a leader in promoting physical health and welfare of community members”	
8.10 Support for Community Facilities	“recognize the importance of educational, health and non-profit community agencies that provide vital services to the residents of the Boulder Valley and will work collaboratively with these agencies to reasonably accommodate their facility needs and consider location based on transportation accessibility	BCH is a vital community institution with a need to expand its Foothills campus operations and concentrated BCH-related activities in one area. A BVCP land use amendment and zoning change supports related health policies in BVCP Chapter 8.

There are also several BVCP Policies that apply to the project which will require additional information at the time of Site Review in order for staff to determine consistency. Policies which should be given special consideration as the project moves forward include:

- BVCP Policy 2.30, Sensitive Infill and Redevelopment;
- BVCP Policy 2.34, Importance of Street Trees and Streetscapes;
- BVCP Policy 2.35 Outdoor Lighting/Light Pollution
- BVCP Policy 6.08 Transportation Impact

Key Issue #2: Would the project be compatible with the character of the surrounding area?

The comments below represent staff’s initial findings regarding various aspects of the project’s compatibility with the surrounding area, including mass and scale, site design, building materials and other design

considerations. These comments are intended to provide the planning Board with a starting point for further discussions regarding project compatibility.

Building Design

Overall, staff finds the conceptual building design to be a strong first iteration. Staff is supportive of the applicant's stated intent to design the medical center building to fit in with the existing BCH Foothills family of buildings while also providing a new and unique "front door" to the medical center property. Staff also finds that the proposed design would be consistent with the existing hospital campus and would not detract from the existing character of the office park. While additional details will be required at time of Site Review, as shown the proposed building design appears to be consistent with a number of Site Review criteria pertaining to Building Design, in particular those criteria addressing compatibility with the existing character of the area and use of high quality, authentic materials.

Mass and Scale

Site Review requires that *"the height of 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 for the immediate area."*

Staff finds that this criterion is partially met, because the proposed medical building is proposed at a comparable height to the existing BCH building and will be no taller than three-stories. The new medical building would be no taller than what exists on the BCH Foothills site and would not appear out of character with the area, which contains taller buildings – most notably the Ball Aerospace building, which exceeds 55 feet. The perceived height of the existing and proposed buildings would be less than the 55 foot limit as the site slopes downward to the north, making the buildings appear closer to the 45 foot range from Arapahoe Ave.

While staff finds that a 3-story medical facility is a logical use for which to request a height modification given the specialized space needs, staff is uncertain that a 5-story, 467-stall parking structure warrants the same degree of consideration. As discussed in staff's review comments to the applicant ([Attachment B](#)), it is unclear that such a large parking structure is actually required to provide for overflow parking from the BCH Foothills campus to the west. Indeed, given that the BCH Foothills project included a 16% parking deferral with plans to build additional parking on the western portion of the lot and underneath the approved west wing, staff finds that the parking needs of the BCH complex as a whole should be carefully analyzed to ensure that the development is providing no more parking than is necessary. Given the large, somewhat blank expanses (in terms of transparency and activity) shown on the parking garage, it would be preferable to have that structure be less than the proposed 55 feet in height so as not come across as overly monolithic compared to other buildings on the site.

Building Materials

As discussed above, staff finds that the conceptual design largely utilizes high quality building materials that are consistent with Site Review criteria and also respond to the existing material palette at the nearby BCH Foothills campus. At time of Site Review, details of important building elements, including windows and reveals; exposed eaves, awnings and soffit; and material joints will be necessary to help articulate how they would be accomplished on the Architectural Elevation plans. In addition, color details and physical material samples will be required.

Site Design

While overall the proposed site plan includes many high quality and well thought out design elements, staff has concerns regarding the site plan as proposed. Specifically, staff would prefer to see a more

comprehensive plan for the entire office park, which could be a future phase or any desired land use changes that would promote a more holistic plan for the entire site while providing flexibility for the site to adapt over time. If the future desired use of the office park is not known at this time, the applicant could also provide one or more scenarios at the time of Site Review to demonstrate possible future development configurations.

PUBLIC COMMENT AND PROCESS:

Required public notice was given in the form of written notification mailed to all property owners within 600 feet of the subject site and a sign posted on the property for at least 10 days. All notice requirements of section 9-4-3, B.R.C. 1981 have been met. Staff did not receive any comments regarding the proposal following mailing of the public notice. The applicant also held a neighborhood meeting on Feb. 10, 2016, which had two attendees who asked questions about the development. Overall, the attendees were largely in support of the proposal, especially the addition of new parking, but expressed concerns related to potential traffic impacts at the corner of 48th St. and Arapahoe.

STAFF FINDINGS AND RECOMMENDATION:

No action is required on behalf of the Planning Board. Public comment, staff, and Planning Board comments will be documented for the applicant's use. Concept Plan Review and comment is intended to give the applicant feedback on the proposed development plan and provide the applicant direction on submittal of the Site Review plans.

Approved By:



David Driskell, Executive Director
Department of Community Planning and Sustainability

ATTACHMENTS:

- A: [Concept Plan Submittal](#)**
- B: [Initial Staff Review Comments to Applicant](#)**

Concept Plan Review Submittal

for

Boulder Community Health Riverbend Medical Center & Parking Garage

Riverbend Rd & 48th St, Boulder, Colorado

November 2, 2015

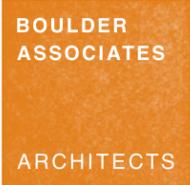


SHEET INDEX

- CP1 - CONTEXT MAP (With Written Statement)
- CP2 - SITE DEVELOPMENT
- CP3 - ARCHITECTURAL CHARACTER
- CP4 - EXTERIOR ELEVATIONS
- CP5 - EXTERIOR ELEVATIONS

RELATED ATTACHMENTS

- TRIP GENERATION ANALYSIS





SITE DEVELOPMENT

GENERAL DESCRIPTION:

The proposed development is a 76,000sf, 3-story medical center and a 5-level parking garage with accessory use space, to provide patient services and support for Boulder Community Health. The proposed development would be an extension of BCH patient services and will be the facility that will house the departments that currently remain at the Broadway campus. These services include, but are not limited to, inpatient rehabilitation, inpatient behavioral health and a neurology clinic.

SITE DESIGN:

The medical center building is sited on the west side of the property, to provide a visual link to the main Foothills Hospital campus as well as establish a strong corner to the entrance of the Riverbend development. The parking garage is located on the east side of the property with accessory use space available at the ground floor level. The accessory use space breaks up the mass of the parking garage and activates the pedestrian activity with spill-out space to the south and to the west.

The Riverbend Road street section has been narrowed and brought down to a more human-scale. The on-street parallel parking has been removed and has been replaced by more landscaped areas and generous pedestrian paths detached from the street. The surface parking has been relocated to a new loop road that can be used by all Riverbend properties. This one-way loop road provides a clear traffic pattern to all of the Riverbend outlots and a protected north-to-south pedestrian path through the site.

The pedestrian circulation was an important design consideration in the site development. Sidewalks have been provided on-axis with the existing Foothills Campus paths to provide a visual and physical connection across 48th street to the main hospital campus. The development proposes adding curb 'bulb-outs' at the intersection of 48th St. and Riverbend to make the crosswalk more visible and encourage a reduction in vehicle speeds. In addition, a north-south sidewalk through the center of the Riverbend Development has been designed to aid in this circulation and bring the public toward the medical center, accessory spaces as well as the landscaped courtyard.

