



Land Use

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Key Facts about the Twin Lakes Land Use Change Requests

Introduction

Parcels of land totaling 20 acres (6655 and 6500 Twin Lakes Road, and 0 Kalua Road) are the subject of two land use designation change requests still under consideration as part of the [2015 Boulder Valley Comprehensive Plan \(BVCP\) Major Update](#) process. The BVCP Land Use Designation Map defines the type of development and the range of development intensity that can occur throughout the Boulder Valley. The parcels are located in Area II of the BVCP planning area, meaning that the BVCP identifies the parcels as eligible for annexation and development. This is part of the BVCP's vision for creating an efficient development pattern that places housing close to existing infrastructure and helps to avoid sprawl.

The content assembled here presents responses to some of the most common questions related to the Twin Lakes land use designation change requests. Additional information:

- [Staff report for the August 30 joint Planning Commission- Board of County Commissioners hearing](#)
- [Staff presentation for the August 30 joint Planning Commission – Board of County Commissioners \(report summary, maps and visuals – see Twin Lakes components\)](#)
- Materials associated with the [Twin Lakes Stakeholder Group](#) process
- Technical studies commissioned by the Twin Lakes Action Group
 - [Blue Mountain Environmental Consulting Open Space Evaluation](#) (page 16)
 - McCurry Hydrology LLC studies of [BCHA property](#) and [BVSD properties](#)
- Technical studies commissioned by the Boulder County Housing Authority:
 - [Felsburg Holt & Ullevig Habitat Assessment](#)
 - [Felsburg Holt & Ullevig Wildlife Corridors Technical Memorandum](#)
 - [Martinez Associates Geotechnical and Hydrologic Investigation](#)
 - Apex Wetlands Delineation Study for [BCHA Property](#) and for [BVSD Properties](#)
- [Request #35](#): Requests submitted by Boulder County Housing Authority and Boulder Valley School District to change from Low Density Residential and Public to Mixed Density Residential land use designation
- [Request #36](#): Requests submitted by members of the public to change from Low Density Residential and Public to Open Space land use designation
- Materials related to past meetings available on the [BVCP docket webpage](#)

Submitting Comments and Staying Informed

We welcome comments and questions about the land use designation change requests in the Twin Lakes neighborhood. Please submit any questions or comments via the [comment form available on the BVCP-15-0001 docket webpage](#). Comments prior to January 5, 2017 will inform a staff report to Planning Commission in advance of the January 18 reconsideration hearing on this matter.

Comments are also assembled and shared with decision makers and on the [BVCP-15-0001 docket webpage](#).

[Sign up to receive email updates and notices](#) of meetings from Boulder County about the Boulder Valley Comprehensive Plan.

Frequently Asked Questions

Each of the questions listed below is a hyperlink to the key facts associated with that question.

Background and Process Questions

1. [What are the **current land use designations** of the parcels, and who owns them? Specifically, is there currently an open space designation on any of the parcels?](#)
2. [What **land use designations were requested** for these parcels?](#)
3. [How was the **request for an open space designation \(Request #36\)** studied as part of staff's analysis of the proposals?](#)
4. [Would the **potential density** associated with the staff-recommended Medium Density Residential designation be compatible with the surrounding neighborhood?](#)
5. [Was the county obligated to purchase the Twin Lakes parcels as open space as part of its commitments under the **Gunbarrel Public Improvement District \(GPID\)**?](#)
6. [If developed, would these parcels meet the park requirement of the **Urban Services Criteria** in the BVCP?](#)
7. [Is **staff putting affordable housing ahead** of comprehensive plan policies related to environmental preservation?](#)
8. [Should **more studies** be completed prior to the decision on the land use designation change?](#)

Environmental, Open Space and Agricultural Significance of the Land

9. [Do the BCHA and BVSD parcels serve as **critical wildlife habitat**?](#)
10. [Would development on the BCHA and BVSD parcels threaten **Great Horned Owls** that live in the area?](#)
11. [Do the BCHA and BVSD parcels meet the county or city's **criteria for purchasing land as open space**, and why isn't the city or county planning to purchase these parcels for preservation?](#)
12. [How **much open land is protected from development**, both within Gunbarrel and in the Boulder Valley Planning Area as a whole?](#)
13. [What **species of special concern** are present on the properties?](#)
14. [How do findings from the **TLAG-commissioned open space study** compare to those from **BCHA's wildlife study**?](#)
15. [Are the parcels designated **Prime Farmland or Farmland of Statewide Importance**?](#)
16. [How has staff's research and analysis addressed **groundwater and hydrology concerns**?](#)

Transportation, Traffic and Cross-Jurisdictional Impacts

17. [What **traffic and parking impacts** would result from medium density development, and is there sufficient infrastructure to support the increased traffic?](#)
18. [How would **road infrastructure** needs be addressed, recognizing that development would be in city jurisdiction but would have impacts on county-owned road infrastructure?](#)

19. [What is the likelihood that additional **RTD service** would be added in the Gunbarrel area?](#)
20. [Could a patchwork of city/county jurisdiction lead to unsafe outcomes in case of a **911 emergency**?](#)

Housing and Location

21. [Are there more **appropriate locations for affordable housing** \(e.g., closer to services and jobs\)?](#)
22. [Why is there a **cash-in-lieu** option to meet the City of Boulder's Inclusionary Housing Program requirements?](#)
23. [Is **Gunbarrel a job center** in need of more housing?](#)

Parcel History

24. [Were the BCHA and BVSD parcels envisioned as open space and community park area in the original **1977 Boulder Valley Comprehensive Plan**?](#)
25. [Are there **restrictions on how the BVSD parcel can be used** based on its history as a subdivision dedication?](#)
26. [Were there **any requirements in the purchase agreement with the Archdiocese** affecting how the BCHA-owned parcel \(6655 Twin Lakes Rd.\) can be used?](#)

Annexation

27. [**When would annexation of the parcels occur** and why is it necessary for developing these parcels?](#)
28. [One of the paths for **annexation contiguity** for the BCHA and BVSD parcels is annexation of a county-owned parcel used as a trail corridor. This parcel is managed as open space located to the northwest of 6655 Twin Lakes Rd. What would be the effect of annexing this parcel, and would it set a precedent of using open space to support development?](#)
29. [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**?](#)

Background and Process Questions

1. **What are the current BVCP [land use designations](#) of the parcels, and who owns them? Specifically, is there currently an open space designation on any of the parcels?**
 - The 10 acre parcel north of Twin Lakes Road (6655 Twin Lakes Road) is currently owned by Boulder County Housing Authority (BCHA) and is designated Low Density Residential (up to six dwelling units per acre). The parcels south of Twin Lakes Road (6500 Twin Lakes Road and O Kalua Road), owned by Boulder Valley School District (BVSD), have a Public land use designation.ⁱ There is not a BVCP Open Space designation on any of the three vacant parcels under consideration.
 - The parcels are all located south of Twin Lakes Open Space, which is managed by the Boulder County's Parks and Open Space Department. Although the three parcels under consideration for land use designation changes are frequented by neighbors, they are not open to the public, nor are they designated as Open Space.
 - A mapping error that has been corrected may be the reason some members of the public have referred to the BCHA parcel as having an Open Space land use designation. A mapping error previously showed a sliver of Open Space designation from the adjacent parcel extending into the northern portion of the BCHA parcel, which caused

the parcel's designation to appear as "Low Density Residential and Open Space." The correct [current designation for the BCHA-owned parcel is "Low Density Residential."](#)ⁱⁱ

