

CITY OF BOULDER
JOINT MEETING
CITY COUNCIL and PLANNING BOARD
Municipal Building, 1777 Broadway
Boulder, Colorado 80302
Thursday, October 13, 2016
6 p.m.

AGENDA

1. CALL TO ORDER AND ROLL CALL

2. PUBLIC HEARING

- A. City Council and Planning Board public hearing to consider public requests for land use map changes as part of the Major Update to the Boulder Valley Comprehensive Plan**

3. ADJOURNMENT

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**JOINT MEETING OF
CITY COUNCIL and
PLANNING BOARD**

MEETING DATE: October 13, 2016

AGENDA TITLE: City Council and Planning Board public hearing to consider public requests for land use map changes as part of the Major Update to the Boulder Valley Comprehensive Plan.

REQUESTING STAFF:

David Driskell, Executive Director, Planning, Housing + Sustainability (PH+S)
Susan Richstone, Deputy Director for Planning (PH+S)
Lesli Ellis, Comprehensive Planning Manager (PH+S)
Jay Sugnet, Senior Planner (PH+S)
Jean Gatza, Senior Planner (PH+S)
Caitlin Zacharias, Planner I (PH+S)
Sung Han, Planning Tech (PH+S)
Dale Case, Land Use Director, Boulder County
Nicole Wobus, Long Range Planning and Policy Manager, Boulder County Land Use
Pete Fogg, Senior Planner, Boulder County Land Use
Steven Giang, Planner I, Boulder County Land Use

EXECUTIVE SUMMARY

The purpose of this item is for the City Council and Planning Board to hold a public hearing on public requests for changes to the Boulder Valley Comprehensive Plan (BVCP) Land Use and Area maps.

A series of hearings and meetings scheduled for Aug. 30 through Dec. 13 focus on Area II requested map changes that require approval by all four bodies (City Council, Planning Board, Board of County Commissioners and Planning Commission) and Area I requested map changes that require approval of the two city bodies.



Staff is proposing that the **Oct. 13 public hearing** focus on the four Area I map changes (i.e., Naropa, 385 Broadway, Mt. Calvary Church, and Table Mesa Shopping Center). Planning Board would then deliberate and vote on Oct. 13 and City Council would deliberate and vote on Nov. 1. Staff is proposing to continue the hearing to Nov. 10, due to the large volume of public testimony anticipated for all the requests and especially for the Twin Lakes property.

The **Nov. 10 continued public hearing** would focus on the two map changes (i.e., Twin Lakes Rd. and 3rd St.) that require approval by four bodies and for which the county has already taken action. Planning Board would deliberate and vote on Nov. 10 and City Council would deliberate and vote on Dec. 13.

The Boulder Valley Comprehensive Plan, jointly adopted by the city and county and updated at least every five years, guides development and preservation in the Boulder Valley. The BVCP articulates a vision for the future and details policies that represent long-standing

community values. The Land Use and Area I, II, III Maps define the desired land use pattern. The public map change request process is one track within the much larger BVCP update that has four phases as described below. Each phase entails extensive community dialogue and engagement. The webpage for the project, www.BoulderValleyCompPlan.net, includes the full project schedule and a link to the 2010 plan and maps.

At the public hearing on Oct. 13, staff also will provide an update on the overall BVCP process, share a draft of the BVCP second survey that will be deployed later in October and ask for feedback.

STAFF RECOMMENDATION

Suggested Motion Language:

Staff requests City Council and Planning Board consideration of this matter and action in the form of the following motions: (Planning Board is scheduled to take action on Oct. 13 on A-D and Nov. 10 on E-F, City Council is scheduled to take action on Nov. 1 on A-D and Dec. 13. on E-F)

For Area I properties that require two-body review

A motion to approve the following Land Use Map changes to the Boulder Valley Comprehensive Plan as shown and described in **Attachments A, B, C and D:**

- A. 2130 and 6287 Arapahoe (Request #1): Change to Public
- B. 385 Broadway (Request #3): Change to Low Density Residential
- C. 0, 693, 695 Broadway (Request #12): No change
- D. 3485 Stanford Ct. (Request #13): Change to Medium Density Residential

For Area II properties that require four-body review

A motion to approve the following Land Use Map changes to the Boulder Valley Comprehensive Plan as shown and described in **Attachments E and F:**

- E. 3261 3rd St. (Request #25): Change to Low Density Residential and Open Space – Other
- F. 6655 and 6500 Twin Lakes Rd. and 0 Kalua Rd. (Requests #35 and #36): Change to Medium Density Residential and Environmental Preservation.

Motion to approve the following Area I, II, III Map change to the Boulder Valley Comprehensive Plan as shown and described in **Attachments E:**

- E. 3261 3rd St. (Request #25): Change to Area II for a portion of the site.

COMMUNITY SUSTAINABILITY ASSESSMENTS AND IMPACTS

The Boulder Valley Comprehensive Plan is the overarching policy document that guides sustainability efforts. Through the Comprehensive Plan policies and maps, the overall goal and intent of community sustainability is established.

- **Economic:** The BVCP land use and Area I, II, III maps guide city decisions relative to annexation and zoning. Therefore, although the map changes do not have direct

economic impacts, they provide the policy guidance for future zoning and development decisions that may affect property values and economic development opportunities. Additionally, revisions to the economic vitality policies of the plan are proposed to strengthen current programs.

- **Environmental:** The BVCP articulates the environmental goals and policies that guide city decision making. Specific to this update, analysis of potential land use map changes provides information on the potential environmental implications of each request where relevant. Additionally, refinement of existing policies related to environmental sustainability will help ensure that the BVCP reflects recent policy initiatives such as the city's Climate Action Plan.
- **Social:** The BVCP provides policy guidance for creating a healthy and inclusive community, and includes policies implemented through the city's social sustainability strategic plan. Specific to this update, revisions are proposed to strengthen the importance of city policies and programs for community health and livability and address the needs of the entire community.

OTHER IMPACTS

- **Fiscal:** BVCP changes are legislative actions and do not have regulatory impacts on properties. However, several of the requests for land use changes or service area boundary changes could result in rezoning requests or annexation requests, which if approved and developed/redeveloped could generate additional tax revenue for the city.
- **Staff time:** The staff time involved in the major update to the BVCP is an anticipated part of the work program.

PUBLIC FEEDBACK ON PUBLIC REQUESTS

The city and county have asked for public feedback on these map change requests and analysis during this phase of work since August and have received a lot of other feedback via email, letters, and phone calls.

- On Aug. 8 and Sept. 26 staff held open houses for the parcels with land use change requests.
- Notice of the open houses was sent to property owners within 600 feet of the subject property and a notice was published in the Daily Camera.
- There was also a facilitated discussion specific to the Twin Lakes requests documented by Peak Facilitation (see below for more detail).
- Comments received at the open houses are documented in the staff report for each request. A large volume of community input was received throughout the BVCP process and documented in the City Council and County Commission proceedings. Public comments related to the Area II land use change requests, in the form of emails received in the summer and fall of 2016, are available on the county's website¹. The full public feedback on phases 1-2 can be found on the plan website at www.BoulderValleyCompPlan.net.

¹ <http://www.bouldercounty.org/property/build/pages/lubvcp150001.aspx#PublicComment>

BACKGROUND

Overall Plan Update

The Boulder Valley Comprehensive Plan, jointly adopted by the city and county, guides development and preservation in the Boulder Valley. The BVCP articulates a vision for the future and details policies that represent long-standing community values. The Land Use and Area I, II, III Maps define the desired land use pattern. The five-year major update is an opportunity to amend the plan to address changes in circumstances and community desires. The public map change request process is one track within the larger BVCP update that has four phases:

Phase 1—Foundations and Community Engagement Plan (completed)

Phase 2—Issues Scoping with Community (completed)

Phase 3—Analyze and Update Plan Policies and Maps (ongoing through early 2017)

Phase 4—Prepare Draft Plan for Adoption, Extend IGA (early 2017)

Each phase has entailed and continues to have extensive community dialogue and engagement. The webpage for the project, www.BoulderValleyCompPlan.net includes the full project schedule and a link to the 2010 plan and maps.

Public Request Process

In October 2015, the city and county received 38 public requests to change either the BVCP land use designation or the Area II/III boundary on individual properties as part of the Boulder Valley Comprehensive Plan update (“map-based change requests”). In late 2015 through March 2016, the four applicable bodies decided to advance ten of these requests for further study plus three policies. Two of the requestors have withdrawn their requests leaving eight current requests (listed below). The decision to advance these requests was based on a variety of factors, including whether or not any changed circumstances warranted the proposal’s consideration with this BVCP Major Update.

Process

Pursuant to BVCP amendment procedures, some of the remaining requests require city (two body) approval and others require both city and county (four body) approval.

List of BVCP Change Requests Approved for Further Study

Two Body Requests <i>Requires action by city agencies</i>		
1	Naropa (two locations)	2130 Arapahoe Ave.: High Density Residential (HR) to Public (PUB); 6287 Arapahoe Ave.: Community Industrial (CI) to Community Business (CB)
3	385 Broadway	Transitional Business (TB) to Low Density Residential (LR)
12	0, 693, 695 Broadway (Table Mesa Shopping Center)	Medium Density Residential (MR) to Community Business (CB)
13	3485 Stanford Court	Low Density Residential (LR) to Medium Density Residential (MR)
Four Body Requests <i>Requires action by both city and county agencies</i>		
25	3261 3rd Street	Area III to Area II to enable future annexation request
35	6655 and 6500 Twin Lakes, 0 Kalua Road	Low Density Residential (LR) and Public (PUB) to Mixed Density Residential (MXR)
36	6655 and 6500 Twin Lakes, 0 Kalua Road	Low Density Residential (LR) and Public (PUB) to Open Space (OS) with Natural Ecosystems or Environmental Preservation designation
Request #10 - 4801, 4855, 4865, 4885, & 4895 Riverbend Rd., Request #26 - 3000 N. 63rd St. & 6650 Valmont Rd., and Request #29 - 2801 Jay Road were withdrawn to pursue different processes.		

Twin Lakes Facilitated Stakeholder Discussions (Requests #35, #36)

In March 2016, the city and county agreed to hold facilitated discussions addressing BVCP change requests #35 and #36 as part of the BVCP Major Update. The stakeholder group met 7 times in the spring and early summer to inform the decision making timeline for the land use change requests. More information is available in **Attachment F** and on the city webpage <https://bouldercolorado.gov/bvcp/twin-lakes>.

Distinction between BVCP Land Use Map Changes and Development Review Processes

Site-specific issues are discussed in individual reports, but it is important to distinguish between what is analyzed as part of the BVCP map-based land use change request process versus the subsequent development review processes. Typically, the more technical details are analyzed and addressed with a specific development proposal at the time of site review with costs borne by the developer. Many of the common issues cited by community members in response to the land use change requests require a specific proposal for the city and community to review and evaluate based on specific annexation and/or site review criteria or other code criteria.

It also is important to note that a land use designation is a *policy level designation*. The intention is to provide a generalized picture of desired future uses and development that guides city council and planning board when a property is zoned. Residential land use designations provide a range of density (number of allowed units per acre) that might be appropriate and do not guarantee the upper range of intensity for any particular property. Rather, the City of Boulder's zoning map assigns each property a zoning district which regulates allowable number of units as well as uses, setbacks, height, etc. Neither land use designations nor zoning are conditioned on a specific development proposal.

It is at the time of site review (for larger properties) or building permit (for smaller properties or developments) that a specific development proposal is evaluated and more technical details are analyzed. In the Site Review process, a project is reviewed for, among other things, compatibility of building height, mass, scale, orientation, architecture and configuration with the existing character of the area or the character established by adopted design guidelines or area plans for the area.

For properties not yet annexed, annexation proposals are often associated with a specific development proposal. When annexation of a property is being considered, City Council can tie the annexation to a specific development proposal and can determine appropriate zoning, restrict the allowed number of units, and impose other requirements such as on-site affordable housing.

For properties located within the city limits, a specific development proposal is reviewed pursuant to the applicable review criteria and if the criteria are not met, the application is either denied or approved with specific conditions that will bring the development in compliance with the applicable review criteria.

Many of these city processes include a public hearing before the Planning Board and City Council. Below are the basic steps of the development review process for larger developments and associated public hearings before the city's Planning Board and Council.

City Development Review Process

1. Pre-application Meeting
2. Concept Plan (*public hearing*)
3. Annexation / Initial Zoning (for Area II properties) (*public hearing*)
4. Site Review (*public hearing*)
5. Technical Document Review (subdivision and site construction drawings)
6. Building Permit
7. Certificate of Occupancy

A more detailed overview is provided [here](#).²

ANALYSIS

The city and county staff worked together to prepare the analyses for the public requests to support policy decisions by elected officials. Staff's approach to analyzing public requests for map based changes is consistent with previous BVCP Major Updates (e.g., 2010, 2005) while reflecting priorities identified during this major update by the community and leaders (e.g., achieving diverse and affordable housing, furthering climate action goals, improving jobs and housing balance). In some cases, analysis is more extensive. Each request has been analyzed based on the overall intent and core values of the BVCP, with specific analysis included depending on individual property unique conditions or community concerns. Individual property reports cite the relevant core values, prior and ongoing community input, history, and other factors as part of the analysis, with the primary focus for most requests being on BVCP Core Values and associated policies.

Consistent with previous BVCP Major Updates, the staff analysis involves assembling and analyzing available data to determine whether existing information would preclude the type of land use associated with a particular change request. Staff analysis does not involve conducting new studies. As noted, detailed studies of issues such as traffic, hydrology and wildlife impacts would inform decision making that occurs later, during the Site Review phase of development.

The role of the comprehensive plan is to provide policy guidance to attain Boulder Valley's future goals and address many topics of importance and need to the entire community; therefore, some policies seemingly compete with each other, and can be cited in support of or against a proposal. The final decision should be consistent, on balance, with the policies and goals of the BVCP. It should not be a weighting, zero sum analysis, or scorekeeping exercise. Therefore, staff gave consideration to different change requests on balance with the overall intent of the plan, unique property context and issues, and concerns and policies highlighted by the public. Ultimately, staff used professional judgment and precedent to guide the evaluation in support of policy decisions by elected and appointed officials.

Changes to the Land Use Map and Area I, II, III Map

The BVCP Land Use and Area I, II, III Maps define the desired future land use pattern for the Boulder Valley regarding location, type and intensity of development. Land use

² https://www-static.bouldercolorado.gov/docs/BVCP_Twin_Lakes_stakeholders_Meeting_1_material-1-201604221522.pdf

designations provide a generalized picture of desired future uses in the Boulder Valley and guide zoning decisions. The Area I, II, III Map delineates the following three major areas within the Boulder Valley Planning Area:

- Area I is that area within the City of Boulder which has adequate urban facilities and services and is expected to continue to accommodate urban development.
- Area II is the area now under county jurisdiction where annexation to the city can be considered consistent with plan policies. New urban development may only occur coincident with the availability of adequate facilities and services.
- Area III is the remaining area in the Boulder Valley, generally under county jurisdiction. Area III is divided into the Area III-Rural Preservation Area, where the city and county intend to preserve existing rural land uses and character and the Area III-Planning Reserve Area, where the city and county intend to maintain the option of future Service Area expansion.

Staff analyzed land use map changes that will undergo review by both city and county decision making bodies. A brief summary of staff recommendations is presented below and the full reports are attached to this memo.

Staff Recommended Map Changes:

2131 and 6287 Arapahoe Ave. (#1)	Change to Public for both parcels – This recommendation recognizes Naropa University as an important public institution. (See Attachment A)
385 Broadway (#3)	Change to Low Density Residential – This recommendation acknowledges the potential loss of existing access through the NIST property and neighborhood’s expressed compatibility concerns. (See Attachment B)
0, 693, 695 Broadway (#12)	No change – This recommendation ensures that potential neighborhood impacts from future use changes in the shopping center are addressed. (See Attachment C)
3485 Stanford Ct. (#13)	Change to Medium Density Residential – This recommendation provides for a greater diversity of housing types and price ranges in the community with a potential benefit for seniors in particular. (See Attachment D)
3261 3rd St. (#25)	Change to Low Density Residential and Open Space – Other Change to Area II – This recommendation creates a more logical service area boundary while ensuring compatible redevelopment for the single-family home site. (See Attachment E)
6655 and 6500 Twin Lakes Rd. and 0 Kalua Rd. (#35 and #36)	Change to Medium Density Residential and Environmental Preservation – This recommendation addresses the need for greater diversity of housing types and price ranges in the community while protecting important natural resources from development as identified by neighborhoods and stakeholder process, as well as a number of other issues as identified in Attachment F.

COUNTY ACTION ON 4-BODY REQUESTS

On Sept. 21, the County Planning Commission approved the staff recommended land use changes. For Twin Lakes, the Planning Commission included the following language, “We recommend that future bodies ensure that the Guiding Principles that were developed in the stakeholder process [Twin Lakes Stakeholder Group] are honored and that future development of the property, in particular, ensure that wildlife values and appropriate corridors are established.” A meeting summary is available [here](#)³.

On Sept. 27, the Board of County Commissions also approved the staff recommended land use changes with the same recommended guiding principles language for Twin Lakes. A meeting summary is available [here](#)⁴. The day prior to the hearing, the requestor for #29, Jay Rd., withdrew their request for consideration. The requester stated that there was no need for a parallel process, as an application to the city for annexation, rezoning and site review was submitted to the city on Sept. 17. Below is a high level summary of the issues discussed by both Planning Commission and the Board of County Commissioners:

3rd Street

- **Density** – supportive of the staff recommendation because it would not result in additional housing units on the site.
- **Blue Line amendments** – recognition that a comprehensive review of potential changes in Area II / III mapping would take place for this and about a dozen other properties, if a November ballot measure to shift the Blue Line is approved.

Twin Lakes Road

- **Stakeholder group process** – appreciation for the work that produced the Twin Lakes Stakeholder Group Guiding Principles and for BCHA and BVSD’s continued commitment to adhere to those principles.
- **Significance of the Area II designation** – discussion of how these lands are intended for annexation and potential future development, as determined through planning and agreements between the city and the county. The overall purpose of the Area I, II, and III Map is to achieve a compact development pattern in the city while protecting the rural character and uses in Area III.
- **School parcel dedication** – legal analysis found nothing to preclude approval of the land use designation.
- **Housing exclusive to BVSD** – regarding whether housing could serve only BVSD employees, other districts have successfully implemented such programs. Having a broad base of employment ensures the restriction does not violate fair housing laws.
- **Cash-in-lieu** – city staff noted that cash-in-lieu is not an option for land that is annexed into the city. Annexation is voluntary and avoids the state prohibition on rent-control.
- **Owls and wildlife** – the nesting owls are located northeast of the BCHA parcel, between the Twin Lakes trail and the neighborhood located to the south. Staff has

³ <http://www.bouldercounty.org/doc/landuse/bvcp150001staffrec20160927.pdf>

⁴ <http://www.bouldercounty.org/doc/landuse/bvcp150001boce20160927.pdf>

monitored the owls for the last eight years and has a program to educate the public about the owls. The owls have successfully fledged in close proximity to the heavily traveled trail and nearby residential development for many years. Great horned owls are urban-adapted, and there is a healthy population in the county of approximately 80 known nests. Although not on the county's list of Species of Special Concern, they are migratory birds and any potential development would need to proceed in compliance with provisions of the Migratory Bird Treaty Act (e.g., timing of construction to avoid impacts, etc.). Other species present on the parcels are urban adapted as well. Furthermore, the vegetation on the parcels is non-native and therefore does not support a large diversity of animals and plants. Animals do make use of the trails on the property, but there is also land serving as a wildlife corridor to the north, and other areas serve as wildlife corridors in close proximity to the parcels.

- **Wildlife connections** – Planning Commission discussed a north/south connection through the site at length. Some expressed a desire to see a connection established with a land use designation while others believed that it is more appropriately addressed during site planning phase of development to determine an appropriate width and location. Both bodies' decisions defer those details to the Site Review stage of the development process.
- **Affordable housing** – affordable housing was discussed as a county-wide and national issue that warrants a regional approach to identifying solutions in Boulder County. There is limited availability of land for developing affordable housing in the valley and the region must introduce new permanently affordable housing and supportive housing where possible. There was recognition that BCHA has a great track record for building successful projects and that these sites provide a unique opportunity to partner with the school district to create affordable places for teachers and district employees.
- **Process** – appreciation for the time and effort to have a community dialogue around these requests, from the Twin Lakes Stakeholder Group to the lengthy county hearings and deliberations. Decision makers heard and understood the concerns expressed by the neighbors, especially around the issues of density, compatibility and the need for wildlife corridors. Many decision makers expressed the importance of maintaining a 30,000-foot view in decision making related to the land use designation change requests and the importance of balancing the values and core principles of the BVCP.

County and city staff prepared a memo to provide clarification on a wide range of issues that were raised during the Aug. 30 public hearing specific to the Area II requests (**Attachment G**). In addition, a [memo](#)⁵ was prepared to address specific legal issues that were raised by both decision makers and the public during the county hearing.

NEXT STEPS

- Nov. 1 – **City Council Agenda Item** on Area I requests (public hearing closes on Oct. 13).

⁵ <http://www.bouldercounty.org/doc/landuse/bvcp150001memolegalissues20160926.pdf>

- Nov. 10 – **Continuation of Joint Public Hearing** with Planning Board and City Council on Area II requests (#25, #35 and #36).
- Dec. 13 – **City Council Agenda Item** (public hearing closes on Nov. 10) – Decision on the land use requests (after Planning Board decision on Nov. 10).
- January 2017 – **Joint Study Session of City Council and Planning Board** to review scenarios, analysis, community engagement results from fall, survey results, and CU South.
- Spring 2017 – **City Council Study Session** to review the Draft Plan and Focus Areas.

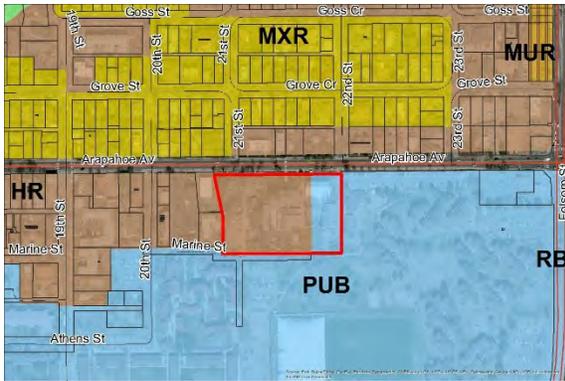
ATTACHMENTS

- A. 2130 and 6287 Arapahoe Ave. (Request #1) Staff Report
- B. 385 Broadway (Request #3) Staff Report
- C. 0, 693, 695 Broadway (Request #12) Staff Report
- D. 3485 Stanford Ct. (Request #13) Staff Report
- E. 3261 3rd St. (Request #25) Staff Report
- F. 6655 and 6500 Twin Lakes Rd. and 0 Kalua Rd. (Requests #35 and #36) Staff Report
- G. County Clarification Memo

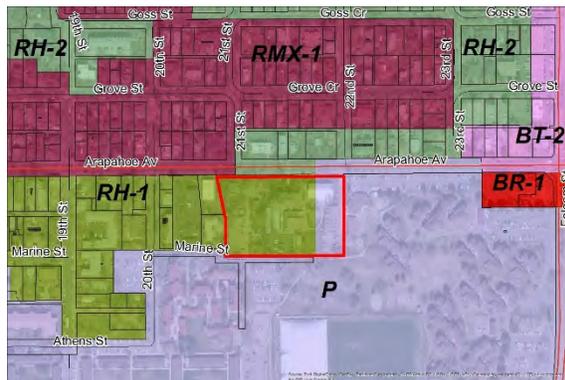
Requests #1a

2130 Arapahoe Ave.

Existing BVCP Land Use Map



Existing Zoning Map



Site Photos



Looking south toward the Lincoln School Building



Looking south toward Wulsin Hall

Request Summary for 2130 Arapahoe Ave.

- Requester: Naropa University
- Type of Request: Land use map change
- Brief Description of Request: High Density Residential (HR) to Public (PUB)
- Approval Required: Two body

Existing Conditions

- BVCP Designation: High Density Residential (HR)
- Zoning: Residential High 1 (RH-1), Public (P)
- Lot Size: 156,087 sq. ft. (3.6 acres)
- Existing Buildings: Approximately 59,527 sq. ft. of university facilities

Jobs and Housing Assumptions

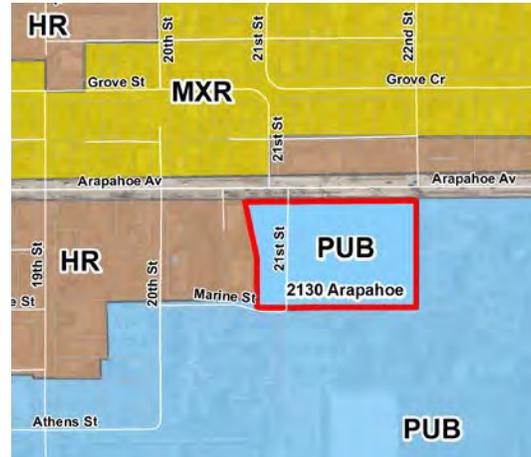
- Current Estimated Dwelling Units: 30-35 with HR designation
- Current Estimated Jobs: n/a with HR designation
- Future Estimated Dwelling Units: n/a
- Future Estimated Jobs: n/a

STAFF RECOMMENDATION FOR REQUESTS #1

Staff is recommending changing the current land use designation from **High Density Residential** to **Public** for the following reasons:

- The Public designation is consistent with the current and intended uses at the site, high density residential is not.
- Acknowledging Naropa University as a Public use is consistent, on balance, with the BVCP.
- The location is compatible with surrounding designations and uses. The University of Colorado (also designated as Public) borders to the east and south while mixed and high density residential borders to the north and west.
- Although the land use designation does not relieve the requestor from the requirements of the Planning Unit Development and Special Review of 1988, the change clarifies policy intent for future zoning implementation.

Recommended Land Use Designation



OVERVIEW

Staff analyzed High Density Residential (existing) and Public (Request #1b) as alternatives.

SITE DESCRIPTION

2130 Arapahoe – Located in Central Boulder, the site contains the Arapahoe Campus for Naropa University, which is located south of Arapahoe Ave. The site is predominantly surrounded by the University of Colorado with Newton Court to the east, and the athletic field to the south. The site is currently made up of various university facilities and housing. To the west is a mix of commercial and residential buildings, and to north is the Goss-Grove neighborhood, where a mix of housing types exist.

Site History

Naropa University has operated on this campus since 1983 and purchased the site in 1986. The university applied and was approved of a Planned Unit Development (PUD) and Special Review in 1988. As a result, future development of the property is subject to the approved master plan for the site and if minor modifications or amendments to the site plan is desired in the future, Naropa must follow the city’s review process established in Section 9-2-14, B.R.C. 1981.

Since the approval of their PUD and Special Review, Naropa made multiple amendments throughout the years. In 1999, Naropa went through a site review process to request an expansion of their facilities, relocation of their buildings, and a parking reduction (UR-99-7 and SI-99-4). The request was a revision to their master plan for their Arapahoe Campus, which contains two properties owned by Naropa (2130 and 2111 Arapahoe Ave). Planning Board approved the request with minor conditions.

The master plan has had a few minor modifications since the 1999 approval (2000, 2001, 2008, and 2013). These minor amendments include relocation of buildings, connection of two buildings, and

addition of small classroom spaces. Future expansion of the existing buildings can continue to be accomplished through the minor modification administrative review process up to the approved 72,000 square feet (total building floor area after completing phase 1 and 2, which includes 2111 Arapahoe Ave., located directly north) and with a parking reduction not to exceed 46 percent. Any expansion that is in excess of the 72,000 square feet or 46 percent parking reduction would result in subsequent Use Review and Review amendment.

Today, the existing Arapahoe Campus is comprised roughly of 65,793 square feet, which is almost 7,000 square feet less than what was approved through the original Use Review and Site Review approvals.

Land Use Designations

The site's land use designation is composed of two different uses: High Density Residential (HR) and Public (PUB). A majority of the site is designated as High Density Residential with a small portion of the west designated as Public, which borders the University of Colorado. The BVCP defines High Density Residential designation as more than 14 units per acre and is associated with a variety of attached residential uses such as townhomes, duplexes, and apartments. Other uses associated with the High Density Residential designation include congregate facilities, dormitories, and boarding houses.

The public land use designation encompasses a wide range of public and private nonprofit uses that provide a community service. This category includes public and private schools and university in addition to municipal and public utility services such as the municipal airport, educational facilities, government laboratories and other nonprofit facilities such as churches, hospitals, retirement complexes, and may include other uses as allowed by zoning.

COMMUNITY INPUT

An open house was held on Sept. 26 in south Boulder that provided an opportunity for the community to review and comment on the draft staff recommendations. A postcard announcing the open house was sent to all property owners within 600 feet of the requested sites. Approximately 250 people attended, with a large number of attendees interested in the discussion of CU South. Public comments related to the two land use change requests for Naropa are provided in **Attachment A-1**. The four comments received at the open house were supportive of the recommended changes.

ANALYSIS

The analysis includes two BVCP land use options: High Density Residential (current), and Public (current and requested).

Compatibility with Surrounding Land Uses

The surrounding area is characterized primarily by residential and university development. The requested Public land use designation has continuity with the University of Colorado campus located to the east and south. CU's property comprises of graduate student and faculty housing, as well as an athletic field. The Goss-Grove Neighborhood to the north is zoned for mixed and high density residential, consisting of condominiums, multi-family units, and single-family homes. The requested land use reflects both the history of use on the property and the master plan for the site.

The BVCP defines the Public Land Use Designation as, “*public and private non-profit uses that provide a community service... Public/Semi-Public also includes: educational facilities, including public and private schools and the university*”. Naropa University has become an integral asset to the community, and continues to serve as an important educational resource for the community. As a result, staff recommends a designation of Public as it better aligns with the goals of the university and the long-term vision Naropa has for their Arapahoe Campus.

Availability of Services and Infrastructure

Transportation and Access to Services

The site is centrally located within the city with various services and amenities within walking distance. The Arapahoe campus is also well connected by high frequency transit lines including the Jump and the Hop. All Naropa University students and staff are provided an Eco Pass, which helps encourage non automobile modes of travel.

Water, Wastewater, and Sanitary Sewer

The site is connected to the city’s existing infrastructure including water, stormwater, and wastewater.

Hydrology, Wetlands and Floodplains

The entire property is within the 100-year flood plain, making the site highly vulnerable to flooding. The site does not contain wetlands. A drainage report was completed by Naropa as part of the master planning for the site in 2000. The report identified the drainage issues related to the first phase of development and how those issues will be addressed.

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies in this report. Staff also prepared a high level analysis of how the land use designations options are positive, negative, or neutral in relation to BVCP core values (see table below).

Overall, the recommendation is consistent with the BVCP core values and policies. Naropa is an important educational asset to the community and the proposed designation will help enable and support Naropa University as an educational institution (Policy 8.10 Support for Community Facilities).

Naropa University currently has a study body of approximately 1,100 students with an additional 250 students attending online. The university is growing and currently has facilities in three different locations (Arapahoe, Nalanda, and Paramita). The Arapahoe campus is largely built to capacity and the Paramita campus is temporary, therefore Naropa is working to consolidate campuses and focus future expansion at the Nalanda Campus. Applying the Public Land Use Designation to the Nalanda and Arapahoe campuses is consistent, on balance, with the policies and goals of the BVCP and is compatible with the surrounding land uses.

Summary of Analysis

The Public designation is consistent with the current and intended uses at the site, high density residential is not. Acknowledging Naropa University as a Public use is consistent, on balance, with the BVCP and the location is compatible with surrounding designations and uses. Although the land use designation does not relieve the requestor from the requirements of the Planning Unit Development

and Special Review of 1988, the change clarifies policy intent for future zoning implementation.

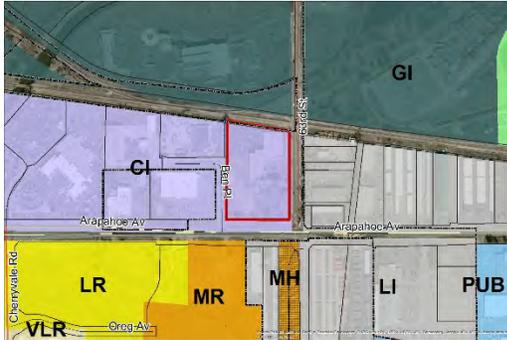
Below is a summary chart of the relevant BVCP Core Values related to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTIONS	
	High Density Residential (current)	Public (requested and recommended)
Sustainability as a unifying framework to meet environmental, economic and social goals	=	+
A welcoming and inclusive community	=	+
Culture of creativity and innovation	=	+
Our unique community identity and sense of place	=	=
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	+	+
Great neighborhoods and public spaces	=	+
Environmental stewardship and climate action	=	=
A vibrant economy based on Boulder's quality of life and economic strengths	=	+
A diversity of housing types and price ranges	+	=
An all-mode transportation system to make getting around without a car easy and accessible to everyone	=	=
+ positive, = neutral, -- negative		

Request #1b

6287 Arapahoe Ave.

Existing BVCP Land Use Map



Existing Zoning Map



Existing Planning Area Map



Request Summary for 6287 Arapahoe Ave.

