



# City of Boulder

## City Council Agenda Item

Meeting Date: January 22, 2026

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### Agenda Title

Consideration of a motion to approve the list of community change requests to be considered during the Boulder Valley Comprehensive Plan update.

### Staff Contact

- Christopher Ranglos, Senior City Planner, Planning & Development Services
- Kristofer Johnson, Senior Manager, Planning & Development Services
- Brad Mueller, Planning & Development Services Director

### Draft Motion Language

Staff requests council consideration of this matter and action in the form of the following motion:

“Approve the list of community change requests recommended by staff in this memorandum for further consideration as part of the Boulder Valley Comprehensive Plan update and direct staff to evaluate these requests for potential incorporation into the draft Comprehensive Plan.”

### Executive Summary

This memorandum provides City Council with an overview of the community change request process and the requests submitted by community members as part of the 2025 Boulder Valley Comprehensive Plan (Comprehensive Plan or Plan) update. The purpose of this item is for City Council to review staff’s initial screening and recommendations, host a public hearing, and determine which requests should proceed for further consideration during the Plan update. This action does not constitute approval or denial of any land use change, Planning Area adjustment, or

policy/text amendment; rather, it identifies which requests warrant more detailed evaluation based on the latest draft Comprehensive Plan policy direction and land use strategy.

Following the initial screening and public hearings, staff will continue to analyze each of the requests approved for further consideration. Review of change requests recommended for inclusion in the draft Plan or Future Land Use Map will occur in conjunction with the review of the entire draft Comprehensive Plan scheduled for March 2026. Approval or denial of requests will be determined as part of the adoption process in Summer 2026.

## Council Action Options

Option	Outcome
Approve motion language as drafted	If the motion is approved by both Planning Board and City Council (and County approval bodies as applicable), staff will further consider the recommended list of requests.
Define and adopt a modified motion	Planning Board and City Council (and County approval bodies as applicable) may add or remove requests to the recommended list. Staff will further consider only those requests that are approved by all applicable bodies.
Refer back to staff	Staff will return to Planning Board and City Council with additional information at a future date as requested.

## Alignment with City Plans and City Council History

### Sustainability, Equity, and Resilience (SER) Framework and Citywide Strategic Plan Alignment

#### SER Framework Goal Area

The update to the Comprehensive Plan is aligned with the city’s Sustainability, Equity and Resilience (SER) Framework. The Plan will establish overall citywide and/or valley-wide policy direction related to all seven SER goal areas. Alignment with the seven SER goal areas was one of the criteria staff used in the evaluation of which requests should proceed for further consideration.

#### Citywide Strategic Plan

As a 20-year vision document, the Comprehensive Plan will further inform how the Citywide Strategic Plan evolves over time, so the city can operationalize and

implement various Comprehensive Plan policies over the 4-year Strategic Plan time frame.

### **Staff Notes**

N/A

### **Alignment with Additional City Plans**

As the city's primary planning document, the Boulder Valley Comprehensive Plan provides the overarching vision, goals, and policies that guide all other city plans, including subcommunity and area plans and department plans, Boulder municipal code updates, annual budgeting, and the Capital Improvements Program. If a submitted request was located within an area covered by an adopted subcommunity or area plan, staff also referenced that plan to inform this initial screening. While this phase did not include detailed policy analysis, the guiding principles, land use vision, and long-term objectives outlined in any relevant subcommunity or area plans were considered to ensure the request is generally compatible with previously established direction for the area.

### **City Council History**

This item has not previously come before City Council. It is, however, part of the ongoing major update to the Boulder Valley Comprehensive Plan that City Council has been involved in since October 2024.

### **Analysis**

#### **Overview of the Community Change Request Process**

The current adopted Intergovernmental Agreement (IGA) and Amendment Procedures for the Boulder Valley Comprehensive Plan (included as **Attachment A**) anticipates that major updates will incorporate amendments that respond to changing conditions and community needs. The community change request process provides community members and property owners the opportunity to submit proposed amendments and request specific changes to the Plan.

The Amendment Procedures (Exhibit B of the IGA) outline the types of possible amendments to the plan that can occur during a major update and as part of the community change request process. They are as follows:

- Changes to the Land Use Map
- Changes to the Area I, II, III Map
- Rural Preservation Area Expansions or contractions
- Planning Area boundary changes
- Edits to the policy section

- Edits to the plan text
- Changes to the Subcommunity and Area Plan section
- Changes to the Master Plan and Program summaries
- Changes to the Urban Service Criteria and Standards.

The community change request process and Comprehensive Plan update cannot authorize certain types of changes. Examples include zoning changes, site-specific development approvals or entitlements, annexations, capital project commitments, amendments to the City Charter, or modifications to the Boulder Revised Code or the Design and Construction Standards. Requests that conflict with state law, intergovernmental agreements, or fall outside the Boulder Valley Planning Area are also outside the scope. Additionally, operational or highly site-specific issues cannot be addressed. The focus of the process is limited to evaluating potential changes to land use designations, Planning Areas, or the Plan's policies and text.

The process consists of three steps:

### **Step 1: Request Window (COMPLETE)**

The request window opened on August 11, 2025, and closed on October 3, 2025. Community members, property owners, and organizations throughout the Valley submitted a total of 34 requests for changes to the plan during this period. Submissions were accepted through a standardized online form available on the project website. Information about the process and the request window was shared with the community via a citywide press release and the July 2025 Planning and Development Services Newsletter. The opportunity has also been referred to in multiple broader Plan update events throughout the year. Staff also hosted two drop-in office hour sessions to provide guidance and answer questions related to the process.

### **Step 2: Initial Screening (IN PROGRESS)**

City and county staff reviewed all submitted requests to determine whether they were appropriate for further consideration. The screening evaluated each request for alignment with the seven goal areas of the draft Comprehensive Plan; if the request was within the policy-level framework of the Comprehensive Plan; feasibility within the scope and timeline of the Comprehensive Plan update; and for consistency with the latest draft Comprehensive Plan policy and Future Land Use Map direction. All requests received are reviewed by City and County approval bodies at public hearings in January 2026. The approval bodies may accept the list of requests recommended by staff to move forward for further evaluation as is or may add or remove requests from the list.

### **Step 3: Analysis and Final Review (NEXT STEP)**

Following the approval bodies' vote on which requests should proceed for further evaluation, the City Planning and Development Services Department, in coordination with the County Community Planning and Permitting Department, will conduct additional analysis and develop a final set of recommendations regarding the proposed changes. Staff will incorporate appropriate changes into the draft Comprehensive Plan and Future Land Use Map, scheduled for public release in March 2026. Approval of the changes will ultimately be considered by the four approval bodies (as applicable) during the Comprehensive Plan adoption process in Summer 2026.

### **Approval Bodies**

The four approval bodies identified in the Boulder Valley Comprehensive Plan determine at this time which community change requests advance for further analysis. For properties in Area I, only City Council and Planning Board review and act on requests; the County does not participate in screening these applications. For land use change requests in Area II that are over 5 acres, City Council, Planning Board, and Board of County Commissioners will review and act on these requests. For all land use change requests in Area III-Rural Preservation, all four bodies review and act on the request. For planning area adjustments five acres and under (Area III-Rural Preservation to Area II), only the City approval bodies act; when the area exceeds five acres, both City and County bodies review and vote. Policy and text amendments follow the same jurisdictional logic: proposals that affect both City and County interests are reviewed by all four approval bodies, while those that apply solely to City policies are considered only by City Council and Planning Board. A request moves forward only if it is approved by all applicable approval bodies.

### **Community Change Requests for Consideration**

The following table summarizes the community change requests that were received during the submission window. Please see **Attachment B** to view each request in detail.

**Land Use Designation Map Change Requests:**

<b>Request #</b>	<b>Address</b>	<b>Planning Area</b>	<b>Requested Change</b>	<b>Staff Recommendation</b>	<b>Approval Bodies</b>
1	1343 Iris Ave.	I	Public (PUB) to High Density Residential (HR); or Medium Density Residential (MR); or Low Density Residential (LR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
2	4655 Table Mesa Dr.	I	Low Density Residential (LR) to High Density Residential (HR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
3	2750 Broadway	I	Transitional Business (TB) to Community Business (CB)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
4	2425 Colorado Ave.	I	Low Density Residential (LR) to High Density Residential (HR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
5	2419 Colorado Ave.	I	Low Density Residential (LR) to High Density Residential (HR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
6	2851 Valmont Rd.	I	Medium Density Residential (MR) to Mixed Use Business (MUB)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
7	0 Twin Lakes Rd.	II	Public (PUB) to Open Space Acquired (OS-A)	Do not consider further	<b>City &amp; County</b> ( <i>City Council; Planning Board; Board of County Commissioners</i> ) (over 5 acres)
8	6655 Twin Lakes Rd.	II	Low Density Residential (LR) to Open Space Acquired (OS-A)	Do not consider further	<b>City &amp; County</b> ( <i>City Council; Planning Board; Board of County Commissioners</i> ) (over 5 acres)

9	<b>0 Kalua Rd.</b>	II	Public (PUB) to Open Space Acquired (OS-A)	Do not consider further	<b>City &amp; County</b> ( <i>City Council; Planning Board; Board of County Commissioners</i> ) (over 5 acres)
10	<b>South Side of Sioux Drive</b>	I	Low Density Residential (LR) to Medium Density Residential (MR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
11	<b>2810 Olson Dr.</b>	I	Low Density Residential (LR) to Mixed-Density Residential (MXR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
12	<b>2855 &amp; 2899 Valmont Rd.</b>	I	Medium Density Residential (MR); Open Space Other (OS-O) to Mixed Use Business (MUB)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
13	<b>1006 Lee Hill Dr.</b>	I	Low Density Residential (LR) to Mixed Density Residential (MXR); or Medium Density Residential (MR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
14	<b>1343 Iris Ave.</b>	I	Public (PUB) to Mixed Use Transit-Oriented Development (MUTOD)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
15	<b>1343 Iris Ave.</b>	I	Public (PUB) to Mixed Use Residential (MUR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
16	<b>2795 Colorado Ave.</b>	I	Low Density Residential (LR) to High Density Residential (HR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
17	<b>3975 28<sup>th</sup> St.</b>	I	Public (PUB); Open Space Other (OS-O); Low Density Residential (LR) to Medium Density Residential (MR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )

18	<b>3825 Walnut St.</b>	I	Light Industrial (LI) to Mixed Use Residential (MUR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
19	<b>3156 28<sup>th</sup> St. and 3158 28<sup>th</sup> St.</b>	I	General Business (GB); Medium Density Residential (MR) to Mixed Use Residential (MUR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
20	<b>1860 38<sup>th</sup> St.</b>	I	Light Industrial (LI) to Mixed Use Residential (MUR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
21	<b>1800 38<sup>th</sup> St.</b>	I	Light Industrial (LI) to Mixed Use Residential (MUR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )
22	<b>East Ridge Subdivision</b>	I	Low Density Residential (LR) to Medium Density Residential (MR)	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> )

**Planning Area Change Requests:**

<b>Request #</b>	<b>Address</b>	<b>Planning Area</b>	<b>Requested Change</b>	<b>Staff Recommendation</b>	<b>Approval Bodies</b>
23	<b>5000 28<sup>th</sup> St.</b>	Area III – Planning Reserve	Area III – Planning Reserve to Area II	<b>Ineligible</b> – Only the City can initiate the change from Area III- Planning Reserve to Area II	<b>N/A</b>
24	<b>6710 Arapahoe Ave.</b>	Area III – Rural Preservation	Area III – Rural Preservation to Area II	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> ) (under 5 acres)
25	<b>810 Marshall Rd.</b>	Area III – Rural Preservation	Area III – Rural Preservation to Area II	Consider further	<b>City Only</b> ( <i>City Council; Planning Board</i> ) (under 5 acres)