2. What [land use designations](#) were requested for these parcels?

- Request Submitted by Neighbors-Open Space Designation: Neighbors of the Twin Lakes parcels submitted requests to change the BVCP land use designation to "Open Space" which would limit how the property may be zoned in the future. The requestors cite that the wildlife, wetlands, open space, and recreational value of this land warrants protection through an open space designation.
- Request Submitted by Boulder County Housing Authority (BCHA) and Boulder Valley School District (BVSD)- Mixed Density Residential Designation: BCHA and BVSD submitted requests to change the land use to address the county's need for more affordable housing. They plan to work in collaboration to build affordable housing for employees of BVSD and other members of the community in need of affordable living¹. They are currently seeking to develop at 12 units per acre. The requestors cite the difficulty of purchasing developable land and the magnitude of the affordable housing need in the county as reasons for seeking to develop at a higher intensity than is allowed under the current designation. They cite an interest in building a non-residential structure (e.g., a day care) as a reason for requesting the Mixed Density Residential designation (which allows up to 18 units per acre).
- County and city staff recommendation dated August 30, 2016 - A hybrid of the two requests including Medium Density Residential and Environmental Preservation designations: The Medium Density designation would allow up to 14 units per acre. Areas around the wetlands and the drainage canal would receive an Environmental Preservation designation. The full staff analysis and recommendation from the Aug. 30 county hearing on this matter is available [here](#).

3. How was the request for an open space designation (Request #36) studied as part of staff's analysis of the proposals?

- In early 2016, the city and county bodies decided which land use change requests warranted further study as part of the BVCP update process. Staff recommended advancing [Request #36](#) for further study with the understanding that a change to an Open Space designation would only be appropriate under a limited set of circumstances (i.e., characteristics of the land warranted a change to an open space land use designation). In addition, staff was aware that much of the research that would be conducted to analyze [Request #35](#) (a proposal to change the land use designation to Mixed Density Residential) would also inform a review of Request #36 and that there may be an outcome where staff would recommend a portion of the parcels be designated as Open Space or Environmental Preservation. It is in that context that Request #36 has been studied by staff.
- Staff has reviewed existing information, including that submitted by TLAG, BHCA and others, to determine if the environmental resource value of the land warrants changing the existing comprehensive plan that envisions development for the parcels. Staff has found that the conditions present do not warrant an Open Space designation, and that open space values can be maintained with the commitment by the property owners to incorporate a wildlife corridor through the properties.

¹ Corrected Jan. 10, 2017

4. Would the potential density associated with the staff-recommended Medium Density Residential designation be compatible with the surrounding neighborhood?

- Staff considers density as just one factor in a broader assessment of neighborhood compatibility. Other factors that determine how a new development would fit into the surrounding neighborhood include scale, massing and design of the development, as well as the character of development that already exists in the neighborhood. Staff highlights that the presence of existing medium and higher density pockets of development within the Twin Lakes neighborhood plays a key role in defining the neighborhood character, and establishes the neighborhood as one in which a mix of densities currently exists (ranging from 2.3 units per acre in Red Fox Hills to 15.6 units/acre in Snug Harbor). Based on the mix of densities in the neighborhood, as well as the neighborhood's close proximity to urban services and infrastructure, staff does not characterize the neighborhood as "rural residential."
- TLAG offers an alternate density assessment using an approach in which average density for the neighborhood as a whole is the primary focus. TLAG calculates the average density for the entire Twin Lakes neighborhood at 4.8 units / acre (or a median of 4.3 units / acre), and characterizes the neighborhood as "rural residential." In contrast to staff's analysis, TLAG's density analysis excluded Brandon Creek, a subdivision with a density of 8.2 units / acre located just north of the Red Fox Hills subdivision.
- Parts of the neighborhood surrounding Twin Lakes Road do fall within the county's Rural Residential Zone District (e.g., Red Fox Hills), and parts are in the Suburban Residential Zone District which allows for more intensity of use. Rural Residential is a common zone district for residential development in county jurisdiction, and is not a reflection of the development density that already exists throughout the Twin Lakes neighborhood. Current development in the neighborhood far exceeds the intensity of development typically seen in the Rural Residential Zone District, which allows just one unit per 35 acres, or per legal building lot.ⁱⁱⁱ Furthermore, the county zoning category is only applicable to development while in county jurisdiction; areas in Area II (those eligible for annexation) would be assigned city zoning that is compatible with the BVCP land use designation upon annexation. That zoning can be more intense than what is allowed under county jurisdiction as long as it is consistent with the BVCP land use designation.

5. Was the county obligated to purchase the Twin Lakes parcels as open space as part of its commitments under the Gunbarrel Public Improvement District (GPID)?

- No. The 1993 Election Notice for the GPID initiative indicated that Boulder County would match GPID funds up to a maximum amount of \$1.9 million. The Election Notice states that the county agreed to match up to that amount; it does not state that the county's match would equal that amount. Since the GPID ballot initiative passed, the county has provided \$1,305,634 in matching funds towards GPID open space acquisitions, meeting the commitment that was made in the Election Notice.
- Prior to passage of the GPID ballot initiative, with input from the GPID steering committee and Gunbarrel residents, properties in the Rural Preservation Area of Area III of the Boulder Valley Comprehensive Plan were targeted for open space acquisition with GPID sales tax proceeds. The clear intent of the GPID steering committee was to purchase rural areas surrounding Gunbarrel, not to prevent infill development in areas surrounded by current development which were contemplated for potential future annexation. The Twin Lakes parcels under consideration for land use designation change are not within the Rural Preservation Area; rather, it is within Area II of the

Boulder Valley Comprehensive Plan and was never on the list of targeted GPID open space properties.

- While it is inaccurate to say the county has a remaining obligation to invest additional matching funds, it is possible the county might invest additional funds to acquire open space properties within the GPID's targeted area. If the county were to do so, it would likely invest in the remaining priority properties identified by the GPID steering committee. Those properties lie east of 63rd Street, north of Jay Road up to the south side of the subdivisions, and west of the Johnson Trust open space property.