- Requester: Naropa University
- Type of Request: Land use map change
- Brief Description of Request: Community Industrial (CI) to Community Business (CB)
- Approval Required: Two body

Existing Conditions

- BVCP Designation: Community Industrial (CI)
- Zoning: Industrial Service 1 (IS-1)
- Planning Area I
- Lot Size: 240,649 SF (5.52 acres)
- Existing Buildings: 2-story Naropa University Building (52,000 SF)

Jobs and Housing Assumptions

- Current Estimated Dwelling Units: n/a with CI designation
- Current Estimated Jobs: 170-190 with CI designation
- Future Estimated Dwelling Units: 60-70 with CB designation
- Future Estimated Jobs: 400-415 with CB designation

Site Photos



Looking west near the parking lot



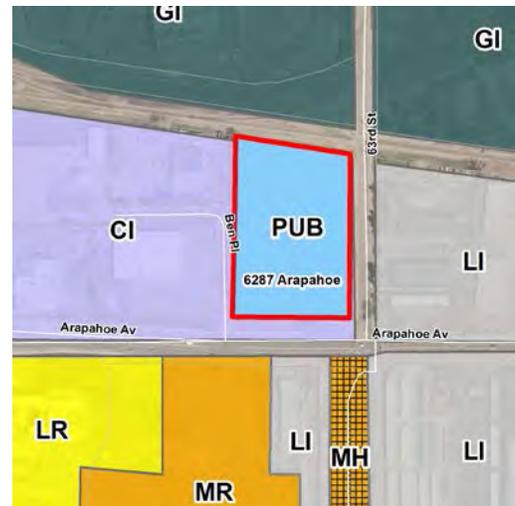
Looking north onto the existing building

STAFF RECOMMENDATION FOR REQUESTS #1b

Staff is recommending changing the current land use designation from **Community Industrial** to **Public** for the following reasons:

- The Public designation is consistent with the current and future desired campus-related uses at the site, industrial is not.
- Acknowledging Naropa University’s property as a Public use is consistent, on balance, with the BVCP.
- The location is compatible with surrounding designations and uses. The area is predominately industrial with some high, medium and low density residential.
- Although the land use designation does not relieve the requestor from the conditions established in their annexation agreement from 2003, the change provides clear policy guidance for future zoning implementation.

Recommended Land Use Designation



OVERVIEW

In addition to the land use request change to Community Business (Request #1b), staff analyzed Community Industrial (existing) and Public (recommended) as alternatives.

SITE DESCRIPTION

6287 Arapahoe – This site is located east on Arapahoe Ave. near the city limits. The site is

bounded by 63rd St. to the east, 62nd St. to the west, Arapahoe Ave. to the south and the rail road to the north. The site is accessed via 63rd St. and the building is located in the northeast corner of the parcel. A mix of Area I and II properties surround the site.

Site History

Originally located within Boulder County, the building was constructed in 1977, and served as a light industrial use. In 2002, the previous landowner (1675 Range, LLC) and Naropa University worked together to annex and develop the site for the university. The application for annexation and rezoning went to Planning Board, at which time the request was slightly modified. Council approved annexation and initial zoning of Industrial Service-1 (IS-1) due to the proximity to other industrial uses. Naropa University was granted special terms documented in an annexation agreement.

Provisions in the annexation agreement permit university uses and the University's associated accessory uses including retail, restaurant use and dormitory uses on this campus. Any student housing or dormitory in the future would require a site review process. The agreement also allowed Naropa to use the existing 52,000 square foot building. Site review would be required for any building area expansion beyond the existing building, if the seating capacity of any assembly area exceeds 500 spaces, or if the demand for parking requires more than 170 spaces. The approved ordinance can be found [here](#).

After the approval, Naropa then renovated the interior of the building to function as an educational facility. The most recent interior renovation to the site was approved in 2014, which remodeled 16,120 square feet of the existing building (PMT2014-01484).

Naropa University currently has a study body of approximately 1,100 students with an additional 250 students attending online. The university is growing and currently has facilities in three different locations (Arapahoe, Nalanda, and Paramita). The Arapahoe campus is largely built to capacity and the Paramita campus is temporary, therefore Naropa is working to consolidate campuses and focus future expansion at the Nalanda Campus.

Land Use Designations

The site's land use changed from Light Industrial to Community Industrial during the 1997 Major Update when the Community Industrial designation was first adopted. Community Industrial is defined in the BVCP as areas where the predominant uses provide a direct service to the planning area and often has an ancillary commercial activity. The uses often include smaller scale auto-related uses, small printing operations, building contractors, building supply warehouses, small manufacturing operations and similar uses.

COMMUNITY INPUT

An open house was held on Sept. 26 in south Boulder that provided an opportunity for the community to review and comment on the draft staff recommendations. A postcard announcing the open house was sent to all property owners within 600 feet of the requested sites. Approximately 250 people attended, with a large number of attendees interested in the discussion of CU South. Public comments related to the two land use change requests for Naropa are provided in **Attachment A-1**. The four comments received at the open house were supportive of

the recommended changes.

ANALYSIS

The analysis includes three BVCP land use options, including Community Industrial (current), and Community Business (requested) and Public (proposed).

Compatibility with Surrounding Land Uses

The surrounding area is primarily characterized by a mix of industrial uses and, across Arapahoe, single-family residential development. Located south of the site are primarily Area II properties. Directly adjacent to the site are auto repair shops, a roofing contractor, a ballroom, storage facilities, small manufacturing services (Schacht Spindle), large manufacturing services (Eco-Cycle, and Boulder County Recycling Center) and car dealerships.

Community Business, the land use designation requested by the applicant, is defined as the focal point for commercial activity, serving a subcommunity or a collection of neighborhoods. The purpose of this designation is to serve daily convenience shopping and service needs of local populations. Current shopping centers with a community business designation includes Table Mesa Shopping Center, Basemar, and Frasier Meadows Shopping Center. The surrounding area of the Nalanda Campus does not contain nor does it anticipate a high intensity of residential development, making Community Business incompatible with the surrounding development and inconsistent with the BVCP policies.

While the Community Business designation and its related zoning would allow for more intensity and uses for Naropa, the approval of the designation would not be consistent with the intended purpose behind a Community Business designation. Unintended consequences may also arise if the ownership of the property was to change in the future, having a potential change in use from university to retail.

The BVCP defines the Public Land Use Designation as, “*public and private non-profit uses that provide a community service... Public/Semi-Public also includes: educational facilities, including public and private schools and the university*”. Naropa University has become an integral asset to the community, and continues to serve as an important educational resource for the community. As a result, staff recommends a designation of Public as it better aligns with the goals of the university and the long-term vision Naropa has for their Nalanda Campus.

Access and Transportation

Currently, the site can only be accessed off 63rd St. and is bounded by railroads directly to the north, limiting and restricting future access to the site. Arapahoe Ave. a state highway, is also a heavily traveled corridor, serving as one of the main access roads in and out of the city. The Jump runs adjacent to the site along Arapahoe Ave., connecting the City of Boulder and Lafayette together. A future bus rapid transit system is also anticipated along Arapahoe Ave.

Availability of Services and Infrastructure

The site is connected to the city’s existing infrastructure including water, stormwater, and wastewater.

Hydrology, Wetlands and Floodplains

The property is not located within the floodplain, and does not contain wetlands. There are no known hydrological issues with the property.

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies in this report. Staff also prepared a high level analysis of how the land use designations options are positive, negative, or neutral in relation to BVCP core values (see table below).

Overall, the recommendation is consistent with the BVCP core values and policies. Naropa is an important educational and community asset to the city, and the proposed designation will help enable and support Naropa as an educational institution (Policy 8.10 Support for Community Facilities).

Naropa University currently has a study body of approximately 1,100 students with an additional 250 students attending online. The university is growing and currently has facilities in three different locations (Arapahoe, Nalanda, and Paramita). The Arapahoe campus is largely built to capacity and the Paramita campus is temporary, therefore Naropa is working to consolidate campuses and focus future expansion at the Nalanda Campus. Applying the Public land use designation to the Nalanda and Arapahoe campuses is consistent, on balance, with the policies and goals of the BVCP and is compatible with the surrounding land uses.

Summary of Analysis

The Public designation is consistent with the current and future desired campus-related uses at the site, industrial is not. Acknowledging Naropa University’s property as a Public use is consistent, on balance, with the BVCP and the location is compatible with surrounding designations and uses. Although the land use designation does not relieve the requestor from the conditions established in their annexation agreement from 2003, the change provides clear policy guidance for future zoning implementation.

Below is a summary chart of the relevant BVCP Core Values related to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTIONS		
	Community Industrial (current)	Community Business (requested)	Public (recommended)
Sustainability as a unifying framework to meet environmental, economic and social goals	=	=	+
A welcoming and inclusive community	=	=	+
Culture of creativity and innovation	=	=	+

Our unique community identity and sense of place	=	--	=
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	--	--	+
Great neighborhoods and public spaces	--	=	+
Environmental stewardship and climate action	=	=	=
A vibrant economy based on Boulder's quality of life and economic strengths	+	+	+
A diversity of housing types and price ranges	--	--	=
An all-mode transportation system to make getting around without a car easy and accessible to everyone	=	=	=
+ positive, = neutral, -- negative			

ATTACHMENTS

A-1. 2130 and 6287 Arapahoe Sept. 26 Open House Comments

BVCP Major Update – Comments from September 26, 2016 Open House for 2130 & 6287 Arapahoe Ave.

1. This really makes sense for Boulder and Naropa. Wonderful way to continue this long standing relationship
2. I really like the proposed changes to PUB for both sites.
3. Makes sense to do. Well thought out by staff.
4. The wildlife habitat is a wetland with 75 bird species (resident and migrant) including golden lagus, western meadowlarks, Wilson snipe, grey fox and jumping mouse. It is an essential connection to South Boulder creek open space. Our raptor population has declined 90% because we do not have large enough contiguous prairie in Boulder. Keep our prairie and keep it a wetland.

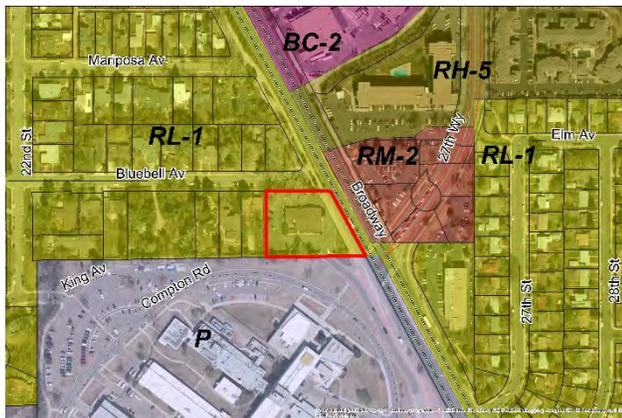
Request #3

385 Broadway

BVCP Land Use Map



Zoning Map



Site Photos



Looking south to the existing building



Looking south from the multi-use path

Request Summary

- Requester: Chuck Palmer, neighbor
- Type of Request: Land use map change
- Description of Request: Transitional Business (TB) to Low Density Residential (LR)
- Approval Required: Two body

Existing Conditions

- BVCP Designation: Transitional Business (TB)
- Zoning: Residential Low – 1 (RL-1)
- Lot Size: 44,821 sq. ft. (1.03 acres)
- Existing Buildings: Office (5,934 sq. ft., constructed in 1957)

Jobs and Housing Assumptions

- Future Estimated Dwelling Units: 2-6 with RL-1 zoning
- Future Estimated Jobs: 28-44 with TB designation

STAFF RECOMMENDATION FOR REQUEST #3

Staff is recommending changing the current land use designation from **Transitional Business and Low Density Residential** to **Low Density Residential** for the following reasons:

- The recommended Low Density Residential designation is consistent with the historic zoning and designation on the site since the current office building was constructed in the 1950s.
- The designation allows 2-6 dwelling units per acre (2-6 units total) if the site is redeveloped as residential.
- Low Density Residential is compatible with the surrounding low density residential neighborhood.
- The current zoning of Residential Low-1 prohibits office use. However, the continued office use is legally non-conforming and allowed to continue operation, but expansion of the use is limited.
- Uses more intense than Low Density Residential is complicated by access. Current access to the site is through a National Institute of Standards and Technology (NIST) easement, but the land use designation should recognize that the easement could be removed and access would be required off Bluebell and through the single-family residential neighborhood.
- Although the site is along Broadway, a major multi-modal corridor in close proximity to jobs and services, it is surrounded on two sides by single-family residential development. In 2015, City Council denied a proposal for Business Transitional-2 on the site indicating that more intense uses on the site are not appropriate.

Recommended Land Use Designation



OVERVIEW

In addition to the land use request change to Low Density Residential (Request #3), staff analyzed Business Transitional (existing) and Medium Density Residential as alternatives.

SITE DESCRIPTION

The property directly fronts Broadway from the west and is bounded by Bluebell Ave. to the north; Compton Rd. to the south and is accessed via 27th St., which serves as the only entrance/exit to the site. The areas to the north and west are single-family homes, with National Institute of Standards and Technology (NIST) located directly south of the site. A paved multi-use path runs adjacent to the site along Broadway.

Site History

The property was developed as an office building and has functioned as a non-conforming commercial use since it was built in 1957. In 1956, a request to build the present office building was denied by the city because the clinic was proposed in an R-1 zone, which did not permit office uses; however, the

decision was appealed to the Board of Zoning Adjustment who granted a variance at the time. In 1964, the Oak Park Corporation requested and was granted another variance allowing the building to expand to approximately twice its original size (a variance is necessary due to the nonconforming use status). In 1973, the owner received another variance to expand the range of professional services. The office use is still considered nonconforming and any new nonresidential use is subject to a use review with Planning Board.

Land Use Designations

During the 2008 BVCP mid-term review, the owner requested to change the property's land use designation from Low Density Residential (LR) to Transitional Business (TB). A series of public hearings and neighborhood meetings took place throughout that process which resulted in Council adopting an alternative land use map change which included leave a 25-foot-wide buffer of the existing residential land use designation on the north and western edge of the property, with the remainder of the property being changed to Transitional Business (TB). This buffer was proposed in order to reduce the potential impacts to the surrounding residential, while still allowing for expansion or redevelopment of the site for continued business uses.

In August 2015, a new property owner requested to rezone the 0.80-acre portion of the property from Residential Low-1 (RL-1) to Business Transitional-2 (BT-2) in conformance with the land use designation. The applicant's written statement indicated the intent to redevelop this site with 16 townhomes, a use permitted by right in Business Transitional zoning districts. City Council unanimously denied the request primarily over issues of access and use, and believed that the denial of the application was necessary in order to preserve the character of the surrounding neighborhood.

COMMUNITY INPUT

An open house was held on Sept. 26 in south Boulder that provided an opportunity for the community to review and comment on the draft staff recommendations. A postcard announcing the open house was sent to all property owners within 600 feet of the requested site. Approximately 250 people attended, with a large number of attendees interested in the discussion of CU South. Public comments related to this land use change request are provided in **Attachment B-1**. Comments received to date and at the open house relate to the following topics:

- Draft staff recommendation – The draft staff recommendation was to keep the current land use designation of TB and LR. The majority of participants were opposed to the recommendation and provided additional arguments for changing the designation back to LR (e.g., future access through the neighborhood, site is more integrated with residential neighborhood than uses across Broadway and NIST to the south, etc.).

In addition, staff received public comments during the 2008 BVCP mid-term update, and the rezoning process from 2015 (LUR2015-00047). General themes of public comments from the past are summarized below. The majority of the listed themes have emerged from the neighborhood's reaction to the proposed project in LUR2015-00047.

- Access – Concerns over the possibility of having access off Bluebell Ave.
- Compatibility – Concerns about the property redeveloping into multi-family/ high density student rental housing.
- Parking - Negative implications on the neighborhood if a parking reduction was requested and approved.

- Light pollution – Taller buildings on a hill will create more light pollution.
- Buffer zone – The buffers to the north and west have historically been ill maintained.
- Construction Staging – No room on the site for staging construction.
- Pedestrian access – Access to the site should only exist from the east, not Bluebell Ave.
- Fire and Life Safety – Access off Bluebell must exclusively be dedicated to emergency vehicles.
- Solar access – High elevation of the site may infringe on 2290 Bluebell’s access to sunlight

Based on community input, staff is recommending Low Density Residential for the site.

ANALYSIS

The analysis includes three BVCP land use options, including Transitional Business (current), and Low Density Residential (requested and recommended) and Medium Density Residential.

Compatibility with Surrounding Land Uses

The 2008 land use change to Business Transitional recognized that the current use of the property as office. According to the BVCP, *“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 associated zoning is either Transitional 1 (BT-1) or Transitional 2 (BT-2), which is defined in the section 9-5-2, “Zoning Districts,” B.R.C. 1981, *“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.”*

In 2008, there was general support for a change from Low Density Residential to Business Transitional. It was assumed that the office use would continue and as long as access was still granted through NIST, there was little to no impact on the adjacent neighborhood. The proposal for multi-family residential was a surprise to many and resulted in the Council denying the rezoning request.

The request for Low Density Residential is consistent with the Boulder Valley Comprehensive Plan in general. The requested land use designation of Low Density Residential allows between 2-6 units per acre and current zoning is Residential–Low 1 defined within the land use code section 9-5-2, “Zoning Districts,” B.R.C. 1981 as, *“Single-family detached residential dwelling units at low to very low residential densities.”* This designation is compatible with the neighborhoods to the west and north, but not necessarily compatible with the uses to the east (high density residential, RTD park and ride, medical and dental offices) and the south (NIST). The primary issue is access, as described below.

Availability of Services and Infrastructure

Transportation and Access to Services

The site is well-served by transit, as it is well-connected both locally and regionally by high frequency transit lines, the majority of which travel along Broadway. Local routes include the Skip, Dash, Bound, 204, and J, and regional routes include AB, FF, DD, DM, and GS. A multi-use path fronts the property along Broadway. The site is also well-served by the Broadway bike and pedestrian path. It is in close proximity to major employers, the University of Colorado and a wide variety of retail sales and services.



Site Access

Direct access to the site was closed after 9-11 due to security concerns. Prior to this closure, a four-way intersection existed at Broadway and 27th Way, with 27th Way extending into Compton Rd. In response to this closure, NIST provided an access easement along 27th St.

During previous city processes, the neighbors expressed a desire to establish a restriction on access from the property onto Bluebell Ave. Currently, the property has access through a perpetual easement across the Department of Commerce (NIST) property. Residents are worried that if access ceased to exist, access will have to be taken on Bluebell Ave., which would have a negative impact on the neighborhood. Staff agrees that business traffic, or significant new resident traffic, traveling through the neighborhood and down Bluebell would not be desirable. Although how the easement may be extinguished is not relevant, it is relevant that the easement could at some point be extinguished. Should the current access through the NIST property be eliminated sometime in the future, access to the property would likely be taken from Bluebell rather than Broadway (city code favors access from the lowest category street¹). All cars accessing the property would then have to drive through the existing residential neighborhood.

Water, Wastewater, and Sanitary Sewer

The site is connected to the city's existing infrastructure including water, stormwater, and wastewater.

Environment

Floodplain

¹ One point of access is allowed per 9-9-5(c)(1), BRC, 1981, unless a traffic study or site plan is approved by the city that demonstrates additional accesses "would not impair any public use of any public right-of-way, or create safety or operational problems, or be detrimental to traffic flow on adjacent public streets."

The site is slightly elevated above the surrounding neighborhood, leaving only a small portion of the property to the west within a 100-year floodplain. Properties directly located to the north and west along Bluebell are within the 100-year floodplain.

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies in this report. Staff also prepared a high level analysis of how the land use designations options are positive, negative, or neutral in relation to BVCP core values (see table below).

On balance, the recommendation is consistent with the BVCP core values and policies. The current limited office use is compatible with the surrounding neighborhood, but higher intensity office and/or residential uses would negatively impact existing neighborhood character and livability.

Policy 2.17 Protection of Residential Neighborhoods Adjacent to Non-residential Zones and Policy 2.19 Compatibility of Adjacent Land Uses state that the city and county will ensure that spill-over effects such as noise and visual impacts be mitigated. Due to the immediately contiguous low density residential neighborhood, compatibility with adjacent land uses is of concern. Changing the land use designation to Low Density Residential ensures that potential spill-over effects will be mitigated.

Summary of Analysis

The recommended Low Density Residential designation is consistent with the historic zoning and designation on the site since the current office building was constructed in the 1950s. The designation allows 2-6 dwelling units per acre (2-6 units total) if the site is redeveloped as residential. Low Density Residential is compatible with the surrounding low density residential neighborhood. The current zoning of Residential Low-1 prohibits office use. However, the continued office use is legally non-conforming and allowed to continue operation, but expansion of the use is limited. Uses more intense than Low Density Residential is complicated by access. Current access to the site is through a National Institute of Standards and Technology (NIST) easement, but the land use designation should recognize that the easement could be removed and access would be required off Bluebell and through the single-family residential neighborhood. Although the site is along Broadway, a major multi-modal corridor in close proximity to jobs and services, it is surrounded on two sides by single-family residential development. In 2015, City Council denied a proposal for Business Transitional-2 on the site indicating that more intense uses on the site are not appropriate.

Below is a summary chart of the relevant BVCP Core Values related to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTIONS		
	Transitional Business (current)	Low Density Residential (requested and recommended)	Medium Density Residential
Sustainability as a unifying framework to meet environmental, economic and social goals	=	=	+
A welcoming and inclusive community	=	=	=

Our unique community identity and sense of place	--	+	--
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	=	--	+
Great neighborhoods and public spaces	=	+	=
Environmental stewardship and climate action	=	=	+
A vibrant economy based on Boulder's quality of life and economic strengths	+	=	=
A diversity of housing types and price ranges	--	--	+
An all-mode transportation system to make getting around without a car easy and accessible to everyone	+	=	=
+ positive, = neutral, -- negative			

ATTACHMENTS

B-1. 385 Broadway Sept. 26 Open House Comments

BVCP Major Update – Comments from September 26, 2016 Open House for 385 Broadway

Staff note: the comments are in response to staff’s draft recommendation to keep the current Transitional Business Land Use designation. Based on feedback, staff changed the recommendation to Low Density Residential.

1. Land use designation is inappropriate for 385 Broadway. 1. The circumstances of ownership and their intentions are irrelevant to the land use designation. 2. All of south Broadway is designated RL-1, except this one parcel and shopping area at Table Mesa. There is not one single case of TB zoning allowed next to RL-1 in the city of Boulder. 3. Hearings had already conducted with the planning board and city council. Both determined unanimously that TB zoning is inappropriate for the parcel. The primary concern is access via Bluebell Ave, which is required by zoning ordinance 9-9-5 and violates several principles of the BVCP. Dan Olson 2285 Bluebell Ave
2. 1. According to a note from Elain McLaughlin (attached) the easement access to 385 Broadway may be changed if any materially different use by an owner might be implemented. 2. The property was originally zoned as residential low density. It should revert to that designation now so that when the building’s useful life is over, it would be populated with residential homes.
3. Planning Board and city council have voted unanimously against use supported by TB, because access along Bluebell and 22nd will not support TB use. NIST will not allow TB use along the frontage road either. The vote clearly shows the site will not support TB use. The existing office has operated under RL for 40+ years. If it is left at TB there will continue to be conflict over use of this site which will be a waste of time and resources all over again. Please make the comp. plan reflect planning board and city council decisions. Thank you – Paul Cheng 2280 Bluebell.
4. Please keep the land use designation as it is we don’t need more density along South Broadway.
5. Planning Board + City Council has voted down along with intense neighborhood support to not allow business transitional zoning at this location. As of now, the exception is an individual who now owns it and will run his insurance agency there. Ideal, but this too can change and the fight begins again. The neighborhood of lower bluebell, lower Chautauqua and especially 22nd St. cannot support any kind of access through bluebell for transitional business. I live on the corner of 22nd and Mariposa and 22nd St is incredibly busy now as it is on exit to baseline. NIST employees are already parking on the south side of 22nd to access NIST and as I said, several streets exit the neighborhood on 22nd and it is already intense volume of cars for such a mellow residential neighborhood. Please do not allow business transitional to allow a large development. It will greatly alter the quality of the neighborhood and the safety of kids, pets and residents. Residents have been fighting for this for 8 years!
6. Dear City Council, the access does not support transitional business so please to RL one! The city planning board and the city council have already voted against this, for good reason. Please consider the existing residents and tax payers who live in that neighborhood and will be severely impacted. Thank you for your consideration- Amy L Metier 2230 Mariposa Ave, Boulder, CO 80302.
7. I think the most important issue is that of access – NIST has given no guarantees that 385 Broadway property would have access if the zoning be changed from low residential or

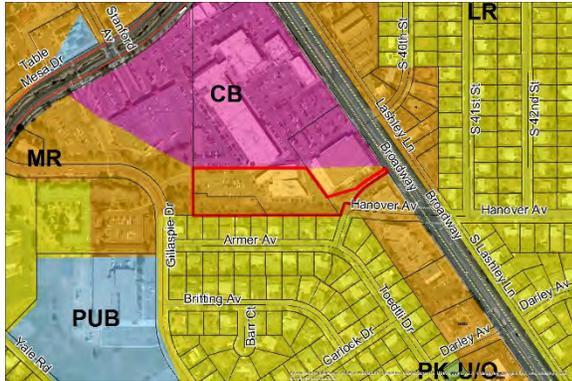
transitional business, but if the business generates too much traffic, they have stated they would deny access. The neighborhood that would have to accommodate a change in access has limited access. Therefore, I believe it is in the best interests of this neighborhood to change the zoning back to low density housing. The argument that the Broadway corridor does not have low density housing is flawed. The south-west side of Broadway (South of NIST) is all low density housing!!

8. What has happened to trust? I have lived here for 46 years
9. I agree with keeping this property TB. Low density residential only makes sense if it can access Bluebell rather than Broadway. And if the parcel were allowed to access Bluebell, a higher density would be more appropriate given the proximity to Broadway.
10. All South Broadway is RL-1 except NIST (Public) and Table Mesa shopping center (commercial). TB is inappropriate for 385 Broadway!

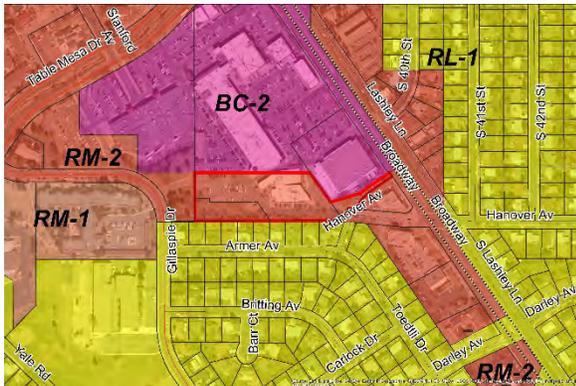
Request #12

0, 693, 695 Broadway Table Mesa Shopping Center

Existing BVCP Land Use Map



Existing Zoning Map



Site Photos



Looking west near Lucky's



Looking northwest near culinary school

Request Summary

- Requester: Table Mesa Shopping Center LLC, owner
- Type of Request: Land use map change
- Brief Description of Request: Medium Density Residential (MR) to Community Business (CB)
- Approval Required: Two body

Existing Conditions

- BVCP Designation: Medium Density Residential (MR)
- Zoning: Residential Medium 2 (RM-2)
- Lot Size (BVCP boundaries do not follow parcel boundaries in this case):
 - Total area impacted by request: 3.5 acres
 - Total area of all properties impacted by request: 10.45 acres
- Existing Buildings: 187,940 sq. ft. of leasable area in Table Mesa Shopping Center

Jobs and Housing Assumptions

- Existing Estimated Dwelling Units: 25-57 with MR designation
- Existing Estimated Jobs: n/a
- Future Estimated Dwelling Units: 36-40 with CB designation
- Future Estimated Jobs: 200-220 with CB

STAFF RECOMMENDATION FOR REQUEST #12

Staff is recommending **no change** for the following reasons:

- Although Community Business is consistent with the current uses on the site, the current Medium Density Residential designation provides a buffer between the shopping center and the residential neighborhood to the south.
- The original Planning Unit Development from the 1960s required a buffer of residential zoning along the south edge of the shopping center.
- A buffer between the residential area and shopping center currently exists in the form of landscaping along the southern property boundary, an access road, and parking. However, a change to Community Business would allow commercial uses by right – meaning that future changes in use would not receive city review or neighborhood input to address potential impacts.

OVERVIEW

In addition to the land use request change to Community Business (Request #12), staff analyzed Medium Density Residential (existing).

SITE DESCRIPTION

The 10.45-acre site is located at the southwest corner of Broadway and Table Mesa Dr. with residential uses located immediately to the south and east and retail and office uses located to the north and west. The Table Mesa Shopping Center was originally constructed in the early 1960's with several additions to the center occurring over time. Currently, there is 187,940 square feet of leasable area within the center. The shopping center is currently undergoing improvements that include parking and driveway reconstruction/repair, irrigation improvements, pedestrian access, trash enclosure improvements, and exterior lighting improvements.



The land use change request is specific to a 3.5-acre portion of the 10.45-acre site that currently consists of parking, an alleyway and a commercial building that is home to a culinary school. Immediately to the south of the site is a single-family neighborhood. This parcel, along with the rest of the Table Mesa

Shopping Center, is at a slightly lower grade than the neighborhood to the south.

Land Use Designations

The 3.5-acre portion of the 10.45-acre site is designated as Medium Density Residential. Medium Density Residential land uses are generally situated near community shopping areas or along some of the arterials of the city, allowing 6-14 units per acre. Similar to the other Medium Density Residential property in the area, it is intended to serve as a buffer between the shopping center and single-family residential land uses.

The remainder of the 10.45-acre site is designated Community Business and the request is to change the designation so the entire site is one land use designation (Community Business). The primary purpose for the request is allow changes in building use without triggering a city use review. For example, as recently as 2014, the property owner was required to undergo the expense and time to expand the Escoffier Culinary School within the Table Mesa Shopping Center (LUR2014-00044). No new development was proposed and there was no neighborhood concern expressed with the proposal.

COMMUNITY INPUT

An open house was held on Sept. 26 in south Boulder that provided an opportunity for the community to review and comment on the draft staff recommendations. Approximately 250 people attended, with a large number of attendees interested in the discussion of CU South. Public comments related to this land use change request are provided in **Attachment C-1**.

The draft staff recommendation presented at the open house was to change the designation of the three parcels to Community Business to provide a consistent land use designation for the entire shopping center. The majority of attendees were opposed to this change. Many cited existing complaints with the property managers and tenants regarding night-time noise from construction and delivery trucks, safety issues with delivery trucks maneuvering through the neighborhood, and an overall lack of responsiveness from the property manager and tenants to neighborhood concerns.

Based on community input, staff is recommending no change to the designation.

ANALYSIS

The analysis includes two BVCP land use options, including Medium Density (current), and Community Business (requested).

Compatibility with Surrounding Land Uses

The Table Mesa Shopping Center is home to a wide variety of local serving retail uses (e.g., grocery stores, banks, restaurants, coffee shops, etc.). A buffer exists between the single family homes to the south and the shopping center in the form of landscaping along the southern property boundary, an access road, and parking. The buffer provides some benefit, but does not fully address noise, one the primary concerns voiced by neighbors from shopping center activities. The property manager is aware of neighborhood concerns and is actively engaged with the tenants to ensure they are conforming to the noise regulations, including night time restrictions regarding delivery times.



Looking east towards Broadway – landscape buffer and single family homes to the

The primary reason for not changing the designation to Community Business is the potential loss of a mechanism to address potential impacts to neighbors. Commercial uses would be allowed by right. In other words, changes in use would not receive city review or neighborhood input to address potential impacts. Use review may not address all concerns, but it creates a mechanism to ensure communication between the city, property owner and neighbors.

Access and Parking

Multiple access points exist on both local and major roads that bound the site including Table Mesa, Gillaspie, and South Broadway. Access points nearest to the site consist of Gillaspie to the west; Broadway to the east; and Armer to the south. A four-way intersection exists on South Broadway and Hanover Ave. that provides access to the site for traffic heading in all directions.

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies in this report. Staff also prepared a high level analysis of how the land use designations options are positive, negative, or neutral in relation to BVCP core values (see table below).

Policy 2.17 Protection of Residential Neighborhoods Adjacent to Non-residential Zones and Policy 2.19 Compatibility of Adjacent Land Uses state that the city and county will ensure that spill-over effects such as noise and visual impacts be mitigated. Due to the proximity of the shopping center to the single-family neighborhood to the south, compatibility with adjacent land uses is of concern. The Medium Density Residential was established as an intentional buffer between the residential neighborhood to the south and the shopping center. As noted above, any redevelopment in the future would need to address compatibility as discussed above in the Compatibility with Surrounding Land Uses section.

Summary of Analysis

On balance, the recommendation of no change is consistent with the BVCP core values and policies. Although Community Business is consistent with the current uses on the site, the current Medium Density Residential designation provides a buffer between the shopping center and the residential neighborhood to the south as specified in the original Planned Unit Development from the 1960s. A change to Community Business would allow commercial uses by right and therefore changes in use would not receive city review or neighborhood input to address potential impacts.