LANDSCAPE DESIGN:

The landscape design establishes a strong north-south and east-west axis that connects the development to the adjacent neighbors, 48th street, the main hospital campus and public realm. Anchoring the north-south axis, between the medical center building and parking garage is a landscaped courtyard garden. The courtyard will provide a healing setting for patients, families and visitors. It will provide a variety of spaces to sit, congregate, relax and enjoy the outdoors. The courtyard will provide safe, paved connections between the medical office building and parking garage, and neighboring facilities.

South of the courtyard garden and drop-off entry plaza, the existing loop-road circular island has been extended towards the medical center building and garage. The island will be landscaped to complement the courtyard. Sidewalks around the island will improve pedestrian circulation through the site from Arapahoe Avenue and encourage use of the courtyard garden. A covered walkway is proposed, connecting the Parking Garage with the Medical Center.

The overall landscape and planting design will be developed to complement and enhance the existing environment and proposed development. It will be based on principles of sustainable landscape design and construction including water-wise plant selection, efficient irrigation and soil management.

PARKING:

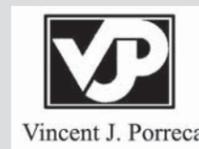
Off-street parking has been provided in a new parking garage with 467 stalls. This volume is intentionally above the 1:300 required by Development Standards, to support the occasional overflow at the Foothills Hospital Campus.

There are also 5 surface spaces dedicated to needs of the new medical center and an additional 13 on-street parking spaces that are available to all Riverbend properties.

BCH Riverbend Medical Center - Concept Plan

Riverbend Rd & 48th St, Boulder, Colorado

November 2, 2015





SOUTHWEST CORNER OF THE PARKING GARAGE & ACCESSORY USE SPACES



SOUTHWEST CORNER OF THE MEDICAL CENTER - VIEW TO THE EAST DOWN RIVERBEND ROAD



SOUTHEAST CORNER OF THE MEDICAL CENTER - VIEW TOWARDS FRONT ENTRY & EXTERIOR COURTYARD

EXTERIOR BUILDING DESIGN

BUILDING DESIGN:

The buildings on the BCH Foothills Hospital campus each have a unique character however are linked to each other through the use of a common material palette. The same approach is proposed in the design at Riverbend. The new building and parking garage will feel familiar enough that it fits within the BCH family but unique in its own right to establish the new 'front door' to the medical center in Riverbend. Brick, Copper and Glass will be the dominant materials on the medical center building and the parking garage will employ concrete, brick and metal panel screens.

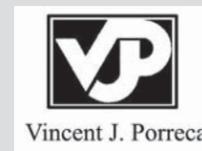
The form of the building engages the public at the ground level through the use of storefront glass and the placement of an exterior courtyard garden between the lobby and retail spaces. This space encourages public gathering and flow between the buildings and throughout the site. The building mass is broken up to respond to interior spatial planning needs as well as addressing site context. The golden section proportions are used in several locations around the building to balance the massing horizontally as well as vertically. The medical center facade will be articulated by punched openings and ribbon windows composed in a way to balance the three stories and provide appropriate daylighting needs for the interior spaces. The main lobby entry and the west corner of the building have been articulated with glass volumes and copper elements which establish a simple hierarchy in the design. Horizontal roof planes organize the massing and provide shading for the interior spaces. These roof planes playfully overlap to emphasize the horizontal and end at the main entry volume. The architecture at the main entry is expressed as vertical overlapping volumes which stretch up to meet the sky uninterrupted, establishing its prominence within the entire building language.

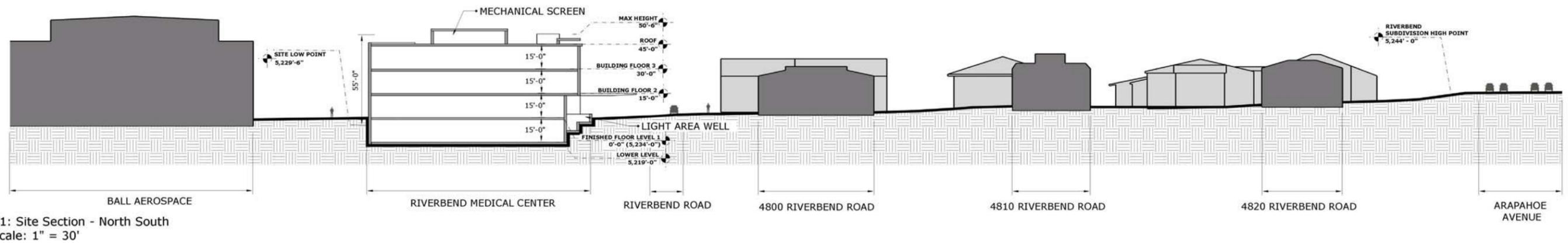
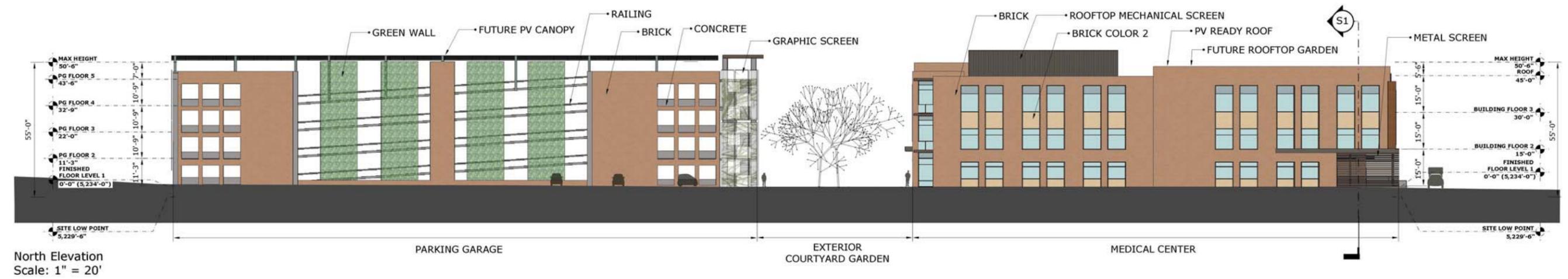
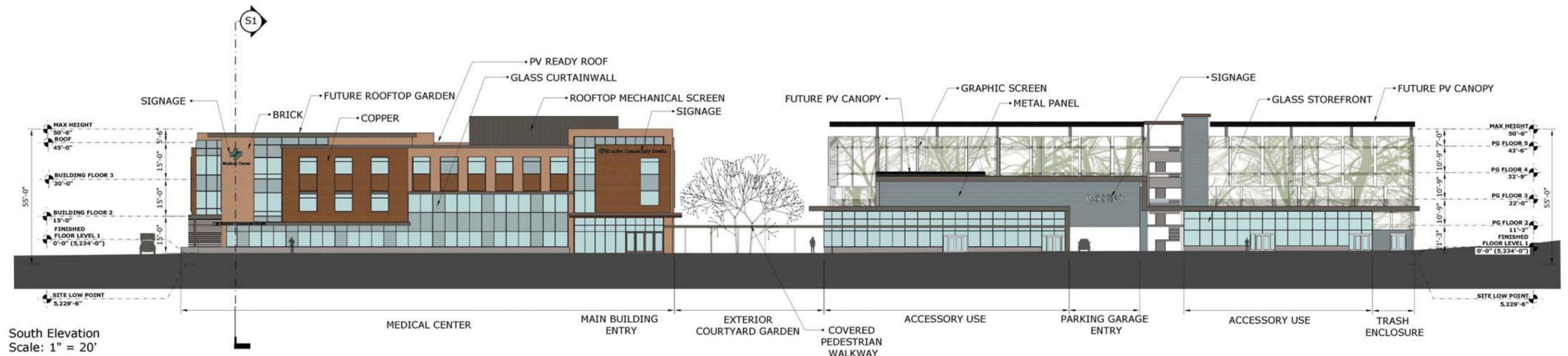
The building height maximum will be 55' for this property. The proposed building will help transition from the scale of the Ball Aerospace building to the smaller Riverbend structures to the south. The Riverbend development slopes significantly from south to north which positions the building's first floor elevation 10'-0" below the traffic along Arapahoe Avenue.