**Policy & Text Change Requests:**

<b>Request #</b>	<b>Policy # or Text Section</b>	<b>Requested Change Summary</b>	<b>Staff Recommendation</b>	<b>Approval Bodies</b>
26	<b>None</b>	Request for a vision-level, funded regional wildfire mitigation program addressing ignition sources, fuel management, structural hardening, and emergency response, which extends beyond the vision level scope of Comprehensive Plan policy and into implementation and programmatic actions.	Do not consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>
27	<b>9.01</b>	City and County partnership with local farmers, ranchers, and ditch companies to pursue infrastructure upgrades and operational programs for agricultural water delivery systems, including actions that extend beyond the vision-level scope of Comprehensive Plan policy and the Boulder Valley planning area.	Do not Consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>
28	<b>None</b>	Revise BVCP amendment procedures to make Land Use Map changes and minor service area boundary adjustments in Area II and III a joint City and County decision.	<b>Ineligible</b> – Revisions to the Amendment Procedures cannot be requested	<b>N/A</b>
29	<b>None</b>	Review the City’s building and land use codes to remove unnecessary barriers. Specifically, review LUC Appendix K in connection with STAMP area plans, and reconsider allowing “medical office” as a conditional use in the STAMP Area.	<b>Ineligible</b> – Revisions to the Boulder Revised Code cannot be requested	<b>N/A</b>

30	<b>2.07</b>	Clarify that future annexation of Area II lands requires resident interest and initiation. Established rural character should be maintained in Area II and act as a buffer between Area I and Area III lands.	Do not consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>
31	<b>2.35</b>	Clarify that provision of community benefits does not automatically allow additional building height, and that aesthetics, view protection, and community input should guide height decisions.	Do not consider further	<b>City Only</b> <i>(City Council; Planning Board)</i>
32	<b>1.17</b>	Establish that future annexation of Gunbarrel must be initiated by residents and remove language about the City and County “continuing to support” eventual annexation of Gunbarrel.	Do not consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>
33	<b>Land Use Map Accuracy</b>	Evaluate and revise land use map designations for accuracy, focusing on Open Space classifications, and enhance land use designation map legibility.	Do not consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>
34	<b>Section 6: Transportation</b>	Propose revisions to transportation policies 6.01–6.22 in Section 6: Transportation. Also recommend updating the Land Use & Transportation Map to reflect combined land use and transportation guidance, replacing the existing land-use-only map. Refer to <b>Attachment C</b> for more details.	Consider further	<b>City &amp; County</b> <i>(City Council; Planning Board; Planning Commission; Board of County Commissioners)</i>

**Equity Analysis**

At this stage of the process, no negative equity impacts have been identified. The initial screening focused on determining which requests are appropriate for further study, and a detailed evaluation of potential equity implications will occur during the next phase of analysis alongside the draft Comprehensive Plan.

## **Fiscal Note**

There are no direct fiscal impacts associated with the review and consideration of the community change requests. All staff work related to the initial screening and subsequent analysis is accommodated within existing City Planning and Development Services and County Community Planning and Permitting Department budgets.

## **Climate, Resilience, and Sustainability Considerations**

At this stage of the process, no material climate, resilience, or sustainability impacts have been identified. The initial screening focused on determining which requests are appropriate for further study, and evaluation of potential environmental, climate, and resilience implications will occur during the next phase of analysis alongside the draft Comprehensive Plan.

## **Community Engagement**

Information about the process and the application window was shared with the community via a citywide press release and the July 2025 Planning and Development Services Newsletter. Staff also hosted two drop-in office hour sessions to provide guidance and answer questions related to the process. The opportunity has also been referred to in multiple broader Plan update events throughout the year. An [online map](#) displaying all submitted requests was made available for community review in December 2025. To date, the city has received two public comments related to specific change requests, which are included in **Attachment D**. As the process advances, staff will provide opportunities for community members to comment on requests that are selected for further consideration during the review period for the draft Comprehensive Plan, set for public release on March 2, 2026.

## **Workplan Considerations**

This item is currently included in the department's work plan in conjunction with the Boulder Valley Comprehensive Plan update.

## **Next Steps for City Council**

In addition to City Council's review, Planning Board, Boulder County Planning Commission and Board of County Commissioners will hold public hearings to vote on and finalize which Community Change Requests will proceed for further analysis. Based on these hearings and votes, staff will confirm the list of requests advancing to Step 3: Analysis & Final review. These requests will be evaluated for inclusion in the final draft Comprehensive Plan.

## **January Public Hearings:**

- Planning Board: January 20, 2026
- Boulder County Planning Commission: January 21, 2026
- City Council: January 22, 2026

- Boulder County Board of County Commissioners: January 27, 2026

## **February 2026 – Analysis:**

City and County staff will further evaluate the selected requests for consideration to be included in the draft Comprehensive Plan.

## **March 2026 – Draft Comprehensive Plan Review:**

Change requests included in the draft Comprehensive Plan will be identified for community review and comment as part of the overall public review process.

## **March 10, 2026 – Draft Comprehensive Plan Open House:**

At this event and online, community members will have an opportunity to provide comments on the draft Comprehensive Plan, which will include the community change requests that will have then been incorporated into the draft Plan and Future Land Use Map.

## **March 26, 2026 – Joint Study Session with Planning Board:**

Staff will present the draft Comprehensive Plan and Future Land Use Map to City Council and Planning Board and highlight which requests have been included. Members will have the opportunity to provide feedback on all of the change requests as recommended by staff.

## **Summer 2026 – Adoption Hearings:**

The final plan and Future Land Use Map, including revisions resulting from community change requests, will be reviewed and considered for adoption by the four approval bodies: City Council, Planning Board, Boulder County Planning Commission, and Board of County Commissioners.

## **Accessibility Statement**

The City of Boulder is committed to digital accessibility. Some content may not be fully accessible due to technical limitations or issues. For alternate formats or accommodations, please visit [Accessibility | City of Boulder](#) or contact [accessibility@bouldercolorado.gov](mailto:accessibility@bouldercolorado.gov).

## **Attachments**

**Attachment A:** Intergovernmental Agreement and Amendment Procedures

**Attachment B:** Change Request Screening Analysis and Staff Recommendations

**Attachment C:** Change Request #34

**Attachment D:** Public Comments Received

# Appendix B: Boulder Valley Comprehensive Development Plan Intergovernmental Agreement with Amendment Procedures (Exhibit B)

THIS INTERGOVERNMENTAL AGREEMENT ("IGA") between the City of Boulder, a Colorado home-rule city ("Boulder" or "City"), and the County of Boulder, a body politic and corporate of the State of Colorado ("County" or "Boulder County") shall become effective as of the "Effective Date" listed below. The City and the County are together referred to as the "Parties."

## RECITALS

A. The Parties have a shared history of cooperative planning beginning in 1977, and previously entered into intergovernmental agreements on June 21, 1978, December 13, 1990 and most recently on July 15, 2002. The Parties desire to extend this relationship through an updated comprehensive development plan and intergovernmental agreement.

B. The most recent intergovernmental agreement, effective as of July 15, 2002, (the "Previous IGA") expires, by its terms, on December 31, 2017. The Parties desire to adopt this IGA to supersede and replace the Previous IGA in order to adopt the most recent updates to the plan.

C. C.R.S. § 29-20-101 *et seq.*, as amended, authorizes the Parties to enter intergovernmental agreements to plan for and regulate land uses in order to minimize the negative impacts on the surrounding areas and protect the environment, and specifically authorizes local (i.e., municipal and county) governments to cooperate and contract with each other for the purposes of planning and regulating the development of land by means of a "comprehensive development plan."

D. The County is the ultimate governmental authority regarding land use control and development in the unincorporated areas of the County, which areas include the Boulder Valley, as defined in the plan attached as Exhibit A (the "Plan" or the "BVCP").

E. The City is the only significant potential source of adequate urban facilities and services required for the orderly urban development of the Boulder Valley, where desired.

F. Under C.R.S. §§ 30-28-106, -108 and -110, as amended, the County Planning Commission and the Board of County Commissioners have made and adopted a master plan for the physical development of the unincorporated area of the County, the Boulder County Comprehensive Plan.

G. Under C.R.S. § 31-23-202, as amended, the Boulder Planning Board and the Boulder City Council have adopted the goals, policies, programs and supportive data of the Boulder Valley Comprehensive Plan.

H. Under C.R.S. § 30-28-106(2)(a), as amended, the master plan shall not be effective inside the boundaries of any incorporated municipality within the region unless such plan is adopted by the governing body of the municipality.

I. To ensure that the unique and individual character of Boulder and of the rural area within Boulder County outside Areas I and II of the BVCP are preserved, the Parties believe that a comprehensive development plan that recognizes the area of potential urbanization within the BVCP that would not be interrupted by Boulder County open space, accompanied by a commitment by Boulder for the preservation of the rural character of lands surrounding Areas I and II within the Boulder Valley and Boulder County, is in the best interest of the residents of each of the Parties.

J. The Parties acknowledge that this IGA may control or limit the County's authority over some properties within the County's jurisdiction but that such control or limitation is justified due to the fact that such properties are currently served by City owned municipal utilities, are bound by service agreements between the property owners and the City, and/or such properties are located within areas specially affecting the City's interests, including but not limited to entry corridors and areas of special impact upon City resources.

K. The Parties find that providing for the area outside Areas I and II of the Boulder Valley Comprehensive Plan within Boulder County to remain as rural in character through the term of this IGA for the purpose of preserving a community buffer through the limitation of annexation by Boulder serves the economic and civic interest of their residents and meets the goals of the Boulder County Comprehensive Plan.

L. Consistent with the municipal annexation, utility services, and land use laws of the State of Colorado, this IGA including, specifically, the annexation and open space portions hereof, is intended to encourage the natural and well-ordered future development of each Party; to promote planned and orderly growth in the affected areas; to distribute fairly and equitably the costs of government services among those persons who benefit therefrom; to extend government services and facilities to the affected areas in a logical fashion; to simplify providing utility services to the affected areas, to simplify the governmental structure of the affected areas; to reduce and avoid, where possible, friction between the Parties; and to promote the economic viability of the Parties.

M. The functions described in this IGA are lawfully authorized to each of the Parties, which perform such functions hereunder, as provided in Article XX, § 6 of the Colorado Constitution, and C.R.S. §§ 29-20-101, *et seq.*; 30-28-101, *et seq.*; 31-12-101, *et seq.*; and 31-23-201 and -301, *et seq.*, as amended.

N. C.R.S. § 29-1-201, *et seq.*, as amended, authorizes the Parties to cooperate and contract with one another with respect to functions lawfully authorized to each of the Parties, and the people of the State of Colorado have encouraged such cooperation and contracting through the adoption of Colorado Constitution, Article XIV, § 18(2).

O. The Parties have each held hearings after proper public notice for the consideration of entering into this IGA and the adoption of a comprehensive development plan for the Boulder Valley.

P. The Parties desire to enter into this IGA in order to plan for the use of the lands within the Boulder Valley through joint adoption of a mutually binding and enforceable comprehensive development plan.

#### AGREEMENT

**NOW THEREFORE**, in consideration of the above and the mutual covenants and commitments made herein, the Parties agree as follows:

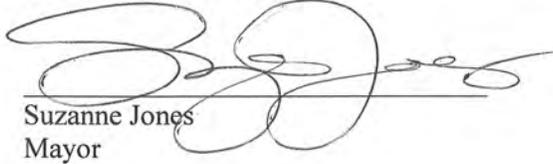
1. Boulder Valley Comprehensive Development Plan. This IGA, including the Boulder Valley Comprehensive Plan text and Map attached to this IGA as Exhibit A, is hereby adopted by the Parties as a comprehensive development plan as provided in C.R.S. § 29-20-105, to be known as the "Boulder Valley Comprehensive Plan" (hereinafter "the Plan"). The Plan shall govern and control the Plan Area as shown on Exhibit A, or as subsequently amended in accordance with Section 6, below.
2. Consistency with BVCP in Planning, Zoning, and Other Land Use Regulations and Actions Required. The City and the County, respectively, within their constitutional and statutory geographic jurisdictions, shall exercise their planning, zoning, subdivision, building and related land use regulatory functions consistent with the plans and policies of the Plan, to the end of attaining the goals and objectives of the Plan.