Below is a summary chart of the relevant BVCP Core Values related to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTIONS	
	Medium Density Residential (current)	Community Business (requested)
Sustainability as a unifying framework to meet environmental, economic and social goals	=	+
A welcoming and inclusive community	+	=
Our unique community identity and sense of place	=	--
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	=	--
Great neighborhoods and public spaces	=	=
A vibrant economy based on Boulder's quality of life and economic strengths	--	+
A diversity of housing types and price ranges	=	=
An all-mode transportation system to make getting around without a car easy and accessible to everyone	=	=
+ positive, = neutral, -- negative		

ATTACHMENTS

C-1. Table Mesa Sept. 26 Open House Comments

BVCP Major Update – Comments from September 26, 2016 Open House for 0, 693 & 695 S. Broadway

1. This tiny area is already at maximal concentration of buildings, people and cars. Now, more development? This is fundamentally changing the nature of our neighborhood and quality of life for its residents. There is already not place to park and it feels nerve wracking driving in this area. I am VEHEMENTILY opposed to this proposal!
2. I'm very disappointed to see that staff recommends CB designation. This seems inconsistent with the city's goals for housing and contradictory with the Stanford Ct. recommendation. – Juana Gomez
3. The neighborhood is filled with children and still maintains a small community feel. Adding condos will add traffic and that is already ridiculous. Adding rental units invites strangers putting children in danger.
4. No more development. That is not in the character and values of Boulder. You have turned Boulder into a building site and tourist trap with your policies.
5. I finally support commercial business near ICS and Lucky's. More shopping!
6. Opening Lucky's has already impacted the homes immediately to the south quite a bit. The trucks unloading are noisy and arrive too early. Pedestrian traffic through the Hanover entrance to the shopping center has gotten very dangerous. Myself and my family members have almost gotten hit there several times just in the last few months. We need less noise, less traffic, slower traffic and more of a buffer between the shopping center and the neighborhood. I am against this change in zoning.
7. No commercial designation change. The density, congestion, traffic is already too high! My request is to turn down a designation change.
8. People live in Armer bought their house with expectations of privacy in their backyards. To build these large apartments looking into their yards is unfair. I would not object to removing the tire company or moving Escofier cooking school to another location and using that land for high density housing – Gaylen Howard – 3800 Armer Ave.
9. I agree with staff's recommendation. This shopping center is a major draw for South Boulder. Eldorado Springs and even Cold Creek Canyon. The proposed change is consistent with the current use. I hope the property owner continues to make improvements to the shopping center to keep it vital. And more bike racks, please!
10. Please no more commercial development. Boulder has created more jobs than housing. It's time to put the brakes on unchecked growth.
11. Please do not change the zoning from MD-Residential to community business. The traffic, noise and pollution in this area are already terrible. Additional traffic will reduce property values in the area and hence reduce property taxes and hence city revenue. The recent remodel and Lucky's market addition to the Table Mesa Shopping Center has completely changed the character of the site. I would urge the city to redo their analysis with new data that accurately reflects the new incredibly busy shopping center. Thank you!
12. Hi there, my name is Patrick Armitage. I live at 3825 Armer Ave. The proposed to change the zoning should not go ahead. The noise, the street traffic and the air quality will all be negatively affected by any change. The intersection of Toedili, Armer and Hanover are already unsafe. With the addition of more commercial traffic this intersection and area will become even more dangerous. It's a neighborhood where young children live and the business benefits do not outweigh the health and safety of residents. Please do not recommend the change in designation to CB. The current MR status provides the right

balance to decision making for all stakeholder, tenants and landowners in the surrounding area. Thank you for taking the time to review this and I hope that you can be persuaded to recommend retaining the MR status- Patrick Armitage

- 13.** I live on Armer Avenue and I am asking that you please do not rezone the area to community business. We have already seen a huge increase in traffic and noise and large trucks coming down our street since Lucky's opened in August. The intersection at Hanover/Toedtli/Armer is even more dangerous. With the rezoning proposal all of this would potentially get worse as residents would have no say in new businesses opening on the property. There are many children/young families on this street and we feel that this rezoning would negatively impact everybody and make it much less safe for our children. It has also become much noisier behind our house with delivery trucker very early in the morning (before 7am) honking and with loud engines with the opening of Lucky's and we feel that this will get worse if the area is rezoned. Please do not recommend the change in designation to "CB". Thank you for reading – Helen Price

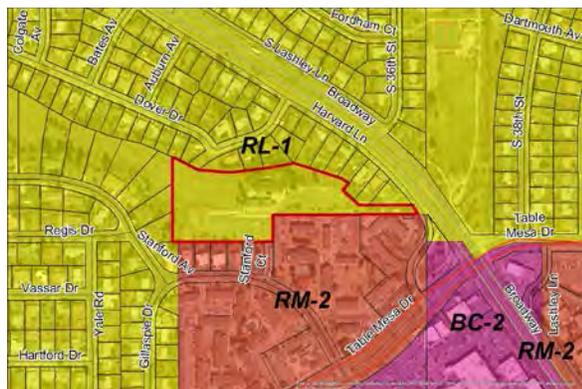
Request #13

3485 Stanford Court

BVCP Land Use Map



Zoning Map



Site Photos



Looking west across the church parking



Looking east from the garden

Request Summary

- Requester: Mt. Calvary Lutheran Church
- Type of Request: Land use map change
- Brief Description of Request: Low Density Residential (LR) to Medium Density Residential (MR)
- Approval Required: Two body

Existing Conditions

- BVCP Designation: Low Density Residential (LR)
- Zoning: Residential Low-1 (RL-1)
- Lot Size: 206,931 sq. ft. (4.8 acres)
- Existing Buildings: Church (29,257 sq. ft.)

Jobs and Housing Assumptions

- Current Estimated Dwelling Units: 10-29 with RL-1 zoning
- Current Estimated Jobs: n/a
- Future Estimated Dwelling Units: 29-67 with MR designation
- Future Estimated Jobs: n/a

Site Photos



Looking north from parking lot



Looking east near steep slope

STAFF RECOMMENDATION

Staff is recommending changing the land use designation from **Low Density Residential** to **Medium Density Residential** for the 3485 Stanford Ct. property for the following reasons:

- Diversity of housing types and price ranges is a core value of the Comprehensive Plan, recognizing that the availability of housing affordable to both low and moderate income populations is “a growing concern”.
- There is a scarcity of sites for housing in Boulder Valley. Allowing Medium Density Residential will increase the diversity of housing types.
- The recommended Medium Density Residential designation furthers other key BVCP policies, including jobs:housing balance, and strengthening community housing partnerships.
- The recommended Medium Density Residential designation allows 6-14 dwelling units per acre (29-67 units total). This is consistent with the mix of residential densities to the south and could be compatible with the single-family residential neighborhoods to the north and west through good site planning.
- The location and characteristics of the site make it suitable for new residential development on the upper portions of the site that are not on a steep slope.

Recommended Land Use Designation



Staff also recommends that the 5 parcels south of 3485 Stanford Ct. (3255, 3305, 3355, 3405, 3455 Stanford Ave.) change from Low Density Residential (LR) to Medium Density Residential (MR) to be consistent with the existing RM-2 zoning and to provide the same designation as the properties to the south and east.

OVERVIEW

Staff analyzed Low Density Residential (existing) and Medium Density Residential (Request #13) as alternatives.

SITE DESCRIPTION

Located in South Boulder, the parcel is directly west of South Broadway, north of Stanford Ave. and South of Dover Dr. Single-family housing bound the site to the north and west, and town homes border the site to the south. The Anderson Ditch runs adjacent to the northern edge of the site. The site sits on a steep slope, which descends in elevation as it moves north.

The current BVCP Land Use designation for the site is Low Density Residential (LR), which consists predominantly of single-family detached units allowing 2-6 units per acre. The area to the north and west the site is also designated as Low Density Residential and the townhomes to the southeast are designated as Medium Density Residential (MR).

Site History

The church was originally built in 1963 and renovated in 1978. In 2000, the church doubled the size of the facility. The addition to the building was built on the south side of the existing building, away from the steep hillside to the north.

The congregation has grown smaller over the years and during the 2015 annual meeting, *“...consideration was given to the need for relocating our church to a smaller facility and possibly addressing the growing need for senior housing in South Boulder within our property.”* Mt. Calvary Church fielded several purchase offers and eventually signed a letter of intent in April 2016 with Frasier Meadows and Boulder Housing Partners with the intent to construct affordable housing for seniors.

Land Use Designation

The requestor proposed a zoning designation of Residential Medium-2 (RM-2), which corresponds to the Medium Density Residential designation. The BVCP defines medium density residential development as 6-14 dwelling units per acre, and its associated zoning would allow for more types of housing and uses. The Residential Medium zoning districts, in addition to detached homes, would allow for duplexes, attached dwellings and townhouses as well as congregate facilities, a use that's desired by the requestor. The current designation of Low Density Residential (LR) is defined by the BVCP as low-density residential development at 2-6 units per acre. The Low Density Residential designation is associated mostly with single-family home neighborhoods, but also allows for public educational facilities and religious assemblies.

COMMUNITY INPUT

An open house was held on Sept. 26 in south Boulder that provided an opportunity for the community to review and comment on the draft staff recommendations. A postcard announcing the open house was sent to all property owners within 600 feet of the requested site. Approximately 250 people attended, with a large number of attendees interested in the discussion of CU South. Public comments related to this land use change request are provided in **Attachment D-1**. Comments received to date and at the open house relate to the following topics:

- Traffic – Current traffic along Stanford Ave. creates safety concerns that will be made worse by additional traffic.
- Senior housing – Support for the intentions of the church, Frasier Meadows and Boulder Housing Partners to build affordable housing for seniors.
- Density – Some supported the range of units allowed and others commented that the number of units allowed is too many and will cause problems with noise, traffic and safety.
- Steep slope – Support for not allowing buildings on the steep slope and for NOT providing

access to the site through the steep slope area.

- Privacy – Concern with how any new development addresses privacy concerns with neighbors on all sides of the property.

ANALYSIS

The analysis includes two BVCP land use options: Low Density Residential (current), and Medium Density Residential (Request #13)

Compatibility with Surrounding Land Uses

The site abuts residential development of varying types on all sides. Down the slope to the north is a single-family residential neighborhood. The area to the south is zoned for medium density residential and consists of duplexes and multifamily attached units.

Density is only one factor in an assessment of neighborhood compatibility. Other factors that determine how a development would fit into the surrounding neighborhood include scale, massing and design (e.g., how the buildings are configured on the site, the building materials used, transitions to adjacent land uses, placement of parks, open space, buffers, lighting, and parking). The slope and any potential impacts to viewsheds of neighbors would be an important consideration as well. The future Concept Plan and Site Review phases of development will address these factors in detail.

The Site Review phase of development for the property would also provide an opportunity for the community to determine a more defined future for the parcel and assign the zoning that is compatible with the surrounding area.



Multi-family homes to the



Steep slope to the north

This recommendation includes 5 properties to the south of Mt. Calvary Church that are zoned Medium Residential-2 and have a Low Density Residential land use designation. The change from Low Density Residential to Medium Density Residential will bring the land use designation into conformance with the current zoning. The 5 parcels are home to duplexes with a total of 10 units. Most of the homes are under different ownership and therefore future consolidation of the parcels is unlikely. As those home redevelop over time, the duplex is the most likely option. Duplexes are an underrepresented housing type in Boulder and should be encouraged.

Environment

Floodplain

500-year floodplain, which runs parallel to Bear Canyon Creek, covers a very small portion of the

eastern edge of the parcel where the sidewalk to Broadway is located.

Steep Slope Ordinance

The Steep Slope Ordinance and Hillside Development Guidelines have been set in place to ensure that future development along hillsides is allowed its fullest potential of development while preserving the aesthetic and environmental character of the hillsides. These new ordinances allow for more regulatory intervention by the city to help mitigate the negative effects that future development may impose on steep slopes. A small portion of the property on the north-west corner, where the steep slope is located, is within the potential mass movement hazard and consolidation/swell constraint zone.

Developable Area

Redevelopment of this property would trigger the 2-acre threshold for mandatory site review. Minimizing cut and fill is one of the site review criteria established by the city as stated in section 9-2-14, "Site Review," B.R.C. 1981, "*Cut and fill are minimized on the site, the design of buildings conforms to the natural contours of the land, and the site design minimizes erosion, slope instability, landslide, mudflow or subsidence, and minimizes the potential threat to property caused by geological hazards.*" Due to this physical constraint, staff estimates the developable area of the site at 143,636 sq. ft. or 3.3 acres. This is generally the area of the site occupied by the buildings, parking lots and garden area.



Availability of Services and Infrastructure

Site Access

Access to the site is provided along Stanford Ct. off Stanford Ave. A curb cut existed at Harvard Ln. prior to the expansion of the church in 2000, which provided direct access to the site. It has now been replaced with a sidewalk and drainage chase. Any access issues would be resolved at the site review stage, as the site meets the threshold for mandatory concept plan and site review. The draft staff report stated that access could be provided from Dover Dr. It is important to clarify that due to the steep slope, automobile access from Dover would not be approved by the city. Access for pedestrians from Dover Dr. would need to be evaluated if requested by the applicant.

Transportation

The site is located near two major corridors: Table Mesa Dr. and Broadway, which has multiple transit lines traveling along these two corridors. The closest bus stop on Broadway is about 600 feet away and is served by both local and regional transit lines, such as the Skip, Dash, J, FF, AB, DD, DM, and GS.

The closest bus stop on Table Mesa Dr. is about 800 feet away and is served by two local routes, the 204 and Skip.

Water, Stormwater, and Wastewater

The site is connected to the city's existing infrastructure including water, stormwater, and wastewater. Any additional upgrades needed in order to support future re-development will be the responsibility of the developer.

Affordable Housing

In 1978, the Boulder Valley and Boulder County Comprehensive Plans identified the need to provide a diversity of housing types and costs. The 1986 BVCP was more explicit, adding policies recognizing that the availability of housing affordable to both low and moderate income populations was “a growing concern,” and that public/private programs, funding and incentives needed to be tapped and developed to augment the limited supply of such housing being provided through private development. A BVCP Core Value is now to provide a diversity of housing types and price ranges. This was also identified in the 2015 Boulder Valley Comprehensive Plan Survey as the number one community value in greatest need of increased attention by 42 percent of the respondents. Allowing Medium Density Residential will create the potential for a diversity of housing types. In addition, Boulder Housing Partners and Frasier Meadows may potentially provide affordable housing for seniors on the site, a large portion of this housing will likely be permanently affordable. This would be above and beyond the current Inclusionary Housing requirement of 20 percent of all units permanently affordable.

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies in this report. Staff also prepared a high level analysis of how the land use designations options are positive, negative, or neutral in relation to BVCP core values (see table below).

Overall, the recommendation is consistent with the BVCP core values and policies. Boulder has a growing senior population, creating more demand for supporting services and senior housing. The recommendation allows the potential for a senior housing development to be built, which will add to the diversity of housing types and serve a special needs population (Policy 7.06 Mixture of Housing Types and Policy 7.03 Populations with Special Needs). Policy 7.03 specifically states that the location of housing for populations with special needs should be within proximity to shopping, medical services, schools, entertainment and public transportation. The location of this property is consistent with this existing policy, having proximity to transit and retail services. Furthermore, the recommended change is consistent with BVCP policies to create a more compact and walkable community.

Few planned locations for housing remain in the city's service area. Allowing medium density residential on these sites is an efficient use of land and resources and will further many other BVCP policies, including jobs:housing balance, by providing additional housing units close to transit and retail services. The designation is compatibility of adjacent land uses, by extending an area of existing Medium Density Residential and providing a buffer to the single family neighborhoods to the north (i.e., the steep slope precludes development). Finally, the recommendation presents an opportunity for Boulder Housing Partners, Frasier Meadows, and Mt. Calvary Church to strengthen community housing partnerships in a way that is compatible with the surrounding neighborhood.

Summary of Analysis

Diversity of housing types and costs is a core value of the Comprehensive Plan, recognizing that the availability of housing affordable to both low and moderate income populations is “a growing concern”.

There is a scarcity of sites for housing in Boulder Valley and allowing Medium Density Residential will increase the diversity of housing prices and types. The recommendation furthers other key BVCP policies, including jobs:housing balance and strengthening community housing partnerships. The recommended Medium Density Residential designation is consistent with the mix of densities in the surrounding area and could be compatible with the surrounding developments through good site planning such as avoiding any development on the site’s steep slopes.

Below is a summary chart of the relevant BVCP Core Values related to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTIONS	
	Low Density Residential (current)	Medium Density Residential (recommended)
Sustainability as a unifying framework to meet environmental, economic and social goals	=	+
A welcoming and inclusive community	=	+
Our unique community identity and sense of place	=	=
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	--	+
Great neighborhoods and public spaces	=	=
Environmental stewardship and climate action	=	=
A vibrant economy based on Boulder’s quality of life and economic strengths	=	+
A diversity of housing types and price ranges	--	+
An all-mode transportation system to make getting around without a car easy and accessible to everyone	=	+
+ positive, = neutral, -- negative		

ATTACHMENTS

D-1. 3485 Stanford Ct. Sept. 26 Open House Comments

BVCP Major Update – Comments from September 26, 2016 Open House for 3485 Stanford

1. Not enough process. 2) Allowing low income housing in a different location than the main development to substitute for the requirement is a recipe for establishing slums. 3) The open house located miles from the development was a joke. About 5 issues crammed together to minimize the process.
2. We live at 2805 Stanford Ave. Got no notice of the rezoning and definitely object to the density. 29-67 units at the Lutheran church or Stanford court is too high! There is no in and out way from the Stanford court when the traffic is already a problem.
3. I have a question about the property lines as shown on the exhibit. Please call - Judith Dippo.
4. 1) Traffic concerns if there is a secondary access to Dover or Harvard. Harvard is (?) a part of the bike path, and dover access would also use this or back streets to Dartmouth. Also, this is on a hillside which has been moving, especially in the last 3 years. 2) Flooding & Drainage – Sept 2013 floods showed existing maps of flood plain are NOT accurate. Drainage from meadow below NCAR originally came thru this property (now ditched along Yale) but the water went where it wanted during the flood. Also, flooding was not likely a 500 or 1000-year event – there were floods in 1938, 1969, and a huge snow in 1923. 3) What happens to the day care at MCLC that's there now? 4) Ground movement. I live directly below the church (3320 Dover), and we had flooding last summer due to broken pipes, including sewage from the church. I not that many pipes have been being repaired and replaced on the crest of the hill (e.g. Stanford) this summer due to ground motion. I do not believe it would be wise to develop more of this hillside. 5) Wildlife. Deer, Bears, Mountain Lions, Foxes & other game use the corridor along the hill. More development would mean more interaction & more animals destroyed.
5. I own a duplex at 499 Harvard. My concern involves flooding. In the Sept Flood we got a lot of flood water from the paved area above us, that is 3485 Stanford Ct. On inspecting the area later, I found that there is an existing (?) of standard size which was intended to divert the water to the planned run off area to the south (a little). However, to be really functional that curb needs to be a wall, probably 2-3 ft. high. Please KEEP! Thanks.
6. This is a horrible idea to be adding this many new homes to an already congested area in S. Boulder. Broadway and the immediate surface streets cannot handle the volume of traffic now. No new housing!
7. If you are planning secondary access off of Dover Dr. (as stated in boulder.gov website) please look at the very steep grade of the unstable hill where this would have to happen... unless you are going to tear down houses. Also we had zero notice about this meeting. I live on the street below. No neighbors knew about it. Please add me to all notification on 3485 Stanford. Thank you. Janet Streater 2830 Dover Dr. Boulder CO 80305
8. My first concern is with the possible “secondary access” may be possible off of Dover Dr. Dover is a very small street at that pt. (7 houses) which open to Harvard. Additional traffic would greatly impact current high bicycle traffic on Harvard Frontage Rd. Harvard is largely

a bike zone between Dartmouth & S Boulder. Any more traffic feeding into Harvard from Dover would be a huge problem. My second concern regard the steep slope behind the church. While I understand that would not be built on. I am concerned that the square footage could be used to over build on the designated flat building land next to it. Last, I personally understand boulders scarce availability of affordable housing, but I hope that only low density (because of traffic) affordable or senior housing will be considered.

9. I am concerned about the traffic implications of this land-use change. Stanford – table mesa intersection is already way over subscribed. As a result, I can only support this change if it is paired with improvements in the traffic flow at this intersection
10. Not in favor of medium density housing. If this does happen it needs to blend in. It’s a high property that is visible for miles. To stuff a bunch of multi-family housing is not a hood fit. I think a lot of plan of what this is going to look like before this ever gets approved
11. Power – today the power on the hillside is a “440 ladder” w/o individual transformers Xcel Energy had access via the Anderson ditch easement, which has lapsed. Xcel says we cannot get an upgrade due to lack of access – what is the power plan for medium density.
12. Yes, for senior housing. Yes, for protect existing homes north of site with screening, landscaping. Yes, please consider a walking/bike path from Stanford down to lower neighborhood. Current upper table mesa people have to go to table mesa & Broadway with bikes – need a short out to Broadway. Buy an easement between homes on Stanford for peds & bikes to pass through? Also make community gardens space to replace current ones & permit seniors to interact with on the gardens. Keep some as community park too please.
13. Please redevelop a community garden or include it in your plan for senior housing once it is implemented. That garden – centennial – has been there for 20 years and we would really miss the opportunity to garden.
14. Very sorry to lose our community garden (centennial) that has been in existence for 20 years. Charlot Mudar (garden leader) Q: When will the garden be closed?
15. Do it! This is a win/win. The area is already home to many multi-family structures. Boulder needs to address availability for senior housing. Frasier Meadows has found a way to help others in the same age group it serves. And finally this is an actual advance in housing instead of the usual payment-in-lieu.
16. Please do not change the zoning from low density to medium density. I strongly suggest turning this area into a park instead. It offers views that can and should be enjoyed by everyone – not just those who would purchase houses there. Any structures on this site will block views of neighbors & additionally detract from the natural view of the site when seen driving along Broadway. Thank you.
17. Access to Dover would be disastrous! The hill is slowly moving.
18. Too much density – for an area of poor access.
19. I am against the rezoning of 3485 Stanford for several reasons: 1) There is no binding site plan of what is to be built, nor the number of units that will be build. 2) Currently the church property acts as a buffer between the RL-1 zoned properties and MR properties. 3)

Potentially, apartments can be built overlooking the private residents on Dover Drive. 4) Access from the property to dover will make dover a through street. Access to Harvard would be at a dangerous intersection on a narrow curved section of road where bicyclists cross Harvard. 5) Anyone who has been at the intersection of Broadway and Table Mesa during rush hour would know how congested this area is & realize we do not need more traffic in South Boulder. 6) There is a lack of transparency for what exactly is planned in the rezoned area

- 20.** No access to development from Dover Dr. – additionally drive on steep slope would be hazardous in poor conditions and limited sight distance from access point. -2.15 compatibility of adjacent land uses – 2.10 preservation of residential neighborhoods – dover drive is not a through street – will destroy the neighborhood. 2) development needs to be limited to single access point – existing onto Stanford only – potential access on Harvard will exacerbate an already dangerous condition. 3) no interruption on steep slope – expansive soils, drainage will negatively impact neighbors to the north. 4) Impacts to wildlife – neighborhoods are rich with wildlife. Increased density will impact their presence. 5) fire hazard – increased density leaves steep slope area more vulnerable to human caused wildfire. 6) concerns over transitional/buttes area from the north as well as view impacts – design of required buttes will be challenging since the development will be uphill. 7) compatibility with surrounding RL-1 single family homes. 8) light pollution – church use is primarily – the night sky is not interrupted by current church lighting – this will densify with the development 9) solar access – particularly for properties to the north in winter 10) clarify numbers allowed – 3.3 buildable with density equaling 6-14 units = 19.8 units to 46.2 units. 11) Privacy – height of development may allow new residents direct views of single family homes and yards.
- 21.** 1) do not make a dover dr. access (too steep – unstable hillside) – adds extra unwanted traffic. 2) limit development to restrictions to regulations according to access. 3) wildlife impact – deer, bear, mt. lion, etc. do not affect their feeding patterns and migrations. 4) do not build eye sore construction – do not block views of mountains & green belt. Height restrictions. 5) too high density for small parcel of property – means more traffic, trash, noise, light pollution. 6) restricts city views – popular fireworks viewing area. 7) walking path is established. How will this be affected? 8) privacy – structure may allow residents to look into existing homes.
- 22.** I have a concern with this project. We have a lot of car traffic as it is on Stanford, Table Mesa. My children ride their bikes & it's already crowded/dangerous w/ all the traffic that exists. Not to mention all the parked cars on Stanford already. I would like follow up on this project going forward.
- 23.** Very concerned with this proposal. The city cannot sustain increased density while also preserving the quality of life that draws us to this special place. As a resident we have seen the recent problems that come with increased traffic, density, and congestion. Increasing density means that developers win at the expense of residents that have sacrificed to be here.

- 24.** South Boulder is already too densely populated. This is an awful idea to add more homes without drastically impacting the road infrastructure to accommodate these changes. Broadway south and north is carrying all the traffic that it can already no more housing!
- 25.** I live down the hill and my house backs to the utility access green space @ 3200 dover drive. I am concerned about the following: 1) access road from Dover! Up that hill? That is insane and would drastically alter traffic flow on Dover. Please don't! 2) medium density structure at the top of the hill. A large structure would intrude on surrounding neighborhoods. If you must build, please make it affordable housing and small! 3) please provide sufficient parking (underground?) for any additional residents. It's crowded up there now. Thanks, Chris Hansen.

Request #25

3261 3rd Street

Existing BVCP Land Use Map



Existing Planning Area Map



Site Photos



Request Summary

- Requester: Margaret Wilson et al. (Wilson family)
- Type of Request: Area II/III boundary change
- Brief Description of Request: Area III to Area II (**Minor Adjustment to the Service Area Boundary**)
- Approval Required: Four-body

Existing Conditions

- BVCP Designation: LR
- Zoning (county): Rural Residential (RR) & Forestry (F)
- Lot Size: 32,278 sq. ft. (0.741 acres)
- Existing Buildings: 1,818 sq. ft. residence; 1,416 sq. ft. agricultural outbuilding

Jobs and Housing Assumptions

- Current Estimated Dwelling Units: 1- 4 with LR
- Future Estimated Dwelling Units: 1-2 with only the portion of property east of blue line designated as LR
- Future Estimated Jobs: 0

STAFF RECOMMENDATION FOR REQUEST #25

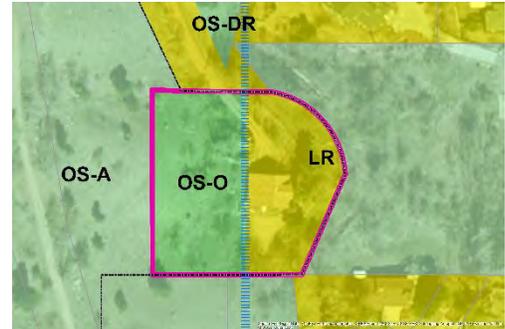
Staff recommends approval of the proposed area change for the parcel from Area III to Area II only for the portion of the property east of the blue line. Staff recommends that the

portion of the property west of the blue line remain in Area III and receive an open space designation.

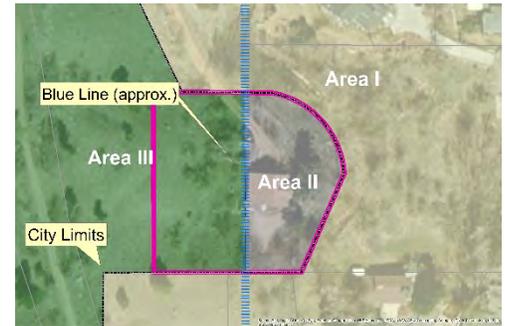
Staff recommends 1) approval of the proposed area change from Area III to Area II for the portion of the property east of the blue line and 2) a land use designation change on the western portion of the property to Open Space - Other for the following reasons:

- Creation of a more logical service area boundary: an Area III to Area II change for the portion of the property east of the blue line is consistent with other “western edge” properties along 3rd St.
- Compatibility with the surrounding area: The existing use is a single-family home and the developable area of the property will not be expanded with a change from Area III to Area II under county zoning. The proposed land use designation change for the portion of the property west of the blue line ensures the preservation of open space and neighborhood character along the western edge and is consistent with other western edge properties along 3rd St.
- Correction of a mapping error: analysis of previous comprehensive plan maps indicates that the Area II/III boundary may have originally bisected the property and was moved in error to the eastern edge of the property during the 1997 digitization of maps.

Recommended Land Use Designation



Recommended Planning Area Boundary



The current proposed blue line ballot measure may have implications for this property. Proposed changes to the blue line would require voter approval. Staff recommends an open space land use designation on the portion of the lot currently west of the blue line regardless of any potential shifts in the blue line. Furthermore, the corresponding zoning on the property should not create any additional building lots.

OVERVIEW

The Board of County Commissioners previously reviewed a Subdivision Exemption request for this property (SE-14-0006: Wilson Lot Recognition) on Aug. 5, 2014 and Mar. 10, 2015. The purpose of this request was to gain recognition as a legal lot. Per Resolution 2015-59, the Board approved the request with the condition that the applicant first pursue a re-designation from Area III to Area II and subsequent annexation to the city.

SITE DESCRIPTION

The property is located in unincorporated Boulder County and comprises 0.741 acres. It lies to the south of Hawthorn Rd. and west of 3rd St. The property abuts the foothills, is surrounded directly by open space and also has contiguity with neighboring residential uses. The Silver Lake Ditch runs along the eastern boundary. Access to the property is provided by an easement that

connects it to Hawthorn Ave.

The blue line bisects the property. From Kalmia down to Alpine, the description of the location of the blue line is indicated as “Low Confidence,” as it is defined in this area as located “150 feet west of the center of 3rd Street” (Sec. 128A, Charter of the City of Boulder). This description does not specify the point along the street from which that measurement should be taken, e.g. from the street centerline or curb edge.

The property is considered a “western edge” property, which refers to properties along the western boundary of the city’s Service Area. The City of Boulder *Guidelines for Annexation Agreements* of “mostly developed residential properties in Area II,” which includes guidelines for the western edge properties, does not apply to this property, as it is in Area III in its entirety. This area designation is atypical for western edge properties along 3rd St., all of which have a portion east of the blue line in the Service Area (either in Area I or II).

Site History

3261 3rd St. is owned by the Wilson family. The property was formed in 1956, when it was sectioned off from a larger parcel. In that process, it became a substandard lot by Boulder County’s standards, as it did not meet the minimum size requirement of 1 acre. The property has a 1,818 sq. ft. residence and a 1,416 sq. ft. agricultural outbuilding. The latter structure collapsed and is currently unusable.

The Wilson family first applied for a Subdivision Exemption process to gain recognition as a legal lot in 2012 (SE-12-0009) as well as a Limited Impact Special Use Review for approval of the residence as a historic accessory dwelling unit (LU-12-0014). The prior docket had a conditional approval based on the landmarking of the historic home on the property that was built in the late 19th century, and the latter docket was denied. The requirement expired after one year, and the applicants resubmitted a Subdivision Exemption request in 2014, noting that the historical designation requirement is not appropriate due to the structural damage to the residence and prospective cost of repairs. The request was conditionally approved subject to the Board of County Commissioners resolution (2015-59) described above.

Planning Area Designation

The Area III – Rural Preservation designation of this property refers to the planning area where the city and county intend to preserve existing rural land uses and character. Staff believes the designation of this property as Area III in its entirety represents a mapping error for the following reasons: maps from the 1990 Boulder Valley Comprehensive Plan (BVCP) major update and before reveal that the property was bisected by the blue line, as is the case today, and that the Area II/III boundary followed the blue line on the western edge of the city. In 1997, the comprehensive plan maps were digitized and show the Service Area boundary along the eastern edge of the property, where it remained through the most recent update of the BVCP in 2010. The 1997 map also defined the blue line as the western boundary of the city’s Service Area. The position of the blue line as defined in the City Charter did not change in this period. Therefore, the shift of the Service Area boundary to the eastern edge of the property created a misalignment between the blue line and the western boundary of the Service Area. Staff was not able to find evidence that this shift took place through an amendment process; a digitizing error as part of the

conversion of maps to digital media is a possibility.

Land Use Designation

3261 3rd Street has a designation of Low Density Residential. Earlier BVCP maps prior to 1990 appear to show the property as split between “Open Space & Other Parks” and “Low Density Residential” along the same boundary as the blue line. The designation of this property as Low Density Residential in its entirety is traceable back to the 1989-1990 annual review of the comp plan, when the parcel is shown without an open space designation. This may have occurred through minor map corrections to the BVCP land use map regarding open space designations for developed properties at the west end of Hawthorn.

Blue Line

The changes to the blue line under consideration would entail a shift in the line to include western edge properties in the Service Area, including 3261 3rd St. On Aug. 16, City Council approved the blue line ballot measure for the ballot this fall. The November election results will determine the status of approval or denial of the blue line amendments. The implications for this property of the potential shift in the blue line are discussed in the “Analysis” section below under “Compatibility with Surrounding Land Uses.”

COMMUNITY INPUT

One comment was received at the Aug. 8 open house on land use change requests. The commenter expressed concerns about the number of houses that may be built on the property.

In 2014 and 2015, several comments received by the county regarding SE-14-0006: Wilson Lot Recognition generally concerned the following topics:

- Importance of maintaining existing footprint of the house.
- Protection of views.
- Compatibility with the adjacent neighborhood and open space.

Other individual opinions expressed include the following: support for the historic preservation of the existing home; concern regarding the environmental sensitivity of the area in light of the impact of the 2013 flood on Hawthorn Ave., the Silver Lake Ditch and the base of the foothills; and concerns regarding the condition of the house as a potential hazard.

ANALYSIS

Criteria for minor adjustments to the Service Area Boundary

The property meets the requirements for a minor adjustment to the Service Area boundary, as outlined in Sec. 2.b.(1) of the Amendment Procedures:

Maximum size and minimum contiguity. The property is less than 10 acres in size and therefore meets the size requirement. The property demonstrates 70 percent contiguity of its perimeter with city limits, and therefore meets the requirement for 1/6 contiguity with the existing service area.

Logical Service Area boundary. Moving the eastern portion of the property to Area II results in a more logical Service Area Boundary. The portion east of the blue line of all other western edge properties along 3rd St. is in the Service Area (Area I or II).

Compatibility with the surrounding area and overall intent of the comprehensive plan.

Maintaining the eastern portion of the property as Low Density Residential and changing the existing western portion of 3261 3rd St. to Open Space - Other would be consistent with the adjacent low density residential neighborhood and open space lands, as described in detail below.

The area and land use designation changes are consistent with the overall intent of the comprehensive plan. The changes recognize the existing development on the property and therefore include that portion of the property within the growth boundary of the city. The changes are furthermore consistent with the preservation of open space, as the portion of the property west of the blue line will remain in Area III and receive an Open Space - Other designation. The portions west of the blue line of all other western edge properties along 3rd St. either have an open space designation or a conservation easement.

Other criteria

Due to the size of the property, moving 3261 3rd St. to Area II would not 1) have major negative impacts on transportation, environment, services, facilities or the budget or 2) materially affect land use and growth projections, service provision to the immediate area or overall Service Area, or the city's Capital Improvements Program. Finally, the proposed area change should not create development potential for land that logically should be considered as part of a larger Service Area expansion.