BCH Riverbend Medical Center - Concept Plan

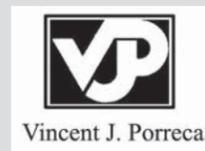
Riverbend Rd & 48th St, Boulder, Colorado

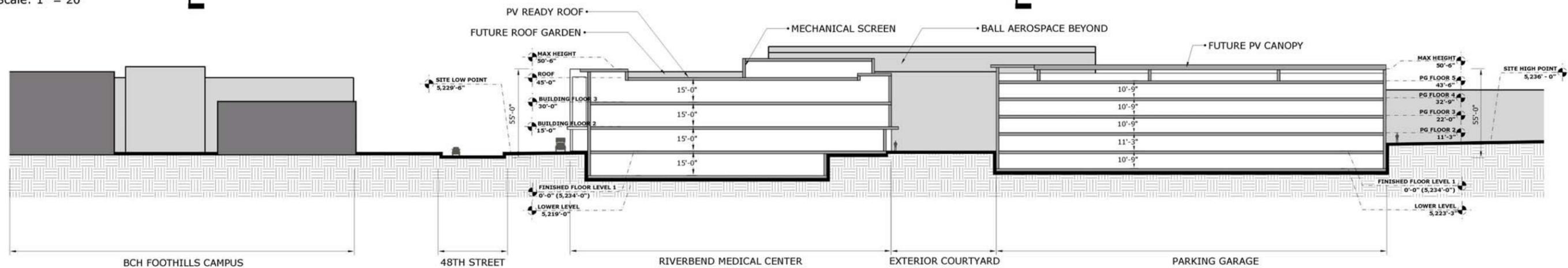
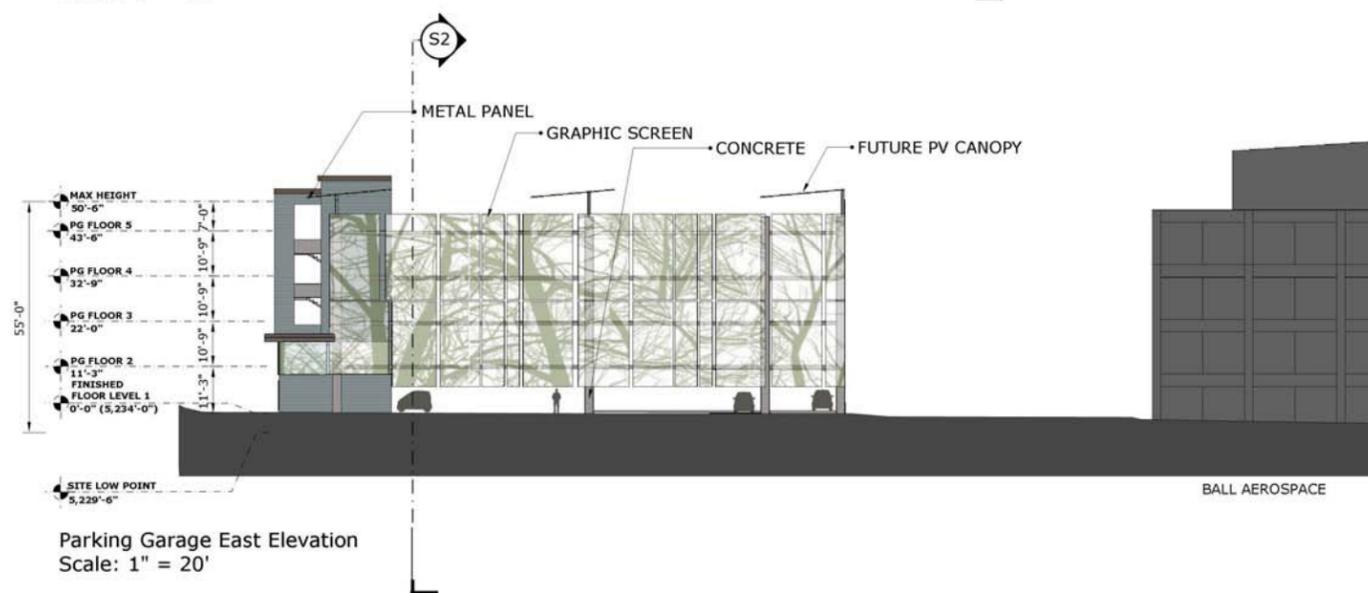
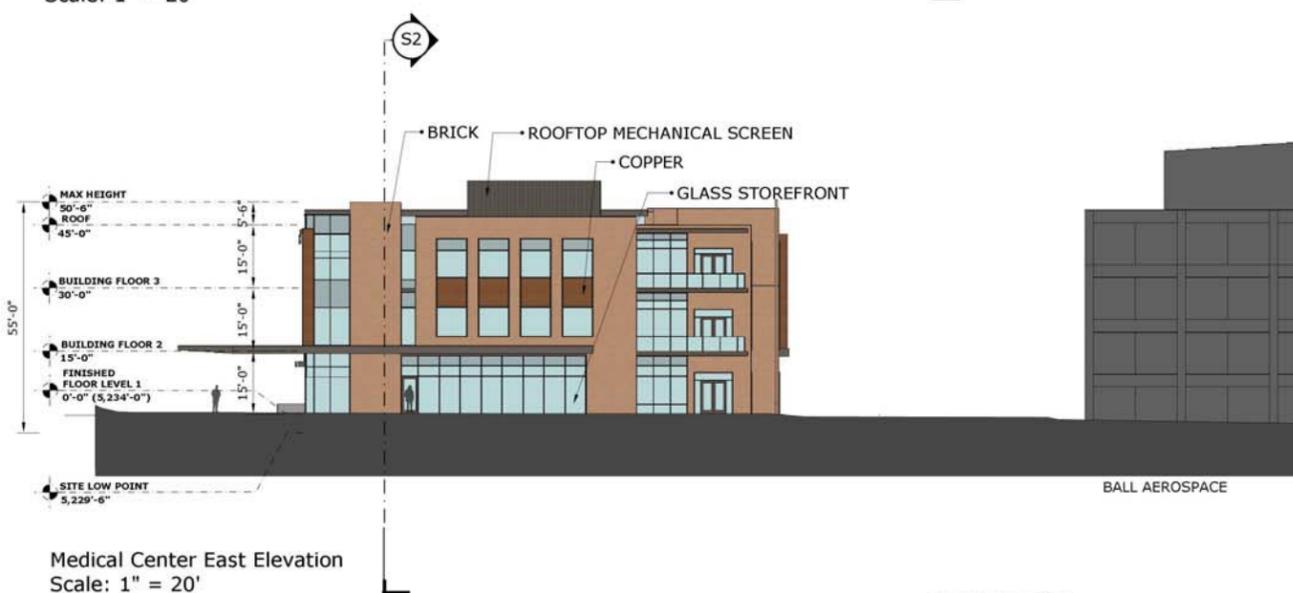
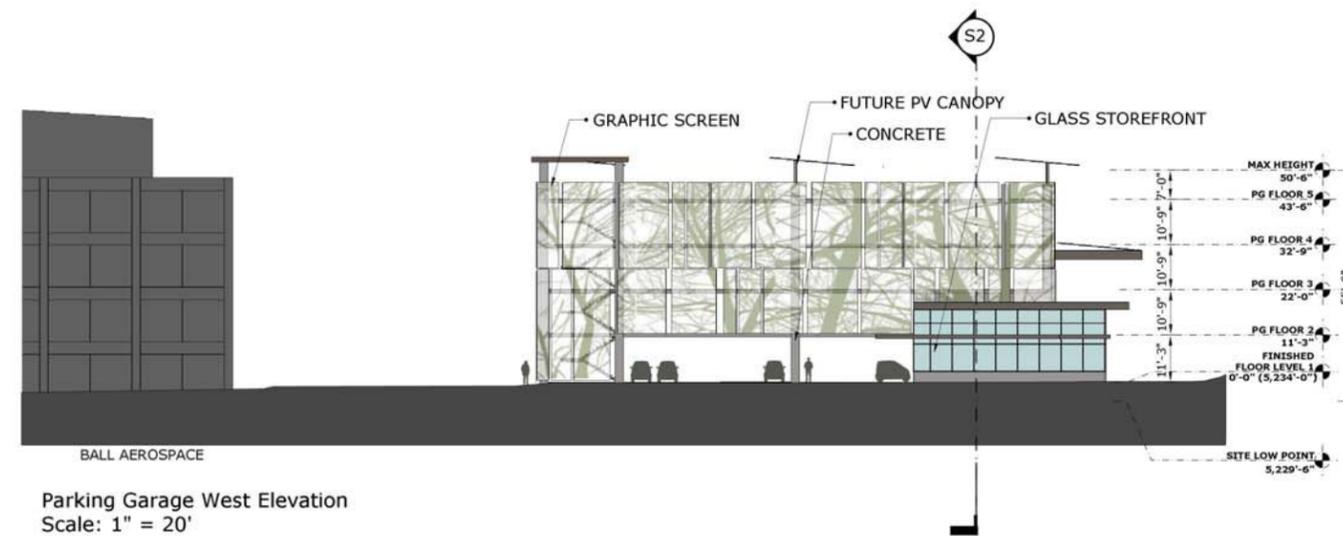
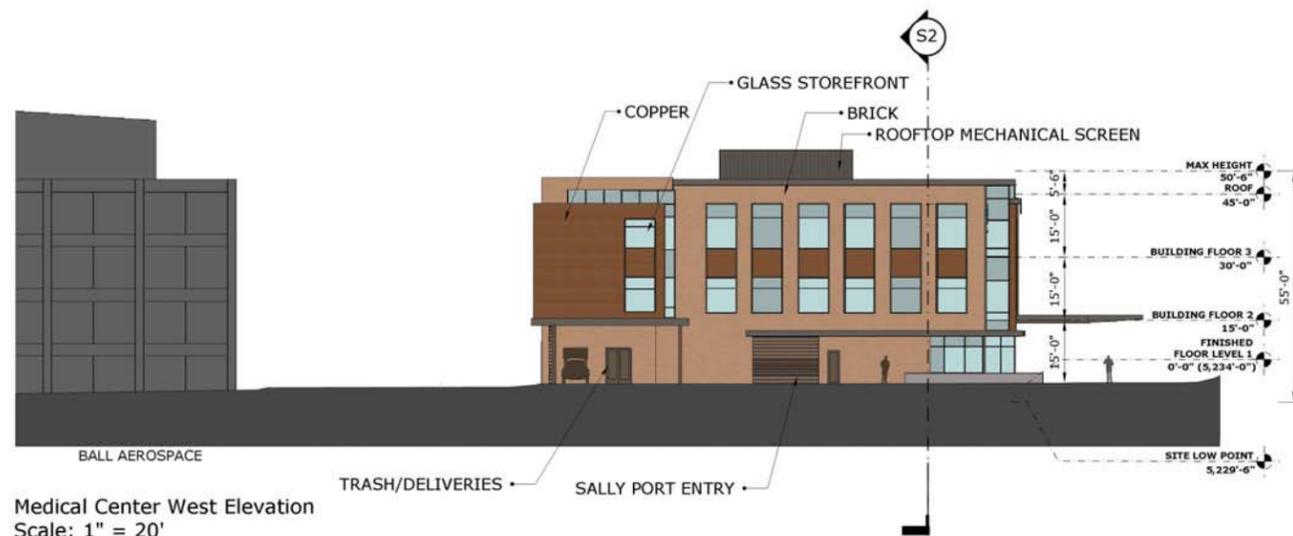
November 2, 2015