6. If developed, would these parcels meet the park requirement of the Urban Services Criteria in the BVCP?

- Yes. Staff finds that proximity to the City of Boulder's Eaton Park, Coot Lake Park and the Boulder Reservoir, and potential for introduction of playground facilities on or near the BCHA and BVSD parcels enables the BCHA and BVSD parcels to meet the park requirement of the Urban Services Criteria. Policy 1.27 (Adequacy of Urban Facilities and Services)(c) of the BVCP states, "In order to make efficient use of existing infrastructure and investment, new development and redevelopment will be located in areas where adequate public services and facilities presently exist or are planned to be provided under the city's Capital Improvement Program." Policy 1.27(a) includes "developed urban parks" in the list of what is deemed adequate facilities and services, and the BVCP's Urban Service Criteria and Standards includes further specifications.^{iv} The BVCP Urban Services Criteria for developed urban parks specifies that adequate facilities and services for new residential development include: 1) "neighborhood parks of a minimum of five acres in size within one half mile of the population to be served;" 2) community parks of a minimum of 50 acres in size within three and one-half miles of the population to be served; and 3) playground facilities for toddlers, preschoolers and school-aged children up through age 12 within one-quarter mile of residents.^v
- Eaton Park is a 26 acre park area located just north of Boulder County's Twin Lakes Open Space. TLAG has pointed out that the developed section of Eaton Park is only 1.5 acres. However, the city and county take into consideration the size of the entire park when reviewing a parcel for this criterion, and the City of Boulder's Parks and Recreation Master Plan does not specify the type of development necessary to be considered a "neighborhood park."^{vi}
- Approximately 11 acres of Eaton Park is classified as wetlands, though the full acreage is available to provide the range of benefits associated with parks, including scenic views, and use by local residents and wildlife. Furthermore, the city currently has plans for the remaining 15 acres not classified as wetlands. Those plans are included in the City of Boulder Capital Improvements Program. They include recreational use and development (e.g., play areas, ballfields), and passive recreation opportunities such (e.g., walking, picnicking).
- In addition, the BCHA and BVSD parcels are located 2.6 from Coot Lake, a 65 acre natural area with trails, an art walk, fishing, picnic tables, a variety of nature play opportunities and restrooms. The Coot Lake trails also provide access to the 67 acre Boulder Reservoir Regional Park and the 380 acre Boulder Reservoir Natural Area, which offers additional trails and recreational opportunities. In addition, across 63rd Street from Coot Lake is Tom Watson Park, a 31 acre community park with a playground, picnic shelter, ball fields, a basketball court, tennis courts, a volleyball court, charcoal grills, and restrooms.

- Staff anticipates that any development BCHA and BVSD would pursue would include the addition of playground equipment, or support for development of such equipment within one-quarter mile of the parcels.
- 7. Is staff putting affordable housing ahead of comprehensive plan policies related to environmental preservation?**
- No, staff's recommendation reflects the key circumstances that exist, and we believe, accommodates many of the interests addressed by stakeholders.
 - Staff has not found any information indicating that the land could not support appropriately designed medium density development while still adhering to and furthering environmental and other BVCP policy objectives
 - The land has been contemplated for development since the original BVCP due to its location in Area II
 - The parcels have access to city water and sewer services
 - The owners of the parcels seek to develop affordable housing
 - There is a demonstrated affordable housing need in Boulder County
 - There is a scarcity of available land on which to develop affordable housing, so it is prudent to efficiently utilize development opportunities that exist on available land, using smart design principles that are sensitive to environmental factors and the interests of the surrounding community
 - Note that the current decision making process pertains to a land use designation change; no specific development proposal has been put forward. Environmental and neighborhood character factors will be addressed in greater depth at the site review phase of development, to come later. An overview of the stages of development for property undergoing annexation is included in a [staff presentation presented at a Twin Lakes Stakeholder Group meeting](#).
- 8. Should more studies be completed prior to the decision on the land use designation change?**
- The focus of the land use designation change process is an analysis as to whether the change would meet the goals and policies of the BVCP and whether any existing information would prevent changing a land use designation. While it is not standard practice to complete additional studies as part of the land use designation change request process, preliminary wildlife and hydrology studies have been submitted by BCHA/BVSD and TLAG. Staff has reviewed those studies along with other existing information, and doesn't feel additional information is necessary to move forward with the recommended designations.
 - It is important for staff to be consistent across the evaluation of the various properties going through the land use designation change request process. More detailed studies and information will be provided during the later phase of the development process and will further inform the extent and location of development.

Environmental, Open Space and Agricultural Significance of the Land

- 9. Do the BCHA and BVSD parcels serve as critical wildlife habitat?**
- No. Based on assessments by Boulder County Parks and Open Space, the Boulder County Housing Authority's (BCHA) wildlife consultant, and a consultant commissioned by the Twin Lakes Action Group (TLAG), the BCHA and BVSD parcels do not serve as

critical wildlife habitat. The results of future research as part of the development review process can guide steps to address wildlife concerns when and if development occurs.

- According to a habitat assessment completed for BCHA in August 2016, “[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.”^{vii}
- The county conducted an 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.
- A third party study commissioned by TLAG also finds that the BCHA and BVSD parcels provide limited wildlife value. In an August 2016 report Blue Mountain Environmental Consulting states, “The urban location of the parcels and homogenous vegetative composition limit the wildlife value.”^{viii} The report notes that species of concern may reside in the Twin Lakes Open Space area to the north, but does not cite the BCHA and BVSD parcels as habitat for those species. The report also lists Migratory Birds of Conservation Concern in the region and notes that the Twin Lakes Open Space area to the north of the parcels in question may serve as suitable habitat for some of those species; it does not claim that those species reside on the BCHA and BVSD parcels.
- The findings from the Blue Mountain Environmental Consulting report generally align with those of Boulder County Parks and Open Space staff and BCHA’s wildlife consultant. The experts find that the BCHA and BVSD parcels are not critical wildlife habitat, but do serve as a wildlife corridor. This finding informed staff’s recommendation to include a wildlife corridor requirement at the time of annexation, when more detailed site development plans are available. As noted, BCHA and BVSD have also committed to including a wildlife corridor in any development plans.

10. Would development on the BCHA and BVSD parcels threaten Great Horned Owls that live in the area?

- No, development on these parcels is unlikely to pose a threat to the owls. Great Horned Owls are generalists and an urban-adapted species, as demonstrated by the fact that existing development in Red Fox Hills is located so close to a nest.
- A pair of Great Horned Owls nests within the Open Space designated land to the north and east of the BCHA parcel. Most years a mating pair successfully reproduces. Great horned owls start nesting in January, raise their family during the winter, and will continue to care for their young for several months, sometimes as late as October. They don’t make their own nests – they find cavities in barns or other buildings. They have the most diverse diet of any raptor in North America, and open space in and around Gunbarrel (See [Figure 1](#)) contributes to their hunting ground.

11. Do the BCHA and BVSD parcels meet the county or city’s criteria for purchasing land as open space, and why isn’t the city or county planning to purchase these parcels for preservation?

- No, these parcels do not meet the criteria for open space acquisition by the Boulder County Parks and Open Space Department. Parks and Open Space staff has reviewed the parcels, and due to: 1) the parcels location within a developed area, 2) their designation for development, and 3) the fact that adjacent open space is already

available for public use, the land does not meet the criteria for acquisition. Further explanation is available in comments by Boulder County Parks and Open Space staff in a [staff report for the July 28, 2016 county Parks and Open Space Advisory Committee](#) meeting. The city's open space department has also reviewed the open space value of the land and concluded that it does not fulfill their criteria for acquisition.

- 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 in question 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 land and support biodiversity across the Boulder Valley as a whole. The city and county greatly value open space and have done great things over the years to preserve and protect our lands. At the same time because of the great need for affordable housing in the community it is important to be extremely thoughtful about developing on parcels which have long been envisioned and planned for development.
- The purchase of the land containing the Twin Lakes just north of these parcels was a unique acquisition within a city's planning area. Boulder County did not pursue acquisition of the property containing Twin Lakes based on its open space value. The county purchased the 42-acre Twin Lakes Open Space property from the Boulder and Left Hand Irrigation Company (B&LHIC) in January 2002 in response to the ditch company's liability concerns and a request that the county acquire and manage the property.^{ix} The B&LHIC has been operating the reservoirs since 1910. Prior to Boulder County Parks and Open Space's acquiring the property, Gunbarrel residents were using the reservoirs for recreation, effectively trespassing onto B&LHIC's private property and raising liability concerns for B&LHIC. In 2002, the county purchased the land and began managing the land and public recreation use around the reservoirs, while B&LHIC retained the right to use the reservoirs to store water.