3. Compliance with BVCP for Annexations Required. The City shall exercise its annexation policies and capital improvements plan consistent with the plans and policies of the Plan, to the end of attaining the goals and objectives of the Plan.
4. Term.
  - 4.1 Term. This IGA shall extend through December 31, 2037.
  - 4.2 Schedule for Plan Reviews. The City and the County agree that the Plan will be reviewed at least every five years for possible amendments to reflect changes in circumstances and community desires. This Agreement shall extend to all revisions and amendments of the Plan that are jointly approved from time to time by the City and the County. As part of the mid-term and major updates, each Party agrees to hold a duly noticed public hearing to determine, among other things, if the term of this Agreement should be extended an additional five years from the date of termination.
5. Amendments to the Intergovernmental Agreement. This IGA may be amended from time to time upon a majority vote of the Boulder City Council and the Board of County Commissioners. This Intergovernmental Agreement will be reviewed by the Parties during the periodic plan reviews.
6. Amendments to the Plan, Referral Process, Notices, and Errors. The procedures for Plan amendments, referrals, notices, and errors are incorporated into the Intergovernmental Agreement and are attached hereto as Exhibit B.
7. Preservation of Legislative Discretion. It is recognized that all provisions of the Boulder Valley Comprehensive Plan that require appropriation of public funds are qualified by the availability of appropriations for those purposes, and the legislative discretion inherent in the appropriation process is not limited by the adoption of the Plan.
8. Severability. If any portion of this Plan is held by a court in a final, non-appealable decision to be per se invalid or unenforceable as to any Party, the entire Agreement and the Plan shall be terminated, it being the understanding and intent of the Parties that every portion of the Agreement and Plan is essential to and not severable from the remainder.
9. Beneficiaries. The Parties, in their corporate and representative governmental capacities, are the only entities intended to be the beneficiaries of the Agreement and the Plan, and no other person or entity is so intended or may bring any action, including a derivative action, to enforce the Agreement or the Plan.
10. Enforcement. Either of the Parties may enforce this Agreement by any legal or equitable means including specific performance, declaratory and injunctive relief. No other person or entity shall have any right to enforce the provisions of this Agreement or the Plan.
11. Defense of Claims. If any person allegedly aggrieved by any provision of the Plan and who is not a Party to the Plan should sue any Party concerning such Plan provision, all Parties shall be notified promptly by any party served; any Party served shall, and any other Party may, defend such claim. Defense costs shall be paid by the Party providing such defense.
12. Governing Law and Venue. This Agreement shall be governed by the laws of the State of Colorado, and venue shall lie in the County of Boulder.

**THIS AGREEMENT** is made and entered into to be effective on the later of the dates of approval by the City of Boulder or Boulder County (the "Effective Date").

Dated: 9/26/2017

**CITY OF BOULDER**

  
Suzanne Jones  
Mayor

ATTEST:

  
City Clerk

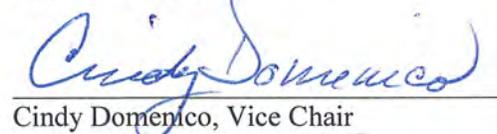
APPROVED AS TO FORM:

  
City Attorney's Office

**BOARD OF COUNTY COMMISSIONERS  
OF BOULDER COUNTY:**



  
Deb Gardner, Chair

  
Cindy Domenico, Vice Chair

  
Elise Jones, Commissioner

ATTEST:

  
Clerk of the Board

APPROVED AS TO FORM:

  
County Attorney's Office

# Exhibit B: Boulder Valley Comprehensive Plan - Amendment Procedures

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## Intro

The Boulder Valley Comprehensive Plan is a joint policy document legislatively adopted by the City of Boulder and Boulder County. The plan is updated periodically to respond to changed circumstances or community needs. Changes to the comprehensive plan fall into four categories:

- Changes that may be considered at any time
- Changes that may be considered during a map-only update
- Changes that may be considered during a mid-term update
- Changes that may only be considered during the major update

The table below summarizes the different types of changes, when they may be considered, and the decision-making bodies that approve them. When the table refers to the decision-making bodies that approve changes:

- "city" means Planning Board and City Council;
- "county" means the County Planning Commission and Board of County Commissioners; and
- "city and county" means Planning Board, City Council, County Planning Commission, and Board of County Commissioners.

## Summary Matrix

Type	WHEN				WHO		HOW
	Map Only	Mid-term	Major Update	Any-time	Approval Bodies	Who may Initiate <sup>1</sup>	Criteria
<b>LAND USE MAP</b>							
All types of Land Use Map changes	X	X	X	-	City (Area I & II Call-up to BOCC for Area II) City and County (Area III)	All	Sec. A.1.
Land Use Map changes related to rezoning, subcommunity/area plan or annexation only	-	-	-	X	City (Area I & II Call-up to BOCC for Area II) City and County (Area III)	City, Prop. owner	Sec. A.1.
<b>PLANNING AREAS MAP - AREA II/III BOUNDARY</b>							
Service Area Expansion (Area III to Area II) or Contraction (Area II to Area III)							
MINOR ADJUSTMENTS: Area III – Rural Preservation to Area II	X	X	X	-	Under 5 acres: City Over 5 acres: City, call-up to BOCC	All	Sec. A.2.a.i
SERVICE AREA EXPANSION: Area III - Planning Reserve to Area II	-	X	X	-	City and County	City	Sec. A.2.a.ii
SERVICE AREA EXPANSION: Reinstatement of Area III - Rural Preservation back to Area II	-	X	X	-	City and County	Prop. owner	Sec. A.2.a.ii
SERVICE AREA CONTRACTION: Area II to Area III Rural - Preservation	-	X	X	-	City and County	All	Sec. A.2.a.iii
Rural Preservation Expansion or Contraction							
RURAL PRESERVATION EXPANSION: Area III - Planning Reserve to Area III - Rural Preservation	-	-	X	-	City and County	All	Sec. A.2.b.i
RURAL PRESERVATION CONTRACTION: Area III - Rural Preservation to Area III - Planning Reserve	-	-	X	-	City and County	All	Sec. A.2.b.ii
Planning Area Expansion or Contraction							
Expansion or contraction of Area III outer boundary	-	X	X	-	City and County	City and County	Sec. A.2.c.i
<b>POLICIES</b>							
Minor edits	-	X	-	-	City and/or County	All	Sec. A.3.
Major edits	-	X	X	-	City and/or County	All	Sec. A.3.
<b>TEXT</b>							
Plan and Program Summaries; Urban Service Criteria and Standards; Subcommunity and Area Plan section	-	X	X	X	City	All	-

<sup>1</sup> All: Members of the public, property owners, city staff, county staff, city approval bodies (Planning Board, City Council); county approval bodies (Planning Commission, Board of County Commissioners)  
City: city staff and approval bodies  
County: county staff and approval bodies  
Public: Members of the public including, but not limited to, property owners  
Property Owners: Owners of property subject to proposed change

## A. Types of Changes

### 1. Land Use Map Changes

#### Description

The Land Use Map is not intended to be a zoning map. Instead, it provides policy direction and definition for future land uses in the Boulder Valley.

#### Criteria

To be eligible for a Land Use Map change, the proposed change:

- a) on balance, is consistent with the policies and overall intent of the comprehensive plan;
- b) would not have significant cross-jurisdictional impacts that may affect residents, properties or facilities outside the city;
- c) would not materially affect the land use and growth projections that were the basis of the comprehensive plan;
- d) does not materially affect the adequacy or availability of urban facilities and services to the immediate area or to the overall service area of the City of Boulder;
- e) would not materially affect the adopted Capital Improvements Program of the City of Boulder; and
- f) would not affect the Area II/Area III boundaries in the comprehensive plan.

#### Decision-making

Land Use Map changes in Area I & II are a city decision, with call-up to the county as described in the referral & call up procedures. Changes in Area III are a city and county decision.

### 2. Area II/III Boundary Changes

#### a. Service Area Expansions and Contractions

##### i. Minor Adjustment to the Service Area (Area III-Rural Preservation to Area II)

#### Description

A minor adjustment to the service area boundary is a small, incremental service area expansion that creates a more logical boundary. A change in designation of land from Area III to Area II may be eligible to be approved as a minor service area boundary adjustment based on the following criteria:

#### Applicability

- a) **Maximum size:** The total size of the area must be no larger than ten acres. Residential areas larger than 10 acres may be considered if the area consists of substantially developed properties below the Blue Line along the western edge of the service area.
- b) **Minimum contiguity:** The area must have a minimum contiguity with the existing service area of at least 1/6 of the total perimeter of the area.

#### Criteria

- a) **Logical Service Area boundary:** The resulting Service Area boundary must provide a more logical Service Area boundary (Area III/II), as determined by factors such as:
  1. more efficient service provision,
  2. a more identifiable edge to the urbanized area or neighborhood,
  3. a more functional boundary based on property ownership parcel lines or defining natural features.

- b) **Compatibility with the surrounding area and the comprehensive plan:** The proposed change of Area III to II must be compatible with the surrounding area as well as on balance, the policies and overall intent of the comprehensive plan.
- c) **No major negative impacts:** It must be demonstrated that no major negative impacts on transportation, environment, services, facilities, or budget will result from an expansion of the Service Area.
- d) **Minimal effect on land use and growth projections:** The proposed change of Area III to II change does not materially affect the land use and growth projections that were the basis of the Comprehensive Plan.
- e) **Minimal effect on service provision:** The proposed change of Area III to II does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall Service Area of the City of Boulder.
- f) **Minimal effect on the city's Capital Improvements Program:** The proposed Area III to II change does not materially affect the adopted Capital Improvements Program of the City of Boulder.
- g) **Appropriate timing:** The proposed Area III to II change will not prematurely open up development potential for land that logically should be considered as part of a larger Service Area expansion.

### Decision Making

Minor Adjustments to the Service Area boundary are a city decision for areas five acres and under. For areas greater than five acres, the Board of County Commissioners may call-up a city decision for its review under the procedures described below.

## ii. Service Area Expansions: Planning Reserve (Area III-Planning Reserve to Area II)

### Description

The Area III-Planning Reserve is identified on the Area I, II, III map and includes approximately 500 acres of land outside the existing service area of the City of Boulder. The Area III-Planning Reserve is not currently eligible for urban services or annexation. This area was established at the conclusion of a comprehensive analysis of Area III; when city and county determined that only a small amount of Area III should be contemplated for future urban expansion, and then only if detailed planning for the area indicates community benefits exceed potential negative impacts. The area was chosen for its location and characteristics based upon the apparent lack of sensitive environmental areas, hazard areas and significant agricultural lands, the feasibility of efficient urban service extension, and contiguity to the existing Service Area, to maintain a compact community.

The Area III-Planning Reserve is that portion of Area III where the city intends to maintain the option of Service Area expansion for future urban development in response to priority community needs that cannot be met within the existing Service Area.

While Service Area expansion into the Area III-Planning Reserve may occur over time in several separate actions, it must result in a logical expansion of the Service Area. The needs of future generations should be considered any time a Service Area expansion of the Planning Reserve is contemplated.

### Baseline Urban Services Study Required

The City of Boulder will complete a baseline urban services study of the Area III-Planning Reserve prior to considering a service area expansion. The purpose of the study is to learn more about the feasibility and requirements to provide urban services to the area, and to understand potential phasing and logical areas of planning and potential expansion. The city may undertake preparing the baseline urban service study at any time for all or a portion of the Planning Reserve, and should include, but is not limited to an analysis and inventory of the existing infrastructure and service capacity (such as needed upgrades to the water, wastewater, and stormwater or facilities and distribution system, additional fire stations or

vehicles and police protection needs, transportation network connections, capacity of existing schools, urban parks), inventory of existing uses in the Area III-Planning Reserve, and identification of logical Service Area expansions (areas and/or phasing). The completed study will be reviewed by the Planning Board and accepted by the City Council.

### Service Area expansion process

#### a) Service Area expansion consideration

The city may consider a service area expansion into the Area III-Planning Reserve following acceptance of the baseline urban services study. Service Area expansion may occur at a mid-term or major update to the BVCP. At the beginning of each BVCP update, the Planning Board and City Council will hold a public hearing to determine if there is interest in considering a Service Area expansion as part of that update. If the city is interested in considering a Service Area expansion, a planning effort to solicit and identify priority community needs will begin. The city will hold public hearings and decide whether the identified needs are of sufficient priority based on the eligibility criteria below to warrant preparation of a Service Area expansion plan. Prior to the public hearings by the city, the identified needs will be referred to the county.