BCH Riverbend Medical Center - Concept Plan
Riverbend Rd & 48th St, Boulder, Colorado
November 2, 2015





BCH Riverbend Medical Center - Concept Plan

Riverbend Rd & 48th St, Boulder, Colorado

November 2, 2015





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
www.boulderplandevlop.net

CITY OF BOULDER
LAND USE REVIEW RESULTS AND COMMENTS

DATE OF COMMENTS: **November 30, 2015**
 CASE MANAGER: **Chandler Van Schaack**
 PROJECT NAME: **BCH Riverbend Medical Center**
 LOCATION: **4801 RIVERBEND RD**
 COORDINATES: **N03W01**
 REVIEW TYPE: **Concept Plan Review & Comment**
 REVIEW NUMBER: **LUR2015-00106**
 APPLICANT: **Vince Porreca**
 DESCRIPTION: **Concept Plan Review and Comment for redevelopment on four parcels on Riverbend Road. Proposed project includes a three story building plus basement (approx. 76,000 sqft) and a separate 467 stall parking structure with 5000 sqft of retail/ancillary use wrap.**

I. REVIEW FINDINGS

Overall, staff finds the current Concept Plan to be a logical consolidation of the existing hospital facilities. Staff understands that the proposed use would help address a major healthcare need and that proximity to the existing hospital emergency room facilities is a key component of the project. That said, there are a number of subsequent processes which must be completed in order for the project to move forward. These include Site Review; Rezoning; a BVCP land use map change; an ordinance to allow for the proposed building height to exceed the 35 foot height limit; subdivision of the properties to consolidate them into one parcel; and tech doc/ building permit. Please note that processes that require an ordinance (rezoning, land use map change and height modification), will require a recommendation by the Planning Board followed by two readings and final approval by City Council. Ultimately, the discussion around the current Concept Plan application will help to inform future process decisions as the project moves forward. A Planning board hearing date for discussion of the Concept Plan has been tentatively scheduled for **March 3, 2015**.