12. How much open land is protected from development, both within Gunbarrel and in the Boulder Valley Planning Area as a whole?

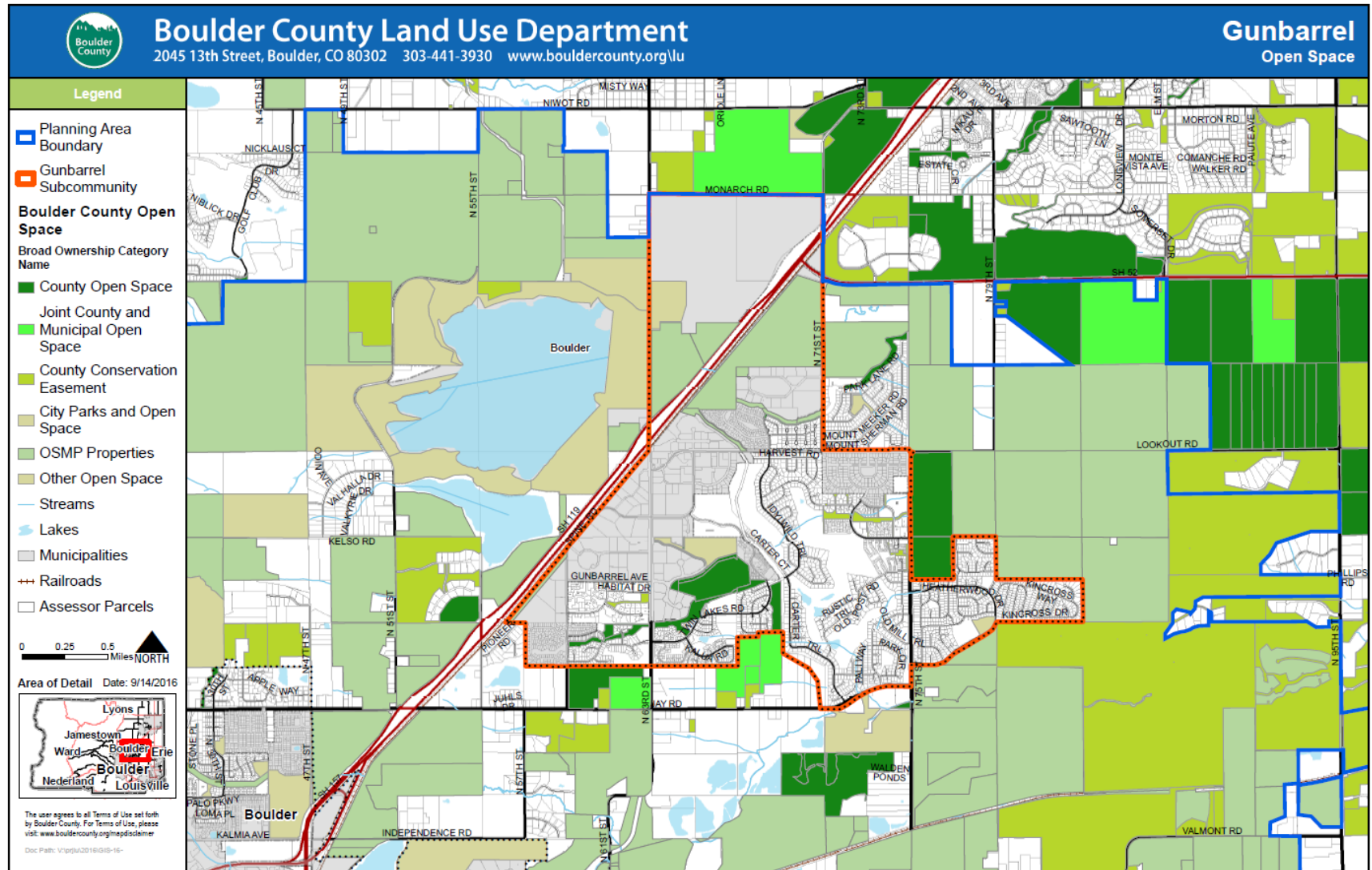
- As shown in Table 1, 440 acres, or 15% of the total Gunbarrel subcommunity is protected from development as either city or county managed open space, easement, or park land. At the level of the Boulder Valley planning area as a whole, over 39,000 acres are protected from development, or 60% of the 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%
[^] 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



13. What species of special concern are present on the properties?²

- Prior to completion of the staff report for the Aug. 30, 2016 public hearing (completed Aug. 23, 2016), staff was made aware of four Boulder County Species of Special Concern (SSC)^x 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 (MBTA), have been identified on the BVSD parcels.
- The [consultant habitat assessment completed for BCHA](#) (submitted Aug. 31, 2016) noted the presence of two SSC detected on the sites (common garter snake and meadow vole) and potential habitat for an additional 10 SSC.^{xi} The [consultant habitat assessment completed for TLAG](#) (submitted Sep. 19, 2016) notes that, according to the Twin Lakes Action Group, four to five SSC have been sighted on the parcels (wood ducks, tiger salamander, meadow vole, common garter snake and periodically long-eared owl).^{xii}
- The consultant reports 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 Aug. 30, 2016 hearing cited the presence of 28 species which the BCCP classifies as SSC. The Parks and Open Space Twin Lakes Management Plan notes many potential mammalian and avian species may be present at the Twin Lakes Open Space.^{xiii} However, this should not be confused with actual sightings of SSC on the BCHA and BVSD parcels which 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 and other strategies that would be required during the city's Concept Plan and Site Review processes. The BCHA consultant habitat assessment completed in August notes specific measures recommended during site design, as well as during and after construction.^{xiv} BCHA and BVSD submitted a [proposal and technical study for wildlife corridors](#) in Dec. 2016.^{xv}

14. How do findings from the TLAG-commissioned open space study compare to those from BCHA's wildlife study?

Table 2. Comparison of the TLAG-commissioned and BCHA-commissioned wildlife studies

Topic	Blue Mountain Open Space Study (TLAG-commissioned) ^{xvi}	Felsberg, Holt and Ullevig (FHU) Wildlife Assessment (BCHA- commissioned) ^{xvii}
Value of Habitat	<ul style="list-style-type: none">• The urban location of the parcels and homogenous vegetative composition limit the wildlife value. However, parcels do function as a wildlife corridor. The area is frequented by a	<ul style="list-style-type: none">• No Critical Wildlife Habitat per Colorado Parks and Wildlife (CPW) classification• Mammalian and reptile wildlife observed: coyote, deer, raccoon,