#### Criteria for Initiating a Service Area Expansion Plan

In order to initiate a service area expansion plan there must be sufficient community need. In determining whether there is sufficient community need, the city will consider the following factors:

- a. **Community Value:** Expansion will address a long-term community value as articulated in the Comprehensive Plan.
- b. **Capacity:** The need for a service area expansion cannot be met within the existing Service Area because there is not suitable existing or potential land/service capacity.
- c. **Benefit:** Expansion will benefit the existing residents in the Boulder Valley and will have a lasting benefit for future generations.

#### b) Service Area Expansion Plan

An expansion plan for priority community needs is anticipated to be similar in scope to an Area Plan, as described in the Comprehensive Plan and will be developed by the city in coordination with the county. If the city initiates preparation of a service area expansion plan, it will include, but not be limited to the following information:

- a. The location and amount of land area needed;
- b. Other uses that are needed or desired based on the identified needs;
- c. Conceptual land use and infrastructure plans, to ensure adequate facilities and services can be provided;
- d. General annexation requirements to further comprehensive plan goals and policies;
- e. Requirements and conditions for the city and the private sector for development, including on-site and off-site mitigation of impacts; and
- f. Anticipated development phasing.

#### Approval of a Service Area Expansion Plan

A service area expansion plan approval and change from Area III-Planning Reserve to Area II will consider the following:

- a. **Minimum size:** In order to cohesively plan and eventually annex by neighborhoods and to build logical increments for infrastructure, it is encouraged that the minimum size of the parcel or combined parcels for Service Area expansion be at least forty acres.
- b. **Minimum contiguity:** The parcel or combined parcels for Service Area expansion must have a minimum contiguity with the existing service area of at least 1/6 of the total perimeter of the area.

- c. **Provision of a community need:** Taking into consideration an identified range of desired community needs, the proposed change must provide for a priority need that cannot be met within the existing service area.
- d. **Logical extension of the service area:** The resulting service area boundary must be a logical extension of the service area. Factors used in making this determination include but are not limited to an efficient increment for extending urban services; a desirable community edge and neighborhood boundary; and a location that contributes to the desired compact urban form.
- e. **Compatibility with the surrounding area and comprehensive plan:** The proposed Area III-Planning Reserve area to Area II change must be compatible with the surrounding area and on balance, the policies and overall intent of the comprehensive plan.
- f. **No major negative impacts:** The Service Area Expansion Plan must demonstrate that community benefits outweigh development costs and negative impacts from new development and that negative impacts are avoided or adequately mitigated. To this end, the Service Area Expansion Plan will set conditions for new development, and it will specify the respective roles of the city and the private sector in adequately dealing with development impacts.
- g. **Appropriate timing for annexation and development:** A reasonable time frame for annexation is projected within the planning period after Area III-Planning Reserve area land is brought into the service area.

#### Decision-making

Initiating a service area expansion plan is a city decision. Approval of a service area expansion plan and change from Area III – Planning Reserve to Area II will be decided by the City and County.

### iii. Service Area Contractions (Area II to Area III-Rural Preservation Area)

#### Description

A Service Area contraction removes land from the city's Service Area, due to a change in circumstances.

#### Applicability

- a) **Minimum size:** No minimum or maximum size.
- b) **Minimum contiguity:** No contiguity required.

#### Criteria

Proposed changes from Area II to Area III-Rural Preservation Area must meet the following criteria:

- a) **Changed circumstances:** Circumstances have changed that indicate either the development of the area is no longer in the public interest, the land has or will be purchased for open space, or, for utility-related reasons, or the City of Boulder can no longer expect to extend adequate urban facilities and services to the area within 15 years.
- b) **Compatibility:** Any changes in proposed land use are compatible with the surrounding area and on balance, the policies and overall intent of the comprehensive plan.

#### Decision-making

Changes from Area II to Area III – Rural Preservation are a city and county decision.

### iv. Service Area Reinstatement (Area III – Rural Preservation Area back to Area II – Service Area)

The owner of property that has been moved from Area II to Area III may request that the change be reevaluated under the same procedures and criteria that were used to make such a change for a period ten years after the change was made. Thereafter, such properties will be subject to all of the procedural requirements of this section.

## **b. Area III Rural Preservation Expansions and Contractions**

### **i. Area III-Rural Preservation Area Expansions (Area III-Planning Reserve to Area III-Rural Preservation)**

#### **Description**

An Area III – Rural Reservation expansion removes land from the Area III – Planning Reserve, due to a change in circumstances.

#### **Applicability**

Land to be considered for a change from Area III-Planning Reserve to Area III-Rural Preservation must have a minimum contiguity with the Area III-Rural Preservation area of at least 1/6 of the total perimeter of the area.

#### **Criteria**

Expansion of the Area III-Rural Preservation Area must meet the following criteria:

- a) **Changed Circumstances:** There is a desire and demonstrated need for expansion of the Area III-Rural Preservation Area due to changed circumstances, community needs, or new information on land use suitability (e.g., environmental resource or hazard constraints, feasibility of efficient extension of urban services, and compact and efficient urban form).

#### **Decision-making**

Changes from Area III-Planning Reserve to Area III-Rural Preservation are a city and county decision.

### **ii. Area III-Rural Preservation Contractions (Area III-Rural Preservation Area to Area III-Planning Reserve)**

#### **Description**

An Area III – Rural Preservation contraction results in land being removed from rural preservation and identification as Area III – Planning Reserve, for potential future inclusion into the service area.

#### **Applicability**

Land to be considered for a change from Area III-Rural Preservation Area to Area III-Planning Reserve must have a minimum contiguity with the Area III-Planning Reserve area or the existing service area (Area I or Area II) of at least 1/6 of the total perimeter of the area.

#### **Criteria**

Contraction of the Area III-Rural Preservation Area must meet the following criteria:

- a) There is a demonstrated need for contraction of the Area III-Rural Preservation Area due to changed circumstances, community needs, or new information on land use suitability (e.g., environmental resource or hazard constraints, feasibility of efficient extension of urban services, and compact and efficient urban form)

#### **Decision-making**

Changes from Area III- Rural Preservation to Area III- Planning Reserve are a city and county decision.

### **c. Planning Area Expansions and Contractions**

#### **i. Boulder Valley Planning Area Expansions or Contractions**

##### **Description**

A Planning Area boundary expansion or contraction changes the outer boundary of the area of joint planning between the city and county.

##### **Applicability**

An Area III outer boundary change may be initiated by the city or the county.

##### **Criteria**

A Planning Area Boundary change must meet the following criteria:

- a) There is a demonstrated need that either expansion or contraction of the planning area is necessary due to changed circumstances or past error in determining the boundary.

##### **Decision-making**

Changes to the Planning Area Boundary are a city and county decision.

### **3. Policy & Text Changes**

#### **Description**

The policies of the Boulder Valley Comprehensive Plan are contained within Chapter III of the plan.

#### **Decision-making**

- a) Where the "county" alone is referred to in the policy, the policy may be amended by the county, after referral to the city.
- b) Where the "city" alone is referred to in the policy, the policy may be amended by the city, after referral to the county.
- c) All other policies will be construed to be joint city and county statements of policy, and are to be amended by joint action.
- d) Where a particular "area" is not specified in the policy text, the policy will apply to all areas.

## **B. Procedures for changes**

This section describes the process and procedures for approving proposed changes to the BVCP. There are four types of procedures for changing the plan:

1. Changes that may be considered at any time
2. Map-only Update
3. Mid-Term Update
4. Major Update

## 1. Changes that may be considered at any time

### i. Scope:

Changes that may be considered at any time include:

- Changes to the Land Use Map concurrent with rezoning, annexation, or adoption/amendment of a subcommunity or area plan
- Changes to the Subcommunity and Area Plan section (Ch. V)
- Changes to the Master Plan and Program summaries (Ch. VI)
- Changes to the Urban Service Criteria and Standards (Ch. VII)

### ii. Schedule and Process

A request initiated by the property owner concurrent with a rezoning, development application, or annexation application must be submitted in writing to the city's Planning Department and must address the criteria for processing the request separately from a plan update. All other changes must be initiated by the city or county.

### iii. Referrals

The city will make a referral with preliminary comments to the county Land Use Department for comment. For land use changes the county will have 30 days after receipt of the referral to provide written notice to the city as to whether the proposed change meets the criteria.

## 2. Map only update

Changes to the comprehensive plan Land Use Map and Area I, II, III Map may be proposed as otherwise provided for in this plan or in a map only update. A map only update may be initiated between mid-term and major updates as needed. The purposes of the map only update are to provide an opportunity for the city and county, as well as the public to request changes to the plan that do not involve significant city and county resources to evaluate, to clean up mapping discrepancies and to make minor adjustments to the service area boundary. The map only update is not intended to be a time to consider significant Land Use Map changes, or any policy changes.

Changes that may be considered during a map only update include:

- Changes to the Land Use Map in Area I or II.
- Minor Adjustments to the Service Area Boundary.

## 3. Mid-term Update

A mid-term update will be initiated at some point between major updates. The purposes of the mid-term update are to address objectives identified in the last major update and review progress made in meeting those objectives, provide an opportunity for the public to request changes to the plan that do not involve significant city and county resources to evaluate, and make minor additions or clarifications to the policy section. The mid-term update is not intended to be a time to consider major policy changes.

Changes that may be considered during a mid-term update include:

- Changes to the Land Use Map.
- Changes to the Area I,II,III Map.
- Planning Area boundary changes.
- Minor edits to the policy section (Ch. III).
- Minor text edits.

- Changes to the Subcommunity and Area Plan section (Ch. V).
- Changes to the Master Plan and Program summaries (Ch. VI).
- Changes to the Urban Service Criteria and Standards (Ch. VII).

#### 4. The Major Update

The comprehensive plan will be reviewed at least every 10 years for potential amendments to reflect changes in circumstances and community desires.

Changes that may be considered during a major update include:

- Changes to the Land Use Map.
- Changes to the Area I,II,III Map.
- Rural Preservation Area Expansions or contractions.
- Planning Area boundary changes.
- Edits to the policy section (Ch. III).
- Edits to the plan text.
- Changes to the Subcommunity and Area Plan section (Ch. V).
- Changes to the Master Plan and Program summaries (Ch. VI).
- Changes to the Urban Service Criteria and Standards (Ch. VII).

#### 5. Schedule & Process of Updates

- Schedule:** Prior to the beginning of each update, the city Planning Department and the county Land Use Department will establish a process and schedule for the update. The schedule and process will be revised as needed during the review process. The process will include an opportunity for landowners and the general public to submit requests for changes to the plan. During major updates, policy changes should precede map changes.
- Screening:** Proposed changes from the public, staff and approval bodies will be reviewed by the city Planning Department, which will prepare a recommendation in consultation with the county Land Use Department on which proposals should go forward and which proposals should receive no further consideration. The bodies will consider all requests for changes together with the staff recommendations at initial public hearings and will compile a list of proposed changes to be considered during the update based upon:
  - consistency with the purposes of the update as described above,
  - available resources to evaluate the proposed change (city and county staffing and budget priorities),
  - consistency with current BVCP policies, and
  - compatibility with adjacent land uses and neighborhood context.
- Further study & initiation of hearings:** After a list of proposed changes to be considered during the update has been determined, the city Planning Department and county Land Use Department will study, seek appropriate public input, and make recommendations concerning proposed changes. Requests for changes to the comprehensive plan that affect an area designated Open Space will be reviewed by the city Open Space Board of Trustees and the county Parks and Open Space Advisory Committee. The board of trustees will make a recommendation prior to any action on that change. The bodies will then initiate the hearings on whether to approve, modify or deny any of the proposed changes.

## C. Referral & Call-up Process

As part of the cooperative planning process, the City of Boulder and Boulder County have established the following referral process for certain types of land use and public improvements activity within the Boulder Valley. A referral is a written communication from the Planning Department of either the city or the county to the Planning Department of either the county or the city, respectively, in which there is contained either a request for or a response to a request for review and comment on the above-described.

Responses to all referrals will be based upon the Boulder Valley Comprehensive Plan, including all applicable policies, maps, and implementation documents, and applicable codes, agreements, ordinances, and resolutions of the respective jurisdictions.