The comments below are based on staff's preliminary review of the proposed Concept Plan. Staff will likely have additional comments at the time of the Planning Board hearing. Please contact the case manager, Chandler Van Schaack, at 303-441-3137 or vanschaackc@bouldercolorado.gov with any questions or comments prior to the hearing.

II. CITY REQUIREMENTS

Access/Circulation David Thompson, 303-441-4417

1. Staff has concerns with the proposed realignment being shown for Riverbend Road given the non-standard one-way couplet being proposed along with the diagonal parking, numerous curb cuts and absence of a continuous detached sidewalk with a landscape buffer. It is staff's preference should Riverbend Road be realigned as part of this project that the alignment of the new road should be a predominantly east / west alignment that allows for a future connection of Riverbend Road to Commerce Street should the adjacent site redevelop.
2. Staff has concerns regarding the number of access points (curb-cuts) being proposed for the property given the impacts of curb-cuts on pedestrian and bicycle safety. At time of site review and in accordance with [section 9-9-5\(c\)](#) of the Boulder Revised Code which limits the number of access points serving the property, look for opportunities through land use design to reduce the number of curb-cuts being shown.
3. In support of Section 9-2-14(h)(D) of the BRC with respect to the multi-modal circulation, at time of site review submittal, please revise the site plans to provide pedestrian and bicycle circulation/connections within the site and connecting to the adjacent sites at each end of the site.
4. At the time of Site Review:

Address: 4801 RIVERBEND RD

Page 1

- a. Pursuant to [section 2.02](#) of the DCS, a Traffic Impact Study is required since the development's trip generation is shown to exceed the nonresidential development threshold of 100 vehicles trips or greater during any single hour in the peak period. The transportation consultant preparing the Traffic Impact Study should contact staff after the project is heard by Planning Board and City Council to discuss staff's review comments on the trip assessment letter and the study parameters of the study prior to initiating the work.
- b. A Transportation Demand Management (TDM) plan consistent with [section 2.03\(l\)](#) of the DCS and [section 9-2-14\(h\)\(2\)\(D\)\(iv\) and \(v\)](#) of the BRC is required to be submitted which outlines strategies to mitigate traffic impacts created by the proposed development and implementable measures for promoting alternate modes of travel and any proposed parking reduction request.
- c. Please show the location and number of the short-term and long-term bicycle parking spaces to be provided on the site following the requirements found in [Table 9-8 and section 9-9-6\(g\)](#), of the BRC.
- d. Please provide bicycle and vehicle parking tables to show the required compact, standard and accessible parking compared to the compact, standard and accessible vehicle parking being provided on the site as well as the required long-term and short-term bicycle parking required compared to what is being provided on the site.

Building Design Chandler Van Schaack, Case Manager

Overall, staff finds the conceptual building design to be a strong first iteration. Staff is supportive of the applicant's stated intent to design the medical center building to fit in with the existing BCH Foothills family of buildings while also providing a new and unique "front door" to the medical center property. While additional details will be required at time of Site Review, as shown the proposed building design appears to be consistent with a number of Site Review criteria pertaining to Building Design, in particular those criteria addressing compatibility with the existing character of the area and use of high quality, authentic materials. At time of Site Review, details of important building elements, including windows and reveals; exposed eaves, awnings and soffit; and material joints will be necessary to help articulate how they would be accomplished on the Architectural Elevation plans. In addition, color details and physical material samples will be required.

Drainage, Scott Kuhna, 303-441-4071

All proposed projects and developments over 1 acre in size shall provide Water Quality Capture Volume and a Water Quality Outlet in accordance with the *UDFCD Drainage Criteria Manual*. It is unclear where this feature will be located based on the submitted site plan.

Flood Control Scott Kuhna, 303-441-4071

1. A floodplain development permit will be required for all development within the 100-year floodplain. The floodplain development permit shall contain certified drawings demonstrating:
 - Any new nonresidential structure will have all lodging units within the structure elevated to or above the flood protection elevation and be floodproofed in a manner requiring no human intervention or have the lowest floor elevated, including the basement, to or above the flood protection elevation.
 - Any new critical facility shall meet the construction requirements of Section 9-3-2(i)(4) of the *Boulder Revised Code*.
 - The proposed buildings will have structural components capable of resisting projected hydrostatic and hydrodynamic loads and the effects of buoyancy, and be constructed with materials resistant to flood damage.
 - Any proposed structures or obstructions in the floodplain, including trash enclosures and raised planters, will be properly anchored to prevent flotation, collapse, or lateral movement and be capable of resisting hydrostatic and hydrodynamic loads.
 - The buildings will be constructed with electrical, heating, ventilation, plumbing, air conditioning equipment, and other service facilities that are designed and located (by elevating or floodproofing) so as to prevent water from entering or accumulating within the components during conditions of flooding.
2. An Emergency Management Plan meeting the requirements of Section 9-3-2(i) of the *Boulder Revised Code* will be required as part of the floodplain development permit:
 - To protect the health, safety, and welfare of the public and of employees, visitors, residents, guests, contractors, and others at risk from hazards at the facility;

- To minimize interruptions or disruptions of operations of critical facilities;
- to protect buildings, physical assets, and electronic information; and
- to prevent environmental contamination.

Fees

Please note that 2015 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.

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.

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 (Dry Creek ditch No. 2). 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 Lokocz, 303-441-3138

As the project plans become more refined, a landscape plan is required that is consistent with, and exceeds, city code requirements. See Sections 9-9-11, 12, 13 and 14, B.R.C. 1981 for all applicable requirements. More specifically:

1. Parking areas containing more than 5 cars are required to be screened from the street and adjacent lots per 9-9-14(b) and (c) BRC 1981. The proposed parking lot adjacent to Table Mesa does not seem consistent with current design practices and a building forward solution. Evaluate if the Site Review Criteria of section 9-2-14(h)(2)(E) can be better addressed especially relevant to efficiency of the parking layout, separation of pedestrian movements and impacts on adjacent properties.
2. A detailed tree inventory including the species, size and condition of all existing trees on the site will be a requirement at Site Review (see 9-2-14(h)(2)(iii), B.R.C. 1981) and should be submitted with the initial application. The proposed site plan acknowledges the existing mature trees on the site, but does not appear to include them as elements worthy of preservation. Special attention should be given to incorporating any healthy mature tree into the overall layout and circulation plan.
3. Please note that all landscape strips are dimensioned from the back of curb not flowline; soil volume is the primary focus. All new landscape strips between curb and sidewalk shall be eight feet consistent with the Design and Construction Standards (DCS) and shall be planted with large maturing street trees.
4. The proposed screening around the parking structure should be a high quality long lasting material complimentary of the overall materials palette. During previous reviews, staff has received information stating that vinyl screening last only ten years in our climate. Evaluate more enduring material options.
5. Previous hospital planting designs have not consistently taken into account the very high levels of de-icing chemicals and necessary sight triangles with the numerous pedestrian and vehicular crossings. As the design develops, please keep these potential issues in mind.