Compatibility with Surrounding Land Uses

The property is contiguous with both open space and residential uses. The use of the property has been residential since the late 19th century, when the house currently on the property was built. Density is one factor in an assessment of neighborhood compatibility. The current Low Density Residential land use designation of 3261 3rd St. allows only residential development and specifies two to six housing units per acre. With 0.741 acres, the property could therefore accommodate up to four dwelling units. Per city regulations, however, only the portion of the property east of the blue line would be eligible for development. Under current conditions, this area comprises roughly .34 acres, or 15,000 sq. ft.

The current draft proposed shift of the blue line to the western edge of the property would result in the entirety of the property, or 32,278 sq. ft., lying to the east of the blue line and thus eligible for development. Staff recommends designating the portion of the property west of the current location of the blue line as Open Space - Other. This land use designation would ensure compatibility with other western edge properties, open space and the character of the surrounding neighborhood.

Staff recommends maintaining the current land use designation of Low Density Residential on the remaining portion of the property east of the current location of the blue line. In addition, should the owner pursue annexation, staff recommends limiting the following: potential for

additional building lots, overall house size and number of units. Potential options to explore include: 1) allowing one unit total with size limitations or 2) allowing one additional unit with size limitations that also offers community benefit, e.g. permanently affordable housing.

Final determination of developable area on the property per city regulations would result from technical staff analysis as part of the annexation process. Factors that could affect the developable area of this property include, but are not limited to the following: slope, soil, height, side yard bulk plane, side yard wall articulation and solar access.

Availability of Services

The site is in proximity to existing development and infrastructure.

Access

The existing width of access per platted easement most likely meets city standards and would be resolved in the annexation process.

Water, Wastewater, and Sanitary Sewer

City water lines and sewer mains exist in the surrounding neighborhood. The map to the right shows the existing sewer system mains. See **Attachment E-1** for additional information.

The site has electrical and gas service but no well or water service and relied upon a cistern to supply water needs until 2009, when the property became vacant. The septic system on the property is in need of replacement. Connecting to the system and any needed upgrades would be the responsibility of the owner.



Figure 1: Existing Sewer Mains
Source: Wastewater Utility Master Plan, 2009

The options for consideration for access to nearby utilities from this property include the extension of water and sewer 1) from Hawthorn Ave. along the driveway access or 2) through adjacent properties. The properties to the southeast of the subject property are privately-owned and would therefore require the provision of a public utility easement. The properties due east and south of the subject property are owned by city open space.

Environment

Open Space

Considerations regarding connectivity with open space and appropriate sensitivity to open space resources should be coordinated with the city should this property be reviewed for annexation. Due to its location next to the foothills, changes to the property could have visual impacts to surrounding open space. Any redevelopment of the property should respect the scenic qualities of the surrounding OSMP lands and not cause greater impacts on ecological systems or water delivery infrastructure than those which exist already in this area (e.g., fences friendly to wildlife movement and ongoing access to the Silver Lake Ditch).

Slope

The extreme slope on the property in addition to the geologic conditions identified by the Pendleton Maps which designate the property as in an area of “Potential Mass Movement Hazard and Consolidation/Swell Constraint” would require geotechnical investigations and engineered drainage plans. These potential constraints could affect the requester’s ability to carry through the expressed desire for redevelopment.

There is a potential that engineering treatments including but not limited to structural shoring and hillside stabilization may be necessary; further analysis to determine what treatments might be necessary would be conducted in the annexation process.

Hydrology, Wetlands and Floodplain

The property is not in a floodplain and does not contain wetlands. There are no known hydrological issues with the property.

Other

Historic Preservation

Research indicates the frame house at 3261 3rd St. was built sometime between 1870 and 1900. At the time of annexation, the historic significance would need to be evaluated.

Summary of Analysis

The recommendation for approval of the proposed area change from Area III to Area II for the portion of the property east of the current location of the blue line acknowledges that the existing development on the property should lie within the growth boundary of the city. This area change creates a more logical service boundary consistent with other western edge properties along 3rd Street. In addition, the recommendation for a land use designation change on the western portion of the property to Open Space - Other ensures the preservation of open space and neighborhood character along the western edge and is also consistent with other western edge properties along 3rd St.

ATTACHMENTS

E-1. Availability of Services

Water

All properties east of 3261 3rd St. that are within the city service area (Area I and II) are connected to the city's water line. The closest water line to the site is found along 3rd St. to the south. Two large pipes, with a diameter of 20 and 24 inches, are located east of the site along 4th St. The site is served by Water Pressure Zone 3, which generally serves areas above an elevation of 5,450 feet.

Stormwater

The major drainage way (or creek) associated with this site is Goose Creek. In looking at the site at a closer detail, the majority of the stormwater near the surrounding site is channeled to an irrigation canal that runs north along the east side of site. This irrigation canal continues to travel north and meets the Mesa Reservoir. The existing storm drains are sized for existing levels of development and any new development may require new storm sewers or up-sizing of existing systems. A 12-inch culvert is located directly east of the site, which channels the water onto Forest Ave. Redevelopment of the site may require up-sizing this culvert to maintain adequate hydraulics.

Waste Water

City sewer mains are found in the surrounding neighborhoods of the site and the closest main to the site is found along 3rd St. to the south. Only local sewer mains surround the site; collector sewer mains are found further east along Balsam Ave. and North St.

LINKS: City of Boulder Public Works Department Master Plans

- [Comprehensive Flood and Stormwater Plan, 2004](#)
- [Stormwater Master Plan, 2007](#) – update in progress
- [Water Utility Master Plan, 2011](#)
- [Wastewater Utility Master Plan, 2009](#)
 - [Wastewater Collection System Master Plan](#) – update in progress
 - [Wastewater Treatment Plant Master Plan](#)
 - [Water Quality Strategic Plan](#)



Figure 2: Existing Water Mains



Figure 3: Existing Storm Mains

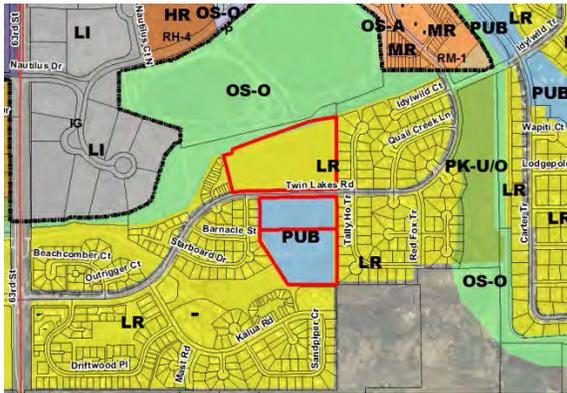


Figure 3: Existing Sewer Mains

Requests #35 and #36

6655 and 6500 Twin Lakes, 0 Kalua Road

Existing BVCP Land Use Map



Existing Planning Area Map



Request Summary

- Requester:
 - #35: Boulder Valley School District and Boulder County Housing Authority
 - #36: Twin Lakes Action Group, community members
- Type of Request: Land use map change
- Brief Description of Request:
 - #35: Low Density Residential (LR) and Public (PUB) to **Mixed Density Residential (MXR)**
 - #36: Low Density Residential (LR) and Public (PUB) to **Open Space (OS)** with Natural Ecosystems or Environmental Preservation designation
- Approval Required: Four body

Existing Conditions

- BVCP Designation: LR and PUB
- Zoning (county): Rural Residential (RR) for all three properties
- Planning Area: II
- Combined Lot Size: 862,000 sq. ft. (19.8 acres)
- Existing Buildings: none

Jobs and Housing Assumptions

- Current Estimated Dwelling Units: 1-60 north parcel (LR); 1 per parcel, south (RR zoning)
- Future Estimated Dwelling Units:
 - #35: 120-360 with MXR
 - #36: n/a with OS
- Future Estimated Jobs: n/a

Site Photos



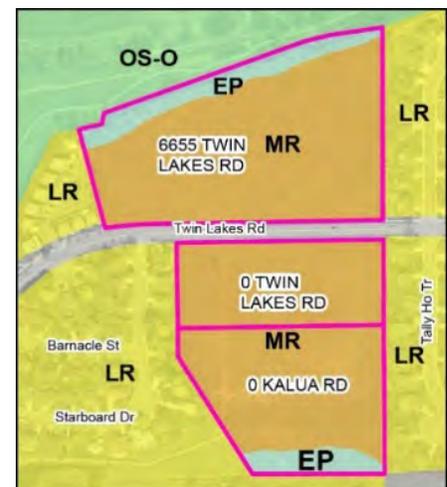


STAFF RECOMMENDATION FOR REQUESTS #35 and #36

Staff is recommending changing the current land use designations from **Low Density Residential (LR)** and **Public (PUB)** to **Medium Density Residential (MR)**, with **Environmental Preservation (EP)** on the wetland and a 50-foot buffer around the wetland and along the irrigation canal for the following reasons:

- The parcels are in Area II (the area designated for urban services) and have been intended for annexation into the city since the 1970s.
- Urban services (i.e., water, wastewater, stormwater, roads) are readily available near the site.
- Diversity of housing types and costs is a core value of the Comprehensive Plan, recognizing that the availability of housing affordable to both low and moderate income populations is “a growing concern”.
- There is a scarcity of sites for housing in Boulder Valley. Allowing Medium Density Residential will allow a diversity of housing types and prices, and a significant portion of the units will be permanently affordable.
- The recommended designations further other key Boulder Valley Comprehensive Plan (BVCP) policies, including jobs-housing balance, compatibility of adjacent land uses, sensitive infill and redevelopment, and strengthening community housing partnerships.
- The recommended Environmental Preservation designation protects the drainage way on the northern edge and wetlands on the southern edge from future development. In addition, the Site Review process will require additional areas of the sites to be set aside for a future trail as identified on the 2010 BVCP Trails Map for human and wildlife movement (a stakeholder group guiding principle).
- While the sites have clear value to the adjacent neighbors for their scenic quality and other resource values, neither the county nor city has found the sites to meet their respective criteria for open space designation or acquisition for broader community benefit, nor is there a willing seller.
- The 2014 update to the Boulder County Comprehensive Plan’s (BCCP) Environmental Resources Element did not identify the parcels as Critical Wildlife Habitat. Species with protected status have been sighted on the parcels. However, based on available information, presence of these species would not preclude development, and future studies will guide steps to address wildlife concerns when and if development occurs.

Recommended Land Use Designation



- Mixed Density Residential (MXR) is not recommended because the designation allows up to 18 units per acre (360 units) and is higher than the 6-12 dwelling units per acre discussed in the Twin Lakes Stakeholder Group process.
- The recommended designation allows 6-14 dwelling units per acre (120-280 units total) and best achieves the numerous and diverse interests articulated by the Twin Lakes Stakeholder Group (see section on Community Input).
- The recommendation is consistent with the mix of densities present in the surrounding area and could be compatible with the surrounding developments.
- The combined sites are large enough that, within the recommended designations, design flexibility can address concerns about visual, environmental, infrastructure, and existing neighbor character while still meeting the #35 requesters' objectives of providing a mixture of housing types.

OVERVIEW

This report analyzes Requests #35 and #36, recognizing the individual issues and concerns expressed through the two separate requests (i.e., Open Space and Mixed Density Residential). It also explores alternative land use designations (i.e., Medium Density Residential and Environmental Protection).

SITE DESCRIPTION

The properties total approximately 20 acres and are bisected by Twin Lakes Rd. with access from the east and west. Existing residential development is on the adjacent properties to the west, east, and south. Directly across an irrigation canal to the north is the Twin Lakes open space.

Site History

6655 Twin Lakes Rd. is approximately 10 acres and owned by the Boulder County Housing Authority (BCHA). The land was purchased from the Archdiocese of Denver by the county in 2013 to provide affordable housing to Boulder County residents and workers. 6650 Twin Lakes Rd. and 0 Kalua Rd. are approximately four and six acres respectively. The two properties are owned by the Boulder Valley School District (BVSD). The properties appear to have been conveyed to the BVSD near the time and in conjunction with the development of the Gunbarrel Green subdivision. Demand for a school at this location did not materialize and BVSD is currently considering using the land to build housing for district staff in collaboration with BCHA's objectives on the northern parcel.

The three parcels, and the adjacent subdivisions, are in Area II (the urban service area) and have been since the 1970s. The BVCP anticipates that all Area II land will annex into the city following specific procedures. The city will not provide urban services to new development in Area II (i.e., water, sewer, parks, libraries, public safety) without annexation.

Land Use Designations

6655 Twin Lakes Rd. (the BCHA-owned parcel) has a BVCP designation of Low Density Residential (LR) and 6650 Twin Lakes Road and 0 Kalua Road (the BVSD-owned parcels) have a BVCP designation of Public (PUB). The three parcels' designations have been in place since 1977. The Low Density Residential land use designation allows only residential development and specifies 2-6 housing units per acre. The Public land use designations encompass a wide range of public and private nonprofit uses that provide a community service. This category includes municipal and public utility services, such as the municipal airport, educational facilities, and government laboratories. It also

includes other nonprofit facilities such as churches, hospitals, retirement complexes and may include other uses as allowed by zoning. The Public designation allows residential development through a special review. The parcels are designated as Public because the land is owned by the BVSD.

COMMUNITY INPUT

Due to a high level of community interest in these sites, City Council and County Commissioners initiated a separate public process to begin a community dialogue on the two requests. The Twin Lakes Stakeholder Group met seven times from Apr. through Jul. The outcomes of the process are discussed below briefly and were used to inform the staff recommendations. A separate Summary Report from Peak Facilitation on the process and group outcomes is **Attachment F-1**.

A large volume of community input was received throughout the BVCP process and documented in the City Council and County Commission proceedings. Public comments related to all land use change requests are available on the county's website

www.bouldercounty.org/doc/landuse/bvcp150001comments5.pdf. The input received to date regarding Twin Lakes is generally concerning the following topics:

- Maintaining the rural residential character and feel of the neighborhood.
- Greater neighborhood input and collaboration.
- Infrastructure maintenance, capacity, responsibility and potential liability (including traffic).
- Hydrology, including basement flooding.
- Agricultural and open space preservation.
- Wildlife habitat and corridor.
- Precedent of annexing open space.

The Summary Report by Peak Facilitation identified perspectives from the stakeholder group related to the following three tasks charged to the group:

Task 1: Jointly formulate recommendations for areas of expertise and selection of experts to inform the desired land use patterns for the area. The areas for study should include the suitability for urban development, desired land use patterns, and environmental constraints.

Task 2: Jointly recommend the appropriate range of potential housing units with consideration given to intensity and community benefit, regardless of who holds title to the property.

Task 3: Following the outcome of the BVCP process and 1 and 2 above, jointly recommend a timeline for the formulation of a set of guiding principles to inform next steps.

Although the group did not reach agreement on the intent of Task 1 or an appropriate range of units (Task 2), the group did agree on the following guiding principles (if development occurs):

- Continue an advisory group to influence development, design elements, etc.
- Be thoughtful and clear about communication and ensure transparency going forward.
- Mitigate impacts on existing infrastructure and neighborhoods.
- Delineate wildlife habitat and corridor, open space, trails, and create a set-aside for no development.
- Ensure a diversity of housing types.
- Create a design that is consistent with the current surrounding neighborhoods.

- Ensure adequate parking to minimize negative impacts on the surrounding neighborhoods.
- Supply appropriate numbers and types of community amenities to the public.
- Supply appropriate numbers and types of affordable housing units.

Overall, staff believes the stakeholder group process created an environment where community questions could be answered and common interests and concerns identified. Staff responses to the Twin Lakes Action Group (TLAG) and community questions are available on the city's website at www.bouldercolorado.gov/bvcp/twin-lakes. One important outcome is an agreement to continue clear and transparent communication in the future if development occurs.

An open house was held on Aug. 8 that provided an opportunity for the community to review and comment on the draft staff recommendations for land use change requests related to the Twin Lakes parcels, as well as two other properties. Seventy-eight comments were submitted about the Twin Lakes requests at the open house. The majority expressed a strong desire for the parcels to be designated as open space. A number of commenters voiced support for the current land use designation that allows up to six dwelling units per acre (more consistent with the existing development) and a smaller group of commenters supported the staff recommendation. Written comments from the open house are in **Attachment F-6**.

ANALYSIS

The analysis includes five BVCP land use designation options, including Low Density Residential (current), Open Space (request #36), Mixed Density Residential (request #35), Medium Density Residential and Environmental Preservation.

Compatibility with Surrounding Land Uses

The site abuts residential development of varying densities on three sides. The primary compatibility concern expressed during the stakeholder group process was the number of units. Although there is not a specific development plan to consider at this point, BCHA and BVSD proposed a range of 6-12 units per acre. The request for Mixed Density Residential would provide for a mixture of housing types and more flexible and creative design, and would allow up to 18 dwelling units per acre.

Density is only one factor in an assessment of neighborhood compatibility. Other factors that determine how a development would fit into the surrounding neighborhood include scale, massing and design (e.g., how the buildings are configured on the site, the building materials used, transitions to adjacent land uses, placement of parks, open space, buffers, lighting, and parking). The future Concept Plan and Site Review phases of development will address these factors in detail.

As part of the stakeholder process, staff conducted a density analysis of area subdivisions (i.e., the number of units divided by the total acreage of a subdivision, including undeveloped land associated with those subdivisions). These subdivisions are characterized by a wide variety of densities. For example, Red Fox Hills is located due east of the property and averages 2.3 dwelling units per acre, while Portal Estates subdivision due west of 6655 Twin Lakes Rd. averages 14.9 dwelling units per acre. Images and densities of surrounding subdivisions are shown in **Attachment F-2**.

The TLAG also conducted an analysis of density using similar data. The analysis showed a histogram of the density of all nearby development and illustrated how development at the proposed 6-12

dwelling units per acre (under the requested MXR designation) would far exceed the current average density across the neighborhood as a whole. TLAG's full analysis is available [here](#).¹

BCHA and BVSD stated an intention to develop in the range of 6-12 units per acre, not up to the 18 units per acre allowed by the requested MXR designation. Staff concludes that the proposed range of 6-12 units per acre is consistent with the mix of densities present in the surrounding area and could be compatible with the surrounding developments (subdivisions within both the city and the county). The proposed residential use is also consistent with the surrounding land uses, and the large combined site could be designed through a collaborative process to maximize compatibility in regard to scale, massing, and design. Specifically, the provision of a significant amount of open space on the site could minimize the visual impacts, hydrology and wildlife concerns. Additionally, the Site Review process would require additional areas of the sites to be set aside for a future trail as identified on the 2010 BVCP Trails Map for human and wildlife movement.

The Twin Lake Stakeholder Group discussed density in great detail. The group developed six alternative scenarios for the site. The discussion and scenario development process revealed common interests among parties that include using open space to continue wildlife passage and trail connection through the site, the provision of other community amenities and the importance of good design and quality building materials. Although the stakeholder group did not reach consensus on the number of units, the Concept Plan and Site Review processes are designed to address design and compatibility with surrounding neighborhoods.

Availability of Services and Infrastructure

The analysis below describes the site's close proximity and access to urban services and infrastructure. Community members have expressed concerns with infrastructure capacity (primarily transportation and stormwater) which are described below.

Transportation and Access to Services. Transit is available approximately 0.5 miles from the site (the 205 stops at Twin Lakes and 63rd) and provides connections to the Gunbarrel Town Center, 28th St., and Downtown Boulder. Gunbarrel Town Center is 1.7 miles by road and 1.3 miles by a multiuse path. Services include a full service grocery store, restaurants, professional offices and medical and dental offices.

There are several dedicated walking/cycling routes to the Gunbarrel Town Center and the walk score for the sites is comparable to other BCHA properties (using walkscore.com). Neighbors expressed concern about increased traffic as a result of new development. In 2012, the Boulder County Department of Transportation measured the average annual daily vehicle traffic on Twin Lakes Rd. at 2,400 vehicles per day. The average vehicle speed was 30 MPH and the average annual daily bike traffic was 56 per day. Due to the parcel size, a transportation impact analysis would be required at the time of Site Review to identify any system deficiencies (including safety) that would require mitigation.

Water, Stormwater, and Wastewater. The site is close to

¹ https://www-static.bouldercolorado.gov/docs/Meeting_5_materials-1-201606



existing infrastructure and the city's water, stormwater, and wastewater master plans anticipate providing services to the site (similar to all Area II lands). The map to the right shows the existing sewer system mains. Connecting to the system and any needed upgrades would be the responsibility of the requestor (similar for all infrastructure). See **Attachment F-3** for additional information.

Jobs. The site is in close proximity to the Gunbarrel employment center where there is a diversity of retail, commercial, professional, manufacturing, research and development jobs. According to the BVCP 2015-2040 Projections, Gunbarrel had 12,700 jobs in 2015 and the potential for an additional 12,850 jobs by 2040 based on existing zoning, while the availability of zoned land for additional nearby residential development to house potential future employees is limited.

Environment

City and county open space staff's evaluations find that the parcels do not meet criteria for acquisition as either park or open space. Furthermore, based on available information the parcels' hydrology and soil characteristics are similar to those of other parcels developed in Area I and Area II. Hydrology and soil characteristics present design issues but do not preclude development on the site. The granularity of currently available data is not sufficient to make final development decisions and more detailed data will be necessary to provide guidance for any decision making during the Site Review phase of development.

Parks and Open Space. Gunbarrel and specifically the Twin Lakes area are served by public parkland provided by Boulder Parks and Recreation at Eaton Park. This is the 26-acre park area just north of Boulder County's Twin Lakes and is primarily a wetland habitat with an interpretive walking path, a picnic shelter and a small BMX skills course. The city's Parks and Recreation Department's master plan indicates the need for future development of Eaton Park to serve the needs of the Gunbarrel area and provide typical amenities of a neighborhood park including a play area, an open multi-use field and other park amenities for active and passive recreation. These amenities would be implemented in the upland areas that are not wetland habitat or conservation areas and are currently identified by the existing piles of fill material that was left on the site from previous uses.

Purchasing the BCHA site as open space was considered when the Archdiocese of Denver approached Boulder County as a potential buyer and indicated a preference for the land to be used for social good. Although the land is next to the county's Twin Lakes open space property, it did not present a priority for the county's open space program because the land is within a developed area.² The land that the county targets for purchase and management as open space is typically on the edge of urban development rather than in the middle of a developed area such as Gunbarrel. The BVCP promotes land preservation to preserve the urban edge through the Area III designation, and that has been significantly achieved in the area. Consequently, Boulder County Parks and Open Space concluded that the property was not appropriate as open space. As mentioned above, there is value to preserving existing trails and wildlife connections through the property.

Hydrology/Floodplains. The sites are not in the 100-year floodplain or High Hazard Zones and do not

²The Twin Lakes open space is also located within a developed area; the land was acquired by Boulder County Parks and Open Space in 2002 in response to a request by the Boulder and Left Hand Irrigation Company Board of Directors due to their concerns about liability issues related to recreational use of the area. See the 2004 Boulder County Twin Lakes Management Plan for more information: <http://www.bouldercounty.org/doc/parks/twinlakesmplan.pdf>.

have any other hazards known or mapped (e.g., fire and steep slopes). As noted during the Twin Lakes Stakeholder Group process, expansive soils are present on the site.³ Hydrology is a particular concern for neighbors of the property. Standing water is often reported on the site during the winter and spring, and neighbors have expressed concerns that development on the site could exacerbate basement flooding several neighboring homes have experienced during heavy rain events. As a result, BCHA is currently undertaking a geotechnical and hydrology investigation to inform any future development on the properties, including any potential impacts to adjacent neighbors. These studies will inform the Annexation and Site Review phases of development.

Staff's analysis is informed by: 1) comments by TLAG's hydrologist, Dr. Gordon McCurry, as well as city and county staff with expertise in hydrology at a May 19 Twin Lakes Stakeholder Group meeting; 2) staff's review of the report by TLAG's hydrologist, Dr. Gordon McCurry; and 3) county staff's review of hydrology-related materials in Twin Lakes area subdivision files, as well as Natural Resource Conservation Service (NRCS) soils data. Staff concludes that the hydrologic constraints present on the site would not preclude future development based on currently available data.

Wetlands. Freshwater emergent wetlands are mapped in the southern portion of the site based on field work conducted in the spring of 2016 by Apex Companies, LLC on behalf of BCHA and BVSD ([Wetlands Delineation Studies](#)).⁴ As a result, staff recommends applying an Environmental Preservation (EP) designation to the wetland and a 50-foot buffer around the wetland. Based on the information gathered to date and contingent upon the findings of the wetlands and wildlife presence/habitat studies underway, the presence of wetlands on the properties do not preclude development on other parts of the site. BCHA and BVSD would need to submit a wetlands delineation report at the time of Site Review.

Habitat. Members of the public have documented a range of species using the two parcels as habitat or for hunting, including coyotes, great horned owls, rabbits, mice, foxes and raccoons. The 2014 update to the Boulder County Comprehensive Plan's (BCCP) Environmental Resources Element involved extensive analysis and peer review by a wide range of experts.⁵ The analysis did not identify this area as Critical Wildlife Habitat. As recently as 2015, Boulder County Parks and Open Space made it clear that the parcel in question does not meet their criteria for acquisition, and, given competing requests for limited acquisition and management resources, there is no interest in the inclusion of this parcel in the county's open space portfolio.

BCHA has contracted with a wildlife consulting firm that is actively monitoring wildlife on the parcels and will continue with a yearlong monitoring effort. At this time staff is aware that species with protected status that have been sighted on the parcels, either by neighbors or the wildlife consultants, include bald eagle, great blue heron, garter snakes, and tiger salamander, recognized in Boulder County as a Species of Special Concern, as well as nesting Western Meadowlarks, protected by the Migratory

³The USDA's Natural Resource Conservation Service (NRCS) soil survey data indicate the presence of expansive clay soils on the parcels. The currently available NRCS data are not granular enough to inform site design. The types of soils indicated by the survey data not uncommon in the Boulder Valley; construction of buildings on the sites may require design accommodations as a result.

⁴ <https://ourbouldercounty.org/document/wetlands-delineation-study-june-2016>.

⁵ A summary of research supporting the BCCP Environmental Resources Element is available at: <http://www.bouldercounty.org/doc/landuse/bccp-supp.pdf>. Additional information related to the Environmental Resources Element is available at: <http://www.bouldercounty.org/property/build/pages/bccp08003.aspx>.

Bird Treaty Act. The consultant report and potential additional studies will inform the future Site Review phase of development to determine if steps should be taken to protect species of concern on any portions of the property.

Based on the information gathered and presented, and contingent upon the findings of the wetlands and wildlife presence/habitat studies underway, the habitat conditions of the properties and presence of protected species would not preclude development, and the results of future research can guide steps to address wildlife concerns when and if development occurs. Further, available information indicates that movement of wildlife across the properties can be accommodated through careful site design, easements, and other strategies that will be required during the Site Review process.

Agricultural Lands of Significance. Soils present on the subject parcels are rated by the NRCS as Farmland of Statewide Importance and Prime Farmland if Irrigated.⁶ However, the BCCP does not recognize these parcels as being of statewide or local importance. The parcels were excluded from BCCP designation due to the fact that they are an enclave in a developed area, and they are in Area II and are anticipated for development rather than for use as farmland. Areas to the south of the sites are categorized as of statewide and local importance in the BCCP.

Affordable Housing

In 1978, the Boulder Valley and Boulder County Comprehensive Plans identified the need to provide a diversity of housing types and costs. The 1986 BVCP was more explicit, adding policies recognizing that the availability of housing affordable to both low and moderate income populations was “a growing concern,” and that public/private programs, funding and incentives needed to be tapped and developed to augment the limited supply of such housing being provided through private development. A BVCP Core Value is now to provide a diversity of housing types and price ranges. This was also identified in the 2015 BVCP Community Survey as the community value in greatest need of increased attention by 42 percent of the respondents. A Medium Density Residential designation would allow for a diversity of housing types on the sites, and a significant portion of the units would be permanently affordable (40-60 percent of the units deeded as permanently affordable is an annexation requirement).

BVCP Policies

Staff reviewed all the BVCP policies and cited the most relevant policies informing the recommendation in **Attachment F-4**. Staff also prepared a high level analysis of how the four land use designations are positive, negative, or neutral in relation to BVCP core values (see table below). For additional information, the policies cited by the school district, housing authority and the TLAG are listed in **Attachment F-5**.

Overall, the recommendation is consistent with the BVCP core values and policies. The property is located in Area II in the BVCP, which is the “area now under county jurisdiction, where annexation to the city can be considered consistent with policies 1.16 Adapting to Limits on Physical Expansion, 1.18 Growth Requirements and 1.24 Annexation. New urban development may only occur coincident with the availability of adequate facilities and services and not otherwise.” (Policy 1.20 Definition of Comprehensive Planning Areas I, II and III) The additional housing units will also help balance available housing with area jobs (Policy 1.19 Jobs:Housing Balance).

⁶ Based on USDA Natural Resource Conservation Service Soil Survey data. See: <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

The current designation has been for residential and public use since 1977. Although a 40-acre community park was envisioned for the area south of Twin Lakes in the 1977 and 1978 versions of the BVCP, those plans were contingent on residential areas of Gunbarrel annexing, which did not occur.⁷ The northern parcel was sold by the Archdiocese of Denver to Boulder County to provide a community good in the form of affordable housing. The southern parcels were deeded to the school district to provide a public use and BVSD identified housing for district staff as a pressing need. The additional housing units will also help balance available housing with area jobs (Policy 1.19 Jobs:Housing Balance).

Neither the county nor city has found the sites to meet their respective criteria for open space designation or acquisition due to the parcels' location within a developed area for which additional development is anticipated by virtue of their Area II status, and due to their habitat characteristics. Finally, the owners of the properties, BCHA and BVSD, have as their objectives the development of affordable housing meeting a long-identified BVCP value and critical need for the community.

Few planned locations for housing remain in the city's service area. Allowing Medium Density Residential on these sites is an efficient use of land and resources and will further many BVCP policies regardless of future ownership of the parcels. There will be significant community benefit by allowing a diversity of housing types to serve area households, with a significant portion of the units being permanently affordable.

Although there is concern in the community regarding sensitive infill and redevelopment on the site, BCHA and BVSD have demonstrated a commitment to work with the community through the stakeholder process. A positive outcome from the process is an agreement to conduct the studies necessary to proceed with an informed development plan that will reflect any constraints associated with the land, while remaining sensitive to the concerns of the neighbors, and working collaboratively to address their interests.

⁷ After Gunbarrel residents voted not to annex in 1978, the next BVCP update in 1981 reflected a change in land use designation from open space to Low Density Residential for the area southeast of Twin Lakes, now Red Fox Hills subdivision, and to Medium Density Residential for the area east of Twin Lakes, now Brandon Creek subdivision. See [staff comments](https://www-static.bouldercolorado.gov/docs/TLSG_Staff_Comments_2016-07-08-1-201608221425.pdf) submitted through Twin Lakes Stakeholder Group process on July 8, 2016 for further discussion: https://www-static.bouldercolorado.gov/docs/TLSG_Staff_Comments_2016-07-08-1-201608221425.pdf.

The following summary chart presents a high level assessment of how the relevant BVCP Core Values relate to the various land use options.

CONSISTENCY WITH RELEVANT BVCP CORE VALUES	BVCP LAND USE OPTION			
	Low Density Residential (current)	Open Space (#36)	Medium Density Residential (Recommended)	Mixed Density Residential (#36)
A welcoming and inclusive community	=	=	+	+
Our unique community identity and sense of place	+	+	+	--
Compact, contiguous development and infill that supports evolution to a more sustainable urban form	--	--	+	+
Open space preservation	=	+	=	--
Great neighborhoods and public spaces	=	=	+	--
Environmental stewardship and climate action	=	=	=	=
A vibrant economy based on Boulder’s quality of life and economic strengths	=	--	+	+
A diversity of housing types and price ranges	--	--	+	+
An all-mode transportation system to make getting around without a car easy and accessible to everyone	=	=	=	=
+ positive, = neutral, -- negative				

ATTACHMENTS

- F-1 Twin Lakes Stakeholder Group Final Report
- F-2 Twin Lakes Area Tour and Density Analysis
- F-3 Availability of Services
- F-4 Analysis of Existing Policies in the 2010 Boulder Valley Comprehensive Plan
- F-5 Policies Cited by BCHA, BVSD and TLAG
- F-6 Twin Lakes Open House Comments

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BACKGROUND: Two Requests for Change

As part of the update to the Boulder Valley Comprehensive Plan (BVCP) that occurs every five years, the City of Boulder and Boulder County invite property owners and the community to submit requests for change to the land use designations of specific parcels. In October 2015, there were competing submissions for change to the land use designations for three parcels totaling approximately 20-acres in Gunbarrel in an area south of Twin Lakes. One of these parcels is owned by the Boulder County Housing Authority (BCHA) and is currently designated as Low Density Residential (LR), which would permit between 2 to 6 dwelling units per acre to be developed. The other two parcels are owned by the Boulder Valley School District (BVSD) and are currently designated Public (PUB), a designation that does not have a specific number of possible units attached to it. BCHA and BVSD submitted requests (consolidated as “request #35”) to have the land use designation of both these parcels changed to Mixed Density Residential (MXR), which would permit between 6 and 18 dwelling units per acre to be built. Members of an association of neighbors from the greater Boulder/Gunbarrel community, known as the Twin Lakes Action Group (TLAG), submitted a requests (consolidated as “request #36”) to have the land use designation for the two properties be changed to open space (OS) with natural ecosystems or environmental preservation designation.¹ Due to the similarity of the requests proposing an open space designation they were consolidated as “Request #36” for analysis purposes.

Four bodies must review and approve any change to a land use designation in the BVCP: the Boulder County Commissioners, the Boulder County Planning Commission, the Boulder City Council, and the City of Boulder Planning Board. During its discussion of these two competing requests to change the land use designation of the Twin Lakes properties in March 2016, the Boulder City Council and Boulder County Commission passed a joint motion establishing a stakeholder group to engage in a collaborative discussion regarding the Twin Lakes properties. The Twin Lakes Stakeholder Group was given the following charge:²

1. Jointly formulate recommendations for areas of expertise and selection of experts to inform the desired land use patterns for the area. The areas for study should include the suitability for urban development, desired land use patterns, and environmental constraints.
2. Jointly recommend the appropriate range of potential housing units with consideration given to intensity and community benefit, regardless of who holds title to the property.
3. Following the outcome of the BVCP process and 1 and 2 above, jointly recommend a timeline for the formulation of a set of guiding principles to inform next steps.