² Updated bullets one and two Jan. 10, 2017

Topic	Blue Mountain Open Space Study (TLAG-commissioned) ^{xvi}	Felsberg, Holt and Ullevig (FHU) Wildlife Assessment (BCHA-commissioned) ^{xvii}
	variety of urban-adapted mesopredators (e.g., cameras have captured fox, coyote, raccoon, skunk, occasionally a mountain lion and a moose). Deer, eastern cottontail, fox squirrel, and vole are also expected to utilize the parcels.	cottontail, field mice, meadow voles, fox squirrels, red fox ³ , a common garter snake, western garter snake <ul style="list-style-type: none"> • Bird species as noted below • A monoculture of non-native plants and grasses
Species of Special Concern	<ul style="list-style-type: none"> • According to TLAG, 4-5 species: wood ducks, tiger salamander, meadow vole, common garter snake and periodically long-eared owl 	<ul style="list-style-type: none"> • No threatened or endangered species • Reviewed TLAG list of species, 2 detected: Common Garter Snake and Meadow Vole; 10 additional SSC have potential habitat there, including tiger salamander and long-eared owl. Wood ducks were found to not have potential habitat on the sites.
Raptors	<ul style="list-style-type: none"> • Expect fields are used for foraging habitat for great horned owl, red-tailed hawk, and American kestrel 	<ul style="list-style-type: none"> • Observed nesting near but outside of the parcels: great horned owl and American kestrel
Migratory Birds	<ul style="list-style-type: none"> • List 10 within the region: bald eagle, burrowing owl, ferruginous hawk, golden eagle, Lewis's woodpecker, loggerhead shrike, mountain plover, short-eared owl, Swainson's hawk, and Williamson's sapsucker • Observed 1: western meadowlark 	<ul style="list-style-type: none"> • 2 found nesting: mallard and western meadowlark • 5 observed foraging for food, collecting nesting material or traveling through the site: American robin, common grackle, red-winged black bird, tree swallow, blue jay (also the Eurasian collared dove, not protected by the MBTA)⁴
	<ul style="list-style-type: none"> • Both studies report observation of the western meadowlark. Otherwise, the studies differ in their discussion of migratory birds. The Blue Mountain Study lists migratory birds of concern that occur within the region, whereas the FHU study lists migratory birds that were detected on the parcels. 	
Agricultural Land of Significance	<ul style="list-style-type: none"> • Designated as Prime Farmland and Farmland of Statewide Importance • Future large scale agriculture is unlikely, could use the fields as community gardens 	<ul style="list-style-type: none"> • FHU report does not address this topic due to its focus on wildlife
	<ul style="list-style-type: none"> • The Boulder County Comprehensive Plan does not identify this land as having agricultural significance. See response to Question #15 for further information. 	

³ Corrected Jan. 10, 2017

⁴ Corrected Jan. 10, 2017

Topic	Blue Mountain Open Space Study (TLAG-commissioned) ^{xvi}	Felsberg, Holt and Ullevig (FHU) Wildlife Assessment (BCHA-commissioned) ^{xvii}
Open Space Acquisition Criteria	<ul style="list-style-type: none"> Meets all county criteria for open space acquisition County Parks and Open Space staff found that the land does not meet open space acquisition criteria. See response to Question #11 for further information. 	<ul style="list-style-type: none"> FHU report does not address this topic.

15. Are the parcels designated Prime Farmland or Farmland of Statewide Importance?

- No. They are not designated through the Boulder County Comprehensive Plan as Prime Farmland or Farmland of Statewide Importance. The soil types present on the parcels are rated by Natural Resource Conservation Service (NRCS) as “Farmland of Statewide Importance” or “Prime Farmland if Irrigated.” The county’s designation considers site-specific conditions, whereas the NRCS designation only considers soil types. 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 of the entire Gunbarrel area sits on soils rated by NRCS as “Farmland of Statewide Importance” or “Prime Farmland if Irrigated.”

16. How has staff’s research and analysis addressed groundwater and hydrology concerns?

- Staff concludes that the hydrologic constraints present on the site would not preclude future development based on currently available data.
- 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, 2016, Twin Lakes Stakeholder Group meeting; 2) staff’s review of the reports by TLAG’s hydrologist, Dr. Gordon McCurry,^{xviii} and BCHA’s hydrologic consulting firm, Martinez Associates; 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.
- A [preliminary geotechnical and hydrologic](#) study commissioned by the Boulder County Housing Authority and completed by Martinez Associates in August 2016 found:

“Based on the subsurface conditions encountered by our site investigation and the proposed site development concepts, we believe the site is suitable for development provided particular attention is given to the conditions discussed above during design and construction. These conditions can be addressed using standard engineering and construction practices used in the Front Range.”^{xix}

The report also addresses concerns about the potential for development on the parcels to result in increased groundwater levels in neighboring areas. The report concludes that impacts due to compaction would be minimal if development proceeds using the types of foundation systems and construction practices discussed in the report. The report states, “It is anticipated that based on the site conditions encountered in our borings and the laboratory test results, the amount of rise in groundwater levels adjacent to the buildings would be a matter of inches and would likely dissipate in a few days.”^{xx}

The study includes geotechnical engineering recommendations to address the site conditions and other site development aspects of the project.

Traffic Impacts, Road Infrastructure and Cross-Jurisdictional Concerns

17. What traffic and parking impacts would result from medium density development, and is there sufficient infrastructure to support the increased traffic?

- Based on the information available at this time, staff believes that the potential impacts on traffic and parking could be mitigated, and that traffic or parking concerns should not prevent a change in land use designation. The area has been planned for development and the incremental increase would not substantively impact the transportation infrastructure.
- Twin Lakes Road is currently operating at less than its rated capacity, and based on the development scenarios, would still be under capacity if developed under the Medium Density Land Use Designation. Two-lane collector roads typically have a range of capacity of about 700 vehicles per hour (vph) each direction for Level of Service A (free flow) to 2000 vph each direction at Level of Service E (breakdown / stop conditions). The current use of Twin Lakes Road identifies a peak hour volume of about 255 vehicles for both directions between 5 and 6 p.m. The a.m. peak is 240 vehicles in both directions between 8 and 9 o'clock in the morning. All other times of day reflect far fewer vehicle trips.
- Transportation and land use planners apply a regional perspective when considering potential development. Planners agree that a lack of affordable housing near employment centers, especially in an area with a tight housing market, increases congestion on regional roads. Development at the Twin Lakes parcels may cause localized impact within the adjacent network. However, should housing not be constructed on the parcels and other similar sites, those who work in the Boulder Valley area will otherwise have to commute from farther away where more affordable housing is available (Longmont, East County, Weld County, Larimer County). This would result in increased commuting costs for lower income families, increased energy consumption and emissions of greenhouse gases and other air pollutants, and increased congestion on Lookout Road, Niwot Road, Valmont/Isabelle, 75th, 95th, Baseline, South Boulder Road, SH52, SH7, SH119, SH287, etc. Dispersed long distance trips are also more difficult to serve with public transit service than trips that originate closer to their destination and are infill development.
- County and city transportation staff, working collaboratively with other departments and agencies, are committed to finding affordable ways for people to get to and from work with services that do not require people to drive long distances to work in Boulder.
- The proposed development would have to submit a [Concept Plan](#) and would be subject to the guidelines established in the City of Boulder's Land Use Code, Section 9-2-13 B.R.C., 1981.^{xxi} The purpose of a Concept Plan is to solicit feedback from staff, the public and the Planning Board on a specific development proposal. The feedback received throughout the process is meant to inform the subsequent steps in the process, including Site Review and Annexation. A vehicle trips analysis is required at the time of Concept Plan submittal so that staff, the public and the Planning Board have some preliminary understanding of the potential traffic impacts. Please note that Concept Plan applications are advisory in nature and do not result in an approval or a denial.
- At the time of Site Review and Annexation, the city would require a Traffic Impact Analysis and Transportation Demand Management (TDM) plan. The TDM 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)(16) & 9-2-14(h)(2)(D)(v) B.R.C., 1981 and section 2.03(I) of the City of Boulder Design and Construction Standards. Per 9-2-14(h)(2)(D)&(E) B.R.C. 1981, as a part of the Site Review process, the applicant must also address impacts related to circulation and parking.^{xxii} Additionally, any necessary right-of-way dedications, reservations and or improvements would be considered through the Annexation / Site Review processes.