Neighborhood Comments

Staff has not received any comments on the proposed Concept Plan.

Parking, David Thompson, 303-441-4417

Staff has concerns on the amount of excess off-street parking being shown for the site in order to support the occasional overflow at the Foothills Hospital Campus. It is staff's preference that transportation demand management strategies be implemented within the site in order to allow for parking reductions. At time of site review, please include a parking study to support providing off-street parking in excess of what is required by the Boulder Revised Code.

Review Process Chandler Van Schaack, Case Manager

Please see the staff response to the Concept Plan Review guidelines below for information on required review processes.

Site Design Chandler Van Schaack, Case Manager

Please see staff comments under "Access/ Circulation" above for site design comments. In addition, staff's analysis of the Concept Plan Review guidelines below includes some considerations for site design moving forward. As mentioned in staff's comments below, staff would prefer to see a more comprehensive plan for the entire office park, which could be a future phase or any desired land use changes that would promote a more holistic plan for the entire site while providing flexibility for the site to adapt over time. If the future desired use of the office park is not known at this time, the applicant could also provide one or more scenarios at the time of Site Review to demonstrate possible future development configurations.

Utilities, Scott Kuhna, 303-441-4071

1. Fire hydrants will need to be installed to meet the coverage requirements outlined in Section 5.10 of the DCS. Per the standards, no portion of any building shall be over 175 feet of fire access distance from the nearest hydrant. Fire access distance is measured along public or private (fire accessible) roadways or fire lanes, as would be traveled by motorized fire equipment. All fire hydrants and public water lines will need to be located within public utility easements.
2. On-site and off-site water main and wastewater main construction per the City of Boulder *Design and Construction Standards (DCS)* as necessary to serve the development will be required. All proposed public utilities for this project shall be designed in accordance with the *DCS*.
3. Vacation of the existing utility and drainage easements will be required for the proposed development of the lots.

III. INFORMATIONAL COMMENTS

Drainage, Scott Kuhna, 303-441-4071

1. Storm water runoff and water quality treatment are issues that must be addressed during the Site Review Process. A Preliminary Storm Water Report and Plan in accordance with the City of Boulder *Design and Construction Standards (DCS)* is required at time of Site Review application. The required report and plan must also address the following issues:
 - Storm water detention
 - Water quality for surface runoff using "Best Management Practices"
 - Minimize Directly Connected Impervious Areas (MDCIA)
 - Water Quality Capture Volume (WQCV)
 - Storm sewer construction
 - Groundwater discharge
 - Erosion control during construction activities
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. 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.
4. A construction storm water 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.

Review Process Chandler Van Schaack, Case Manager

Per section 9-2-14(b)(1), B.R.C. 1981, Concept Plan and Site Review are required for projects located in the P zone district that are over 5 acres in size or include over 100,000 square feet of floor area, and projects over 2 acres in size are eligible for voluntary Site Review. Per section 9-2-13(b), B.R.C. 1981, an applicant for a development that exceeds the "Site Review Required" thresholds shall complete the concept review process prior to submitting an application for site review.

Once the Planning Board has reviewed a Concept Plan application and provided comments at a public hearing as required by section 9-2-13(f), B.R.C. 1981, a Site Review will be required. The Site Review application form can be found online at: <http://www.bouldercolorado.gov/www/publications/forms/208.pdf>. Please note that a request for a Height

Modification to allow for the proposed buildings to exceed the 35' height limitation will require Planning Board approval at a public hearing.

Applications for Site Review are submitted to the Planning and Development Services Center and are reviewed through the Land Use Review process. This review process takes approximately three to four months to complete. Site Review approvals are valid for three years, after which they expire if they have not been implemented.

Utilities, Scott Kuhna, 303-441-4071

1. A water system distribution analysis will be required at time of Site Review in order to assess the impacts and service demands of the proposed development. Conformance with the city's *Treated Water Master Plan, October 2011* is necessary.
2. A collection system analysis will be required at time of Site Review to determine any system impacts based on the proposed demands of the development. The analysis will need to show conformance with the city's *Wastewater Collection System Master Plan, March 2009*.
3. 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.
4. The applicant is advised that any proposed street trees along the property frontage may conflict with existing or proposed utilities, including without limitation: water, wastewater, storm drainage, flood control, gas, electric, telecommunications, drainageways, and irrigation ditches, 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.
5. 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.

IV. NEXT STEPS

A Planning Board hearing has been scheduled for March 3, 2016. Concept Plan Review is not an iterative process; therefore, no response to these comments or changes to the plan set are required. If the applicant wishes to provide additional supporting documentation for the Planning Board hearing, it should be provided to the case manager no later than February 15, 2016.

V. CITY CODE CRITERIA CHECKLIST

Case #: LUR2015-00106

Project Name: Riverbend Medical Center

Date: November 30, 2015

CONCEPT PLAN REVIEW AND COMMENT

Section 9-2-13

(g) Guidelines for Review and Comment: The following guidelines will be used to guide the planning board's discussion regarding the site. It is anticipated that issues other than those listed in this section will be identified as part of the concept plan review and comment process. The Planning Board may consider the following guidelines when providing comments on a concept plan:

- (1) Characteristics of the site and surrounding areas, including, without limitation, its location, surrounding neighborhoods, development and architecture, any known natural features of the site including, without limitation, mature trees, watercourses, hills, depressions, steep slopes and prominent views to and from the site;**

The project site is located in East Boulder near the intersection of 48th Street and Arapahoe Avenue, just east of the Boulder Community Hospital Foothills Campus and adjacent to the Ball Aerospace property to the north and east. Currently, the site is the location of the Riverbend office park, which consists of twelve individual properties containing a variety of professional and medical office uses. The park is arranged as

a series of 2-story office buildings arranged around a cul-de-sac with surface parking provided on each lot. The site is surrounded by large, mature trees, which gives it a somewhat secluded feel. The character of the area surrounding the site is somewhat eclectic, with the hospital facilities immediately to the west and the large, industrial buildings of the Ball Aerospace campus immediately to the north. The site is bordered on its east side by a large surface parking lot serving Ball Aerospace. The area across Arapahoe to the south consists of high density residential development characterized by 2 to 3-story buildings setback from the street with detached parking garages along the major frontages.

(2) Community policy considerations including, without limitation, the review process and likely conformity of the proposed development with the Boulder Valley Comprehensive Plan and other ordinances, goals, policies, and plans, including, without limitation, sub-community and sub-area plans;

The proposed project presents a number of community policy considerations. First, the proposed project would require rezoning the subject properties from BT-2 (Business – Transitional 2) to P (Public) in order to accommodate the proposed hospital use, which is prohibited in all zoning districts except for the P zone district.

Rezoning. The Rezoning Criteria are found in [section 9-2-18](#) of the Boulder Revised Code, and are listed below. Applications for a rezoning are required to meet one of the following six criteria.