The joint resolution further indicated that the Stakeholder Group should be comprised of representatives of BCHA, BVSD, and TLAG. Heather Bergman of Peak Facilitation Group was selected as the facilitator for the first meeting and indicated that the Stakeholder Group could elect to work with Ms. Bergman or select a different facilitator for their future meetings. Ms. Bergman coordinated with BCHA, BVSD, TLAG, and City and County staff to identify a date and time for the

¹ Multiple requests were submitted by different applicants for the same land use designation change outcomes. For purposes of analysis, staff grouped the requests according to proposed outcomes. Two requests for a change to MXR (by BCHA and BVSD) were grouped as Request #35. Eleven requests, which included requests from individuals as well as the Twin Lakes Action Group (TLAG), for a change to Open Space were grouped as Request #36.

² The complete Council motion is included in this report as Attachment A.

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first meeting. BCHA, BVSD, and TLAG were each invited to send up to 3 people to participate in the first meeting, which occurred on April 13, 2016. The final meeting occurred on July 20, 2016. The Stakeholder Group's agreements are detailed below, followed by a summary of the process and several attachments for additional context and detail.

STAKEHOLDER GROUP AGREEMENTS

At the sixth meeting, the Stakeholder Group discussed each of the three tasks given to them in the Council motion and determined what, if any, agreement they had on each issue. The following outcomes and agreements emerged from this discussion. All agreements were achieved by consensus; exceptions are noted.

Task 1: Jointly formulate recommendations for areas of expertise and selection of experts to inform the desired land use patterns for the area. The areas for study should include the suitability for urban development, desired land use patterns, and environmental constraints. As described above, this was a challenging discussion for the Stakeholder Group due to the differing views of the purpose of the task. For this reason, they discussed their views on this item in two ways: 1) regarding the land use designation change decision, and 2) regarding further development.

- ***Regarding land use designation changes:***
 - TLAG feels that the TLSG failed to fulfill this aspect of the Council motion, particularly as it relates to analyzing the feasibility of land use designation change request #36.
 - BCHA/BVSD feel that they gained additional information and have more information available than they have ever seen in similar processes.
 - TLAG will present additional information and study results to City and County staff before the August 8 Open House; staff commits to seriously reviewing these studies.
- ***Regarding land use patterns if development and annexation occur:***
 - Further hydrological assessments are desired, specifically regarding impacts to surrounding homes.
 - Further traffic studies are needed.
 - BCHA and BVSD will consult with the TLAG representatives prior to issuing additional RFPs to gain their input on scope of work and desired expertise for contractors. The Stakeholder Group agrees that this should occur in a way that is timely and expeditious.

Task 2: Jointly recommend the appropriate range of potential housing units with consideration given to intensity and community benefit, regardless of who holds title to the property.

The Stakeholder Group did not come to an agreement on the appropriate range of potential housing units for the Twin Lakes properties. They discussed three options and then shared their respective views on each option.

- ***If zero dwelling units per acre are constructed, then:***
 - Hydrological, wildlife, rural residential, and other community interests will be met.
 - Principles of open space will be met, and annexation will not be necessary.
 - Affordable housing will not be provided for the community on these properties.

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- **Perspectives:**
 - *TLAG has a strong preference for zero units. It is consistent with the request for land use designation that they submitted and the mission of the organization.*
 - *BCHA and BVSD cannot develop affordable housing units under this approach.*

- ***If six dwelling units per acre are constructed, then:***
 - It will be hard to meet affordable housing needs due to the cost of development, including building costs, hydrological and mitigation solutions, and wildlife habitat mitigation efforts.
 - Development may not be able to accommodate as many other community interests and amenities, such as open areas, community gardens, trail connections, etc.
 - Private-public partnerships could be explored to fund community benefits. TLAG is prepared to work to raise both upfront funding to develop community benefits, as well as funding to support ongoing maintenance costs. BCHA and BVSD indicated that this would help with the costs of development but may not be sufficient.
 - Attached, multi-family housing options will need to be constructed. This would require a deviation from the current BVCP regulations for low density development.
 - Fewer households would be served by affordable units.
 - More interests identified by some members of the surrounding community and TLAG could be met.
 - An ongoing TLSG advisory group would be needed to help guide design and ensure compatibility with surrounding neighborhoods. TLAG representatives are willing to participate in such an advisory group; BCHA and BVSD are interested in working with such a group.
 - **Perspectives:**
 - *Six units per acre could be acceptable as an absolute maximum to TLAG if it abides by all of the stipulations outlined in the bullet points above. Six units per acre is a compromise number for TLAG, as it is higher than the zero units they prefer and deviates from their requested land use change. TLAG acknowledges that by-right development at this density can occur under the current Low Density Residential land use designation.*
 - *BCHA and BVSD indicated that six to twelve units per acre could be feasible for them to develop affordable housing, but further analysis would be required to be sure.*

- ***If 12 dwelling units per acre are constructed, then:***
 - Community benefits must be superb for those within and outside of the development.
 - An advisory group must influence the design and community benefits; this group should include potential residents and is even more important to have when developing at a higher density.
 - The development will be more financially feasible and is more likely to meet identified housing interests.
 - Diverse housing types will be explored and utilized, including townhomes, multiplexes, and single-family detached homes.
 - **Perspectives:**

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- *BCHA and BVSD have a strong preference for this number of units. As their land use change request sought to allow up to 18 units, they believe that this is already a compromise number.*
- *TLAG will not be able to support this development, as it is contrary to their mission statement.*

Task 3: Following the outcome of the BVCP process and 1 and 2 above, jointly recommend a timeline for the formulation of a set of guiding principles to inform next steps.

The Stakeholder Group identified and then agreed by consensus to the following list of guiding principles for the Twin Lakes properties:

Guiding Principles If Development Occurs

- Continue an advisory group to influence development, design elements, etc.
- Be thoughtful and clear about communication and ensure transparency going forward.
- Mitigate impacts on existing infrastructure and neighborhoods.
- Delineate wildlife habitat and corridor, open space, trails, and create a set-aside for no development.
- Ensure a diversity of housing types.
- Create a design that is consistent with the current surrounding neighborhoods.
- Ensure adequate parking to minimize negative impacts on the surrounding neighborhoods.
- Supply appropriate numbers and types of community amenities to the public.
- Supply appropriate numbers and types of affordable housing units.

TLSG PROCESS: 6 Meetings and an Open House

Meeting 1: Understanding the Council Motion and Developing Protocols

At the first meeting, the Twin Lakes Stakeholder Group heard from Mary Young and Bob Yates from the Boulder City Council and Deb Gardner from the Boulder County Commission regarding the goals and intent behind the Council motion (which was supported by the County Commissioners). Additionally, the group developed Protocols at this meeting to guide their future discussions. As part of this discussion, BVSD shared that there would only be one person representing the School District; BCHA shared that they would have up to 3 people participating at each meeting; and TLAG shared that they would have up to 3 people participating. Staff from both the City and County Planning Departments agreed to attend meetings and remained engaged to answer questions and provide context as needed regarding the BVCP and the associated revision process.^{3,4}

Meeting 2: Identifying Interests and Gaining Shared Knowledge

At the second meeting, each of the three entities in the Stakeholder Group outlined the interests that motivate their interest in the Twin Lakes properties. The identified interests were put together into a single list of stakeholder interests that was then printed on the agenda of the remaining meetings. The identified interests were:

- Meet housing needs.
- Provide affordable housing needs for workers of BVSD and other entities.
- Utilize land that is near existing infrastructure and jobs.

³ The TLSG Protocols are included in this report as Attachment B.

⁴ Summaries of all 6 TLSG meetings are included in this report as Attachment C.

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- Plan both sites of Twin Lakes together.
- Create program synergies between BVSD and BCHA.
- Create broad community support.
- Protect the environment and wildlife.
- Develop neighborhood amenities.
- Develop property to meet community interests and needs.
- Retain teachers and other employees throughout the County.
- Develop a vision and plan for Gunbarrel.
- Avoid setting regrettable legal precedents.
- Be able to offer permanent affordable housing as a recruitment tool for new teachers.
- Protect the rural-residential feel of the neighborhoods and surrounding lands.
- Collaborate on the creation of information and entire discussion.
- Base decisions in facts and science.
- Allow for a transparent process and open discussions.
- Allow all parties to remain up-to-date and informed on the progress of the process.
- Protect homes that already exist.
- Ensure ability to maintain infrastructure.
- Preserve agricultural lands.
- Move the process along at an appropriate pace.
- Learn from and improve on past projects.

Also at the second meeting, City and County staff answered questions that were provided by members of the Stakeholder Group over email in between meetings. Questions primarily addressed the BVCP process and methods; affordability and housing statistics and projections; annexation, zoning, and density; community benefits and amenities; site review; and compatible development and surrounding areas. A few questions were directed to and answered by the BCHA and BVSD representatives on the Stakeholder Group.

Meeting 3: Continuing to Gain Shared Knowledge and Understanding Hydrology at Twin Lakes

At the third meeting, City and County staff answered questions that had not been addressed at the previous meeting due to time constraints. Following this, the Stakeholder Group engaged in information sharing regarding their respective views and understandings of the hydrology on the Twin Lakes properties. City and County staff shared what they currently know about the hydrology on the properties and outlined how this information would be used in developing the staff recommendation regarding land use designation changes in the BVCP and the additional levels of detail required for future processes (i.e., annexation, initial zoning and site review). The TLAG representatives asked a professional hydrologist with whom they have been working to share his view of the hydrology of the properties. Following these presentations, the group discussed items that they would like to see added to the hydrology study already underway on the properties (more on this below).

Meetings 4 and 5: Exploring Options for the Twin Lakes Properties

At the following two meetings, the Stakeholder Group engaged in a map-based discussion about ways that land use could be configured on the Twin Lakes properties. Using base maps of the Twin Lakes properties, the group explored different land use options, ways the property can be configured, and where/how dwelling units, roads, and various amenities could be constructed on the properties if development occurs. The maps included open space, wildlife corridors, trails and other community benefits. They developed these “concept maps” based on the current land use

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designation of low density residential, as well as the proposed open space land use designation and the proposed mixed density residential land use designation. At the first map meeting, the group drew housing units, open space corridors, and other items directly on the maps. They determined at the end of the meeting that their housing units were not to scale and made it difficult to visualize the overall effect of the map. For the second map meeting, the group used to-scale mock-ups of housing units in concert with their drawing of roads and corridors to help them develop concept maps that were more understandable. A total of eight concept maps were developed at these two meetings. The group discussed how each concept map met or did not meet the identified interests that emerged from Meeting 2.

Open House: Getting Public Input on the Concept Maps

The Stakeholder Group agreed that it would be advantageous to host an open house and solicit input from the community on the concept maps. Members of the group worked together outside of meetings to prepare six summary concept maps that represented the variety of options they explored at the meeting. At the open house, participants were invited to comment on each of the six concept maps, indicating what they liked about each concept, what concerns they had about each map, and how each could be improved. Additionally, participants were invited to share general comments and write any questions they had. Members of the Stakeholder Group attended the open house and answered questions about the group's process and the concept maps. Approximately 60 people attended the open house. Following the open house, the Stakeholder Group agreed to post the maps on the TLSG website and invite additional comments via email. More than 30 comments were received via email. All comments submitted at the open house and via email were summarized in a single document and provided to the TLSG members in advance of the final meeting.⁵

Meeting 6: Finding Agreements

At the final meeting, the Stakeholder Group addressed each of the three tasks given to them by the Council motion and determined what agreements they could find on these items. The agreements are outlined below.

STUDIES: When and How to Learn More about Twin Lakes

The first task given to the Stakeholder Group by the Council motion was to “jointly formulate recommendations for areas of expertise and selection of experts to inform the desired land use patterns for the area. The areas for study should include the suitability for urban development, desired land use patterns, and environmental constraints.” This task proved challenging for the Stakeholder Group. The TLAG representatives interpreted this task as directing the group to discuss studies that should be done immediately to inform the land use designation change requests (both #35 and #36). For these members of the group, having a better understanding of the hydrology and wildlife values, in particular, would be critical to ensuring that City and County staff were able to make an informed recommendation to the four decision-making bodies regarding these land use changes—particularly regarding request #36 to change the designation to open space. Completion of such studies prior to the land use designation decision was extremely important for these members of the Stakeholder Group.

For the BCHA and BVSD representatives, this task referred to studies that would be done to inform the site development process that comes after the land use designation decision, assuming the land

⁵ The summary of comments received on the concept maps is included in this report at Attachment D.

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use designation either remains the same as it is or is changed to mixed density residential as they requested (#35). These members of the group believed that the studies should start now as they would take some time to complete, but they did not believe that these studies were intended to inform the land use designation decision. With this understanding, prior to the joint motion and the first facilitated meeting in April, BCHA issued RFPs for contractors to do both a hydrology study and a wildlife study. They stated an intent to gain input from the Stakeholder Group on the scopes of work for these two studies, as well as on the scope of work and desired expertise for future studies to occur on the property.

Members of the Stakeholder Group provided input on the scope of work for the hydrology and wildlife studies via email; these suggestions were discussed at Meeting 3. The confusion and disagreement regarding the intent of this task emerged again during the agreements discussion at Meeting 6.

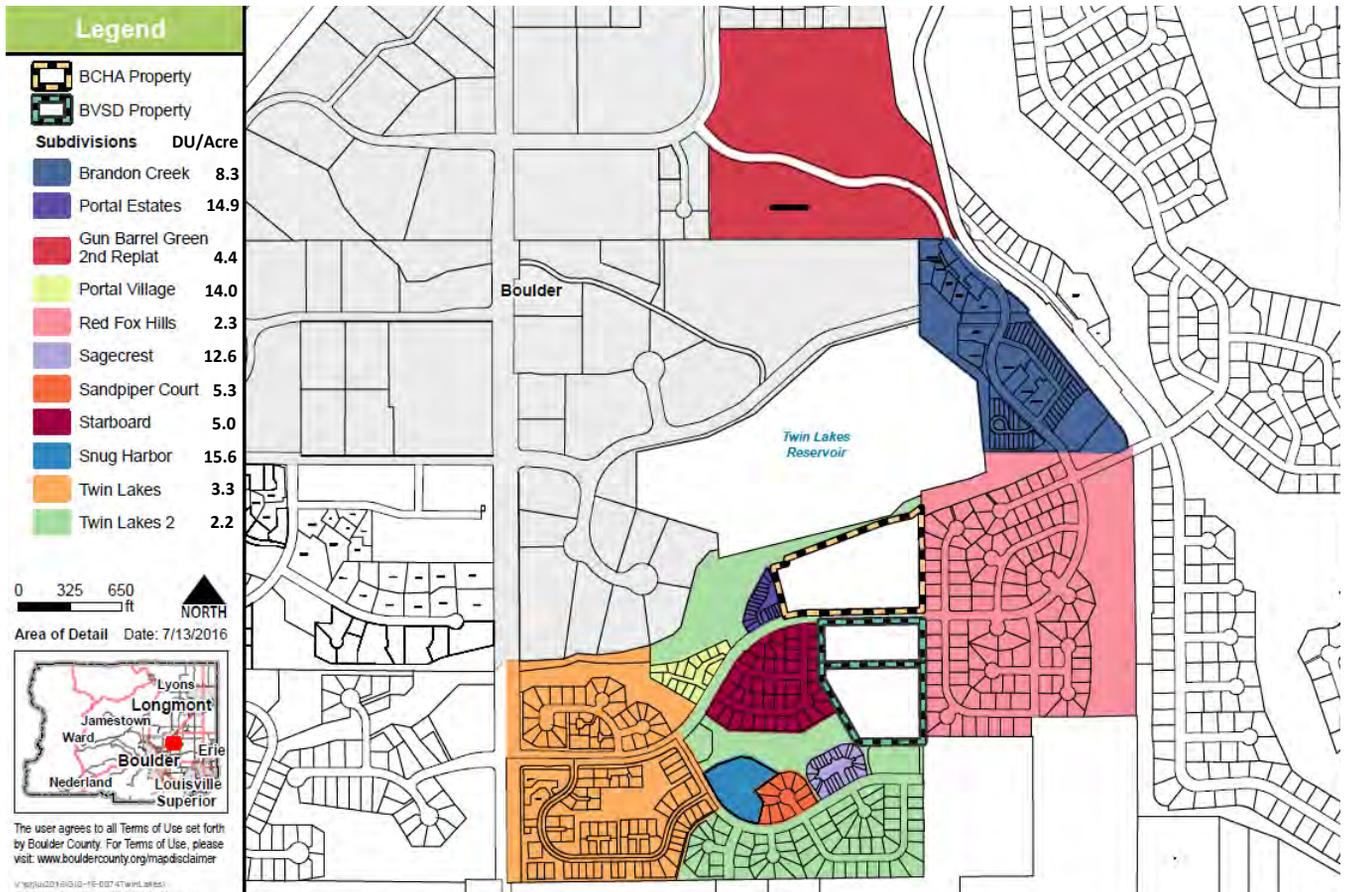
PUBLIC COMMENT

At the first meeting, the Stakeholder Group discussed several options for receiving public input during the course of their deliberations. In order to maximize their discussion time, they agreed that public comment should be submitted to them via email through the facilitator. At regular intervals, the facilitator shared with the Stakeholder Group public comment emails that had been received. Eleven separate comments were received via email and shared with the group (exclusive of email comments received regarding the concept maps). Several early comments included questions from the public regarding the BVCP and the associated process. These questions were combined into a single document, and City and County staff provided written responses to these questions. The questions and answers were distributed to the Stakeholder Group, posted on the BVCP [website](#), and printed out as reference documents at the open house.⁶

⁶ The question/answer document is included in this report as Attachment E.



Twin Lakes Neighborhood & Structure Analysis



This report contains an inventory analysis of the different subdivisions in the Twin Lakes area. Density was calculated by taking the total number of units in a subdivision and dividing it by the total area of the subdivision which includes all open space and right of ways.

Twin Lakes 1 Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
3.3 du/acre	121	6,067 sqft.	37.0 acres



Approved in 1970, the Twin Lakes 1 Subdivision largely consists of 1-3 story single family homes with a small portion dedicated to multi-family apartment complexes.



Twin Lakes 2 Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
2.2 du/acre	77	8,048 sqft.	34.6 Acres



Approved in 1976, Twin Lakes 2 Subdivision consists of a mixture of single family residences and multi-family duplexes. An existing Boulder County Housing Authority affordable housing project already exists here at Catamaran Court.



Snug Harbor Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
15.6 du/acre	40	N/A	2.6 Acres



Approved in 1984, Snug Harbor contains 2-3 story apartments. Parking here is in designated car ports and small parking lots within the subdivision. This subdivision is unique to others in the area because it is 1 parcel.



Starboard Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
5.0 du/acre	43	6,917 sqft.	8.6 Acres



Approved in 1999, the Starboard Subdivision largely consists of 2-3 story single family homes with a few ranch style single family homes.



Sandpiper Court Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
5.3 du/acre	10	7,018 sqft.	1.9 Acres



Approved in 1992, the Sandpiper Court Subdivision consists of 2-3 story single family homes.



Sagecrest Subdivision

Density	Number of Units	Average Parcel Size	Average Building Size
12.6 du/acre	24	2,577 sqft.	1.9 ACres



Approved in 1999, the Sagecrest subdivision consists mainly of single family homes and multi story townhomes.



Red Fox Hills Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
2.3 du/acre	116	10,163 sqft.	51.3 Acres



Approved in 1980, Red Fox Hills contains a mixture of 2-3 story single family homes.

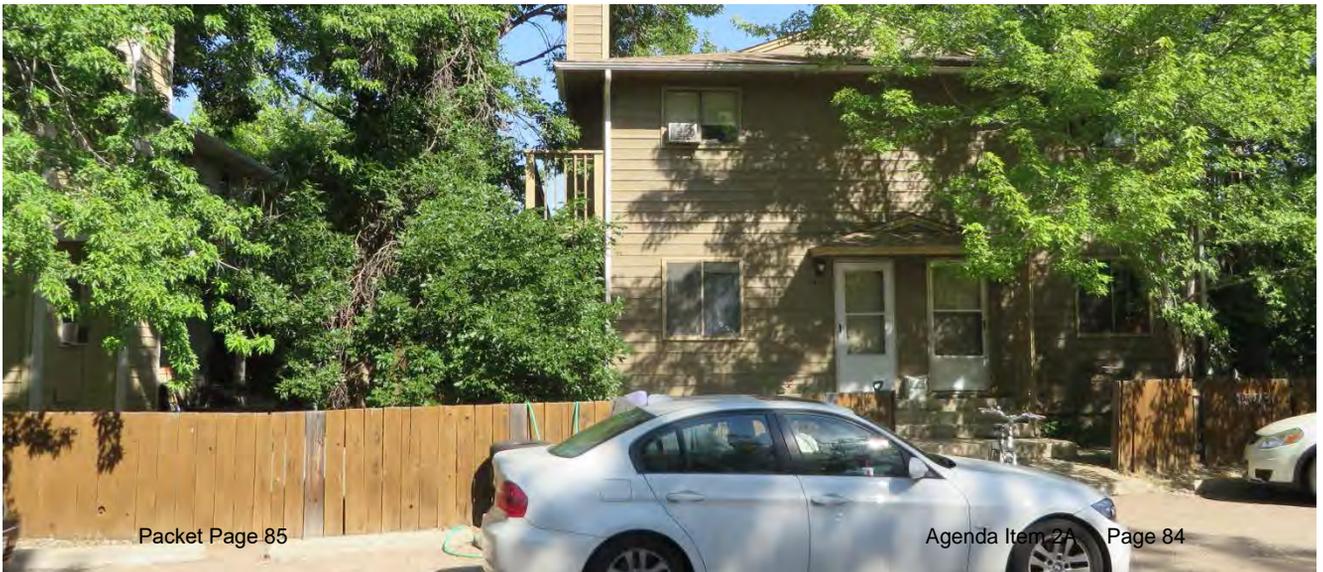


Portal Village Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
14.0 du/acre	30	4,785 sqft.	2.1 Acres



Approved in 1973, Portal Village contains multi-family duplexes and triplexes. Most vehicles either park in a car port or on the street within the subdivision.



Portal Estates Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
14.9 du/acre	20	2,154 sqft.	1.34 Acres



Approved in 1979, Portal Estates contains multi-story townhomes and duplexes. Most of the parking is in car ports with a small dedicated parking lot within the subdivision.



Brandon Creek Subdivision

Density	Number of Units	Average Parcel Size	Sub-division Size
8.3 du/acre	164	3,150 sqft.	19.8 Acres



Brandon Creek largely consists of 1-3 story single family homes and condos. Parking is done either on the street within the subdivision or assigned parking spots and car ports.



Gunbarrel Green 2nd Replat

Density	Number of Units	Average Parcel Size	Sub-division Size
4.38 du/acre	159	N/A	36.3 Acres



Gunbarrel Green 2nd Replat largely consists of condominiums. Parking on the northern half is a mixture of parking lots and dedicated parking garages.



Water

All properties surrounding the Twin Lakes site that are within the city service area (Area 1 and 2) are connected to the city's water line. A large, 12-inch diameter water main runs adjacent to the site along Twin Lakes Road. The site, along with the rest of Gunbarrel, is served by Water Pressure Zone 1, which generally serves areas that are below an elevation of 5,270 feet.

Stormwater

The major drainage way (or creek) associated with Gunbarrel is Dry Creek. The majority of the stormwater near the surrounding site is channeled to an intermittent creek that runs east along the south side of the Twin Lakes property. This intermittent creek continues to travel east and meets Boulder Creek. The intermittent creek on the south side of the parcel crosses under the Boulder Supply canal in an 18-inch culvert. Development of the site may require improvements such as up-sizing this culvert to maintain adequate hydraulics. The county currently maintains storm drainage infrastructure associated with Twin Lakes Road. Should annexation of the parcels occur the county and city would establish a maintenance arrangement that would ensure the needs generated by any new development would be sufficiently addressed.

Waste Water

A collector sewage line runs parallel with the intermittent creek that's located south of the site and feeds into the city's waste water treatment plant, which is located about a mile south-east of the site. The pipeline that provides this connection has been ranked by the Waste Collection System Master Plan as a medium priority for future improvements to the city's waste water system.

LINKS: City of Boulder Public Works Department Master Plans

- [Comprehensive Flood and Stormwater Plan, 2004](#)
- [Stormwater Master Plan, 2007](#) – update in progress
- [Water Utility Master Plan, 2011](#)
- [Wastewater Utility Master Plan, 2009](#)
 - [Wastewater Collection System Master Plan](#) – update in progress
 - [Wastewater Treatment Plant Master Plan](#)
 - [Water Quality Strategic Plan](#)



Figure 1: Existing Water Mains



Figure 2: Existing Storm Mains



Figure 3: Existing Sewer Mains

Analysis of Existing Policies in the 2010 Boulder Valley Comprehensive Plan

Below are the key policies that informed staff's analysis of the requested land use designation changes with staff comments. This provides additional support for recommending Medium Density Residential (MR) and Environmental Preservation (EP) designations.

Policy	Policy Text	Staff comments
1.02 Principles of Environmental Sustainability	<p>The city and county will strive to preserve and protect the natural resource base and environmental quality on which life depends by:</p> <ul style="list-style-type: none"> a) Maintaining and enhancing the biodiversity and productivity of ecological systems; b) Ensuring the efficient use of natural resources in a manner that does not deplete them over time; and c) Reducing and minimizing the use of non-renewable resources. 	<p>Careful development of the parcels should be guided by this policy. It is important to consider the requests in the context of the broader efforts in place to protect the environment and open space across the Boulder Valley as a whole. Placing development in pre-planned locations is part of a broader effort to preserve the environment and support biodiversity at the scale of the planning area.</p>
1.04 Principles of Social Sustainability	<p>The city and county will strive to promote a healthy community and address social and cultural inequities by:</p> <ul style="list-style-type: none"> a) Respecting and valuing cultural and social diversity; b) Ensuring the basic health and safety needs of all residents are met; and c) Providing infrastructure and services that will encourage culturally and socially diverse communities to both prosper within and connect to the larger community. 	<p>Providing more affordable housing helps support social diversity and serves the needs of those with lower incomes who play an essential role in our community.</p>
1.19 Jobs:Housing Balance	<p>Boulder is a major employment center, with more jobs than housing for people who work here. This has resulted in both positive and negative impacts including economic prosperity, significant in-commuting, and high demand on existing housing. The city will continue to be a major employment center and will seek opportunities to improve the balance of jobs and housing while maintaining a healthy economy. This will be accomplished by encouraging new housing and mixed use neighborhoods in areas close to where people work, encouraging transit-oriented development in appropriate locations, preserving service commercial uses, converting industrial uses to residential uses in appropriate locations, improving regional</p>	<p>The city seeks opportunities to introduce housing as a step to improve the balance between jobs and housing units, particularly in areas already planned for development (e.g., where conditions do not preclude development, and near areas with significant projected job growth).</p>

		transportation alternatives and mitigating the impacts of traffic congestion.	
2.03	Compact Development Pattern	The city and county will, by implementing the Boulder Valley Comprehensive Plan, 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 within the Boulder Valley. The city prefers redevelopment and infill as compared to development in an expanded Service Area in order to prevent urban sprawl and create a compact community.	The development pattern set forth in the BVCP envisions some level of development for these parcels – indicated by their inclusion in Area II since the 1970s. Following through with that planned development pattern helps ensure a more efficient use of land resources at the scale of the Boulder Valley. This is an underlying principle of the comprehensive plan.
2.01	Unique Community Identity	The unique community identity and sense of place that is enjoyed by residents of the Boulder Valley and characterized by the community’s setting and history will be respected by policy decision makers.	A key element in Boulder’s unique identity is the designation of Areas I, II and III. At the community level, allowing additional development and addressing a community need within Area II of the BVCP is consistent with this concept. At the neighborhood level, the Twin Lakes open space will remain a resource to the community regardless of any new development that may occur. Developing the parcels would not preclude maintaining the unique community identity of the neighborhood, and it would further enhance the ability of new residents of the neighborhood to enjoy the Twin Lakes open space. Close proximity to open space like that offered by Twin Lakes is a unique aspect of the Boulder Valley community identity as a whole.
2.06	Preservation of Rural Areas and Amenities	The city and county will attempt to preserve existing rural land use and character in and adjacent to the Boulder Valley where environmentally sensitive areas, hazard areas, agriculturally significant lands, vistas, significant historic resources, and established rural residential areas exist. A clear boundary between urban and rural areas at the periphery of the city will be maintained, where possible. Existing tools and programs for rural preservation will be strengthened and new tools and programs will be put in place.	The Area III designation is the predominant manner in which rural areas are defined and protected under the BVCP. Several references have been made in public comments to the rural residential character of the neighborhood. While the current county zoning is 'rural residential' that is largely due to the fact that it is the default residential zoning category in the county. Given the nature of surrounding development in the Twin Lakes neighborhood, the plan would not define the BCHA and BVSD sites as "rural."

2.15	Compatibility of Adjacent Land Uses	To avoid or minimize noise and visual conflicts between adjacent land uses that vary widely in use, intensity or other characteristics, the city will use tools such as interface zones, transitional areas, site and building design and cascading gradients of density in the design of subareas and zoning districts. With redevelopment, the transitional area should be within the zone of more intense use.	The neighborhood surrounding the subject parcels include areas of development at a variety of densities ranging from 2 - 16 units/acre. The range allowed in the Medium Density Residential designation (6-14 units/acre) is consistent with the mix of densities present in the surrounding area, and BCHA and BVSD have expressed a commitment to site planning and building structures that would be consistent with and/or complement the surrounding development. The specifics of which will be addressed at future review processes.
2.3	Sensitive Infill and Redevelopment	With little vacant land remaining in the city, most new development will occur through redevelopment. The city will gear subcommunity and area planning and other efforts toward defining the acceptable amount of infill and redevelopment and standards and performance measures for design quality to avoid or adequately mitigate negative impacts and enhance the benefits of infill and redevelopment to the community and individual neighborhoods. The city will also develop tools, such as neighborhood design guidelines, to promote sensitive infill and redevelopment.	BCHA and BVSD have demonstrated a commitment to conduct the studies necessary to proceed with an informed development plan that will reflect any constraints associated with the land, while remaining sensitive to the concerns of the neighbors and working collaboratively to address their interests. In addition, further studies will be required at the site planning stage.
2.33	Environmentally Sensitive Urban Design	For capital improvements and private development, the city and county will strive to ensure that buildings, streets, utilities and other infrastructure are located and designed to protect natural systems, minimize energy use, urban heat island effects and air and water pollution, and support clean energy generation.	Development would be required to proceed in a manner sensitive to environmental factors. The recommendation of Environmental Protection on portions of the sites protect the wetland and irrigation canal. Further protections for wildlife corridors and buffers, water and the like will be addressed at future stages of development.
3.04	Ecosystem Connections and Buffers	The city and county recognize the importance of preserving large areas of unfragmented habitat in supporting the biodiversity of its natural lands and viable habitat for native species. The city and county will work together to preserve, enhance, restore and maintain undeveloped lands critical for providing ecosystem connections and buffers for joining significant ecosystems.	This policy guides the overall approach to open space acquisition. Although the sites did not meet the city and county's criteria for acquisition, the Twin Lakes Stakeholder process identified ecosystem connections and buffers as an important design element for any future development.

6.07	Investment Priorities	To protect previous investments and ensure efficient use of existing travel corridors, the city and county will prioritize their investment first to maintenance and safety improvements of the existing systems. Second priority is given to capacity additions for the non-automotive modes and efficiency improvements for existing road facilities that increase levels of service without adding general purpose lanes.	Maintaining the compact urban development pattern envisioned in the current Area II comprehensive plan mapping supports the goals of achieving an efficient use of existing infrastructure and public services.
7.02	Permanently Affordable Housing	The city will increase the proportion of permanently affordable housing units to an overall goal of at least ten percent of the total existing housing stock through regulations, financial subsidies and other means. City resources will also be directed toward maintaining existing permanently affordable housing units and securing replacements for lost low and very low income units.	The community is in critical need of permanently affordable housing. Limited vacant land and redevelopment opportunities exist within the Boulder Valley. Annexations provide an opportunity to achieve our housing goals by requiring 40-60% of all units to be permanently affordable.
7.04	Strengthening Community Housing Partnerships	The city will create and preserve partnerships dedicated to the community's housing needs by supporting private and nonprofit agencies that create and maintain permanently affordable housing in the community, and fostering nonprofit and private sector partnerships. The city recognizes the role of the university in the housing market and will encourage the University of Colorado and other post-secondary institutions in their efforts to increase the amount of on campus housing.	BCHA and BVSD have demonstrated a commitment to work collaboratively across local housing organizations to address affordable housing needs in a manner that is sensitive to the concerns of the community.
7.13	Integration of Permanently Affordable Housing	Permanently affordable housing, whether publicly, privately or jointly financed will be designed as to be compatible, dispersed, and integrated with housing throughout the community.	Concern has been expressed that the concentration of affordable housing in one location would be too high, given the intent to disperse affordable housing across the community. However, staff views this policy at the community level and the number of units proposed is consistent with other affordable housing projects in other parts of the city. Regardless, working with the neighbors on design and integration will be essential throughout the development process.

Boulder Valley Comprehensive Plan (BVCP) Policies Cited by BCHA, BVSD and TLAG

BVCP Policies Cited by Boulder County Housing Authority (BCHA) and Boulder Valley School District (BVSD)

1.03 Principles of Economic Sustainability

The city and county will strive to develop and maintain a healthy, adaptable economy that is vital to the community's quality of life and high level of services and amenities by:

- a. Promoting a diverse economy that supports the needs of all community members;
- b. Promoting a qualified and diversified work force that meets employers' needs and supports a range of jobs; and
- c. Providing for and investing in a quality of life, unique amenities, and infrastructure that attracts, sustains, and retains businesses and entrepreneurs.