All referral requests and responses of departments of the city and the county will be received, reviewed and communicated through the respective planning departments, with the understanding that referral responses may be reviewed by the Planning Board or Planning Commission and/or the City Council or Board of County Commissioners at the referee's discretion.

Complete referral responses will be made within 30 days of receipt. The referrer will consider all referral responses or the fact that there have been no responses before proceeding with the activity proposed.

The city will not grant or deny applications for out-of-city water and sewer permits for development activities in Area II unless it has first received a referral response from the county.

The Board of County Commissioners may call up the following city decisions:

- Minor adjustments to the service area boundary over 5 acres in size.
- Area II Land Use Map changes over 5 acres in size.

The call up provisions do not apply to enclaves, city-owned land, and properties along the western edge of the service area below the blue line. After approval of a city decision that is eligible for a call-up, the city planning department will notify the county planning department of the decision. If the Board of County Commissioners chooses to call-up the decision within 30 days of the final city decision, it will hold a public hearing to approve or deny the change within 60 days of the call-up decision. The Board of County Commissioners may approve or deny the change or approve and request the city modify the approval. Any change to the comprehensive plan that is a result of a call up by the county will be final upon approval by both the city and the Board of County Commissioners.

## D. Notification

Any property owner whose property would be affected by a proposed change in land use designation or by service area expansions, contractions or boundary changes will receive timely written notice that such change or changes will be considered. Planning staff will exert its best efforts to provide such notice within 30 days of receiving a request that is to be considered. However, no hearing to approve or deny any such proposal will be held unless planning staff notified the affected property owner in writing at least 30 days prior to the date set for the hearing on the proposed change.

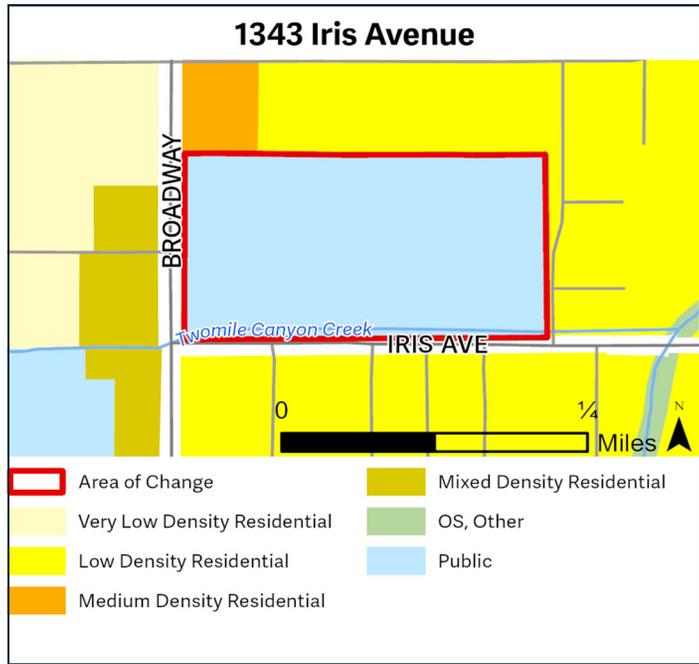
To provide general public notice, the city Planning Department will publish a Comprehensive Plan map indicating where the proposed changes are located and a description of each change at least ten days prior to the first public hearing to consider the proposed changes.

## E. Errors

If a discrepancy is found to exist within the Boulder Valley Comprehensive Plan that is clearly a drafting error, mapping discrepancy or a clerical mistake, either the city or the county, after a referral request to the other agency, may correct such error.

## Request #1

<b>Address:</b>	<b>1343 Iris Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB)
<b>Proposed Land Use:</b>	High Density Residential (HR); or Medium Density Residential (MR); or Low Density Residential (LR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

Boulder County is requesting a Land Use change for the County-owned property at 1333 Iris Avenue, on the northeast corner of the intersection of Broadway and Iris in North Boulder (North Broadway Complex). The County is suggesting a change from its current use designation, Public (P), to Residential (R) without specified zoning. This property is 17.5 acres including parking lots, 5 office buildings, a playground, paths and open field space. The County believes this property is ripe for residential use for three reasons: supporting space for housing needs by increasing supply for a growing front-range population, existing infrastructure for transportation and accessibility, and alignment with strategy and vision for the region.

There's been no more pressing conversation across Colorado (and Boulder County) than the need for housing. The Denver metro region "needs to build 511,000 units by 2050 to meet current and future housing needs" according to a June 2024 Regional Housing Needs Assessment produced by the Denver Regional Council of Governments (DRCOG.) This property, 17.5 contiguous acres within City limits on transit routes and with existing utilities to the site, offers significant opportunity to increase supply. While the County is not submitting a zoning preference for the property, this campus represents an opportunity for in-fill meeting affordable or attainable inventory needs including the possibility of units suitable for ownership or rent to own. Housing in Boulder County (and, more specifically,

the City of Boulder) remains amongst the most expensive in the State of Colorado and the United States overall. The Boulder County Community Foundation's Trends Report finds that the average median home value for Boulder County now tops \$713,000 and is substantially higher in the City of Boulder.

Ownership seems increasingly out of reach and is likely to pressure existing residents, the local economy and the viability of local employment and educational entities. One misconception in the affordable housing space is that affordable homes need to be single family style homes with a large yard. This location, on existing transit routes just north of downtown, is an opportunity to explore affordable or attainable ownership housing solutions for the community in other formats: potentially mixed use residential in a walkable area for families of all types who desire a potentially smaller footprint or shared amenities and greenspace. There is a wealth of knowledge in the housing space in the City and County of Boulder in government organizations, non-profit partners and the development community. Boulder County hopes organizations leverage these partnerships to explore the needs of the community.

This location on the Iris and Broadway corridor has the conditions to create a walkable and transit accessible neighborhood. There are two lines of existing transit, including RTD Skip and LF lines5, as well as two walking paths, Iris Path and Broadway Path. In addition, utilities exist to the site. Roughly 30% of the property appears to be in the 500 year flood plane, and less than 10% of the property appears to be in the 100 year flood plane. The flood appears to come from the Western property edge and then flow southeast to Iris Avenue. This proposal for land use change would allow a potential purchaser’s vision for residential development to continue exploration of highest/best use of the property in alignment with this comprehensive plan update and with City of Boulder permitting requirements.

Changing the land use for the North Broadway property aligns with long-term, comprehensive strategy of the region. It also aligns with recent feedback received by the community during this Comprehensive Plan Update process which focuses on the creation and enhancement of walkable neighborhoods. The Regional Housing Collaborative, Boulder County Housing Authority, and The City of Boulder have acknowledged the need for affordable low-, moderate-, and middle-income households; affordable is typically defined as household spending less than 30% of their income on housing. The Boulder County Regional Housing Plan in part calls for "securing land and development/redevelopment opportunities" which appear to align with the opportunity presented in shifting the land use of the North Broadway Complex property. Goals set by the Boulder County Regional Housing Partnership seek strategies for achieving the 12% regional affordable units goal which may leverage this property. One of the primary challenges to affordable housing is the high demand, with limited space available for new homes. While the ability and capacity of the local housing development market remains challenged by rising costs of land and construction, recent state and local legislation continue to pursue opportunities to address Boulder County housing needs (re: condo defect-related legislation, density considerations, etc).

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	

	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

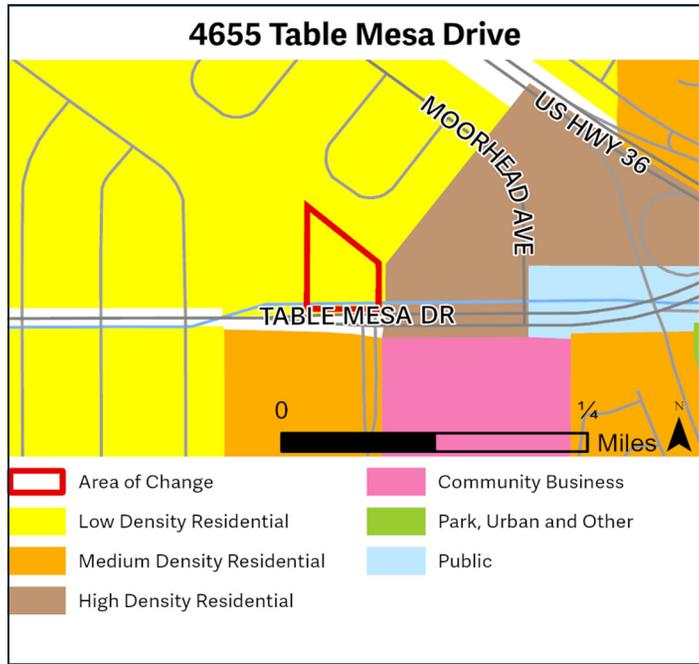
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the High Density Residential (HR), Medium Density Residential (MR) and Low Density Residential (LR) land use designations will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce residential development on the County-owned property to help address regional housing needs. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #2

<b>Address:</b>	<b>4655 Table Mesa Drive</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	High Density Residential (HR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

This underutilized RTD PnR would have far greater potential to serve the Boulder community if it was zoned High Density Residential. HDR zoning would be consistent with adjacent properties to the east that also have the high density (HR) land use, and, at 1.25 acres, the property is far too large for low density residential. Additionally, the site is extremely well served by transit with the flatiron flyer, DASH, 204, 206, and AB directly in front of the property. Thanks to its excellent transit connections, DOLA recognized the area as potential TOD in its HB-1313 TOC legislation maps. As Boulder responds to state requirements and meets its own needs and goals, this site is an excellent location for high density multifamily development, and also has strong potential for affordable housing, which would support RTD's Equitable TOD Policy. Lastly, with RTD as the landowner, any potential development at this site would be contemplated in coordination with the City of Boulder and local stakeholders to ensure it met local priorities and needs.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

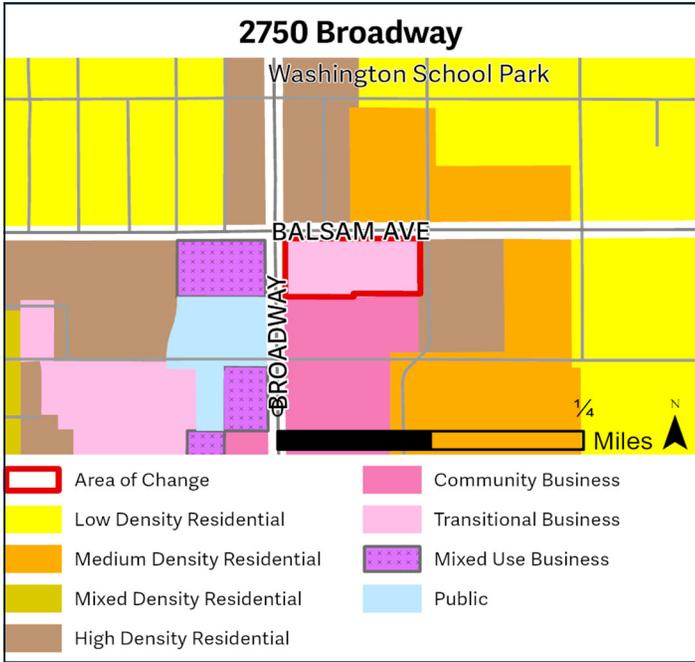
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the High Density Residential (HR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce additional residential development on an underutilized site to support housing and transit-oriented development goals. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

**Request #3**

<b>Address:</b>	<b>2750 Broadway</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Transitional Business (TB)
<b>Proposed Land Use:</b>	Community Business (CB)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



**Applicant Narrative:**

Boulder Medical Center has existed in its current location for over 75 years. However it is highly likely that Boulder Medical Center pre-dates the establishment of any Land Use Designation being applied to its property. The history of when and how Land Use Designations first came into being in the city is not available, so we can't be certain of how the Transitional Business (TB) designation came to be attached to the site. Anecdotally... In raising this point with the Planning Director, he said it would be reasonable to think that when the first Land Use Map for the city was created, someone drove by and said, well, it's a medical center so let's support that activity in the Land Use Map designation. Hence the Transitional Business designation.

In that time, the medical use and the use designation have had a good and healthy marriage. However, things change. Indeed the Center needs significant improvements to be a state of the art medical facility that can provide for the evolving needs of Boulder.