Criteria: The city's zoning is the result of a detailed and comprehensive appraisal of the city's present and future land use allocation needs. In order to establish and maintain sound, stable and desirable development within the city, rezoning of land is to be discouraged and allowed only under the limited circumstances herein described. Therefore, the city council shall grant a rezoning application only if the proposed rezoning is consistent with the policies and goals of the Boulder Valley Comprehensive Plan, and, for an application not incidental to a general revision of the zoning map, meets one of the following criteria:

- 1) *The applicant demonstrates by clear and convincing evidence that the proposed rezoning is necessary to come into compliance with the Boulder Valley Comprehensive Plan map;*
- 2) *The existing zoning of the land was the result of a clerical error;*
- 3) *The existing zoning of the land was based on a mistake of fact;*
- 4) *The existing zoning of the land failed to take into account the constraints on development created by the natural characteristics of the land, including, but not limited to, steep slopes, floodplain, unstable soils and inadequate drainage;*
- 5) *The land or its surrounding environs has changed or is changing to such a degree that it is in the public interest to encourage a redevelopment of the area or to recognize the changed character of the area; or*
- 6) *The proposed rezoning is necessary in order to provide land for a community need that was not anticipated at the time of adoption of the Boulder Valley Comprehensive Plan.*

BVCP Land Use Map Change. Rezoning from BT-2 to P would also require a change to the BVCP land use designation for the subject properties from Transitional Business (TB) to Mixed Use Business (MUB) Changing the BVCP land use designation on Lot 2 from Public (P) to Community Business (will require a BVCP future land use map amendment. BVCP amendment procedures can be found at:

<https://www-static.bouldercolorado.gov/docs/ii-amendment-procedures-1-201307121131.pdf>.

BVCP land use map changes may be considered at any time as part of a rezoning request. Please also note that the city is currently updating the 2010 BVCP, which brings with it an opportunity to request future land use map changes as part of that process. If you would like to pursue the land use map change separate from other applications, please contact Comprehensive Planning Division staff.

Either way, the application must meet all of the following criteria to be eligible for a BVCP land use map amendment:

- 1) *The proposed change is consistent with the policies and overall intent of the comprehensive plan.*

- 2) *The proposed change would not have significant cross-jurisdictional impacts that may affect residents, properties or facilities outside the city.*
- 3) *The proposed change would not materially affect the land use and growth projections that were the basis of the comprehensive plan.*
- 4) *The proposed change does not materially affect the adequacy or availability of urban facilities and services to the immediate area or to the overall service area of the City of Boulder.*
- 5) *The proposed change would not materially affect the adopted Capital Improvements Program of the City of Boulder.*
- 6) *The proposed change would not affect the Area II/Area III boundaries in the comprehensive plan.*

Staff finds that there are several community policy considerations related to the proposed rezoning and land use map change. Specifically, the current proposal raises questions as to the long-term desired character of the site and surrounding areas, and whether it is appropriate to consider the requests as part of a single project or whether there should be a more comprehensive discussion regarding the office park and surrounding area as a whole. Given that the office park contains 12 properties which share access from Riverbend Rd., staff finds that any changes to the zoning and land use on the project site (which consists of the 3 northernmost properties) should take the future development of the other 9 properties to the south into consideration to the extent possible. At time of Site Review, if possible, it would be helpful to explore a more comprehensive development plan for the entire office park, which could be a future phase or any desired land use changes that would promote a more holistic plan for the entire site while providing flexibility for the site to adapt over time. Implementing these changes now may be a more efficient way of addressing the future use of the entire Riverbend Office Park, rather than having to come back with future incremental applications. Staff recognizes that the site is not currently held in common ownership and that the future desired use of the office park may not be known at this time.

Overall, if the rezoning and land use map change are approved and the project moves forward, staff finds that the proposed hospital use would be largely consistent with the “P” Land Use Designation for the site, as well as with many of the broader policy goals contained in the BVCP. In addition to the meeting many of the general goals found in Chapter 5, “Economy” and Chapter 8, “Community Well-Being,” particularly those related to quality of life and provision of services to populations with special needs, some additional BVCP policies with which the current Concept Plan proposal appears consistent include:

BVCP Policy	Excerpt from BVCP	How the Proposal is <u>Consistent</u> with BVCP Policies
1.03 Principles of Economic Sustainability 1.04 Principles of Social Sustainability	1.03 – “... strive to develop and maintain a healthy, adaptable economy that is vital to the community’s quality of life and high level of services...” 1.04 – “...strive to promote a healthy community and address social and cultural inequities by...ensuring the basic health and safety needs of all residents are met...” .	The project represents a needed expansion of a vital community health institution. The relocation of facilities from the North Broadway BCH campus to the Foothills campus has created a need for additional facilities in close proximity to the Foothills campus. A BVCP land use change and rezoning appear to be the most logical path forward to accommodate the proposed development. Better enabling a concentration of BCH-related uses near the Foothills campus will help ensure the community’s basic health needs are being met, and continued high quality of life.
2.03 Compact Development Pattern	“...ensure that development will take place in an orderly fashion, take advantage of existing urban services, and avoid, insofar as possible, patterns of leapfrog, noncontiguous, scattered development...”	The request will enable a concentration of BCH-related land uses for a more contiguous development pattern near the Foothills campus. Without enabling this concentration of land uses, BCH-related uses (e.g., medical offices) may, over time, locate in a more disconnected, spread out pattern from the Foothills campus.

BVCP Policy	Excerpt from BVCP	How the Proposal is <u>Consistent</u> with BVCP Policies
2.17 Variety of Activity Centers	<p>“... support a variety of regional, subcommunity and neighborhood activity centers where people congregate for a variety of activities such as working, shopping, going to school or day care, accessing human services...”</p> <p>“Good multimodal connections to and from activity centers and accessibility for people of all ages and abilities will be encouraged”</p>	<p>Enabling a concentration of BCH related land uses near the Foothills campus supports BVCP goals and policies around accessibility to activity centers. East Arapahoe is a multimodal corridor, with an active transportation planning project underway (see comments below under BVCP policies in Chapter 6). Many land uses typically ancillary to a hospital decide to locate there due to numerous trips back and forth to the hospital (e.g., doctor rounds, referrals, etc.). Enabling a better concentration of these uses will also support a reduction in vehicle miles traveled.</p>
2.21 Commitment to a Walkable and Accessible City	<p>“promote the development of a walkable and accessible city by designing neighborhoods and business areas to provide easy and safe access by foot to places such as neighborhood centers, community facilities, transit stops or centers, and shared public spaces and amenities”</p>	
2.22 Improve Mobility Grid	<p>“The walkability, bikeability and transit access should be improved in parts of the city that need better connectivity and mobility, for example, in East Boulder. This should be achieved by coordinating and integrating land use and transportation planning and will occur through both public investment and private development.”</p>	
6.01 All-Mode Transportation System 6.02 Reduction of Single Occupancy Auto Trips 6.05 Accessibility 6.06 Mobility Services	6.01 – “safe and convenient connections between modes” 6.02 – “support greater use of alternatives to single occupancy automobile travel” 6.05 – “develop a complete all-mode transportation system that accommodates all users, including people with mobility Impairments, as well as youth, older adults and low income persons” 6.06 – “increase their support for mobility services for older adults and people with disabilities to reflect the expected increases in these populations”	<p>The East Arapahoe Transportation Plan project is currently underway. The Plan’s purpose is to “address existing and future transportation needs in the East Arapahoe Corridor, including local and regional travel, and facilitate safe travel and access by people using all modes—walk, bike, transit, and auto”.</p> <p>The Plan’s conceptual design alternatives include enhanced multimodal facilities that would integrate well with an intensification of the Foothills campus for BCH-related uses. The section of East Arapahoe in front of the Riverbend Office Park and Foothills campus is getting particular attention in assessing opportunities to integrate land use and transportation planning.</p>
6.09 Integration with Land Use	<p>In multimodal transportation corridors, “develop a highly connected and continuous transportation system for all modes identify locations for mixed use and higher density development integrated with transportation functions through appropriate design”</p>	
8.01 Providing for a Broad Spectrum of Human Needs	<p>“develop and maintain human service programs that provide for the broad spectrum of human needs”</p>	<p>BCH is a vital community institution with a need to expand its Foothills campus operations and concentrated BCH-related activities in one area. A BVCP land use amendment and</p>