1.04 Principles of Social Sustainability

The city and county will strive to promote a healthy community and address social and cultural inequities by:

- a. Respecting and valuing cultural and social diversity;
- b. Ensuring the basic health and safety needs of all residents are met; and
- c. Providing infrastructure and services that will encourage culturally and socially diverse communities to both prosper within and connect to the larger community.

1.05 Community Engagement

The city and county recognize that environmental, economic and social sustainability are built upon full involvement of the community. The city and county therefore support the right of all community members to play a role in governmental decisions, through continual efforts to maintain and improve public communication and the open conduct of business. The city and county will continue to support programs and provide opportunities for public participation and neighborhood involvement. Efforts will be made to use effective technologies and techniques for public outreach and input, remove barriers to participation and involve community members not usually engaged in civic life. Emphasis will be placed on notification and engagement of the public in decisions involving large development proposals or major land use decisions that may have significant impact on or benefits to the community.

1.11 Regional and Statewide Cooperation

Many of the problems and opportunities faced by Boulder and other jurisdictions, particularly providing affordable housing, addressing the jobs-housing imbalance, creating a healthy economy, improving regional transportation, protecting the environment, managing open space, delivering human services and managing growth can only be dealt with effectively through regional or statewide cooperation and solutions.

Therefore, the city and county will actively pursue cooperative planning opportunities, intergovernmental agreements, broader information exchange and communication, collaborative initiatives and closer cooperation with each other and with other entities in the region and state. This may include other cities, counties, unincorporated communities, the University of Colorado, the school districts, regional organizations and other policy-making bodies. These entities will be

encouraged to identify and address issues of shared concern for which a multi-jurisdictional perspective can best achieve mutually beneficial solutions.

1.19 Jobs: Housing Balance

Boulder is a major employment center, with more jobs than housing for people who work here. This has resulted in both positive and negative impacts including economic prosperity, significant in-commuting, and high demand on existing housing. The city will continue to be a major employment center and will seek opportunities to improve the balance of jobs and housing while maintaining a healthy economy. This will be accomplished by encouraging new housing and mixed use neighborhoods in areas close to where people work, encouraging transit-oriented development in appropriate locations, preserving service commercial uses, converting industrial uses to residential uses in appropriate locations, improving regional transportation alternatives and mitigating the impacts of traffic congestion.

1.24 Annexation

The policies in regard to annexation to be pursued by the city are:

- a. Annexation will be required before adequate facilities and services are furnished.
- b. The city will actively pursue annexation of county enclaves, Area II properties along the western boundary, and other fully developed Area II properties. County enclave means an unincorporated area of land entirely contained within the outer boundary of the city. Terms of annexation will be based on the amount of development potential as described in (c), (d), and (e) of this policy. Applications made to the county for development of enclaves and Area II lands in lieu of annexation will be referred to the city for review and comment. The county will attach great weight to the city's response and may require that the landowner conform to one or more of the city's development standards so that any future annexation into the city will be consistent and compatible with the city's requirements.
- c. Annexation of existing substantially developed areas will be offered in a manner and on terms and conditions that respect existing lifestyles and densities. The city will expect these areas to be brought to city standards only where necessary to protect the health and safety of the residents of the subject area or of the city. The city, in developing annexation plans of reasonable cost, may phase new facilities and services. The county, which now has jurisdiction over these areas, will be a supportive partner with the city in annexation efforts to the extent the county supports the terms and conditions being proposed.
- d. In order to reduce the negative impacts of new development in the Boulder Valley, the city will annex Area II land with significant development or redevelopment potential only if the annexation provides a special opportunity or benefit to the city. For annexation considerations, emphasis will be given to the benefits achieved from the creation of permanently affordable housing. Provision of the following may also be considered a special opportunity or benefit: receiving sites for transferable development rights (TDRs), reduction of future employment projections, land and/or facilities for public purposes over and above that required by the city's land use regulations, environmental preservation, or other amenities determined by the city to be a special opportunity or benefit. Parcels that are proposed for annexation that are already developed and which are seeking no greater density or building size would not be required to assume and provide that same level of community benefit as vacant parcels unless and until such time as an application for greater development is submitted.

- e. Annexation of substantially developed properties that allows for some additional residential units or commercial square footage will be required to demonstrate community benefit commensurate with their impacts. Further, annexations that resolve an issue of public health without creating additional development impacts should be encouraged.
- f. There will be no annexation of areas outside the boundaries of the Boulder Valley Planning Area, with the possible exception of annexation of acquired open space.
- g. Publicly owned property located in Area III and intended to remain in Area III may be annexed to the city if the property requires less than a full range of urban services or requires inclusion under city jurisdiction for health, welfare and safety reasons.
- h. The Gunbarrel Subcommunity is unique because the majority of residents live in the unincorporated area and because of the shared jurisdiction for planning and service provision among the county, the city, the Gunbarrel Public Improvement District and other special districts. Although interest in voluntary annexation has been limited, the city and county continue to support the eventual annexation of Gunbarrel. If resident interest in annexation does occur in the future, the city and county will negotiate new terms of annexation with the residents.

2.03 Compact Development Pattern

The city and county will, by implementing the Boulder Valley Comprehensive Plan, 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 within the Boulder Valley. The city prefers redevelopment and infill as compared to development in an expanded Service Area in order to prevent urban sprawl and create a compact community.

2.09 Neighborhoods as Building Blocks

The city and county will foster the role of neighborhoods to establish community character, provide services needed on a day-to-day basis, foster community interaction, and plan for urban design and amenities. All neighborhoods, whether residential areas, business districts, or mixed land use areas, should offer unique physical elements of neighborhood character and identity, such as distinctive development patterns or architecture; historic or cultural resources; amenities such as views, open space, creeks, irrigation ditches, and varied topography; and distinctive community facilities and business areas.

2.10 Preservation and Support for Residential Neighborhoods

The city will work with neighborhoods to protect and enhance neighborhood character and livability and preserve the relative affordability of existing housing stock. The city will seek appropriate building scale and compatible character in new development or redevelopment, appropriately sized and sensitively designed streets and desired public facilities and mixed commercial uses. The city will also encourage neighborhood schools and safe routes to school.

2.23 Trail Corridors/Linkages

In the process of considering development proposals, the city and county will encourage the development of paths and trails where appropriate for recreation and transportation, such as walking, hiking, bicycling or horseback riding. Implementation will be achieved through the coordinated efforts of the private and public sectors.

2.31 Design of Newly-Developing Areas

The city will encourage a neighborhood concept for new development that includes a variety of residential densities, housing types, sizes and prices, opportunities for shopping, nearby support services and conveniently sited public facilities, including roads and pedestrian connections, parks, libraries and schools.

2.32 Physical Design for People

The city and county will take all reasonable steps to ensure that public and private development and redevelopment be designed in a manner that is sensitive to social, health and psychological needs. Broadly defined, this will include factors such as accessibility to those with limited mobility; provision of coordinated facilities for pedestrians, bicyclists and bus-riders; provision of functional landscaping and open space; and the appropriate scale and massing of buildings related to neighborhood context.

2.33 Environmentally Sensitive Urban Design

For capital improvements and private development, the city and county will strive to ensure that buildings, streets, utilities and other infrastructure are located and designed to protect natural systems, minimize energy use, urban heat island effects and air and water pollution, and support clean energy generation.

2.36 Design Excellence for Public Projects

Public projects bear a special responsibility to exhibit design excellence. The city and county will work to ensure that new capital projects and transportation facilities are visually attractive and contribute positively to the desired community character.

3.12 Water Conservation

The city and county will promote the conservation of water resources through water quality protection, public education, monitoring and policies that promote appropriate water usage. The city will endeavor to minimize water waste and reduce water use during peak demand periods. New development and redevelopment designed to conserve water will be encouraged.

4.03 Energy Conservation and Renewable Energy

The city and county will implement innovative programs and opportunities for individuals, businesses and organizations to reduce energy consumption and develop local energy generation. The city will support private decisions to use renewable energy, develop local renewable energy resources and preserve options for developing renewable energy in the future. The city will review and consider revisions to regulations to support on-site energy generation, including solar and wind.

The city and county will pursue an energy path that not only reduces carbon emissions, but also promotes innovation, competition and economic vitality, and will set goals to ensure that the community has access to reliable, competitively priced and increasingly clean energy.

4.05 Energy-Efficient Building Design

The city and county will pursue efforts to improve the energy and resource efficiency of new and existing buildings. The city and county will improve regulations ensuring energy and resource

efficiency in new construction, remodels and renovation projects and will establish energy efficiency requirements for existing buildings. Energy conservation programs will be sensitive to the unique situations that involve historic preservation and low-income homeowners and renters and will ensure that programs assisting these groups are continued.

5.05 Support for Local Business and Business Retention

The city and county recognize the significant contribution of existing businesses in the local economy and will work to nurture and support established businesses and maintain a positive climate to retain businesses. Business retention and expansion is a primary focus for the city. The existing jobs that are in Boulder are the city's most important jobs.

6.01 All-Mode Transportation System

The Boulder Valley will be served by an integrated all-mode transportation system, developed cooperatively by the city and county. This transportation system will include completed networks for each mode, make safe and convenient connections between modes, and provide seamless connections between the city and county systems. Improvements to the travel corridors network will be made in a manner that preserves or improves the capacity or efficiency of all modes and recognizes pedestrian travel as a component of all trips.

7.01 Local Solutions to Affordable Housing

The city and county will employ local regulations, policies, and programs to meet the housing needs of their low and moderate income households and workforce. Appropriate federal, state and local programs and resources will be used locally and in collaboration with other jurisdictions. The city recognizes that affordable housing provides a significant community benefit and will continually monitor and evaluate its policies, programs and regulations to further the city's affordable housing goals.

7.02 Permanently Affordable Housing

The city will increase the proportion of permanently affordable housing units to an overall goal of at least ten percent of the total existing housing stock through regulations, financial subsidies and other means. City resources will also be directed toward maintaining existing permanently affordable housing units and securing replacements for lost low and very low income units.

7.05 Strengthening Regional Housing Cooperation

The city and the county will work to enhance regional cooperation on housing issues to address regional housing needs and encourage the creation of housing proximate to regional transit routes. Such efforts include the Regional HOME Consortium and the Ten Year Plan to Address Homelessness.

7.06 Mixture of Housing Types

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

7.09 Housing for a Full Range of Households

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

7.10 Balancing Housing Supply with Employment Base

Expansion of the Boulder Valley housing supply should reflect to the extent possible current employer locations, projected industrial/commercial development sites, variety of salary ranges, and the demand such developments bring for housing employees. Key considerations include housing type, mix, and affordability. The city will explore policies and programs to increase housing for Boulder workers by fostering mixed-use and multi-family development proximate to transit, employment or services and by considering the conversion of commercial and industrial zoned or designated land to residential use.

7.13 Integration of Permanently Affordable Housing

Permanently affordable housing, whether publicly, privately or jointly financed will be designed as to be compatible, dispersed, and integrated with housing throughout the community.

8.01 Providing for a Broad Spectrum of Human Needs

The city and county will develop and maintain human service programs that provide for the broad spectrum of human needs, from safety net services to early intervention and prevention programs which mitigate more costly, long-term interventions and forestall worsening social conditions. Services balance meeting immediate needs with long-term solutions to critical social issues.

8.02 Regional Approach to Human Services

The city will continue its collaborative role in human services planning and funding through partnerships with other agencies and local governments. The city and county will coordinate a regional approach such as that articulated in the Ten-Year Plan to Address Homelessness and the Human Services Strategic Plan. The city will seek to address the disproportionate burden placed on Boulder as a key regional service center.

8.04 Addressing Community Deficiencies

The city will identify barriers to provision of important basic human services and work to find solutions to critical social issues such as lack of housing options for very low income and special needs populations, access to and affordability of basic services, and limited availability of affordable retail products.

8.05 Diversity

The community values diversity as a source of strength and opportunity. The city and county will support the integration of diverse cultures and socio-economic groups in the physical, social, cultural and economic environments; promote opportunities for community engagement of diverse community members; and promote formal and informal representation of diverse community members in civic affairs.

9.02 Local Food Production

The city and county will encourage and support local food production to improve the availability and accessibility of healthy foods and to provide other educational, economic and social benefits. The city and county support increased growth, sales, distribution and consumption of foods that are healthy, sustainably produced and locally grown for all Boulder Valley residents with an emphasis on affordable access to food for everyone and long term availability of food.

9.05 Urban Gardening and Food Production

The city will encourage community and private gardens to be integrated in the city. This may include allowing flexibility and/or helping to remove restrictions for food production in shared open spaces and public areas, encouraging rooftop gardens and composting and planting edible fruit and vegetable plants where appropriate.

BVCP Policies Cited by Twin Lakes Action Group (TLAG) and Members of the Public

2.01 Unique Community Identity - The unique community identity and sense of place that is enjoyed by residents of the Boulder Valley and characterized by the community's setting and history will be respected by policy decision makers.

2.03 Compact Development Pattern -The city and county will avoid patterns of leapfrog, noncontiguous scattered development within the Boulder Valley.

2.04 Open Space Preservation - The city and county will permanently preserve lands with open space values by purchasing or accepting donations of fee simple interests, conservation easements or development rights and other measures as appropriate and financially feasible. Open space values include use of land for urban shaping and preservation of natural areas, environmental and cultural resources, critical ecosystems, water resources, agricultural land, scenic vistas and land for passive recreational use.

2.06 Preservation of Rural Areas and Amenities - The city and County will attempt to preserve existing rural land use and character in and adjacent to Boulder Valley where vistas and established rural residential areas exist.

2.09 Neighborhoods as Building Blocks - The city and county will foster the role of neighborhoods to establish community character, provide services needed on a day-to-day basis, foster community interaction, and plan for urban design and amenities. All neighborhoods, whether residential areas, business districts, or mixed land use areas, should offer unique physical elements of neighborhood character and identity, such as distinctive development patterns or architecture; historic or cultural resources; amenities such as views, open space, creeks, irrigation ditches, and varied topography; and distinctive community facilities and business areas.

2.10 Preservation and Support for Residential Neighborhoods - The City will Work with neighborhoods to protect and enhance neighborhood character and livability... the city will seek appropriate building scale and compatible character in new development.

2.15 Compatibility of Adjacent Land Uses -To avoid or minimize noise and visual conflicts between adjacent land uses that vary widely in use, intensity or other characteristics, the city will use tools such as interface zones, transitional areas, site and building and cascading gradients of density in the design of subareas and zoning districts.

2.19 Urban Open Lands - Open lands within the fabric of the city constitute Boulder's public realm and provide recreational opportunities, transportation linkages, gathering places and density relief from the confines of the city, as well as protection of the environmental quality of the urban environment.

2.20 Important Urban Design Features - Boulder Creek, its tributaries and irrigation ditches will serve as unifying urban design features for the community. The city and county will support the preservation or reclamation of the creek corridors for natural ecosystems, wildlife habitat; for recreation and bicycle and pedestrian transportation; to provide flood management; to improve air and water quality.

2.30 Sensitive Infill and Redevelopment - With little vacant land remaining in the city, most new development will occur through redevelopment. The city will gear subcommunity and area planning and other efforts toward defining the acceptable amount of infill and redevelopment and standards and performance measures for design quality to avoid or adequately mitigate negative impacts and enhance the benefits of infill and redevelopment to the community and individual neighborhoods. The city will also develop tools, such as neighborhood design guidelines, to promote sensitive infill and redevelopment.

3.04 Ecosystem Connections and Buffers - The city and county recognize the importance of preserving large areas of unfragmented habitat in supporting the biodiversity of its natural lands and viable habitat for native species. The city and county will work together to preserve, enhance, restore and maintain undeveloped lands critical for providing ecosystem connections and buffers for joining significant ecosystems.

3.06 Wetland and Riparian Protection Natural and human-made wetlands and riparian areas are valuable for their ecological and, where appropriate, recreational functions, including their ability to enhance water and air quality. Wetlands and riparian areas also function as important wildlife habitat, especially for rare, threatened and endangered plants, fish and wildlife. The city and county will continue to develop programs to protect and enhance wetlands and riparian areas in the Boulder Valley. The city will strive for no net loss of wetlands and riparian areas by discouraging their destruction or requiring the creation and restoration of wetland and riparian areas in the rare cases when development is permitted and the filling of wetlands or destruction of riparian areas cannot be avoided.

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

3.22 Protection of High Hazard Areas - The city will prevent redevelopment of significantly flood-damaged properties in high hazard areas. The city will prepare a plan for property acquisition and other forms of mitigation for flood-damaged and undeveloped land in high hazard flood areas. Undeveloped high hazard flood areas will be retained in their natural state whenever possible. Compatible uses of riparian corridors, such as natural ecosystems, wildlife habitat and wetlands will be encouraged wherever appropriate. Trails or other open recreational facilities may be feasible in certain areas.

3.24 Protection of Water Quality - Water quality is a critical health, economic and aesthetic concern. The city and county will protect, maintain and improve water quality within the Boulder Creek watershed as a necessary component of existing ecosystems and as a critical resource for the human community. The city and county will seek to reduce point and nonpoint sources of pollutants, protect and restore natural water system, and conserve water resources. Special emphasis will be placed on regional efforts such as watershed planning and priority will be placed on pollution prevention over treatment.

3.28 Surface and Ground Water - Surface and groundwater resources will be managed to prevent their degradation and to protect and enhance aquatic, wetland and riparian ecosystems. Land use and development planning and public land management practices will consider the interdependency of surface and groundwater and potential impacts to these resources from pollutant sources, changes in hydrology, and dewatering activities.

6.08 Transportation Impacts - Traffic impacts from a proposed development that cause unacceptable community or environmental impacts or unacceptable reduction in the level of service will be mitigated. All development will be designed and built to be multimodal, pedestrian-oriented and include strategies to reduce the vehicle miles traveled generated by the development. New development will provide continuous pedestrian, bike and transit systems through the development and connect these systems to be surrounding the development. The city and county will provide tools and resources to help businesses manage employee access and mobility and support public-private partnerships, such as transportation management organizations, to facilitate these efforts.

6.13 Improving Air Quality - The city and county will design the transportation system to minimize air pollution by promoting the use of non-automotive transportation modes, reducing auto traffic, encouraging the use of fuel efficient and alternatively fueled vehicles that demonstrate air pollution reductions and maintain acceptable traffic flow.

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

7.05 Strengthening Regional Housing Cooperation - The city and the county will work to enhance regional cooperation on housing issues to address regional housing needs and encourage

the creation of housing proximate to regional transit routes. Such efforts include the Regional HOME Consortium and the Ten Year Plan to Address Homelessness.

7.13 Integration of Permanently Affordable Housing - Permanently affordable housing, whether publicly, privately or jointly financed will be designed as to be compatible, dispersed, and integrated with housing throughout the community.

8.03 Equitable Distribution of Resources - The city will work to ensure that basic services are accessible and affordable to those most in need. The city and county will consider the impacts of policies and planning efforts on low and moderate income and special needs populations and ensure impacts and costs of sustainable decision making do not unfairly burden any one geographic or socio-economic group in the city. The city and county will consider ways to reduce the transportation burden for low income and disabled populations, enabling equal access to community infrastructure.

Boulder County Comprehensive Plan (BCCP) Policies Cited by Twin Lakes Action Group (TLAG) and Members of the Public

OS 1.01 It is recognized that the acquisition of an interest in open space lands must be based on the long term implementation of the county's overall open space plan, in which prioritization of need and available revenues must be considered. From time to time, applications for various land use decisions which contemplate development are expected to be made for privately owned lands which have been designated as open space on the Open Space Plan Map of the Boulder County Comprehensive Plan. In such cases, it will be the responsibility of the county to make decisions with regard to the possible acquisition of an interest in such lands in a timely manner. In the event a decision to acquire whatever public interest the county may desire is not made with reasonable promptness and pursued diligently, applicants shall be entitled to have their applications processed and considered as any other similar applications, not involving open space, would be.

OS 1.02 The county shall not deny development or other land use applications, otherwise in compliance with the land use regulations, solely because of the open space designation. However, in reviewing development or other land use applications, the county shall consider the open space values and other characteristics which contribute to the open and rural character of unincorporated Boulder County.

OS 2.01 The county shall identify and work to assure the preservation of Environmental Conservation Areas, critical wildlife habitats and corridors, Natural Areas, Natural Landmarks, significant areas identified in the Boulder Valley Natural Ecosystems Map, historic and archaeological sites, and significant agricultural land.

OS 2.02 Significant natural communities, rare plant sites, wetlands, and other important stands of vegetation, such as willow carrs, should be conserved and preserved.

OS 3.01 Where necessary to protect water resources and/or riparian habitat the county shall ensure, to the extent possible, that areas adjacent to water bodies, functional irrigation ditches

and natural water course areas shall remain free from development (except designated aggregate resource areas). The county may preserve these open corridor areas by means of appropriate dedication during the development process, reasonable conditions imposed through the development process, or by acquisition.

OS 3.02 Where appropriate the county shall continue to acquire parcels of land or right-of-way easements to provide linkages between public lands.

OS 5.01 Boulder County shall, in consultation with affected municipalities, utilize open space to physically buffer Community Service Areas, for the purpose of ensuring community identity and preventing urban sprawl.

OS 5.04 The county shall use its open space acquisition program to preserve agricultural lands of local, statewide, and national importance. Where possible, purchase of conservation easements, purchase of development rights, or lease-back arrangements should be used to encourage family farm operations.

OS 5.05 The county shall use its open space program as one means of achieving its environmental resources and cultural preservation goals.

OS 8.01 The county shall annually develop a Capital Improvements Program (CIP) for open space acquisition and trails construction. Formulation of the CIP shall take into consideration project suggestions from municipalities as well as suggestions received from the public. The CIP shall be reviewed by the Parks and Open Space Advisory Committee, after public comment, and recommended for adoption after public hearing by the Board of County Commissioners.

OS 8.02 Purchases of land for open space require approval by the Board of County Commissioners after public hearing and after review and recommendation of the Parks and Open Space Advisory Committee.

BVCP Major Update – Comments from August 8, 2016 Open House for Twin Lakes

1. I have several concerns about the proposed affordable housing development on Twin Lakes Road. 1. First and foremost, moving the property in the midst of a year-long wildlife study is unacceptable. Removing the cover for wildlife will adversely affect the diversity of wildlife, in addition to adversely affecting the maturing of the flora. 2. We in the county have no say in city development of this property. We don't get to vote on it as a community. This whole process is supposed to give us a voice, but I certainly don't feel like my voice is being heard. No Matter how many times I write letters, fill out comment cards, and speak at these community meetings. 3. Infrastructure in our neighborhood is not set up to handle 200-250 more dwellings. In fact, there was yet another water main break on Twin Lakes Road today. The nearest bus stop is nearly a mile away and the bus does not come very often. The grocery store is a mile and a half away, and our neighborhood has a walk score of 17 out of 100 (car dependent). 4. Hydrology - the water table is very close to the surface and supports wetlands on the north and south portions of the property. Many neighbors had flooding in both September 2014 and June 2015. Any new development will also be susceptible to flooding. 5. This is essential wildlife corridor between Twin Lakes open space and Johnson trust, Boulder Creek, and Walden ponds to the South. It is heavily used, as wildlife areas have documented. Dear, raccoons, mink, coyotes, fox, rabbits, squirrels, meadow voles (a species of special concern), tiger salamanders (another species of special concern) great horned owls, bald eagles, red tailed hawks, kestrels, caper's hawks, northern harriers, and even great blue herons frequent the fields, please don't develop this property. Please keep it as open space! Laura Kovsky 6394 Twin Lakes Rd
2. Dear "People of the Deciders" - We are here to raise our voice at the legal maneuvering of yet another onslaught to the health of our community. The privileged class of corporate mafia assume that they can do their quick cash change of hand, all under a false pretext of concern for the poor. It is a tragic ruse that destroys our ecosystem's fragile existence. We must learn to make our world sustainable, no? The studies indicate that our water table would become a real issue, and to ignore that glaring problem is a foundational mistake. And then the problems multiple. Be our champions, not our rapists. Martha Mcpherson 4809 Branden Creek Dr Boulder 80301
3. This land seems to have been dedicated years ago for use of boulder county citizens. Low income is still part of the citizens of this land. Roads will accommodate the cars that are added by housing and everyone will wave hello to each other
4. The current draft proposal would mean 500+ cars added to the gun barrel corridor namely Twin Lakes Road. There is no way our community can handle that many vehicles. The grocery store Kin Soopers is already stretched - running out of food - to keep up with the new developments around it. Avery Brewery is now getting permits to play electric guitar music that blares out over a mile in all directions. Last Saturday it was impossible to be outside or even have our windows open. We complained to the police who told us they had many such calls of complaint. Gunbarrel has been an island of peace and sanity against the backdrop of an ever expanding downtown. Nesting owls and other wildlife have a home here. From the outset we could see the deck stacked against us. It is heartbreaking
5. Boulder County Commissioners illegally sold this public land to NCHA developers and intentionally ignored a formal request letter to have public hearings to expand the Twin Lake Open Space located adjacent to 6655 Twin Lakes Rd with this public property!! 6655 Twin Lakes Rd was originally purchased from the Archdiocese with public funds and remained in the boulder County Land bank for over 2 years. before it was quickly deeded shortly after commissioners received gunbarrel residents request letter for 0\$ down and a zero interest promissory not due in 2025. We want our land back!

6. Staff rec. says no Boulder County Species of Special Concern on the parcels. There are at least 2 that live on the parcels. Meadow Vole and Tiger Salamander and at least 8 more that use the parcels. There has never been a full species inventory. Also, staff rec says that TLAG & public submitted 11 BVCP violations if development occurs. There is a list submitted to staff of 20 BVCP violations. Why was that? not used for Att. E (?). Also, BCHA mowed the entire N Parcel halfway through their wildlife study, effectively destroying habitat for multiple species. Why did they not just mow the perimeter like NVSD did, and when will BCHA & BVSD do a proper species inventory?
7. 1. The proposed density in the development is beyond what any human being should have to endure. 2. This area is far too removed from where most of its inhabitants will be working. For many the cost of getting to and from work could be cost prohibitive. 3. The number of cars that could possibly be in this area is not manageable and have there been thoughts of where the overflow will go. 4. What happened to the council's obligation in the 60's to preserve wildlife and open space.... They are not making any more of this so let's preserve what we have.
8. Do NOT annex county land, period especially at Twin Lakes without county voter approval. We had land use amounts for a reason. There are more than enough reasons not to develop this land in the proposed way. Listen to the residents
9. The proposal to develop the two open parcels of land on either side of Twin Lakes Rd - as low-income housing - will irreparably change the character of our neighborhood. The (?) of 200-500 more automobiles in this neighborhood is unsustainable. The local supermarket is already stretched to provide for the surrounding area. They will stretch it much further. If water and drainage problems and damage from the 2013 flood has shown us anything, it is that all the new planned construction will be setting the residents up for more extensive water damage problems in the future. The open space around the two lakes is a treasure, with its owls and other nesting birds. As boulder gets more and more congested and developed, this area is one of the few remaining nature sanctuaries easily accessible to folks in a residential area. The Avery Brewery is already contributing a huge influx of visitors on the north side of the lakes; yesterday the noise from the ? rock music there throughout the day was unbearably loud and intrusive. With development on the other side of the lakes, the loss of tranquility will be complete.
10. I fully support the new medium-density residential designation of twin Lakes. I'm excited for more housing for local mid-to-low income wage earners and fellow citizens. I would have been upset if the planners commission caved to neighbor pressures b/c neighbors will always protest affordable housing. We live near a trailer park and the neighbors are awesome in North Boulder. Thanks for embracing the community's larger values.
11. Listen to the people. No high density change. Open space only for each parcel. New commissioners are on the way.
12. Dear all, have a heart <3 Build something that really fits, make everyone happy. Play fair. Really. Thanks
13. How many time do you have to do this? Total BS
14. Before anything proceeds the current homeowners need to be assured that they will have a vote should the area present annexation. I fell the city council is presenting some very under-handed ways to sneak the red fox hills residence into unwillingly annexed to the city. They need to assure us that this illegal land grab is not a step toward annexation
15. Please do NOT approve the staff recommended proposal. 6-14 units/acre is still way too many. The affordable housing should have been placed in the gunbarrel area where the hundreds of new apartments were just built.... Near King Soopers, gast station, BUS STOPS, other shops & restaurants. None of that is where the new proposal is in Twin Lakes. Please stop this proposal & consider LOW DENSITY. keeping it OPEN SPACE is best. Thank you.

16. The land belongs to everyone, not just the wealthy. The need for low income housing is so great in Boulder County and around the entire country! Everyone is entitled to proper housing and their life circumstances shouldn't exclude them from a safe place to live. Low income people come from all walks of life - people who've lost all their money because of medical bills, losing businesses, disabilities, etc. Low income people are human beings! We love nature as much as the wealthy.
17. Dear all, please do not go through with your development that will bulldoze 20 acres of owl hunting meadows. Just why do you put people through all the meetings etc and do whatever you want? This is a corrupt system! Sincerely, Renee St. Autumn
18. I am a homeowner in Gunbarrell. We bought our house two years ago. We came here on vacation and fell in love with Boulder. I am a cyclist & we hike a lot. We ride and walk Twin Lakes just about every day. We love nature - the open space - wildlife, trees, all of it. This is our home now & why we came to Boulder. I am truly upset after 450 apts were built half mile from our house and now the city wants to build 240 more? In open space? I am flabbergasted. I am not opposed to low income housing. But I strongly urge you to find other more suitable space for building. The issues that concern me are - our roads are already stressed & it gets more dangerous to hike & bike. The wildlife corridor - we love our wildlife - birds, foxes, deer. etc. The hydrology in this area Twin Lakes is fragile. This development will I feel disrupt it. I am concerned with the way it is being done - even the proposal suggests 5 areas that may be in violation of Colo State Law. I strongly oppose this development. There are not enough services to support another 1000 people & two hundred cars. It just doesn't make sense to me. We came here for the open space close to our house and in the area! We love it here. Protect, please our open space. surely there is a better alternative. Respectfully, Allen Bee 5262 Spotted Horse Tr Boulder 80301 Sorry for the bad handwriting :)
19. If this property must be developed, it would make an ideal community park for the neighborhood and for gunbarrel. I strongly oppose the plan to develop the land into mixed use housing. It should ideally remain open space. To me, it FITS THE CRITERIA for open space. The proposed development would change the entire feel of the neighborhood, MY neighborhood. The place I live, the place I come home to after work. Please do not build the mixed density housing. Please listen to those of us who live there.
20. 1. An MR designation is inconsistent with the surround LR and open space lands. 2. The location is far from basic services like grocery stores so will result in a significant increase in traffic and congestion in this area.
21. STOP railroading the Twin Lakes to ghettoize our neighborhood!!! This dense development adjacent to the Twin Lakes Open Space which is small, its only the roads surrounding the lakes but has the most visitors of any Boulder County Park will NOT be sustainable into the future!! The wildlife will be driven away and the transient people from the encampment planned 2 blocks away will take over what's left! Eaton Park lands are mostly swamp land. Why do you want to destroy what little open space there is in Gunbarrel? We ? development is the direct consequence of 15 years of failed bad housing policies and corrupt (city & County under BVCP) are using affordable housing as political expediency to FORCE higher density development into low density neighborhoods!
22. The Twin Lakes Project seems more like development overreach and reckless. The proposal calls for 500 vehicles, give or take a few, which seem to cause excessive congestion, let alone the problems that go along with overpopulating such a small area. Over development has to be controlled. There is more than enough "affordable housing" in the Gunbarrel, Twin Lakes area. You must not disregard the wildlife that live in the area. That is what makes the area unique, serene, tranquil. Development should begin further down 36 beyond Broadway, before turn to Lyons. Thank you for your consideration. Debra Lewis 4804 Brandon Creek Dr.
23. This site is perfect for an infill development project supporting both affordable & Mkt rate housing. Have lived in gunbarrel for 15 years, this site has been disturbed for years and makes sense for more housing.

That supports our teachers & other professionals, families & young people struggling to afford housing in our community. Please contact me. Jeff Dawson Resident of Orchard Creek

24. I live (own the property) at 4614 Starboard Dr. My backyard is adjacent to the school district parcel. Let it go on record that I am vehemently opposed to any development of this parcel & to the parcel on the N. Side of Twin Lakes Road. My very peace of mind & quality of life are at stake here. Richard Rossiter
25. The process for civic involvement in shaping the policy of the rezone is awful. The hydrology issues alone are problematic enough to suggest this should remain open space.
26. A concern about the development impacting water and sewage of existing development in the twin lakes area. How will we be guaranteed that this development won't affect us financially.
27. Frank Alexander mentioned in the initial inquiry into the purchase of the Twin Lakes land (?? Requisition was made for the \$400? For the purchase of the land from the Arch Dioces) that an affordable housing project was feasible at five units per acre. Since the land is presently zoned for 2-6 units per acre, Hold him to it! Go ahead, build a project, but do so under the existing land use designation, do not increase the density! This isn't something you would do for any private entity, so keep the land as LDR. That is the only compromise that is acceptable to this land. Regard Patrick & Priscilla Maddow (residents at the area) PS Even though its city policy do away with cash in lieu!
28. Please don't annex or build on the parcels at all. We purchased in this area for the rural and open feel, and this will ruin it. Plus putting in low-income housing in an area where there are no city services or transportation, no shopping, and no hospitals nearby is absurd. Affordable housing should be in walking (short) distance to grocery stores, buses, hospitals, libraries and other city services. Plus, the number of people & cars the county wants to add is extremely inconsistent with the low density housing that currently exists. To allow the city to annex county property in order to allow developers to make money from our tax dollars should be illegal. The county does not have our best interests in mind. They have no business being landlords when they fail at so much of what the county is supposed to support - like road maintenance. This is just a greedy endeavor that will set a precedent that could potentially ruin all open space for the future. Meanwhile the city continues to allow developers to pay instead of building low-income housing on already owned city land - like with the recent gunbarrel developments & now the armory. Shame on you! Leave our open space alone. You have plenty of your own land to rezone & build on.
29. This area demands to be protected as open space preservation, as a wildlife habitat and corridor, and walking and biking trails. The proposal for low-income housing is inappropriate because the location provides no services within walking distance and public transportation is minimal. The process used by the city and county to review proposals fails to take into account reasonable arguments in opposition. We attended a city council meeting last spring where the majority of presentations were adamantly opposed to the low-income, high density proposal.
30. Not enough studies have been done to justify these projects. Many more years needed. Bob Marshall 4801 Brandon Creek Dr.
31. I feel that these condos can go somewhere else. These owls were there first & have right to stay where they are now.
32. I cannot afford to live in Boulder. I understand the need for affordable housing. But, the Twin Lakes and the owl habitat provide an essential resource. People need natural spaces, and we have too few. Not only do we owe it to the owls and other animals living at the Lakes, but we owe it to the people of Boulder to leave this space natural. It deserves our protection. Seeing the owls, watching them, listening - it changed me, and it changes the way we approach the world. It changes the way we live, and it changes the way we treat each other. Please don't take away our natural places. Please protect the owls and the entire ecosystem. Don't build at the twin lakes.