This cannot be done in the current location for many reasons – most significantly because the Medical Center is a designated Critical Facility. The structure sits within both the 500 year and the 100 year Floodplain Boundaries; much of it is ±9' below the Flood Protection Elevation required for the structure. Therefore floodproofing would be required if the center were to make the needed upgrades. Doing so – while also maintaining its

operations – is not feasible. Consequently, the Medical Center will have to relocate to a new site where such improvements can be accomplished.

**MEDICAL CENTER'S DEPARTURE FROM 2750 BROADWAY**

The current land use designation does not make sense for the property once the medical use is no longer the site's predominant activity. Upon the Center's departure the most appropriate future land use the property is Community Business (CB), the same designation as the remainder of the block, shared today with IDEAL BROADWAY SHOPS.

This designation would allow for the full block of the neighborhood center designation to the south to be applied to this highly accessible site. Once the site is cleared, it would be then possible to build a new facility meeting the city's floodplain regulations and eventually making it possible to provide high density housing directly adjacent to neighborhood shops and activity. And like the adjacent neighborhood center itself, the

Community Business designation would lead to a rezoning of the property to BC-2 where housing associated with Neighborhood Centers is encouraged. The city has a need for housing in this location, and the opportunity to maximize its potential on this site is greatly enhanced with the change proposed.

IDEAL BROADWAY SHOPS and the adjacent COMMUNITY PLAZA both have BC-2 zoning and are identified by Land Use Code Appendix N for Special Use Restrictions. But sites are constricted by floodplain regulations and likely landmarking limitations. Therefore this BMC site provides an opportunity to provide higher density housing adjacent to the Neighborhood Center that is not otherwise easily achievable.

**MEDICAL CENTER’S RELOCATION**

New medical facilities are expensive to build; land sufficient to support a medical center’s needs are difficult to find in Boulder – i.e. expensive. The medical center’s most significant tangible asset to provide for that upgrade is the land that it sits on today. Consequently, the funds raised from the sale of their existing land has to substantially provide for their new facility in Boulder. To better serve their existing clients, this would at best be somewhere near their current location, where land costs are extremely high.

Allowing for high density housing as a part of the Neighborhood Center would provide the most support for the financial needs of the Medical Center and significantly enhance its ability to provide for the needs of the Boulder Community for decades to come.

**BVCP POLICIES IN SUPPORT OF MAP CHANGE**

This request reflects changes to the physical conditions, supports the goals of the Plan &:

- Is on balance consistent with the policies & intent of the Plan;
- Has no cross-jurisdictional impacts outside of the city;
- Would not affect the growth projection basis of the Plan;
- Would not affect the provision of urban services to the area; &
- Does not affect the city’s Capital Improvements Program.

Principal 2015 BVCP policy supporting this request:

8.13 Support for Community Facilities

The city and county recognize the importance of educational, health, cultural and non-profit community agencies that provide vital services to the residents of the Boulder Valley and will work collaboratively with these agencies to reasonably accommodate their facility needs and consider location based on transportation accessibility or other needs.

Also:

3.22 Floodplain Management

7.10 Housing for a Full Range of Households

7.11 Balancing Housing Supply with Employment Base

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	

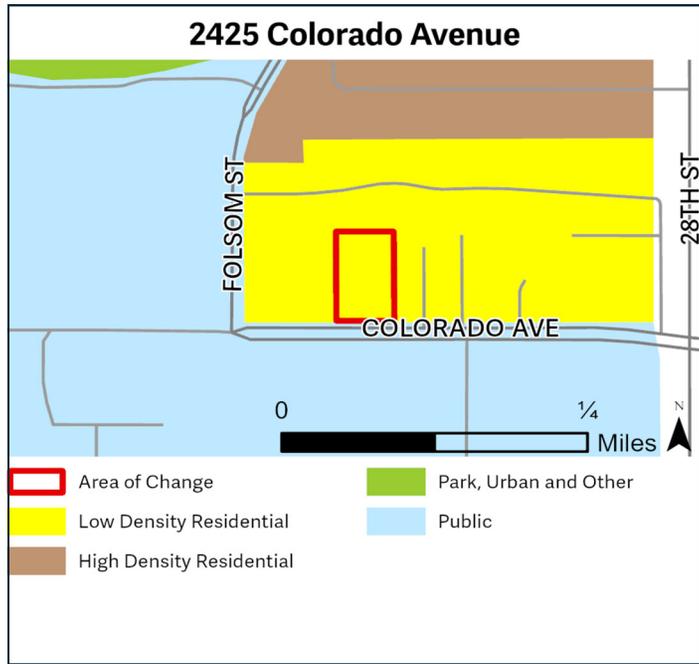
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Community Business (CB) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce a designation that supports future redevelopment of the site, including potential high-density housing adjacent to the neighborhood center, once the existing medical use relocates. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #4

<b>Address:</b>	<b>2425 Colorado Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	High Density Residential (HR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

This request is to change the land use designation for the St. Aidan's properties at 2425 Colorado Ave to allow greater flexibility and accommodate high density housing alongside its long-standing role as a faith-based community institution. St. Aidan's is uniquely located across from the University of Colorado Boulder campus, near transit, services, and employment centers. Its central location makes it well-suited to provide community-serving housing that supports Boulder's broader goals of equity, affordability, and sustainability.

The land use change would allow for thoughtfully designed residential development on the property that could deliver housing opportunities for low- and middle-income households, including students, staff, young families, and essential workers. These populations are increasingly priced out of Boulder's housing market, and creating affordable options near campus and transit will directly advance BVCP policies promoting inclusivity, community diversity, and equitable access to opportunity.

Allowing additional density on the St. Aidan's property also represents a more efficient use of centrally located, underutilized land. Many faith-based and non-profit properties like St. Aidan's have excess land area or facilities that no longer match contemporary needs. Updating the land use designation to enable residential development, in partnership with community-serving organizations, ensures these assets contribute to the greater public

good while preserving the long-term mission and presence of the institution.

This change also strengthens the financial sustainability of St. Aidan's. By allowing for compatible residential development, the congregation can create new pathways to maintain and invest in its facilities while continuing to provide worship, gathering, and outreach services that benefit the broader community. In this way, the land use change not only addresses Boulder's housing shortage but also safeguards the ongoing role of a valued community institution.

From a sustainability perspective, adding housing on the St. Aidan's property reduces the pressure for sprawl and supports climate goals by placing residents in a walkable, bikeable, and transit-served location. It integrates housing with existing infrastructure rather than expanding the city's footprint.

In summary, this land use designation change for the St. Aidan’s property advances multiple BVCP priorities:

- Housing Affordability and Choice: Creates opportunities for low- and middle-income households who are increasingly excluded from Boulder.
- Equity and Inclusion: Provides access to housing for students, workers, and families near services and employment.
- Sustainability: Promotes compact, efficient development in a central location with strong transit access.
- Community-Serving Institutions: Helps preserve in our location of ministry the presence and mission of St. Aidan’s while unlocking new community benefits.

St. Aidan’s is ready to serve as a partner in addressing Boulder’s most pressing housing challenges. With a land use designation that reflects this potential, the property can both continue its faith-based mission and contribute significantly to the city’s goals for a more affordable, equitable, and sustainable future.

**Screening Analysis:**

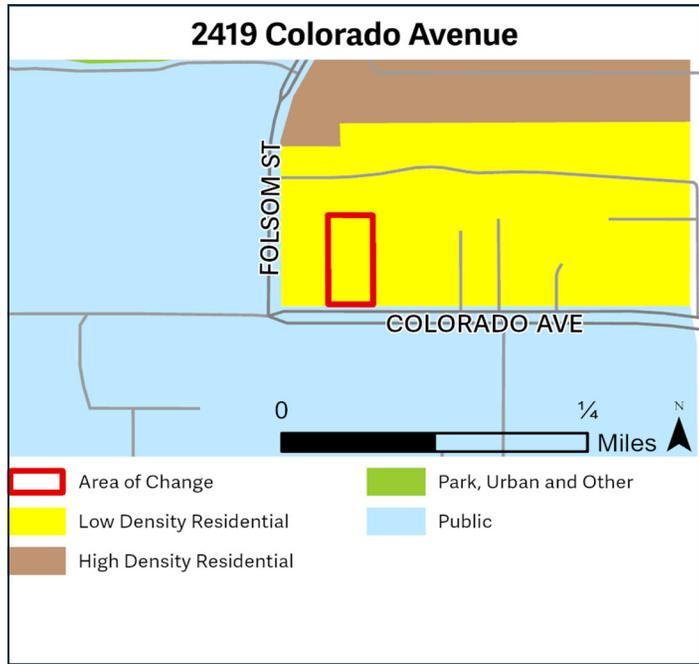
	<p><b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>            Accessible &amp; Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe</p>	<b>Yes</b>	<b>No</b>
		X	
	<p><b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>            Is the request within the policy level scope of the Comprehensive Plan?</p>	<b>Yes</b>	<b>No</b>
		X	
	<p><b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>            Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?</p>	<b>Yes</b>	<b>No</b>
		X	
	<p><b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>            Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?</p>	<b>Yes</b>	<b>No</b>
		X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the High Density Residential (HR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce additional residential development while retaining St. Aidan’s long-standing role as a faith-based community institution. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #5

<b>Address:</b>	<b>2419 Colorado Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	High Density Residential (HR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

This request is to change the land use designation for the St. Aidan's properties at 2419 Colorado Ave to allow greater flexibility and accommodate high density housing alongside its long-standing role as a faith-based community institution. St. Aidan's is uniquely located across from the University of Colorado Boulder campus, near transit, services, and employment centers. Its central location makes it well-suited to provide community-serving housing that supports Boulder's broader goals of equity, affordability, and sustainability.

The land use change would allow for thoughtfully designed residential development on the property that could deliver housing opportunities for low- and middle-income households, including students, staff, young families, and essential workers. These populations are increasingly priced out of Boulder's housing market, and creating affordable options near campus and transit will directly advance BVCP policies promoting inclusivity, community diversity, and equitable access to opportunity.

Allowing additional density on the St. Aidan's property also represents a more efficient use of centrally located, underutilized land. Many faith-based and non-profit properties like St. Aidan's have excess land area or facilities that no longer match contemporary needs. Updating the land use designation to enable residential development, in partnership with community-serving organizations, ensures these assets contribute to the greater public

good while preserving the long-term mission and presence of the institution.

This change also strengthens the financial sustainability of St. Aidan's. By allowing for compatible residential development, the congregation can create new pathways to maintain and invest in its facilities while continuing to provide worship, gathering, and outreach services that benefit the broader community. In this way, the land use change not only addresses Boulder's housing shortage but also safeguards the ongoing role of a valued community institution.

From a sustainability perspective, adding housing on the St. Aidan's property reduces the pressure for sprawl and supports climate goals by placing residents in a walkable, bikeable, and transit-served location. It integrates housing with existing infrastructure rather than expanding the city's footprint.

In summary, this land use designation change for the St. Aidan’s property advances multiple BVCP priorities:

- Housing Affordability and Choice: Creates opportunities for low- and middle-income households who are increasingly excluded from Boulder.
- Equity and Inclusion: Provides access to housing for students, workers, and families near services and employment.
- Sustainability: Promotes compact, efficient development in a central location with strong transit access.
- Community-Serving Institutions: Helps preserve in our location of ministry the presence and mission of St. Aidan’s while unlocking new community benefits.

St. Aidan’s is ready to serve as a partner in addressing Boulder’s most pressing housing challenges. With a land use designation that reflects this potential, the property can both continue its faith-based mission and contribute significantly to the city’s goals for a more affordable, equitable, and sustainable future.