18. How would road infrastructure needs be addressed, recognizing that 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 city development that impacts county-owned infrastructure. As additional infill development occurs in the BVCP service area it will become increasingly important for the city and county to continue to work together and develop additional arrangements to address infrastructure needs. This is an area that can be addressed through an agreement between the City of Boulder and Boulder County.

19. What is the likelihood that additional RTD service would be added in the Gunbarrel area?

- It is possible, depending on funding priorities within the county. Boulder County can contract with RTD or other providers for transit services supporting the Twin Lakes area if such an expansion is deemed necessary when more detailed studies are completed, depending on future funding priorities. Each year, Boulder County purchases additional service on regular transit routes to increase service levels to a point beyond standard service levels provided by RTD on the route, in the form of a transit “buy-up.” In some cases, strong-performing transit capacity purchased by the county is adopted by the transit operator into their annual budgets, assuming that the additional service runs meet transit operator service standards.
- Transit buy-ups are based on demand and available funding. Potential buy-ups are prioritized relative to one another, and compared to other dedicated uses and corridors outlined in the Boulder County Transportation Sales Tax. Boulder County attempts to leverage its funding through this program as much as possible through utilizing state and federal grants.
- Service buy-ups can be purchased proactively, based upon a perceived demand for service to determine the viability of a market, or reactively, based upon demonstrated demand along existing routes that will benefit from additional transit runs. These strategies have proved successful in helping to strengthen the transit market and level of service for several Boulder County routes, and this mechanism could be used to address increased demand for RTD service in the Gunbarrel area.

20. 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 the City of Boulder, Boulder County, or local fire protection districts respond to law enforcement, 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.”

Housing and Location

21. Are there more appropriate locations for affordable housing (e.g., closer to services and jobs)?

- Any location within the city service area that is suitable for residential development is considered suitable for affordable housing. Low-income and middle-income affordable housing serves households earning between 30-120% area median income (AMI). These households include seniors on a fixed income, families and professionals that earn a decent salary but cannot afford to live in the community where they work. With the exception of some seniors, these types of households do not typically need to be located closer to services than other residents.
- The parcels are located in close proximity to services. Local Transit is available approximately 0.5 miles from the parcels (the RTD 205 route stops at Twin Lakes and 63rd St.) and includes stops at the Gunbarrel Town Center, along 28th St, 29th Street Mall and Downtown Boulder, with connections to the University of Colorado at Boulder and Boulder Junction at Depot Square. Regional bus service in the form of the RTD J and BOLT routes are located approximately 1.5 miles⁵ from the location (on Spine/63rd Street and along SH119, respectively) providing service to Boulder (Downtown Boulder, Boulder Junction at Depot Square, University of Colorado at Boulder) and Downtown Longmont (BOLT only). The SH119 corridor was also identified by RTD as a near-term Bus Rapid Transit Corridor that would provide high frequency all day service along the corridor between Boulder and Longmont.
- Gunbarrel currently has approximately 12,700 jobs and a zoned capacity for an additional 12,850 jobs. Siting housing in close proximity to those jobs aligns with several BVCP policies. Specifically, 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.*
- Research shows that very little vacant land (publicly or privately owned) exists within the service area (BVCP Areas I and II). Much of the undeveloped land in the Boulder Valley that would be considered for locating affordable housing is either in a floodplain or has other use restrictions based on the source of funding used to purchase the land. This underscores the importance of making use of sites that have been long-planned for development as the community works to address a shortage of low- and middle-income housing.

22. Why is there a cash-in-lieu option to meet the City of Boulder's Inclusionary Housing Program requirements?

- The city's Inclusionary Housing (IH) program requires that new residential development contribute at least 20% of the total units as permanently affordable housing. The city has adopted a multi-faceted program to account for the limitations under state law (see bullet below). Options for meeting this requirement include providing the permanently affordable units on-site, dedicating off-site newly constructed or existing units as permanently

⁵ Corrected Jan. 10, 2017

affordable, dedicating vacant land for affordable unit development or making a cash contribution to the Affordable Housing Fund in lieu of providing affordable units (Cash-in-lieu).

- Colorado law prohibits rent control by counties and municipalities except by a voluntary agreement with the owner. The statute does not limit the rights of counties or municipalities to manage and control the rent for properties they own through a housing authority or similar agency. Courts in Colorado have determined that requiring developers to build permanently affordable rental housing on-site is a form of rental control.
- In order for a market developer and their financing partners to create on-site affordable rental housing, they must enter into a permanent partnership for the affordable portion of the development, or the units must be sold by the nonprofit. The city cannot require a developer to pursue this path. Moving forward in this direction depends on the desire of the developer to do so and the capacity, financial ability and willingness of the partner agency. To address this situation, as noted, the city's IH program offers alternative pathways for a developer to contribute to the development of affordable housing in the community.
- The cash-in-lieu funds received through the IH Program 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.^{xxiii}
- Between 2000 and 2015, the cash-in-lieu component of the IH program helped increase the total number of new affordable housing units beyond what would have resulted if all units had been built on-site. The total share of new units affordable to low and moderate income households (i.e., deed restricted) was 24 percent of all new housing units added during that period. The Inclusionary Housing requirement is for only 20 percent, and the additional four percent is due, in part, to the cash-in-lieu.

23. Is Gunbarrel a job center in need of more housing?

- Yes. 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.^{xxiv} The availability of zoned land for additional nearby residential development to house potential future employees is limited and insufficient to meet future needs.