BVCP Policy	Excerpt from BVCP	How the Proposal is <u>Consistent</u> with BVCP Policies
8.07 Physical Health	“strive to ensure that this community continues to be a leader in promoting physical health and welfare of community members”	zoning change supports related health policies in BVCP Chapter 8.
8.10 Support for Community Facilities	“recognize the importance of educational, health and non-profit community agencies that provide vital services to the residents of the Boulder Valley and will work collaboratively with these agencies to reasonably accommodate their facility needs and consider location based on transportation accessibility	

There are also several BVCP Policies that apply to the project which will require additional information at the time of Site Review in order for staff to determine consistency. Policies which should be given special consideration as the project moves forward include:

- BVCP Policy 2.30, Sensitive Infill and Redevelopment;
- BVCP Policy 2.34, Importance of Street Trees and Streetscapes;
- BVCP Policy 2.35 Outdoor Lighting/Light Pollution
- BVCP Policy 6.08 Transportation Impact

East Arapahoe Transportation Plan. The city is also working on land use and transportation projects in the area that the applicant should be aware of and the city would welcome BCH’s participation in. First is the East Arapahoe Transportation Plan. The city’s transportation staff has preliminarily identified the Arapahoe street section in front of Boulder Community Health, Foothills campus as a focus area for more detailed analysis as part of a larger plan for multimodal improvements along the corridor. The city is also currently assessing policy and regulatory changes to better accommodate ancillary land uses and redevelopment near the foothills campus but does not have a detailed scope and schedule yet. More information about the project can be found here: <https://bouldercolorado.gov/goboulder/east-arapahoe-transportation-plan>

Height Modification. On March 31, 2015, City Council approved a height ordinance that establishes a two-year period during which modifications to the by-right height for new buildings will only be considered through the Site Review process in specific parts of the city or in particular circumstances. As the applicant is aware, the project site is not included in the list of exempted areas; therefore, a request to exceed the 35 foot height limit for the zone district would require a new ordinance by council. Clearly, whether the proposed project should be granted a de facto exemption from the height ordinance is a significant policy consideration that warrants further discussion as the project plans progress.

(3) Applicable criteria, review procedures, and submission requirements for a site review;

As stated above, a Site Review application would be required and would be subject to all the criteria in Section 9-2-14(h) of the Land Use Regulations. Submission requirements would be the same as any other Site Review and would have to satisfy the requirements of sections 9-2-6 and 9-2-14(d). Development of the site would also have to be found consistent with the Design and Construction Standards (DCS).

Applications for Site Review are submitted to the Planning and Development Services Center and are reviewed through the Land Use Review process. This review process takes approximately three to four months to complete. Site Review approvals are valid for three years, after which they expire if they have not been implemented. Ultimately, if the project is designed to include a height modification request, a public hearing and recommendation by the Planning Board followed by approval of an ordinance by City Council would be required.

(4) Permits that may need to be obtained and processes that may need to be completed prior to, concurrent with, or subsequent to site review approval;

In addition to the required Concept Plan and Site Review, the applicant will be required to complete the following processes:

- Rezoning/ Land Use Map Change – to rezone the property from BT-2 to P and change the BVCP land use designation for the site from Transitional Business to Public. These processes may be run concurrently and follow the standard land use review process. A rezoning requires a recommendation by the Planning Board followed by approval of an ordinance by City Council.
- Subdivision – a subdivision is required in order to consolidate the three existing properties into one property to allow for the proposed development. The subdivision process follows the standard land use review process and is a staff-level subject to call-up by the Planning Board. A subdivision must be completed prior to approval of a building permit application.
- Ordinance – to request a height modification to allow for the proposed building to exceed the 35 foot height limit for the BT-2 zone. The ordinance does not have a separate review process and must be requested through the Site Review process. Approval of an ordinance requires a recommendation by Planning Board followed by two readings at City Council.
- Technical Document Review – following Site Review and Rezoning approval, if approved, the applicant is required to submit an application for Technical Document (TEC doc) Review prior to application for building permit. The intent in the TEC doc review is to ensure that technical details are resolved such as drainage and transportation issues that may require supplemental analyses.

(5) Opportunities and constraints in relation to the transportation system, including, without limitation, access, linkage, signalization, signage, and circulation, existing transportation system capacity problems serving the requirements of the transportation master plan, possible trail links, and the possible need for a traffic or transportation study;

Please see comments under “Access/ Circulation” above. Staff has identified several issues with the project’s access and circulation as proposed. Staff has also identified additional documentation that will be required in order to evaluate the proposed project’s transportation impacts. Additional information on the proposed parking structure and how it will fit into the broader parking plan for the existing hospital will be required.

(6) Environmental opportunities and constraints including, without limitation, the identification of wetlands, important view corridors, floodplains and other natural hazards, wildlife corridors, endangered and protected species and habitats, the need for further biological inventories of the site and at what point in the process the information will be necessary;

The site is impacted by the 100-year floodplain, and as such a floodplain development permit will be required for all development within the 100-year floodplain. Please see staff comments under “Flood” above for additional information.

As mentioned above, there are numerous healthy, mature trees located on the site. These will need to be taken into consideration as project plans move forward. Please see staff comments under “Landscaping” above for additional considerations.

(7) Appropriate ranges of land uses; and

Given the project site’s proximity to the existing Boulder Community Hospital Foothills Campus as well as the hospital’s need to relocate existing facilities from the Broadway campus, staff acknowledges the project site as an appropriate location for the proposed hospital use. As mentioned above, the applicant will be required to complete a rezoning and BVCP land use map change in order to allow for the proposed use. During these processes, the applicant will be responsible for demonstrating that the proposed rezoning and land use map change meet the applicable review criteria. The proposed rezoning and land use map change should also include a discussion of the existing and proposed uses located on

the site as well as a discussion of surrounding uses in order to determine the appropriateness of the range of land uses proposed.

Additional information on the proposed accessory uses and parking garage will be required at time of Site Review. It should be noted that retail uses as a principal use are prohibited in the P zoning district, and that the uses will need to meet the definition of "Accessory Use" found in section 9-16 of the Boulder Revised Code in order to be approvable. In addition, detailed information on the proposed parking garage will be required in order to determine whether it may be considered a second principal use. It should be noted that a parking garage as a principal use is only allowed in the P zone district pursuant to a Use Review approval.

(8) The appropriateness of or necessity for housing.

Not applicable, as no new housing is proposed as part of this development.