33. I think that the wants and needs of Boulder's citizens are pretty clear. We want affordable housing - and we want open space. The "buzz" is that Boulder and the Surrounding Areas are being too dense. People complain about traffic, about new building seemingly everywhere and they also see that the needs for affordable housing is lacking. One very overlooked solution would be to stop letting developers buy their way out of accommodating affordable housing. The cash-in-lieu option is outrageous. Can you picture a city where people of all income levels could live side by side in the same building? I can and it is a much more attractive option for all involved than what is being offered on the Twin Lakes properties. We need open space and affordable housing. Please think clearly and with open minds about what would be the better choice in this location, Thank you.
34. Dear Decision Makers, I am absolutely in favor of additional low income/affordable housing for the Boulder area & equally opposed to locating it by Twin Lakes Rd. I am not a NIMBY. Anyone who knows me can attest to that. I believe the Twin Lakes area is the wrong place for a low income housing development for the following reasons: 1) there are no services in the gunbarrel area to speak of. 2) there is minimal public transportation available. 3) We will be creating over crowding in a relatively small area. I am old enough to remember when San Juan(?) was created in the 60's - created low income housing totally outside the city; no transportation end of 30th; housing was a long way from services. I could not believe it was happening. ? & I cannot believe we didn't learn from that & about recreating that ill thought out plan. It felt then like "Out of sight, out of mind" & it feels that way again! And homeless encampment?! are busses going to be provided to bring them here & take them back again? We did that in the 60's - took people to ? & canyon & brought them back! We can do better.
35. 1) The open space value of the twin lakes properties has been under appreciated by the Boulder City council & the comprehensive plan. I fear the lakes will suffer without fields environmental support. 2) I object to upzoning at the city's convenience without regard to neighborhoods, established historic designations (6655 was proposed for open space land is a last pocket amid annexed gunbarrels growth). 3) The annexed section of gunbarrel has become a nightmare of box apartments (with NO affordable units) The grocery store being taxed to its limits, there's only 1 gas station. No library, social services needed by affordable tenants proposed for 6655. 4) The rural character of the neighborhood is being dishonored. The proposed "affordable housing" is not for purchase but for rent. Like co-housing occupants tenants are far less likely to maintain an investment in a neighborhood. Hundreds of cars will be added to the equation. I have trouble enduring the fumes when I open my window as it is. 5) The BVCP & City Council throw around generalities. My definition "sustainability" includes room to breathe. Those bike paths & trails in the mountains are NOT accessible to me! The powers that be have decided already. They pay lip service and orchestrate their take over at will what they like. 6) annexation through open space is against the state statutes and attempts to twist this is wholly against the intent of the law! to protect county property from over reaching city annexation. I deplore that the county is in bed with the city; that the BCHA's Board of Directors is/are the county commissioners. Such MISUSE of government is abhorrent! The future ramifications will allow Boulder to bombast Gunbarrel. Hail People's Republic! you make me sick
36. I am a resident of Gunbarrel yet my property is actually in the City of Boulder. My concern with use of the Twin Lake property for use of low income housing sets an awful precedent of how City of Boulder/Bo County commissioners have acquired the property and threatens the democratic process of having community involvement. Being able to have the city make a decision on behalf of Boulder County will set the wrong tone to the perception of political system as a whole as it is forcing tax payers to accept a decision that they had no involvement in yet should be
37. The staff solution concentrates homeless individuals & families into a project outside of the city. This goes against BVCP by not dispersing the homeless population into the community; additionally, the city &

county should work with gunbarrel residents to develop a sub committee plan before changing the land use designation and ultimately up zoning the area. This change affects the overall character of the gunbarrel community. Also, this is an opportune time to evaluate the open space & it's future given the growing population of the city & gunbarrel. We all will need more open space close to the city. Finally, a wildlife corridor is necessary to link warden & sawmill ponds across Jay Road to twin lakes open space.

38. I do not think that it is a good fit to try to cram in hundreds of people that cannot afford to live in Boulder into these 20 acres. We live in Rural Residential and do not need city services or amenities. I have lived her in Twin Lakes for over 30 years. The hydrology is not compatible for building. The noise and congestion it will create will forever change my quality of life. There is a triangle of land on 47th and the Diagonal that would be suitable for Boulder Housing Partners to build affordable housing. I do not see that we will develop any good housing with the density proposed. We are Rural Residential. We deserve to preserve our quality of life. The traffic will be too much for the tiny road into the proposed area. It would preserve our quality of life to have OPEN SPACE. Please hear us! I do not feel that we have been served fairly by Boulder County or the City of Boulder. Seeing what has been built in gunbarrel, it is so crowded already. Why do you want to add to this? the pollution/heat/noise is not compatible with our quality of life. We chose to live here for a reason and do not want to have our area developed with the density proposed. Please hear us! the city already receives the commercial tax base and the retail. Preserve our neighborhoods! The animals in our neighborhood are important. We have the owls/deer/mice/coyotes. They need to return their space. I feel that we have not been treated fairly. We demand to be heard & have the studies done that are fair to all. Thank you, Sue.
39. As a taxpayer and long term resident, with passing the process of the purchase of land through the so-called good faith efforts of the discussion process - while sabotaging the efforts by mowing land while supposedly conducting a "wildlife study" - it has been so disheartening. For some reason I guess I drank the KoolAid about concerns around development with Boulder County. (this is not unsubstantiated as I grew up here and recall the serious commitment towards controlled -(NO)- development back in the 70's. No more, clearly! Now - regardless of higher water table, protected species, lack of services in proximity - some one's folly in purchasing the Twin Lakes property without advance research - has snowballed into a bulldozing (literally & figuratively) effort - to characterize the concerned neighbors as simply "not in my backyard", selfish people. Truly insulting to those of us who have paid taxes - and who have voted in support of increased open space over the years - only to have to fight for open space now.... Kristen Aldretti 6824 Idylwild Ct Boulder CO 80301
40. There needs to be more protection of the wildlife corridor than just a "trail" for movement of wildlife - That is if there will be any wildlife left after the bulldozers and construction! All your drawings completely disregard the opening at the SE corner that allows wildlife access to the Twin Lakes. Also, it is totally inaccurate that the land has only a few species of special concerning using the parcels
41. Once again the City Planner & County Planning Group gets together w/ cronies to strategize what makes sense to them. The public process is & has been pitiful. You all come up w/ what you want, you know nothing about community & economic planning. And developing up a flood plain after the 2013 flood is just insane. Who is going to pay for these damages next time? This project needs to be scrapped & you need to start over with a real, knowledgeable planner.... not just try to implement the fanboy projects that Mr. Driscoll is so famous for planning but never are successful. We need affordable middle-low class housing but that ? our sacred open places & does not even risk any chance of flooding, mold, wildlife in packs. We need to start living up to our ? claims. If not then my (illegible)
42. (sent as email) From: Bill Smart To: the3georges. I appreciate all you are doing to help in the preservation of our open space. I may not be able to go to the meeting tonight, but thought you might be able to add my

two cents if you think is worthy. If they have truly lost all interest in preserving our open spaces, the following may be used in any way you like, but I do feel the end goal is to provide a happy medium for all concerned. Some very insightful Council people of the 60's had the forethought to preserve our open lands to gain vistas of the mountains and prairies for all to admire. What they have created is something very wonderful that we and many visitors admire and appreciate. The current City Council is at a pivotal point in the planning and preservation of what was conceived decades ago. Can you imagine the beautiful lawn at Chautauqua filled with Affordable Housing or any kind of housing for that matter. These precious pieces of green space need to be saved! There is no doubt that there is a need for affordable housing and we appreciate your efforts, but they need to be planned with the interests of all who are involved. What the Council is about to do is literally throwing our open spaces "under the so called bus". These are areas that can't be retrieved. I believe a happy medium can be achieved if your desires are "truly sincere". For many decades the city of Boulder has eyed the Gunbarrel area for annexation. If what you are proposing is to achieve this end goal the hairs of every citizens back should be raised and they should all be leery of where you will strike next. This is not only a please to preserve a vanishing commodity that the whole city enjoys, but a chance to reestablish the communities faith in what was begun decades ago. Are you willing to be the City Council that will be eternally known for throwing our Green Space away? The proposed density in this development is beyond what any human being should have to endure. It is too far removed from where most of these future inhabitants work. They will soon find it is cost prohibitive for them to commute on a daily basis. The shopping in this area is already stressed. Imagine the air pollution produced from circling a parking lot six times to find a parking place to get groceries!?! Have you even thought of how many stop lights will need to be put up to provide for their safety? Just guessing, but I think at least three or four stop lights will be necessary to provide safety not only for the existing residents, but the influx you are proposing housing for. I am pleading with the Council to not only look at your agenda as a checklist, but to also understand that what you are actually creating is a housing development for human beings. They do not deserve to live in a "Sardine Can". Welcome to "Sardineville". Hope this is helpful. Best Regards, Bill and Kay Smart

43. Very disappointed in the outcome - You had community support @ 120 on 6 du/a. Seems you lost an opportunity to build support and have now just created animosity and distrust in the process. Leave it LR at 2-6 units/acre MAX! - Open Space should be ashamed of themselves for allowing annexation to BC and no one else very arbitrary
44. Look ahead to when Boulder County is more developed - the one piece of open space thousands of gunbarrel residents can walk to is the tiny Twin Lakes Open Space - it looks bigger because it has views to S & West - with this proposed development filling those up - twin lakes will look more like a city park. Think ahead - the way all the purchases of open space have - this is the last opportunity to have open space here - save it & try to preserve the quality Boulder CO & City residents expect. It seems to be rapidly slipping away. I am overall sad & angry about the pace, density & look of development in Boulder CO. I have enjoyed living in Gunbarrel the last 17 years - but good things end so I will eventually cash in like everyone - I truly believe that is the bottom line of what is happening. very sad
45. What is the city's commitment to the infrastructure of the existing subdivisions (Obviously there will be a great effect on storm sewers, etc.). Why should this be annexed if gunbarrel traditionally votes against annexation? How can unprecedented, unethical & perhaps illegal methods to annex be employed to form a ? continuous line & city land? The density of population will be a direct negative effect upon the community east of 63rd off of Twin Lakes Rd. There is still a rural sense in this area after all these decades. How can the county & city justify changing the zoning laws for a government project having denied private developers that opportunity? Why are you not building affordable housing for people to buy? That's what

boulder county needs - new homeowners, not transient renters or ? and more people who cannot begin to build any equity for their future. Why after 40 years in Boulder county w/ emphasis on open space are the governing forces sneakily taking up these options?

46. I would prefer no development on these two field, but the proposed density is a big problem for me. This density is in no way compatible with the current density of adjacent development and will have a tremendous negative impact on traffic, noise, and quality of life. Please do anything possible to build on the low end of proposed number of units its stated in the first line. I do not want any development! call me - Mike Altenbum
47. I believe the city and county planners analysis to up-zoned was flawed. The overall average density of the neighborhood is 4 units per acre. The analysis only matched to three small sub-division (portal estates, portal village and snug harbor) at around 14-15 units per acre. While ignoring the rest of surrounding subdivisions. This is not a fair and impartial recommend analysis. Please reconsider your recommendation and leave the area's current density as is. Thank you!
48. My wife and I moved to Twin Lakes from downtown Boulder 2 years ago to raise our baby away from the noise and congestion of the ? Area. We love living here but are afraid of or neighborhood and the whole Twin Lakes are becoming densely populated. We are afraid of the damages that would accompany the huge ? and we are sad to think of the light and noise pollution that would ruin the rural feel of our community. We feel like its irresponsible to cram so many people into these parcels when they would be better served in more central locations throughout Boulder. It seems criminal to allow developers to buy out of building affordable housing and the pile all of it on top of each other in one area. It does seem like ? facilitated ? with TLAG were ? Stephen Whitehead
49. The Boulder Valley Comprehensive plan is a travesty with its "requirement" that developers include on-site inclusive designated affordable units in new projects allowing cash-in-lieu renders such a rule non-existent & insures that affordable housing will never be inclusive and will always be segregated & out of sight, out of mind. The result leads us to the outrageous debacle being perpetrated on the residents of the Twin Lakes area with manipulative, deceptive tactics being forced down our throats in order to seize the only open space are we have. This is not a debate about affordable housing as a worthwhile program, it's about the city & county violating the BVCP while trying to pretend they aren't or that it's acceptable It's about ignoring all of the reasons that the Twin Lakes meadows are a terrible choice of location to build anything, affordable or not. The current rural residential zoning must remain, and the hundreds of residents who settled here are enraged that the city and county are attempting to destroy our area & our way of life. The meadows need to be designated Open Space to complete the wildlife corridor & to preserve the owls nest home & the scores of wildlife species that live in these habitats. The independent hydrology geologist's study has shown that the high water table deems the meadows as unfit for building because of the probability of flooding in both the new construction & the existing surrounding homes. The density **change**, high traffic, and hundreds of additional cars would be untenable. The poor infrastructure & crumbling roads already can't support the existing neighborhoods. The bus service is woefully deficient & the location of the meadows is too far from bus stops for many people to walk, including seniors, children, mothers w/ small children, etc. & especially in bad weather or heat. Very few services exist near Twin Lakes & the new build would be nearly entirely car-dependent. Over & over the city & county have been caught in deceptive & manipulative, sneaky tactics to push this through at any cost. WE will not let this happen! the recommendations presented tonight are unacceptable & must be rewritten!
50. Our gunbarrel town center sub community plan was destroyed with nearly 600 units of 3 story dense apartment buildings! No affordable housing was built there -so clearly planners have already determined that gunbarrel doesn't need any AH!! Don't dump on gunbarrel. Now they want to destroy the only other

possible site of a community gathering place - the twin lakes! For all the multi-millions of taxes (sales & use) collected from gunbarrel - what gunbarrel got was the exact opposite of what the community had agreed to under the 2006 adopted BVCP gunbarrel town center community plan! and no amenities in over 45 years!!!

51. The Twin Lakes Road parcels need to be designated as Open Space in the upcoming Boulder Valley Comprehensive Plan. They have been used as open space by the surrounding neighborhoods for decades, they provide an important wildlife corridor connecting Twin Lakes open space to the north with sawhill ponds (& Johnson & Coen) trusts to the south. In addition, there are hydrology concerns on these parcels. There is a puddle that has formed in the Southeast corner of the North Field that has been there for weeks. The water level is high in these fields & yet the monitoring wells that were drilled were not drilled in the southeast & eastern parts of the north field where flooding has occurred. Just today there was yet another water main break on the twin lakes road. For these reasons, & many more, these fields are best suited as open space for the gunbarrel community. Development on these fields could cause flooding of nearby homes & fields to the south and east. So why the push to develop over 200 units of affordable housing on these fields. One ulterior motive is to shore up the municipalization of electricity for the city of Boulder. Annexing through open space in order to establish the ? continuity (required by state statute) is unprecedented. Open Space directors have never allowed this in the past as it opens up Open Space lands to encroachment by development. However, for some reason the director has given the go ahead to annex open space in order to establish the necessary continuity for these parcels. Once this precedent is set then they can annex more areas of gunbarrel & form enclaves that can be annexed without a vote in 3 years. Thus allowing the city of Boulder to get the gunbarrel substation.
52. Leave our Rural/Residential property & neighborhoods alone! No annexation through open space or any other avenue! We see through everything you're trying to perpetrate. Designate both Twin Lakes Parcels as Open Space as proposed by our hundreds (thousands?) of residents.
53. Using the mere discussion of densities in the TLSG as a reason to advance medium density is wrong. - Using 3 tiny areas as justification for zoning 20 acres as up to 14 units/acre is flimsy and should not be done. - If you are going to say affordable housing is a trump card in the BVSD, have the intellectual honesty to say so - This draft plan is proposing a density completely out of character with the neighborhood, and must be revised down. - this draft plan is going to drive years of litigation and divisive opposition
54. My primary concern is that you've forgotten the community you serve. By forcibly taking open space in a low density area that is far removed from town you are compounding Boulder's congestion problems. It's a short sighted and flawed plan that will create yet more traffic, putting the low income housing several miles from the business center is nonsense. The community that this development is intended for should have access to jobs at a reasonable distance, a pharmacy and other services that simply are not present in the twin lakes area. Pushing low income people out of the city creates more barriers for the people they're intended for. This area certainly does not meet the criteria of having "Adequate facilities"
55. One of the environmental concerns I have is that the water table is far too high here. My land abuts this property and it is essentially wet-lands. The building activities will disturb habitat for my favorite neighbors: great-horned owls, rocky mountain blue birds, herons, red-winged black birds and many other wonderful species of birds. This area has several species of special concern, including a resident Great Blue Heron who has lived here for at least 5 years. I saw a cormorant today, and an endangered wood pecker. Whoever studied the parcel for species of special concern also missed the plains harvest mice present in the field. The other species of rodents are an important food source for the owls.

56. I object strongly to the annexation for these purposes. I don't want to be part of Boulder proper and this is a bully move on BVCP's part. This is a scam precedent and should be stopped. Affordable housing belongs in the central business district where it is painfully absent. This should be your priority.
57. I strongly oppose the proposed development in the twin Lakes area. There already is a lot of development near the King Soopers area in Gunbarrel. Open Space is needed for recreation and most importantly for wildlife habitat. The alternative locations should be used instead for more housing. More housing means more traffic which means more congestion, traffic lights, etc... The survey's used to research this area appear to be inadequate according to the articles posted in the Daily Camera. Neighbors should have a vote in this matter! Please reconsider
58. I have many comments and concerns about developing this area & Understand the why's of development. My concerns come from - infrastructure - gunbarrel has increased traffic yet little road improvements (consider potholes, water line breakages & increased traffic at Spine and at 63rd this development sits close to our enjoyable wildlife corridor. There will be ? and maybe some species will not return (consider our owls) question - is Gunbarrel going to become our affordable housing area? Will these plans increase the risk of flooding. This plan offers buildings nested between 4200 nice single home neighborhoods - concerned w/ taking away the view of the mountains and concerned offers too modern a design. Boulder is already looking like a sterile city. Gades away from a rural feeling and would suggest looking in another area of Boulder like the former ? site. Boulder has also prided itself on "open space" community. I believe we can & should stick to that. What about services - gunbarrel does not have adequate competitive services now (King Soopers is a satellite store). White Rock Cir Resident Boulder (Colorado) 8/8/2016
59. 1) Going against current density goes against the entire community. 2) Annexation through open space has never been allowed and is probably illegal. 3) Destruction of wildlife in the area is criminal, at best. The wildlife needs to be preserved. 4) People in gunbarrel purchased property based on the area. Building on wildlife corridors should NOT be permitted. It destroys the area and disrupts the "feel" of the community. 5) gunbarrel residents have NOT been listened to in regards to what we want for the area.
60. I am disappointed that development of the twin lakes owl habitat area is still being considered. The open space area and wildlife around & in this area are a precious commodity that should be preserved at all costs. Owls need substantial habitat & wildlife to survive. we are risking the livelihood of the owls by building in this area. Please consider another area for housing. Would it be possible to convert some of the commercial space to residential. It seems like there is a lot of empty buildings on pearl & 55th & lookout. Thank you for thinking about open space & protecting the Great Horned Owl.
61. Do not bend state statue law to set an illegal and dangerous precedent which could endanger open space lands for development up & down the Boulder Valley. 6655 Twin Lakes Rd has no contiguity with the city. By state statue it is illegal to annex county owned open space land in order to have contiguity for annexation and development of 6655 Twin Lakes Rd. Illegal!! BCPOS open space land and 6655 Twin Lakes Rd are NOT owned by the same owner for any service, annexation, concept plan. When gunbarrel community learns how dangerous this precedent will be for the annexation of the rest of gunbarrel for the development of open space lands. This will be stopped!!
62. The gunbarrel community & I want an open space designation on the 20 acre owl hunting meadow then the twin lakes owl space should be created. Ken Beitel
63. The community was willing to accept 120 units based on the facilitated talks. BCHA & BVSD turned it down. This plan in no way represents that compromise & commitment from the community. At 120 units, this could go forward. Staff did not acknowledge this in the plan. Now there will be more conflict & mistrust. Probably lawsuits & delays. A win-win turned into a lose-lose.

64. I believe that the Boulder County Housing Authority should go ahead with the affordable housing Plan! Teachers need housing in Boulder! Seniors need housing in Boulder! My Spanish teacher wakes up at 4:30 am every day, chugs a pint of coffee, and gets on the bus from Denver to his job at Boulder High School. He is one of the most enthusiastic teachers I know. Hardworking people such as he deserves to live in affordable housing. Also there are not "key owl habitats" in the Twin Lakes area. And there is a bunch of wildlife area with the Twin Lakes nearby, they don't NEED this exact area
65. I believe we should build affordable housing for teachers. My teacher has to commute every day to get to school. Also after looking at the area, I think that it is a perfect location with plenty of open space right next door. Also due to the recent floods, many people & teachers need affordable housing now more than ever. Also the Twin Lakes Open space has PLENTY of space for wildlife & I am sure that it would be a great help to all teachers & seniors. Build houses please
66. 1) I am disappointed in the MR recommendation given that the surrounding neighborhoods are LR. However, it is better than the MR requested; thank you for that. 2) Since BCHA requires high density in order to obtain funding, they should consider other sites that are more appropriate for high density. The potential homeless encampment sites are just a few of the many potential sites. 3) Since NCHA seems to be "selling" this high density requirement to provide "affordable housing" for teachers, public employees, and other public servants, we expect them to follow through. Currently 80% of BCHA has been claiming for the Twin Lakes Development. This goal of serving the middle class will require new approaches, new funding, sources and collaboration with private industry. Something must be done differently than in the past: we look forward to your plans to make this change. 4) BCHA/BHP/BCSD will have rights to build 280 units in Twin Lakes. That is larger than the Kestrel complex. It is also higher density than the 6-12 units per acre that BCHA has claimed all along; that would be 240 maximum. It is larger than San Juan del Centro. 5) I encourage the planning staff to encourage and allow BCHA to subdivide all those parcels. Sell half to private developers. Keep the rest for "affordable" housing. A mix of incomes in the new development benefits the low income recipients as they would feel segregated. In addition, by selling some of the parcels to private developers, you can use some of that funding to build units restricted to BVSD staff, police, firemen/women, and other public servants without being restricted by HUG regulation. And this would allow moderate priced open market housing
67. I cannot support the level of housing density being proposed for numerous reasons that have been well-articulated by TLAG. I'm disappointed that the many concerns that have been brought up (traffic, lack of public transportation, no nearby goods and services, etc., etc.) have not been addressed by the agencies trying to push this project through. My basic feeling is that the type of project being proposed is ill suited for this location. the level of impact the area is unacceptable. I would be less opposed to a development that met the current zoning.
68. Boulder County needs housing for teachers and hard working middle class families. This development deserves the support of all community members. The alleged impacts on wildlife are a smokescreen for anti-development, anti-affordable housing NIMBYs. Housing is critical for Boulder County
69. How is anyone in the Red Fox Hills neighborhood to believe a word you say? Nothing has been truthful. Instead I feel you will bully your way thru even though you claim to want TLAG input. This particular site is considered "infill"?! Our streets can't even be un-paved even though we have paid the taxes - then you say you'll "upgrade"? This would be a "flag-pole" - how ridiculous - again, where is our benefit in this? On other sites you have directly caused home flooding which you to no responsibility for. You're even "fibbing" your won hydrology study. This cash-in-lieu thing infuriates me. You can't hold yourselves accountable - instead you want more money to hoard & not use in beneficial updates (neighborhood roads anyone?) Your latest comment about lack of documented wildlife? OMG! Obviously OSMP/Boulder CO/Housing are all in this

together (see previous bullying comment) I've had a mountain lion in my backyard! This is coming from a master level social worker! I support affordable housing this is not a NIMBY issue - instead it is a strong request to defend open space

70. I strongly object to the process used to determine suitability & designations. I was assured hydrology, wildlife, traffic, and infrastructure would be studied in more detail AFTER the designations were determined. From a scientific (& common sense?) view, getting data after a result and direction have been determined sets the study up for failure, & it is the community that will suffer the brunt. I feel voiceless & unheard in this seemingly rubber stamped move, when can I vote? When I say that I have concerns, they are blown off. The affordability of my home is at risk & no one seem to notice?
71. Open space!
72. To have this upzoning without a plan for this area disenfranchises the residents and creates an unsupported development just like the developments this year on lookout road which added 550 new housing units not one of them affordable, and no sub community plan to address infrastructure needs. What is the tax basis collected from the commercial properties in Gunbarrel? Why can we not have a real plan? You have made a mistake recommending higher than rural residential density. Deny both change requests until there is a plan that makes sense for the context of this area. This density makes sense for City of Boulder looking to concentrate low income housing elsewhere, but what would actually work, if there were adequate planning, is rural residential, work force housing for incomes like \$50-90k looking to purchase a home. Co-workers would love to buy in Gunbarrel, a small home, integrated into the neighborhood. This would serve affordable housing AND existing community, but since there isn't anyone who is willing to take the needs and interests of gunbarrel residents into account, the county is failing its stewardship responsibilities
73. Thank you for not recommending the MXR designation. I appreciate that your staff recognized that 18 units/acre was out of proportion with the rest of the Twin Lakes neighborhood. I still feel that anything higher than 6 units/acre will negatively impact our neighborhood in ways that are unfair to current residents and that will totally change everything about it. The comments that this neighborhood is not technically "rural residential" fails to take into account how this area presently feels to those who live here and those who visit. How many places in Boulder have a field that a resident Great Horned Owl feeds from? How many have had a brand new organic farm move in adjacent to their neighborhood? How many people can look up from their backyard and regularly see a heron flying above them? This neighborhood still has a rural feel and only the actions of the city of Boulder (increased development, Avery Brewery) will change that. I find the argument that this new development matches existing (4) developments in density very weak. None of those is larger than 5% of all units in this area or take up more than 1.3% of the total developed acreage. Together they make up 15% of all units and 4% of acreage. Developing these 20 acres at 12 units/acre would mean this one development would have 26% of all units in the neighborhood and would sit on 9% of the land. This is a very large project! And a huge change to the character of the neighborhood. At 6 units/acre, the development would be a more reasonable 13% of the total units, closer to the current high-density development in the neighborhood, though still much larger than any single one of these developments. All these percentages were derived from the density study numbers in your draft recommendation, and I believe them to be a fair way to analyze the character of this neighborhood and how it would change.
74. I strongly oppose development on the Twin Lakes Rd properties in question. First of all there is no way any private developer could obtain approval of the requested land use changes. There is just no way - these are special interests at stake here, yes? Our community wants/deserves a voice in this process. We do not just want lip service paid to us. BCCP States - growth should be channeled to municipalities - agricultural land should be protected - preservation of our environment and natural resources should be a high priority in

making land use decisions. Twin Lakes N & S fields are our chatauqua!!! the neighbors in the area <3 our neighborhood & wish to keep its rural feel. It's safe feel. This is not a suitable place for development - our neighborhood floods & takes hydrology issues seriously - it's a haven 4 wildlife - take nature study - it's a wildlife corridor & attached to open space. Don't bulldoze our wildlife, our vistas, our land. Stop cash-in-lieu & put housing elsewhere.

75. The development of the Twin Lakes parcels depends on the annexation of open space to achieve continuity with city of boulder land. This has never been done before in Colorado, and it sets a terrible precedent that should concern all Coloradans who value the integrity of open space. If this annexation goes through, it will greenlight other open space annexations to justify development in any other situation like this one. I feel that money and political power always have a built-in advantage over the interests of ordinary citizens. This advantage should be challenged at every opportunity.
76. This land is completely unsuitable for high density development. The grass is green even w/o rains, and the wildlife actively use this corridor to move back and forth between walden ponds and Twin Lakes. BCVP has listed this land as a wildlife corridor. Since it's active let's keep it that way. Additionally, given that we truly need a park and playground in twin lakes this land is perfect for open space. It would be the jewel of our community and really add value to our neighborhood. It is something many of my neighbors in the community would enjoy with their children and their dogs. Plus, the owls could still thrive and hunt locally. I encourage the county to complete more thorough and viable hydrology and wildlife studies to discern more accurately the true value of these lands to the Twin Lakes community and keep the open space.
77. This project is development overreach and a great example of obtaining property in a way that disadvantages the T.L. community as well as the gunbarrel area. Linda Joyce 4808 Brandon Creek Dr.
78. Concerned for what is going on in Gunbarrel - new buildings/rental units w/ no increase in bus routes, addressing congestion with roads and no \$ supporting the Gunbarrel area - to repair the terrible roads that exist. It's clear that the city gets over \$8mm in revenue from the local b? yet why is that not reinvested in the community? And I live in Gunbarrel yet I am annexed with the city.



Land Use

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TO: Boulder County Planning Commission
FROM: Boulder County Land Use and City of Boulder planning staff
RE: Clarifications following August 30 Hearing
Date: September 14, 2016

The Board of County Commissioners and Planning Commission held a joint public hearing on August 30, 2016 to consider staff recommendations and public comments related to four land use change requests as part of the Boulder Valley Comprehensive Plan (BVCP) Major Update. The hearing agenda included requests for land use changes at: 3261 3rd Street (Request #25), 2801 Jay Road (Request #29), and 6655 and 6500 Twin Lakes Rd., 0 Kalua Road (Requests #35 and #36). In advance of decision-making by Planning Commission on September 21, staff would like to provide clarification on a number of topics related to the Twin Lakes requests.

This memo is intended to clarify and correct information presented at the hearing. This memo is also intended to address topics frequently raised as areas of concern for which staff believes additional information would help inform decision-making. Generally, staff responds immediately following public testimony at the public hearing. The delay between public testimony and decision-making has allowed us to review the testimony, gather some of the questions and provide this response. We anticipate we have not clarified or addressed all the questions Planning Commissioners may have. Additional questions of staff or requestors can be asked at the meeting, or if possible, please submit questions to staff by **September 19**.

Planning staff is also reviewing testimony and preparing to respond to questions related to the 3261 3rd Street and 2801 Jay Road properties (Requests #25 and #29). Please submit any questions you may have related to those requests by September 19 as well.

Questions are grouped in the following sections:

- Affordable Housing
- Annexation of Open Space
- Traffic Impacts, Road Infrastructure and Cross-Jurisdictional Concerns
- Wildlife and Open Space Preservation
- Parcel History and Land Use Designations
- Timing of Studies & Process
- Agricultural Land of Significance

Affordable Housing

1. Why is there a cash-in-lieu option that enables developers to avoid including on-site permanently affordable housing units to meet the City of Boulder's Inclusionary Housing Program requirements?
 - The City of Boulder's Inclusionary Housing program offers three options for private developers: (1) 20% affordable units on-site; (2) 25% affordable units off-site in a

different approved location; (3) cash-in-lieu (i.e., payment made as an alternative to building affordable housing units).¹ The city's program does not allow developers to avoid their affordable housing obligation, but state law restricts how that obligation can be fulfilled.

- Colorado statute prohibits rent control except by a housing authority or similar agency (housing non-profit). The market developer and their financing partners must enter into a permanent partnership for the affordable portion of the development, or the units must be sold by the nonprofit. This outcome is dependent not only on the developer but also on the capacity, financial ability and willingness on the part of a partner agency.
 - There are also important benefits to the cash-in-lieu component of the Inclusionary Housing Program. The funds are used to support critical housing needs such as affordable housing for very low income, shelter housing, and housing for individuals with special needs that cannot be realized through on-site inclusionary housing requirements. Cash-in-lieu funds can also leverage additional funding sources (state and federal), producing a multiplier effect and greatly increasing the total funds available to support additional affordable housing investments.²
 - Between 2000 and 2015, the total share of new units affordable to low and moderate income households (i.e., deed restricted) was 24 percent. The Inclusionary Housing requirement is for only 20 percent and the additional four percent is due, in part, to the cash-in-lieu.
 - The Inclusionary Housing program is a City of Boulder program, though Boulder County Housing Authority, in its role as a housing authority, can participate in projects made possible through the city's Inclusionary Housing program.
2. Are there more appropriate locations for affordable housing (e.g., closer to services and jobs)?
- BVCP policy 7.13 provides guidance on the location and types of affordable housing.
 - **7.13 Integration of Permanently Affordable Housing.** Permanently affordable housing, whether publicly, privately or jointly financed will be designed as to be compatible, dispersed, and integrated with housing throughout the community.
 - Very little vacant land exists within the service area (both publicly or privately owned). City-owned land in particular is either in a floodplain or has other use restrictions based on the source of funding used to purchase the land.
 - Gunbarrel currently has approximately 12,000 jobs and a zoned capacity for an additional 12,000 jobs. Siting housing in close proximity to those jobs aligns with several BVCP policies.
 - Any location within the city service area that is suitable for residential development would be suitable for affordable housing. Affordable housing serves hard-working households earning between 30-120% area median income (AMI). These households include seniors on a fixed income, young families and professionals that earn a decent salary, but simply cannot afford to live in the community where they work.