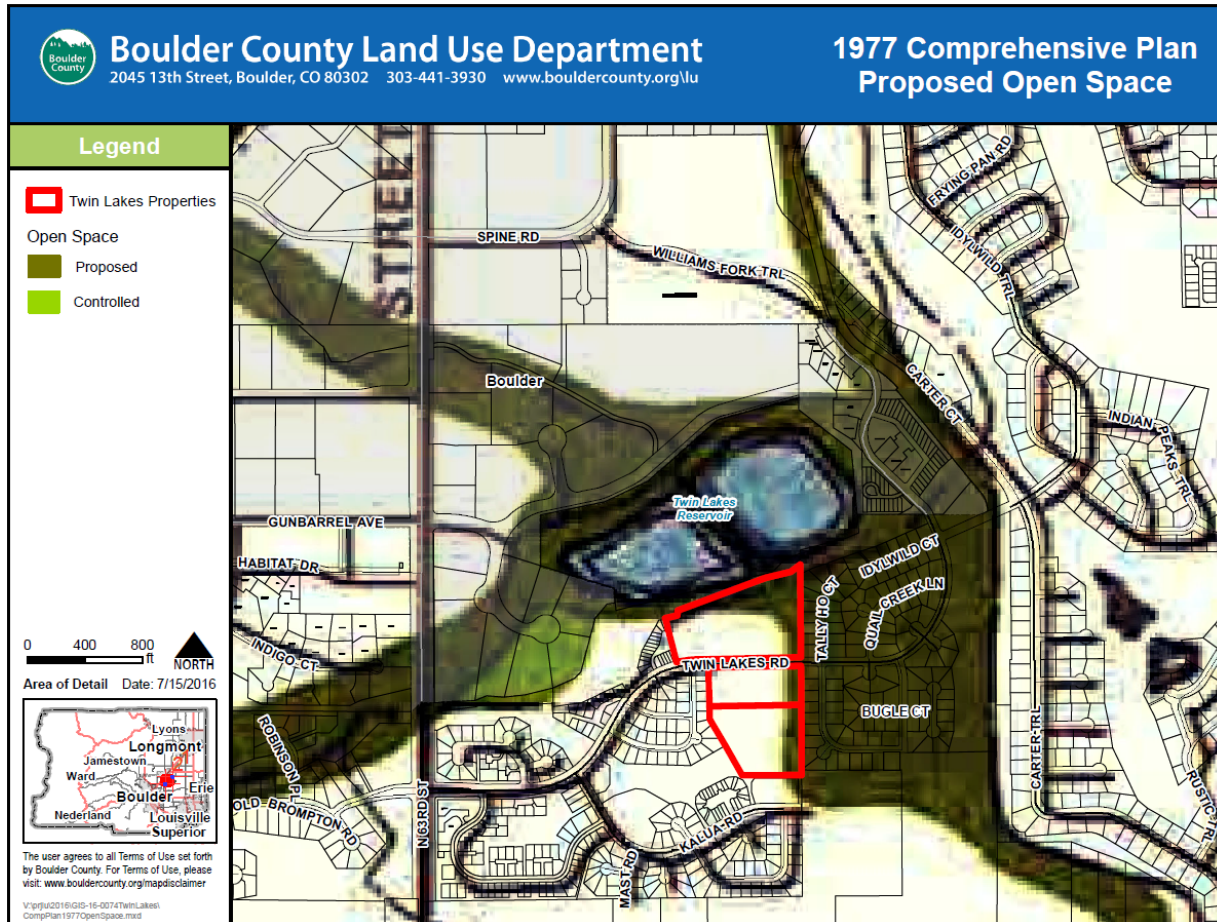
Parcel History

24. Were the BCHA and BVSD parcels envisioned as open space and community park area in the original 1977 Boulder Valley Comprehensive Plan?

- Plans for a park and north-south greenbelt located to the south and east of the east lake appeared in the 1977 BVCP, but were dependent on the assumption that those areas would annex to become part of City of Boulder jurisdiction. A 40-acre community park was envisioned for the area that is now Red Fox Hills; only a small portion of the planned park area covered land currently owned by BCHA and BVSD. See Figure . The city's capital improvement plans at that time were developed based on the expectation that residents of Gunbarrel would ultimately annex into the City of Boulder and 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).^{xxv} Annexation of Gunbarrel has been put to vote multiple times and failed. Lacking property and use tax

revenue from the residents in unincorporated Gunbarrel, the City of Boulder 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 property and use taxes remains a barrier to their receiving city services like libraries, parks and recreation centers.

Figure 2. Overlay of BCHA and BVSD Parcels, and 1977 Comprehensive Plan Proposed Open Space



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

25. Are there restrictions on how the BVSD parcel can be used based on its history as a subdivision dedication?

- The Land Use Map change that BVSD requested affects how the property may be zoned post-annexation. While the property is under county jurisdiction, the parcel remains subject to state law governing county subdivisions⁶. Upon annexation, however, the annexing city has land use authority over the property and controls subdivision and zoning. Therefore, whether there are restrictions on the BVSD parcel post-annexation depends on whether the city places restrictions on the use of the parcel. The Municipal Annexation Act requires a city to zone (or rezone) a property upon or within 90 days

⁶ Corrected Jan. 10, 2017

after annexation. It also specifically allows a city to subdivide (or resubdivide) a property upon annexation.

26. Were there any requirements in the purchase agreement with the Archdiocese affecting how the BCHA-owned parcel (6655 Twin Lakes Rd.) can be used?

- The Archdiocese understood that it was transacting with Boulder County in the interest of building affordable housing under the Boulder County Housing Authority. Therefore, the Archdiocese may have had expectations as to how BCHA intended to develop the property, but there are no legal restrictions on the use of the parcel in the purchase agreement, in the deed conveying the property to BCHA, or elsewhere.

Annexation

27. When would annexation of the parcels occur and why is it necessary for developing these parcels?

- No annexation proposal has been submitted to the city at this time. Any annexation of the BCHA and BVSD parcels would occur at a later date and be subject to a separate city process.
- In order to develop more than one housing unit per building lot (the maximum allowed under county jurisdiction) the parcels must be annexed so they will be part of the city's jurisdiction. Annexation requires 1/6 contiguity, which means 1/6 of the border of the parcel proposed for annexation needs to touch parcels or right-of-way (ROW) in the City of Boulder. Adjacent parcels and/or ROW can be annexed at the same time as the proposed parcel to provide contiguity.
- To address future annexation of the parcels along Twin Lakes Road, 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.
- The BVCP does provide a process in which a property owner can pursue annexation and land use designation change simultaneously. That process only requires review by the city's decision making bodies. BCHA and BVSD have chosen to pursue a land use designation change request through the "four body" decision making process that is open to wider public review.

28. One of the paths for annexation contiguity for the BCHA and BVSD parcels is annexation of a county-owned parcel used as a trail corridor. This parcel located to the northwest of 6655 Twin Lakes Rd. is managed as open space. What would be the effect of annexing this parcel, and would it set a precedent of using open space to support development?

- No. Annexation of the trail corridor parcel (Outlot 7 of the original Twin Lakes subdivision plat) would not set a precedent of using open space to support development. Annexation of the trail corridor, or of open space, would only change the jurisdiction in which the land is located. The ownership or management would not change. Therefore, if the Boulder County-owned trail corridor parcel in question was annexed, the parcel would remain county-owned and still be maintained as a trail corridor available for public use.
- Regarding setting precedence, this is a fairly unique situation in which there is county-owned land used as open space within a community service area. A community service area is an area planned for annexation and development. Any request for annexation of county-

owned property interest 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
3. There is a demonstrated need for affordable housing in the community, and addressing that need is consistent with BVCP policy

Therefore, in this case the county would support and pursue potential annexation of open space to facilitate affordable housing development on the BCHA and BVSD parcels. Note that the county has agreed previously to allow open space land in which it owns an interest to be annexed within a city's planning area.

- State statute (C.R.S. 31-12-104(a)(1)) allows a municipality to ignore certain types of property (roads, state-owned land, etc.) for purposes of contiguity, but does not allow a municipality to ignore county-owned open space to gain contiguity. This provision does not, however, preclude a county from seeking or allowing annexation of property that is used for or managed as open space, as long as all the statutory requirements for annexation are met.
- Boulder County-owned open space may only be annexed at the request of the county. Given the unique circumstances described above that would need to exist, the small portion of county open space in a community service area, and the county's deep commitment to the policies of the BVCP and BCCP, the county would only support annexation of open space in rare instances.
- In recognition of the long history around annexation in Gunbarrel and lack of interest of unincorporated neighborhoods in annexation, the city and county have not moved forward with annexation and have adopted policy language specific to Gunbarrel (BVCP Policy 1.24 Annexation: h).^{xxvi}

29. 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 the parcel would not create any enclaves (i.e., land in county jurisdiction that is surrounded by land in city jurisdiction), a condition that would create the need to annex other parts of Gunbarrel.
- 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.^{xxvii}
- As stated in Question 28, in recognition of the long history around annexation in Gunbarrel and lack of interest of unincorporated neighborhoods in annexation, the city and county have not moved forward with annexation and have adopted policy language specific to Gunbarrel (BVCP Policy 1.24 Annexation: h).^{xxviii}