**Screening Analysis:**

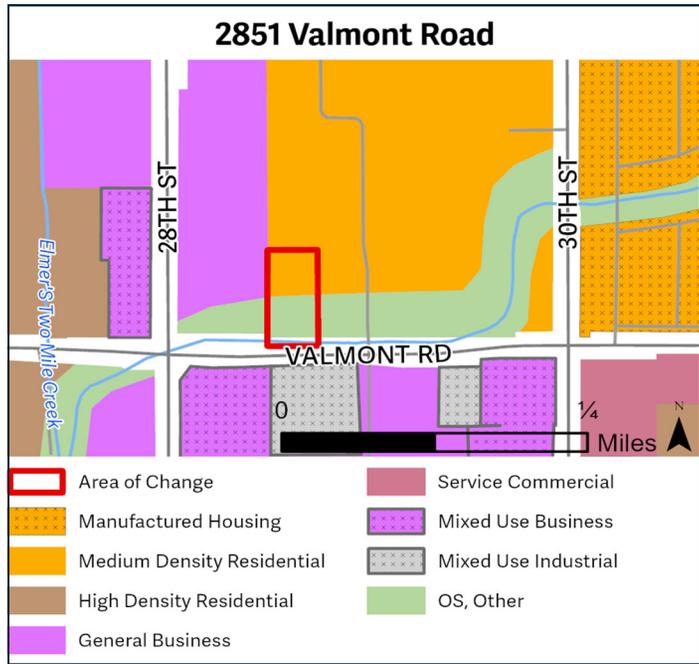
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the High Density Residential (HR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce higher-density residential development while retaining St. Aidan’s long-standing role as a faith-based community institution. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #6

<b>Address:</b>	<b>2851 Valmont Road</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Medium Density Residential (MR)
<b>Proposed Land Use:</b>	Mixed-Use Business (MUB)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

We are requesting a Land Use Designation from MR to MUB, per the 2020 Boulder Valley Comp Plan (the “Comp Plan”) for our property located at 2851 Valmont Road. The property is currently zoned RM-1 and was originally a single-family residence that included out-buildings. At that time, in the 1970’s and 1980’s, this area was more rural in character with lower density. For the past 35 years, the property was occupied by Sturtz & Copeland Florist & Greenhouse (our family business) up until the business was sold and relocated in 2023. Over the years, the growth and expansion of Boulder has bypassed the property with development that includes medium and high density residential, commercial and retail uses. The physical condition of the area has also changed, and Valmont Road is now better served by the transportation and infrastructure developed by the City for cars, bikes and pedestrian traffic. The infrastructure supports density and a mix of uses as Valmont now functions as an east/west connector from 55th Street to Folsom Street. The change of use will also allow future development that is more consistent with The City of Boulder future planning efforts as well as the Comp Plan. Below are some examples and sections from the Comp Plan and the shared Community Goals that support our request:

### Comp Plan Core Values:

- To create compact, contiguous development and infill that supports evolution to a more sustainable urban form;

- Neighborhood connectivity should align with the all-mode transportation system to make getting around without a car easy and accessible to everyone

Section 2- Built Environment. Encourage more sustainable Urban Form development that is compact with density in locations guided by the Land Use Map to create and support a variety of housing types, viable commercial opportunities and high frequency public transit. Allow for daily needs to be met within easy access from home, work, school, services or recreation without driving a car. MUB is consistent with this approach. Section 2.14- Mix of Complementary Land Uses, the city and county will strongly encourage, consistent with other land use policies, a variety of land uses in new developments. In existing neighborhoods, a mix of land use types, housing sizes and lot sizes may be possible if properly mitigated and respectful of neighborhood character. MUB is consistent with this approach.

Section 2.15 Compatibility of Adjacent Land Uses, the immediate area, especially along Valmont and 28th Street, consists of several COB zoning designations that are consistent with the MUB use.

Section 2.18 Boulder Valley Regional Center & 28th Street, the city will preserve and enhance the BVRC as a high-intensity regional commercial center while encouraging the addition of a variety of housing types. MUB is consistent with this approach.

Community Goals:

The Community Goals as stated below to help prioritize choices about the Boulder Valley's Future also align with our request for change of use to MUB:

- Accessible & Connected
- Environmentally Sustainable
- Economically Vital
- Livable
- Safe

We believe the MR use designation and RM-1 zoning along our section of Valmont is no longer viable, nor is it consistent with the Comp Plan, Community Goals, and City Planning. The change of use to MUB will allow future development to be more responsive to today's needs within the City of Boulder and our specific neighborhood. Thank you for your consideration.

**Screening Analysis:**

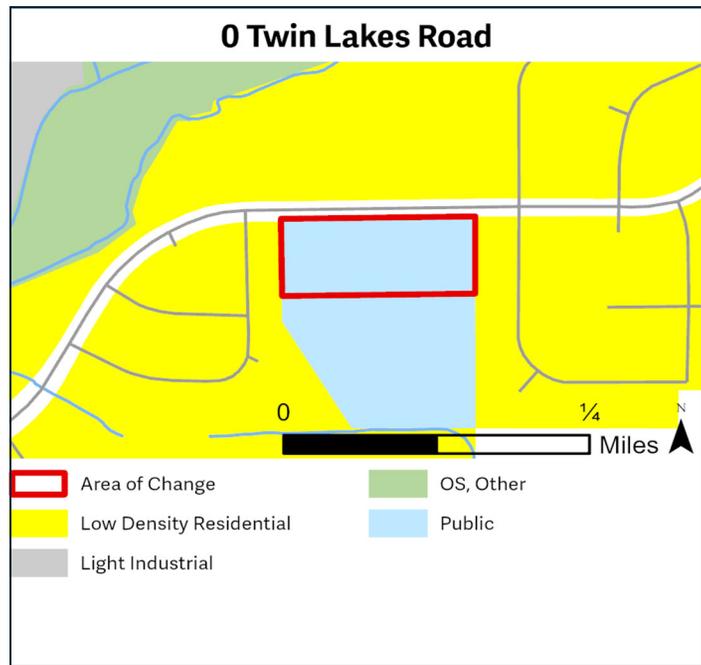
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Business (MUB) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce a designation that allows a mix of residential and commercial uses consistent with surrounding development along Valmont Road. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #7

<b>Address:</b>	<b>0 Twin Lakes Road.</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB)
<b>Proposed Land Use:</b>	Open Space- Acquired (OS-A)
<b>Staff Recommendation:</b>	No, do not consider further under the new draft Future Land Use Map



### Applicant Narrative:

In concert with 6655 Twin Lakes Road and 0 Kahlua Road, the property qualifies for open space according to the County's acquisition criteria. Parks and Open Space staff strive to acquire land that meets these criteria:

- Land threatened by development that is near or adjacent to existing open space
- Prime agricultural land
- Wildlife habitat
- Riparian and scenic corridors
- Land that could provide trail connections.

<http://www.bouldercounty.org/os/openspace/pages/acquisitions.aspx>

According to the County description of the existing Open Space:

In the 1960s, thanks to the nearby IBM plant and other commercial attractions, the Gunbarrel residential area grew up around the lakes. The lakes have been central to the Gunbarrel community from the beginning.

<http://www.bouldercounty.org/os/parks/pages/twinlakes.aspx>

As the community has grown, the need for additional open space to accommodate additional residents has grown with it. So has the need to better protect remaining natural values under siege from encroaching development on private land has grown with it.

Now is the time to protect this parcel and expand the existing Open Space. This request is submitted with parallel requests for the adjacent properties at 6655 Twin Lakes Road (9.97 acres), and 0 Kahlua Road (6.08 acres), which are located directly south of 6655 Twin Lakes Road. The two southern parcels are currently owned by Boulder Valley School District (the "BVSD parcels"). Thus, including this 3.97-acre 6650 parcel, the County, City, and community have a rare chance to expand Gunbarrel's magnificent Twin Lakes Open Space by a total of 17 acres. All three proposed properties are currently publicly owned. This unique opportunity for the 2015 BVCP Update is made possible by the County's purchase of 6655 in 2013, and the fact that BVSD has stated it has no plans to use 6650 or 0 Kahlua for School District purposes.

For more details on this Land Use Change Request, see item 1F from the 2015 Comprehensive Plan Update, and items 10-12 from the 2020 Update.

**Screening Analysis:**

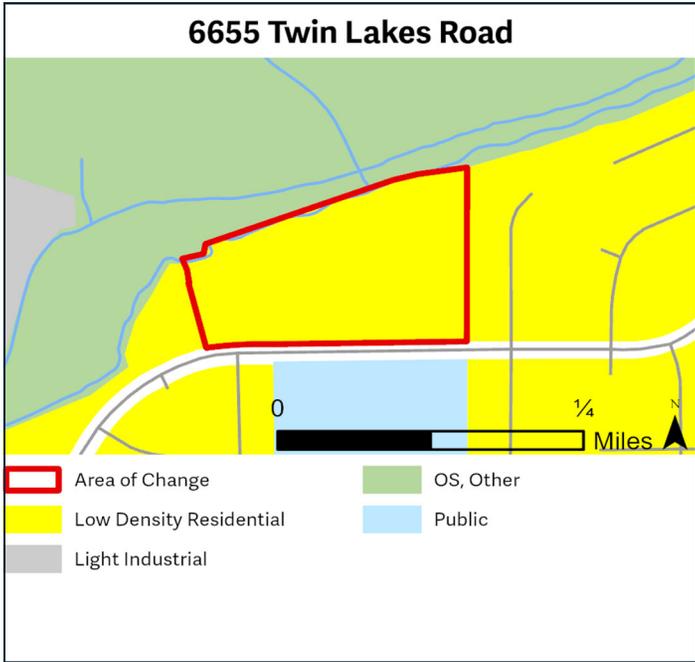
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	X
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	X

**Staff Recommendation: No, do not consider further under the new draft Future Land Use Map**

Staff does not recommend further consideration of this request within the context of the new draft Future Land Use Map. The request is generally inconsistent with the most recent draft policy and land use map direction. The parcel is in Area II (the area designated for urban services) and has been intended for annexation into the city since the 1970s. Urban services (i.e. water, wastewater, stormwater, roads, etc.) are available near the parcel. While the site has clear value to the adjacent neighbors for its scenic quality and other resource values, neither the county nor city has found the site to meet their respective criteria for open space designation or acquisition for broader community benefit.

**Request #8**

<b>Address:</b>	<b>6655 Twin Lakes Road</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	Open Space- Acquired (OS-A)
<b>Staff Recommendation:</b>	No, do not consider further under the new draft Future Land Use Map



**Applicant Narrative:**

The property is ideal for open space according to the County’s acquisition criteria: Parks and Open Space staff strive to acquire land that meets these criteria:

- Land threatened by development that is near or adjacent to existing open space
- Prime agricultural land
- Wildlife habitat
- Riparian and scenic corridors
- Land that could provide trail connections.

<http://www.bouldercounty.org/os/openspace/pages/acquisitions.aspx>

According to the County description of the existing Twin Lakes Open Space:

In the 1960s, thanks to the nearby IBM plant and other commercial attractions, the Gunbarrel residential area grew up around the lakes. The lakes have been central to the Gunbarrel community from the beginning.

<http://www.bouldercounty.org/os/parks/pages/twinlakes.aspx>

As the community has grown, the need for additional open space to accommodate additional residents has grown with it. So has the need to better protect remaining natural values under siege from encroaching development on private land. Now is the time to protect this parcel and expand the existing Open Space. This request is submitted with

parallel requests for the adjacent properties at 6650 Twin Lakes Road (3.95 acres) and 0 Kalua Road (6.08 acres), which are located directly south of 6655 Twin Lakes Road. The two southern parcels are currently owned by Boulder Valley School District (the “BVSD parcels”). Thus, including the 9.97-acre 6655 parcel, the County, City, and community have a rare chance to expand Gunbarrel’s magnificent Twin Lakes Open Space by a total of 17 acres. All three proposed properties are currently publicly owned.

See our Land Use Change Requests 1E in the 2015 Comprehensive Plan Update, and items 10-12 in the 2020 Update, for additional details on this request.