¹ For additional information on the City of Boulder's Inclusionary Housing program, see:

<https://bouldercolorado.gov/housing/ih-program-details>.

² For example, in the case of Boulder Housing Partners' High Mar project, the city contributed \$2.5M for a project totaling \$12.2M. More details are available at: <https://www-static.bouldercolorado.gov/docs/affordable-housing-development-trends-1-201411041604.pdf>.

3. Does concentrating a large number of affordable housing units in one location cause problems for residents and neighbors?
 - Boulder County Housing Authority is providing comments addressing this point.
4. Isn't there plenty of city-owned land or other land that could be used for affordable housing?
 - No. Analysis completed as part of Phase 1 of the BVCP Major Update found a shortage of land available for future housing development in general. There is very little undeveloped land remaining within the city (less than 1% of the total parcel acreage). The city uses a historic growth rate average (0.6%, roughly 268 units per year) to project additional dwelling units into the future, until the zoning district capacity is reached. For the 2015-2040 projections, this maximum number of units is anticipated to be reached within the 25 year projections timeframe.³

Annexation of Open Space

Note: Any annexation of the BCHA and BVSD parcels would occur at a later date and be subject to a separate city process. The Land Use designation change is not contingent on annexation. No annexation proposal has been submitted to the city yet. To address future annexation of the parcel, there may be multiple options available to gain the necessary contiguity. However, the specifics of annexation would need to be worked out between the city and the owners of the parcels proposed to be annexed at the time of an actual annexation proposal.

5. What would be the effect of annexing open space, and would it set a precedent of using open space to support development?
 - Annexation of open space will only change the jurisdiction of the land. It will not affect the ownership or management. Therefore, annexation of the parcel under consideration for providing the necessary 1/6 contiguity for a potential BCHA development would not change the fact that the parcel would remain county-owned and maintained open space, available for use by the public.
 - This is a fairly unique situation in which there is county owned open space within a community service area (i.e., the area planned for annexation and development). Any request by the county for annexation of open space would be considered based on the specific circumstances of the request, and its consistency with the Boulder Valley Comprehensive Plan (BVCP) and Boulder County Comprehensive Plan (BCCP). In this case: 1) the BVCP and BCCP support a compact urban development pattern, 2) the BVCP anticipates all Area II land will be annexed into the service area, and 3) there is a critical need for affordable housing in the community, and addressing that need is consistent BVCP policy. Therefore, the county would support potential annexation of open space to facilitate affordable housing development on the BCHA and BVSD parcels.

³ Sources: 1) Boulder Valley Comprehensive Plan. 2015-2040 Projections Methodology. Available at: https://www-static.bouldercolorado.gov/docs/BVCP_Projections_Methodology_Formatted_082815-1-201508281638.pdf. 2) Boulder Valley Comprehensive Plan Trends Report. December 8, 2015. Available at: https://www-static.bouldercolorado.gov/docs/Trends_Report_12-8-15-1-201512091328.pdf

- Boulder County-owned open space may only be annexed at the request of the county. Given the circumstance that would need to exist, and given the county's deep commitment to the policies of the BVCP and BCCP, cases in which the county would support annexation of open space would be rare.
6. Would the annexation of open space for the BCHA development set up a situation that would enable the city to forcibly annex other parts of Gunbarrel?
- No. The parcel under consideration for annexation is Outlot 7 of the original Twin Lakes subdivision plat. Annexation of that parcel would not create any enclaves, a condition that would be necessary in order for the city to unilaterally annex.
 - When the subdivisions in the Twin Lakes area were developed they were provided city water and sewer services contingent on an expectation that they would promptly annex to the city. However, Gunbarrel voters elected not to annex.⁴
 - The city has recognized the issues with Gunbarrel annexation and has not moved forward with annexation. In recognition of the long history around annexation in Gunbarrel and lack of interest of unincorporated neighborhoods in annexation, the city and county have adopted policy language specific to Gunbarrel in the BVCP which states:

BVCP Policy 1.24 Annexation: h) The Gunbarrel Subcommunity is unique because the majority of residents live in the unincorporated area and because of the shared jurisdiction for planning and service provision among the county, the city, the Gunbarrel Public Improvement District and other special districts. Although interest in voluntary annexation has been limited, the city and county continue to support the eventual annexation of Gunbarrel. If resident interest in annexation does occur in the future, the city and county will negotiate new terms of annexation with the residents.

7. Isn't annexation of open space illegal?
- No. The "skipping rule" in C.R.S. 31-12-104(a)(1) prohibits "skipping" over and ignoring county-owned open space for purposes of obtaining contiguity for annexation. The statute allows a municipality to ignore certain types of property for purposes of contiguity (roads, state-owned land, etc.), but exempts county-owned open space from what can be skipped over. This does not, however, preclude a county from seeking annexation of its open space because using it for contiguity is not "skipping" over it. Again, this is a decision the County Commissioners would make at a future time.
8. Does annexing open space to achieve contiguity with other properties fit the "suggested intent" of the contiguity requirements (e.g., enabling the extension of urban services and infrastructure to properties suitable or intended for annexation)?
- The suggestive intention of contiguity is not easily pinned down when reading the statutes. For example, "The Colorado Legislature has declared that Part 1 of the Municipal Annexation Act of 1965 shall be liberally construed. In 1972 the Colorado Supreme Court relied on the liberal construction of this section to declare that the policy of the statute is to encourage natural and well-ordered development of municipalities..."⁵

⁴ Cornett, Linda, "Gunbarrel Area Voters Reject Annexation," *Boulder Daily Camera*, November 2, 1978.⁵ Colorado Land Planning and Development Law. Seventh Edition, 2006. Chapter 8, page 186.

⁵ Colorado Land Planning and Development Law. Seventh Edition, 2006. Chapter 8, page 186.

The one-sixth contiguity requirement is considered the basis for finding that a ‘community of interest’ exists between the land proposed to be annexed and the annexing community. In fact, the statute makes a point of describing what does not affect contiguity; “...the existence of streets, alleys, rights-of-way, public lands (except county-owned open space), or water bodies between the annexing municipality and the land proposed to be annexed.”⁶ As noted earlier, counties may choose to allow annexation of open space. There are no criteria, limitations or prescriptions in the state statutes that impose conditions on counties in making that choice. It is reasonable to assume that if water bodies, rights-of-way and other public lands do not affect contiguity for the purpose of providing services and infrastructure, then neither would county-owned open space if that were the county’s decision.

Traffic Impacts, Road Infrastructure and Cross-Jurisdictional Concerns

9. Won’t the traffic and parking impacts of medium density development be unreasonably high?
 - Traffic impacts would be assessed as part of the development review process. At the time of site review, the city would require a Traffic Impact Analysis and Travel Demand Management (TDM) plan. The plan would outline strategies to mitigate traffic impacts created by the proposed development, and implementable measures for promoting alternate modes of travel, in accordance with section 9-2-14(D), B.R.C., 1981 and section 2.03(I) of the City of Boulder Design and Construction Standards. During the site review process, the applicant must address impacts related to circulation which include, without limitation: discouraging high speeds, minimizing potential conflicts with vehicles, ensuring safe and convenient multi-modal travel/connections, promoting alternatives to single-occupant vehicles, use of TDM techniques, providing on-site facilities for external linkages for other modes of transportation, minimizing the amount of land devoted to the street system, designing for types of traffic expected from all modes of travel, and controlling noise and exhaust (Boulder, CO Municipal Code 9-2-14. h-2). At the time of annexation, the development would also be subject to the guidelines established in the City of Boulder’s Land Use Code, Section 9-9-8. D, and the city’s Design and Construction Standards.
 - No information available at this time indicates that the potential impacts of traffic and parking could not be mitigated, or that traffic or parking concerns should preclude a change in land use designation.

10. How would road infrastructure needs be addressed since the development would be in city jurisdiction but would have impacts on county-owned road infrastructure?
 - The city and county would coordinate to address the infrastructure needs of any development. As additional infill development occurs in the BVCP service area it will become increasingly important for the city and county to work together and develop additional arrangements to address infrastructure needs. This is an area that can potentially be addressed through an agreement between the City of Boulder and Boulder County.

⁶ Ibid. page 187.

11. Are there plans to increase public transportation in the Gunbarrel area?
 - The city and county will work with RTD and other partners to advocate for increased service, and look for additional funding sources that could be used to help fund such services.
12. Could a patchwork of city/county jurisdiction lead to unsafe outcomes in case of a 911 emergency?
 - The county and city work together to ensure seamless response to 911 emergencies. The Boulder County Sheriff's Office provided the following statement: "Calls are routed to the appropriate 9-1-1 center based on the location of the call. If a call is misrouted to the wrong center, the caller will be transferred to the other center with the original center staying on the line to confirm that a call is not dropped. It is not uncommon based on the severity of the call to have resources from both the City of Boulder or Boulder County respond for law, fire or EMS type calls. Ultimately, it is more likely that you will get too many resources going to a call, especially in an area where there is a question on jurisdiction, until it can be verified."

Wildlife and Open Space Preservation

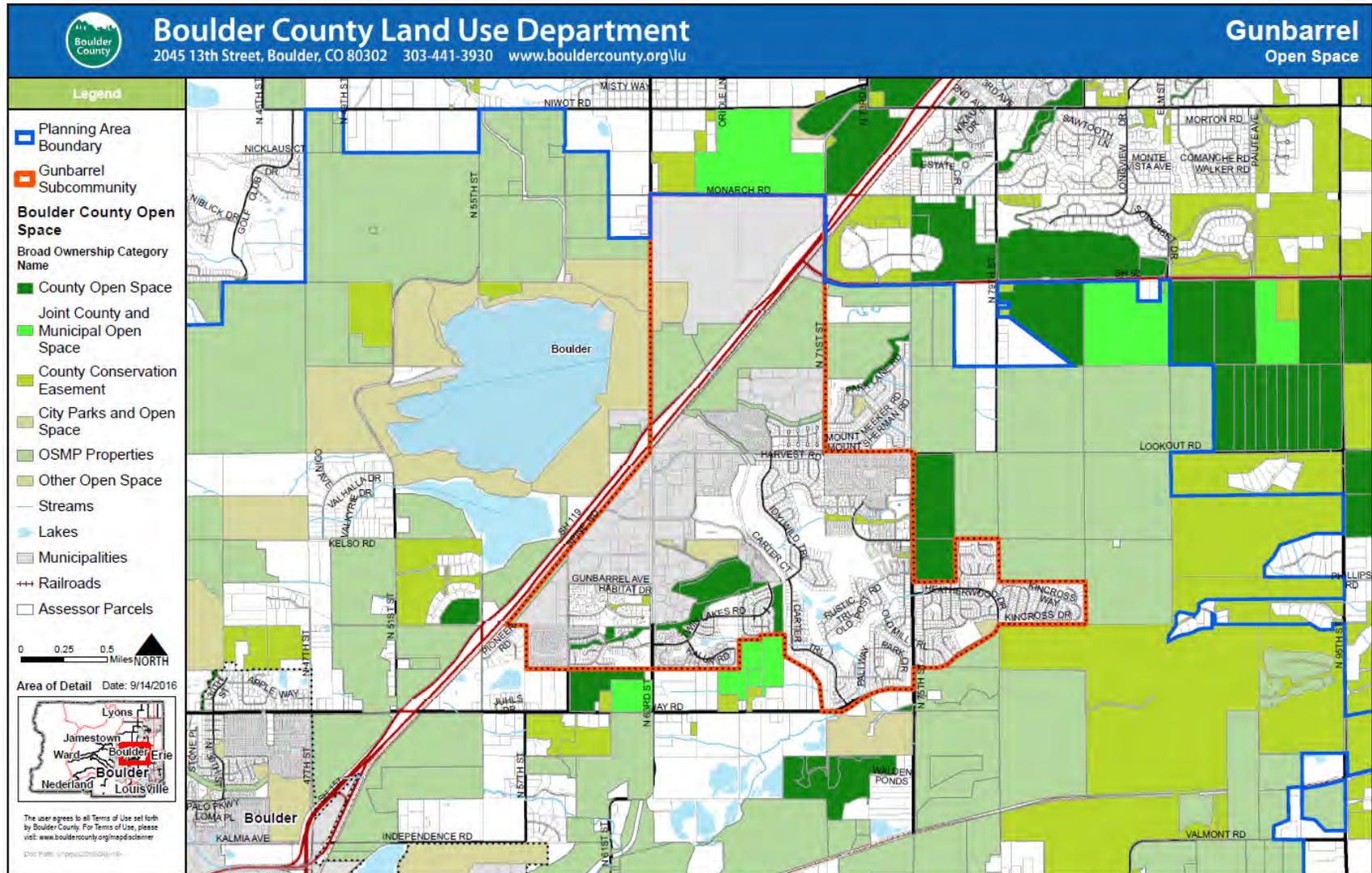
13. Doesn't the county want to preserve land to support biodiversity?
 - A fundamental principle of land use planning and the BVCP is to be deliberate about where development will go, and what areas will remain undeveloped. The parcels south of Twin Lakes have been part of Area II of the BVCP and envisioned for development since 1977. Area II is the area intended to be annexed into the city and become part of the urban service area. *By clearly establishing areas intended to ultimately be annexed into the city (Area II) and establishing areas intended to remain rural*, the BVCP is designed to preserve and support biodiversity across the Boulder Valley.
 - Both the City of Boulder and Boulder County open space departments are leaders in open space preservation. They seek to protect large tracts of land outside of developed areas.
14. How much open land is protected from development, both within Gunbarrel and in the Boulder Valley Planning Area as a whole?
 - As shown in Table 1, 440 acres, or 15% of the total Gunbarrel subcommunity is protected from development as either city or county managed open space, easement or park land. At the level of the Boulder Valley planning area as a whole, over 39,000 acres are protected from development, or 60% of the planning area as a whole.
 - As shown in Figure 1 the Gunbarrel subcommunity is surrounded by open space, much of which can serve as wildlife habitat and hunting grounds.

Table 1. Summary of Protected Lands, Gunbarrel, Boulder Valley Planning Area

Area	Size of Area (Acres)	Total Acres Protected from Development	% of Total
Gunbarrel subcommunity	2,852	440	15%
BVCP as a whole	64,729	39,155	60%
*Gunbarrel Improvement District and Gunbarrel Public Improvement District lands are jointly purchased with Boulder County and occur outside the Gunbarrel Subcommunity on the south and east edges.			
^ Acreages are based on Boulder County and City of Boulder open space mapping.			

Source: City of Boulder GIS

Figure 1. Open Space in the Gunbarrel Subcommunity and Surrounding Area



15. Do the BCHA and BVSD parcels serve as critical wildlife habitat?
- Based on the information gathered and presented the habitat conditions of the properties and presence of protected species would not preclude development. Furthermore, the results of future research can guide steps to address wildlife concerns when and if development occurs. According to a habitat assessment completed for the Boulder County Housing Authority in August 2016, which staff received after the August 30 hearing, “[Colorado Parks and Wildlife] CPW does not classify any of the project site as critical wildlife habitat, rare plant areas, significant natural communities, or significant riparian areas. Also, based on information from the [U.S. Fish and Wildlife Service] USFWS, there is no Critical Habitat for threatened and endangered species present at or near the project site.⁷
 - The county conducted a comprehensive update to the Environmental Resources Element of the Boulder County Comprehensive Plan in 2013-2014. That process engaged numerous county biologists and peer scientists in a process of identifying high priority habitat for preservation both at the site-specific and at the landscape scale. The Twin Lakes parcels were not identified as Critical Wildlife Habitat as part of that assessment.
16. How many Boulder County Species of Special Concern have been sighted on the BCHA and BVSD parcels?
- Staff was made aware of four Boulder County Species of Special Concern (SSC) sighted on the BCHA and BVSD parcels, either by neighbors or the wildlife consultants. Those include bald eagle, great blue heron, garter snakes, and tiger salamander. In addition, nesting Western Meadowlarks, protected by the Migratory Bird Treaty Act, have been identified on the BVSD parcels.
 - The consultant habitat assessment completed for BCHA noted the presence of two SSC detected on the sites (common garter snake and meadow vole), and potential habitat for an additional 10 SSC.⁸
 - The consultant report and potential additional studies would inform the future Site Review phase of development to determine if steps should be taken to protect species of concern on any portions of the property.
 - Commenters at the August 30 hearing cited the presence of 28 species which the BCCP classifies as species of special concern. The Parks and Open Space Twin Lakes Management Plan notes many potential mammalian and avian species that may be present at the Twin Lakes Open Space.⁹ However, this should not be confused with actual sightings of species of special concern on the BCHA and BVSD parcels that lay south of the Twin Lakes Open Space.
 - Available information indicates that movement of wildlife across the properties can be accommodated through careful site design, easements, and other strategies that would be

⁷ Felsburg Holt & Ullevig, “Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road.” September 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>

⁸ Ibid.

⁹ Boulder County Parks and Open Space. Twin Lakes Open Space Resource Evaluation and Management Plan, 2004. See appendices 3 and 4. Available at: <http://www.bouldercounty.org/doc/parks/twinlakesmplan.pdf>.

required during the city's Concept Plan and Site Review processes. The consultant habitat assessment completed in August notes specific measures recommended during site design, as well as during and after construction.¹⁰

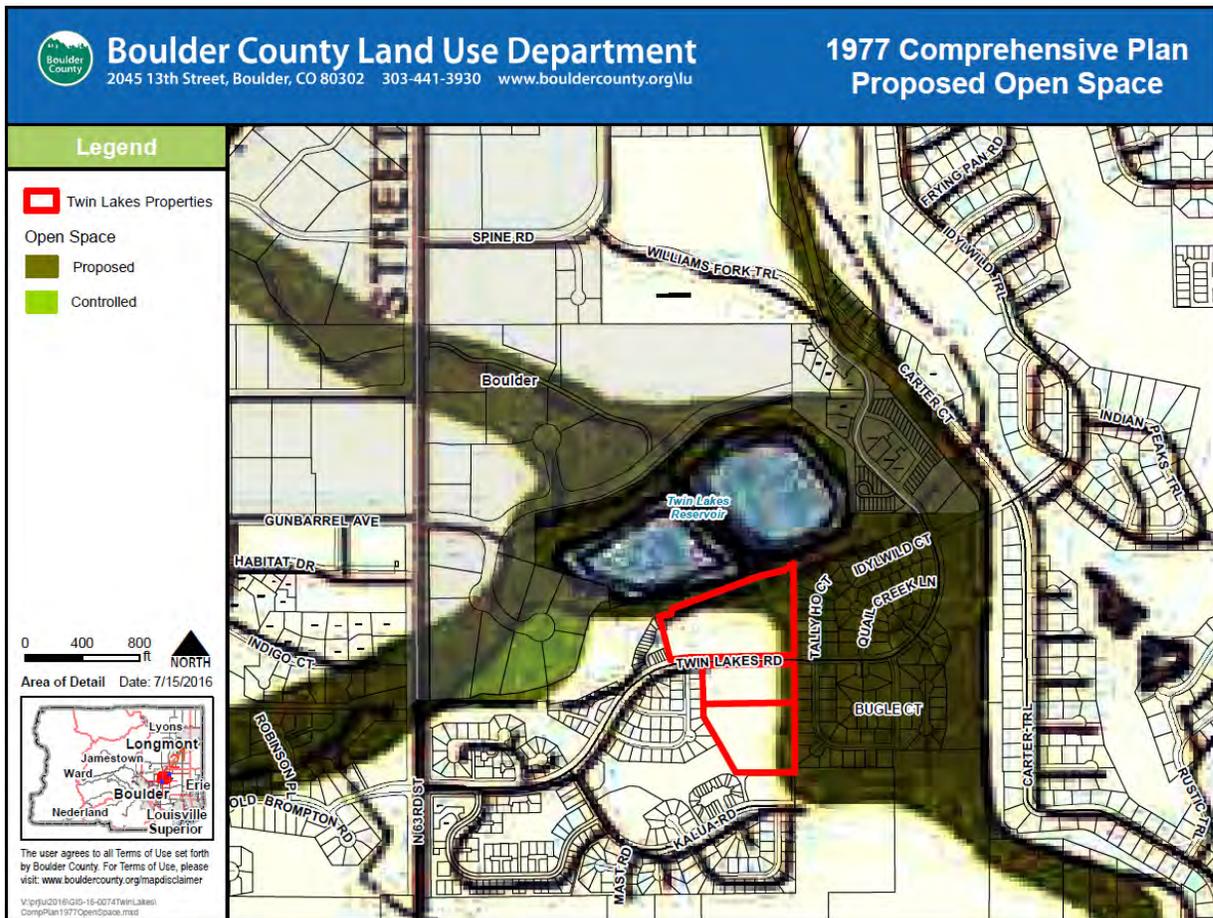
Parcel History and Land Use Designations

17. Weren't the BCHA and BVSD parcels envisioned as open space and community park area in the original 1977 comprehensive plan?
 - No. In the original 1977 BVCP, areas to the south and east of the Twin Lakes were identified as proposed open space, part of a north-south greenbelt. A 40-acre community park was envisioned for the area south and east of the east lake (covering the area that is now Red Fox Hills; the park plan did not include the parcels currently owned by BCHA and BVSD). See Figure 2.
 - Those plans were contingent on the assumption that those areas would annex to become part of City of Boulder jurisdiction. The city's capital improvement plans at that time were developed based on the expectation that residents of Gunbarrel would ultimately share equitably in supporting the full range of urban services the city provides to its citizens, and which are not offered by the county (e.g., libraries, recreation facilities and fire protection).¹¹ Lacking property and sales and use tax revenue from the residents in unincorporated Gunbarrel, the city did not carry out those early plans for park and other city-supported services in the Gunbarrel area. The fact that many Gunbarrel residents do not pay city taxes remains a barrier to their receiving city services like libraries, parks and recreation centers.

¹⁰ Felsburg Holt & Ullevig, "Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." September 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>

¹¹ Boulder Valley Comprehensive Plan, Revised 1978, p. 55, see Note 1. The Capital Improvements Program described in the 1978 version of the BVCP also makes reference to plans for other parks, library services, and recreational facilities in Gunbarrel, contingent on annexation.

Figure 2. 1977 BVCP Proposed Open Space, Overlay with Current Development



Source: Boulder County Land Use; 1977 Boulder Valley Comprehensive Plan

18. Since the BVSD parcel was deeded to the school district as part of subdivision land dedication are there requirements for that land to be developed for a school or park use?

- Staff could not locate any restrictions of the use of the BVSD parcels for school or recreation or for any other specific purpose. Use of the parcels is not restricted in the deed, or through any other legal means that staff could identify. Even if there were use restrictions associated with the Boulder County Land Use Code’s requirement to dedicate of the property, those requirements would not apply post-annexation because, post-annexation, the city and not the county would have Land Use jurisdiction over the property.

19. Isn’t there an open space designation on the BCHA parcel, or other restrictions on the use of the parcel?

- No. The BCHA parcel was conveyed from the Twin Lakes Investment Co. to the Archdiocese of Denver as part of a private transaction between two private parties. The BCHA parcel has a Low Density Residential land use designation in the BVCP land use map and has since the 1977 BVCP. A mapping error previously showed a sliver of open space designation crossing over into the northern portion of the parcel. However, that error has been corrected.

20. Is there a requirement in the purchase agreement with the Archdiocese that this land be used for affordable housing, or would an open space use meet the “social good” requirement for the purchase of this property?
- While the Archdiocese certainly understood that it was transacting with the Boulder County Housing Authority and therefore may have had expectations as to how BCHA intended to develop the property, there were no legal restrictions on the use of the parcel in the purchase agreement or in the final deed.
21. What is the significance of the “public” land use designation on the BVSD parcels and is it reasonable for it to be changed?
- The BVCP defines the PUB (Public/Semi-Public) land use designation as one that “...encompass[es] a wide range of public and private non-profit uses that provide a community service.”¹² The list includes municipal and public utility services, educational facilities, government offices, government laboratories; non-profit facilities; “...and may include other uses as allowed by zoning.”¹³ A proposed change in this land use designation is analyzed by city and county staffs in a similar fashion and with attention to BVCP policies, Core Values, and Areas of Focus as are all other change requests. The need for a continued PUB designation by the property owner/user, and the alternative designation being requested, is also taken into consideration. In the case of Land Use Designation Change Request #35, the BVSD has determined that affordable housing for its employees poses a greater need and community service than retaining the site for a school.
 - The public land use designation does not require public ownership.

Timing of Studies & Process

22. Should more studies be completed prior to the decision on the land use designation change?
- It is not standard practice to complete additional studies as part of the land use designation change request process. The focus of the land use designation change analysis process is on whether any existing information would preclude the change in designation. No formal development application has been prepared and submitted against which additional studies and other materials may then be required based on the details presented and comprehensiveness of the application. It is important for staff to be consistent across the evaluation of the various properties going through the land use designation change request process.
 - Preliminary wildlife and geotechnical studies have been completed and data will continue to be collected for both of those studies. The findings of those preliminary studies will inform any development process that would take place at the parcels in the future. The findings of the preliminary studies will also help shape the scopes of any additional studies that may be required as part of the development review process.

¹² 2010 Boulder Valley Comprehensive Plan, pg. 68.

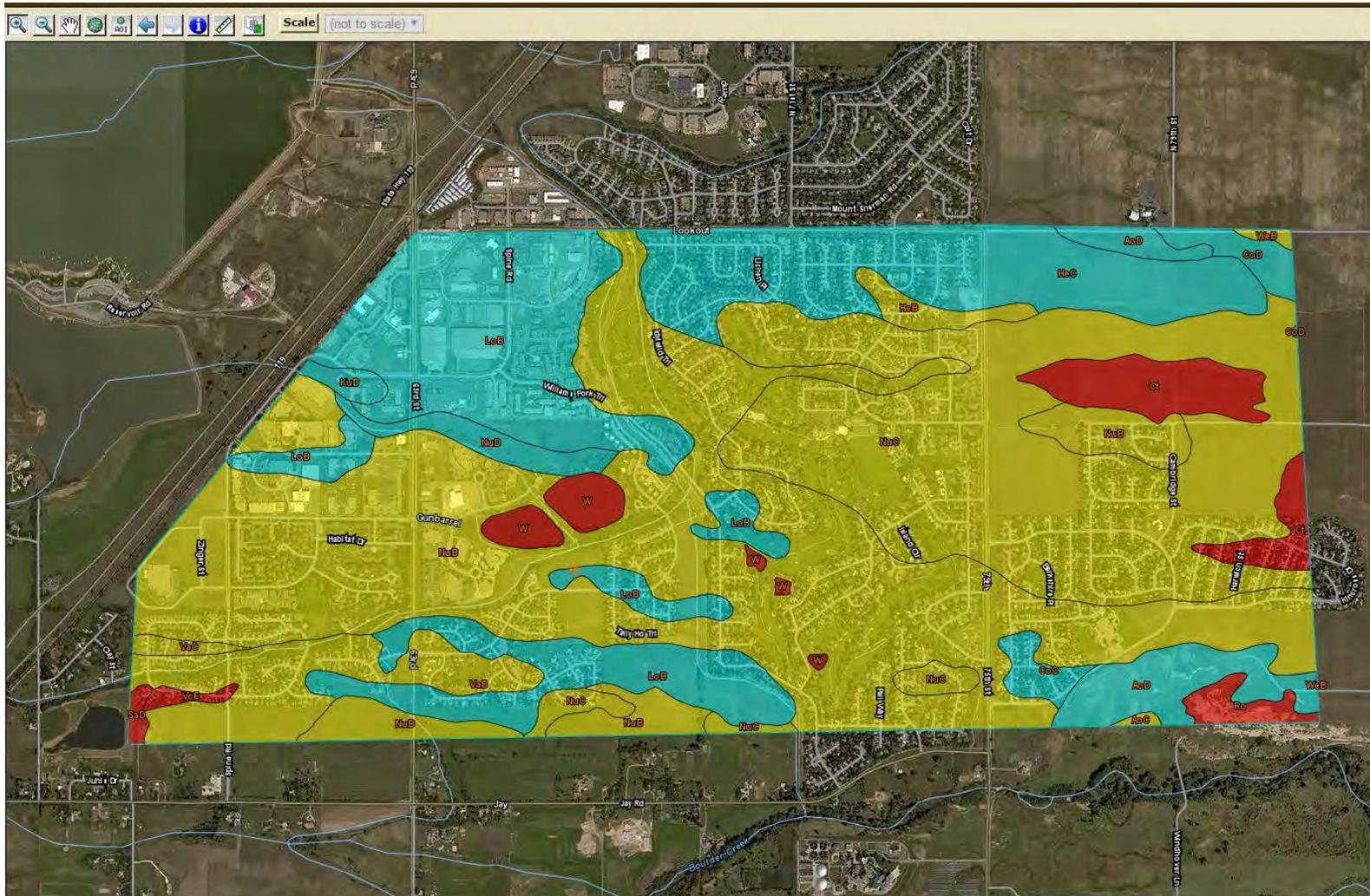
¹³ Ibid. pg. 68

23. Why does the Board of County Commissioners hear and decide on a BVCP land use change request from the Boulder County Housing Authority?
- The Board of County Commissioners (BOCC) is only one of the four bodies that reviews proposed changes to the BVCP. The BVCP land use change requests go through a substantial public process, and three bodies other than the BOCC also decide on these requests. Any approval must be agreed upon by all four bodies. Each of the bodies will make its decisions on the land use change requests based on joint city and county staff recommendations and under the BVCP guidance. Each of the four bodies is expected to keep an open mind throughout the process and appropriately weigh under the BVCP goals and policies all the information received as to the requested land use designation changes over the course of the process.
 - The BOCC rendering a decision on a request by a related entity, or even a request by its own departments, is typical for a land use planning process. Public entities sometimes have dual roles. Public entities own property just as private applicants do. They undertake projects on property they own. Typically, county projects are subject to the same land use and zoning rules as projects by private parties. As a land use regulatory body, the BOCC holds county projects to the same standard as they hold private projects. For example, the BOCC renders land use decisions on applications submitted by Boulder County Parks and Open Space and Boulder County Transportation. The BOCC renders its decisions not based on who the applicant may be, but based on the merits of a proposal based on applicable criteria.

Agricultural Land of Significance

24. Aren't the parcels designated Farmland of Statewide Importance?
- No. The soil types present on the parcels are rated by NRCS as "Farmland of Statewide Importance" or "Prime Farmland if Irrigated." However, the NRCS designation does not factor in site-specific conditions aside from soil. Therefore, a developed parcel of land with those same soil types would also be rated as "Farmland of Statewide Importance" based on NRCS's data sets. In fact, a large portion of Red Fox Hills, and much of the commercial area of Gunbarrel sit on the same Longmont clay that is rated as "Farmland of Statewide Importance." Furthermore, much the entire Gunbarrel area sits on soils rated by NRCS as "Farmland of Statewide Importance" or "Prime Farmland if Irrigated." See Figure 3 and Figure 4.
 - The Boulder County Comprehensive Plan includes its own assessment of agricultural lands of significance that factors in NRCS soils data in addition to relevant site-specific characteristics and land use context. The BCHA and BVSD parcels are not designated as farmland of significance in Boulder County, reflecting their land use designation and the development characteristics of the surrounding area.

Figure 3. NRCS Soils Survey Data for Gunbarrel Area. Many developed portions of Gunbarrel also sit on soil that is classified by NRCS as “Farmland of Statewide Importance” and “Prime Farmland if Irrigated.” Figure 4 includes NRCS classifications associated with soil types shown in this figure.



Source: <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

Figure 4. NRCS Soil Survey Farmland Classification Data for Soils Present in Gunbarrel Area. This shows NRCS soil classifications for soil types that appear on Figure 3.

Tables — Farmland Classification — Summary By Map Unit				
Summary by Map Unit — Boulder County Area, Colorado (CO643)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AoC	Ascalon-Otero complex, 3 to 5 percent slopes	Prime farmland if irrigated	2.0	0.1%
AoD	Ascalon-Otero complex, 5 to 9 percent slopes	Farmland of statewide importance	70.4	2.9%
CoC	Colby silty clay loam, 3 to 5 percent slopes	Farmland of statewide importance	15.3	0.6%
CoD	Colby silty clay loam, 5 to 9 percent slopes	Farmland of statewide importance	18.1	0.8%
Ct	Colby-Gaynor association	Not prime farmland	71.7	3.0%
HeB	Heldt clay, 0 to 3 percent slopes	Prime farmland if irrigated	17.5	0.7%
HeC	Heldt clay, 3 to 5 percent slopes	Farmland of statewide importance	206.6	8.6%
KuD	Kutch clay loam, 3 to 9 percent slopes	Farmland of statewide importance	9.2	0.4%
LoB	Longmont clay, 0 to 3 percent slopes	Farmland of statewide importance	373.7	15.6%
NuB	Nunn clay loam, 1 to 3 percent slopes	Prime farmland if irrigated	892.5	37.2%
NuC	Nunn clay loam, 3 to 5 percent slopes	Prime farmland if irrigated	528.1	22.0%
NuD	Nunn clay loam, 5 to 9 percent slopes	Farmland of statewide importance	26.1	1.1%
Ro	Rock outcrop	Not prime farmland	16.1	0.7%
SaD	Samsil clay, 3 to 12 percent slopes	Not prime farmland	4.5	0.2%
VaB	Valmont clay loam, 1 to 3 percent slopes	Prime farmland if irrigated	104.3	4.3%
VaC	Valmont clay loam, 3 to 5 percent slopes	Prime farmland if irrigated	7.0	0.3%
VcE	Valmont cobbly clay loam, 5 to 25 percent slopes	Not prime farmland	5.3	0.2%
W	Water	Not prime farmland	30.1	1.3%
WeB	Weld fine sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated	3.0	0.1%
Totals for Area of Interest			2,401.5	100.0%
Description — Farmland Classification				
Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.				

Source: <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>