ⁱ See Boulder Valley Comprehensive Plan Land Use Map Descriptions, available at: https://www-static.bouldercolorado.gov/docs/iii-land-use-map-descriptions-1-201307121132.pdf?_ga=1.245515520.586192584.1470052088

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- ⁱⁱ One can view current BVCP land use designations by going to the City of Boulder's eMapLink, searching for a particular address and turning on the "Future Land Use" map layer in the Legend. The eMapLink is available at: <https://maps.bouldercolorado.gov/emaplink/? ga=1.10650928.586192584.1470052088>
- ⁱⁱⁱ The county's Rural Residential Zone District would also allow one unit per acre if the parcel is within a Community Service Area and has access to water and sewer service. See Boulder County Land Use Code, Article 4-103(E). Available at: <http://www.bouldercounty.org/doc/landuse/lucodearticle04.pdf>. However, in this case the BVCP is the guiding document and in order to obtain those necessary services the parcels would need to be annexed.
- ^{iv} 2010 Boulder Valley Comprehensive Plan. Policy 1.27 Definition of Adequate Urban Facilities and Services. Pg. 15; Chapter VI. Urban Services Criteria and Standards. Pg. 94. Available at: <https://www-static.bouldercolorado.gov/docs/boulder-valley-comprehensive-plan-2010-1-201410091122.pdf? ga=1.249323651.586192584.1470052088>.
- ^v Ibid.
- ^{vi} Boulder Parks and Recreation Master Plan. 2014. Pg. 26 Available at: https://www-static.bouldercolorado.gov/docs/MP_Layout_V7.8_Final_sm-1-201404020833.pdf? ga=1.252341773.586192584.1470052088
- ^{vii} Felsburg Holt & Ullevig, "Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." August, 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>
- ^{viii} Blue Mountain Environmental Consulting, LLC. "Memorandum Re: Open Space Evaluation of 6655 and 6600 Twin Lakes Road (Twin Lakes Parcels)." Pg. 16, August 23, 2016. Available at: https://static1.squarespace.com/static/57d084b68419c274d399543c/t/57ed9d9fd2b857477bc8178c/1475190193151/tlag_asessment_9-29.pdf#page=16
- ^{ix} Boulder County Parks and Open Space. "Twin Lakes Open Space Resource Evaluation and Management Plan." 2004. Available at: <http://www.bouldercounty.org/doc/parks/twinlakesmplan.pdf>.
- ^x The Boulder County Comprehensive Plan (BCCP) Environmental Resources Element includes a list of Species of Special Concern (SSC), which are locally threatened or endangered flora and fauna that the county seeks to protect. A list of the BCCP SSC is available at: <http://www.bouldercounty.org/doc/landuse/bccp-wssc.pdf>
- ^{xi} Felsburg Holt & Ullevig, "Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." Prepared for the Boulder County Housing Authority. August, 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>
- ^{xii} Blue Mountain Environmental Consulting, LLC. "Memorandum Re: Open Space Evaluation of 6655 and 6600 Twin Lakes Road (Twin Lakes Parcels)." Prepared for the Twin Lakes Action Group. Pg. 16, August 23, 2016. Available at: https://static1.squarespace.com/static/57d084b68419c274d399543c/t/57ed9d9fd2b857477bc8178c/1475190193151/tlag_asessment_9-29.pdf#page=16
- ^{xiii} 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>.
- ^{xiv} Felsburg Holt & Ullevig, "Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." Prepared for Boulder County Housing Authority. August, 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>
- ^{xv} Felsburg, Holt & Ullevig. "Boulder County Wildlife Corridors Technical Memorandum for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." Prepared for Boulder County Housing Authority. December, 2016. Available at: <http://www.bouldercounty.org/doc/hhs/twin%20lakes%20wildlife%20corridors%20and%20buffers%20-%20bcha%20and%20bvsd.pdf>
- ^{xvi} Blue Mountain Environmental Consulting, LLC. "Memorandum Re: Open Space Evaluation of 6655 and 6600 Twin Lakes Road (Twin Lakes Parcels)." Prepared for the Twin Lakes Action Group. Pg. 16, August 23, 2016. Available at: https://static1.squarespace.com/static/57d084b68419c274d399543c/t/57ed9d9fd2b857477bc8178c/1475190193151/tlag_asessment_9-29.pdf#page=16
- ^{xvii} Felsburg Holt & Ullevig, "Boulder County Habitat Assessment for 6655 Twin Lakes Road, 6500 Twin Lakes Road and 0 Kalua Road." Prepared for Boulder County Housing Authority. August, 2016. Available at: <https://ourbouldercounty.org/document/interim-twin-lakes-habitat-assessment>
- ^{xviii} TLAG hydrology report for BCHA property: McCurry Hydrology LLC. "Preliminary Hydrologic Analysis of the BCHA Property at 6655 Twin Lakes Road." Prepared for Twin Lakes Action Group. June 24, 2015. Available at: https://static1.squarespace.com/static/57d084b68419c274d399543c/t/57d9d1cf8419c23a9b7bd300/1473892816531/Hydrology_Analysis_6655TwinLakesRd_06-24-15.pdf
- TLAG hydrology report for BVSD properties: McCurry Hydrology LLC. "Preliminary Hydrologic Analysis of the BCHA Properties at 6600 Twin Lakes Road." Prepared for Twin Lakes Action Group. November 16, 2015. Available at: https://static1.squarespace.com/static/57d084b68419c274d399543c/t/57d9d20229687fdaba1f1729/1473892867252/Prelim_Hydrology_Analysis_BVSD_property_11-16-15.pdf

^{xix} Martinez Associates. "Preliminary Geotechnical and Hydrologic Investigation, Twin Lakes Properties, Boulder, CO." Prepared for the Boulder County Housing Authority. August 19, 2016. Pg. 6. Available at:

<https://www.ourbouldercounty.org/sites/ourbouldercounty.org/files/document/pdf/Preliminary%20Geotech%20report.pdf>

^{xx} Ibid.

^{xxi} The first Twin Lakes Stakeholder Group Meeting included a staff presentation about the development process, which is included in the meeting materials. See: [https://www-static.bouldercolorado.gov/docs/BVCP_Twin_Lakes_stakeholders_Meeting_1_material-1-](https://www-static.bouldercolorado.gov/docs/BVCP_Twin_Lakes_stakeholders_Meeting_1_material-1-201604221522.pdf?_ga=1.260868489.586192584.1470052088)

[201604221522.pdf?_ga=1.260868489.586192584.1470052088](https://www-static.bouldercolorado.gov/docs/BVCP_Twin_Lakes_stakeholders_Meeting_1_material-1-201604221522.pdf?_ga=1.260868489.586192584.1470052088)

^{xxii} Impacts related to circulation include: discouraging high speeds, minimizing potential conflicts with vehicles, ensuring safe and convenient multi-modal travel/connections, promoting alternatives to single-occupant vehicles, use of Transportation Demand Management 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)

^{xxiii} 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>.

^{xxiv} See Boulder Valley Comprehensive Plan Key Resources and Maps, BVCP Phase 1. Available at:

<https://bouldercolorado.gov/bvcp/key-resources-and-maps-bvcp-phase-1>

^{xxv} 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.

^{xxvi} 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.

^{xxvii} Cornett, Linda, "Gunbarrel Area Voters Reject Annexation," *Boulder Daily Camera*, November 2, 1978.

^{xxviii} 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.