**Screening Analysis:**

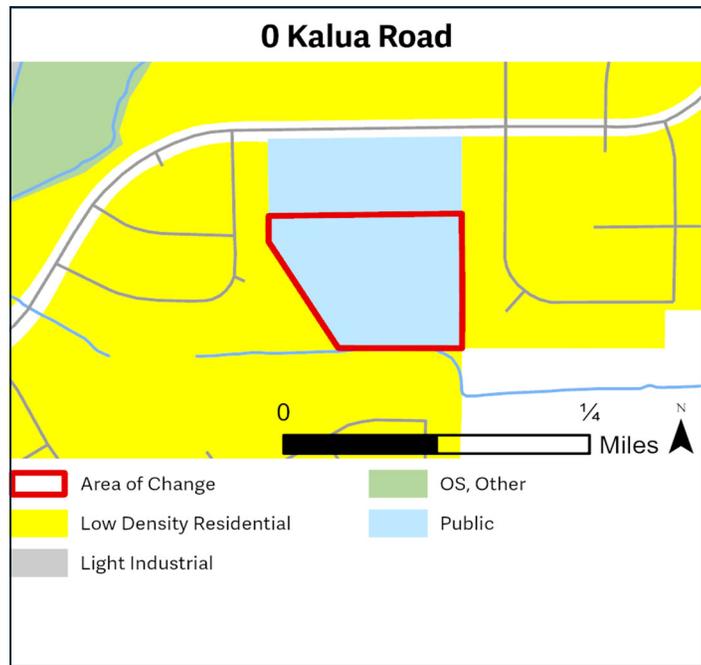
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe		X
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?		X

**Staff Recommendation: No, do not consider further under the new draft Future Land Use Map**

Staff does not recommend further consideration of this request within the context of the new draft Future Land Use Map. The request is generally inconsistent with the most recent draft policy and land use map direction. The parcel is in Area II (the area designated for urban services) and has been intended for annexation into the city since the 1970s. Urban services (i.e. water, wastewater, stormwater, roads, etc.) are available near the parcel. While the site has clear value to the adjacent neighbors for its scenic quality and other resource values, neither the county nor city has found the site to meet their respective criteria for open space designation or acquisition for broader community benefit.

## Request #9

<b>Address:</b>	<b>0 Kalua Road</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB)
<b>Proposed Land Use:</b>	Open Space - Acquired (OS-A)
<b>Staff Recommendation:</b>	No, do not consider further under the new draft Future Land Use Map



### Applicant Narrative:

In concert with 6655 Twin Lakes Road and 6650 Twin Lakes Road, the property qualifies for open space according to the County's acquisition criteria: Parks and Open Space staff strive to acquire land that meet these criteria:

- Land threatened by development that is near or adjacent to existing open space
- Prime agricultural land
- Wildlife habitat
- Riparian and scenic corridors
- Land that could provide trail connections.

<http://www.bouldercounty.org/os/openspace/pages/acquisitions.aspx>

According to the County description of the existing Open Space:

In the 1960s, thanks to the nearby IBM plant and other commercial attractions, the Gunbarrel residential area grew up around the lakes. The lakes have been central to the Gunbarrel community from the beginning.

<http://www.bouldercounty.org/os/parks/pages/twinlakes.aspx>

As the community has grown, the need for additional open space to accommodate additional residents has grown with it. So has the need to better protect remaining natural values under siege from encroaching development on private land has grown with it.

Now is the time to protect this parcel and expand the existing Open Space. This request is submitted with parallel requests for the adjacent properties at 6655 Twin Lakes Road (9.97 acres), and 6650 Twin Lakes Road (3.97 acres), which are located directly south of 6655 Twin Lakes Road. The two southern parcels are currently owned by Boulder Valley School District (the "BVSD parcels"). Thus, including this 6.08-acre 0 Kalua Road parcel, the County, City, and community have a rare chance to expand Gunbarrel's magnificent Twin Lakes Open Space by a total of 17 acres.

For more information on this Land Use Change, please refer to item 1G in the 2015 Comprehensive Plan Update, and items 10-12 in the 2020 Update.

**Screening Analysis:**

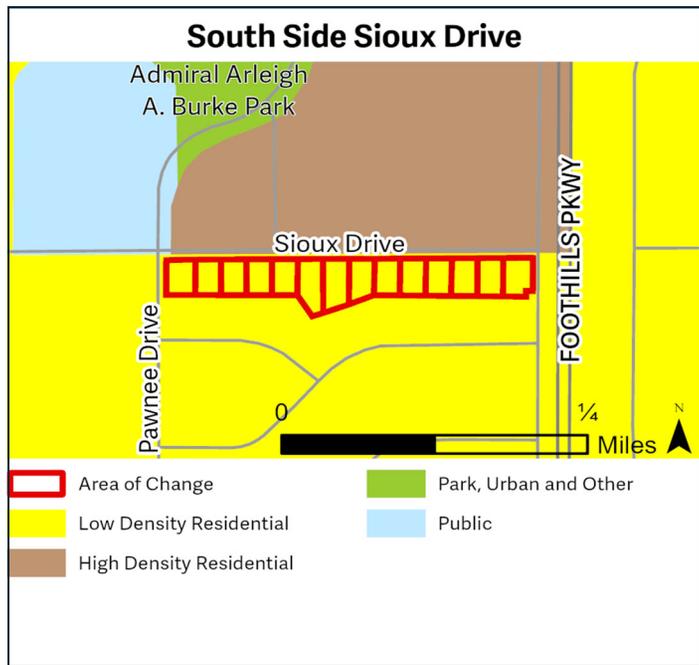
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe		X
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?		X

**Staff Recommendation: No, do not consider further under the new draft Future Land Use Map**

Staff does not recommend further consideration of this request within the context of the new draft Future Land Use Map. The request is generally inconsistent with the most recent draft policy and land use map direction. The parcel is in Area II (the area designated for urban services) and has been intended for annexation into the city since the 1970s. Urban services (i.e. water, wastewater, stormwater, roads, etc.) are available near the parcel. While the site has clear value to the adjacent neighbors for its scenic quality and other resource values, neither the county nor city has found the site to meet their respective criteria for open space designation or acquisition for broader community benefit.

## Request #10

<b>Address:</b>	<b>Sioux Drive between Pawnee Drive and Thunderbird Drive</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	Medium Density Residential (MR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

Sioux Drive between Pawnee and Thunderbird separates two substantially different land use/zoning designations. The south side of the street has a Low Density Residential land use and the north side is High Density. The south side is zoned RE and the north side is zoned RH-5.

This difference in land use and zoning creates two very different urban and suburban forms that are incompatible without some mediating zone or at least a much wider right-of-way. Their juxtaposition across a typical residential street is incongruous.

I propose changing the lots on the south side of Sioux Drive to medium density residential land use and RM-1 zoning. Here is my rationale:

Existing Condition:

Frasier is currently in site review to vacate Ponca Place and construct a very large addition - the bulk of which is parallel to Sioux and tight to the 25' setback line. The proposed structure would be more than 450 feet in length and 55 feet tall with four stories over a partially below grade parking structure.

On the south side of the street are small detached single family structures, most only a single story and some less than 15 feet at the ridge of the roof.

### Land Use Current:

High Density Residential land use and RH-5 zoning north of Sioux allows most of what Frasier is proposing (although 55 feet is outside the by-right allowable height). Frasier has proposed vacation of the Ponca right-of-way to allow them to make their campus and structures even larger.

Low Density Residential land use and RE zoning south of Sioux allows only single family detached structures. Duplex structures are allowed within the RE zone only if the lot size provides 7,500 sf per dwelling unit. The majority of the lots on the south side of Sioux are non-conforming and only about 11,000 sf. As a result, duplexes cannot be constructed there.

### Land Use Change Proposed South Side of Sioux:

A Medium Density land use and RM-1 zone designation on the south side of Sioux would allow a narrow strip of slightly more dense housing between the RH-5 zone north of Sioux and the RE zone that would remain on the north side of Ricara and Shawnee.

The Medium Density land use and RM-1 zone designation would allow duplexes and even, potentially, small triplexes on the 11,000 sf lots on the south side of Sioux. This would allow two and three story structures. With the current RE zone an 11,000 sf lot could have a house of 4,222 sf in floor area and lot coverage of 3,166 sf. The house could be a maximum of 29.7 feet tall (due to the non-conforming lot size).

With an RM-1 zone designation a triplex structure would require a minimum of 6,000 sf of open space. There would be no maximum floor area. The maximum building height would be 35'. The RM-1 zone would eliminate bulk plane, side wall articulation and solar access requirements. This would open the possibility for duplex/triplex townhomes or stacked flats along Sioux. And while these structures might be larger than the single family structures on Ricara and Shawnee they wouldn't be significantly different. They would be a good "middle ground" between the urbanity of Frasier's site and the suburban character of the remainder of the Keywaydin neighborhood.  
Missing Middle:

Boulder is a city of primarily existing single family detached dwellings. It is becoming city of more dense, large multi-family housing. With the exception of maybe Whittier and University Hill, it is lacking in all of the other housing types that might support the "missing middle." See Image A (credit to Opticos Design Inc.) The proposed land use change might provide the opportunity for missing middle housing. I don't think many people will find it desirable to live in a small detached single family suburban home on the south side of Sioux across the street from a structure of the scale Frasier is proposing. See Images B, D and F that illustrate the existing and/or forthcoming condition. Image D shows a cross section through Frasier's proposed structure, the structure at 4700 Sioux and the structure at 4755 Shawnee. Image F shows the single family houses on the south side of Sioux superimposed on Frasier's planned expansion on the north side.

Two or three story duplex/triplex structures would be a better planning fit across the street from Frasier and probably more appealing to the people who would want to live across the street from such a large urban structure. See Images C and E showing a proposed intermediate zone of medium density housing. Image E shows a similar cross section as Image D but with a medium density triplex at 4700 Sioux Drive. I believe the requested land use change and concomitant zone change illustrated in Image C and Image E, would be a better planning solution to the issue of incompatible land uses on opposite sides of Sioux Drive and provide more diversity in housing types for different households with little or no impact on adjacent existing land uses. These structures could provide more housing for the "missing middle" in Boulder.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Medium Density Residential (MR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce medium-density residential development in a neighborhood where high density housing exists directly north of Sioux Drive. The properties are well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #11

<b>Address:</b>	<b>2810 Olson Drive</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	Mixed Density Residential (MXR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

The neighborhood is surrounded by higher density. It is also well served by public transportation options.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

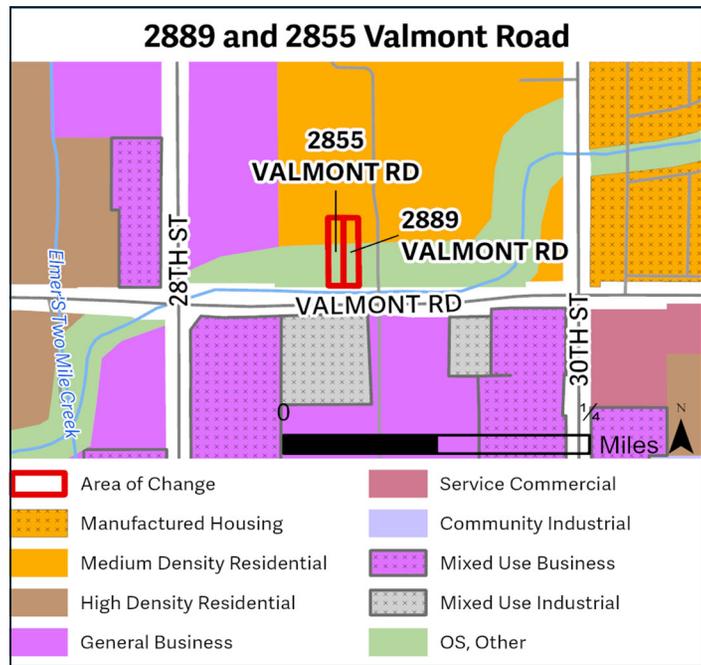
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Density Residential (MXR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce medium-density residential development in a neighborhood currently surrounded by higher-density uses. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #12

<b>Address:</b>	<b>2855 &amp; 2889 Valmont Road</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Open Space – Other (OS-O); Medium Density Residential (MR)
<b>Proposed Land Use:</b>	Mixed-Use Business (MUB)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

This is a request to change the current Boulder Valley Comprehensive Plan (comp plan) designation on the properties at 2855 and 2889 Valmont Road from Mixed Use Residential (MR) to Mixed Use Business (MUB). The Boulder Valley Medical Center owns and occupies the existing buildings on the two properties and has been in operation for 52 years in Boulder (38 years at this location). The current RM-1 zoning allows for the continued use but a business zoning district would be more consistent with the existing use. The MUB comp plan designation would allow for a business zoning that is more conducive to the existing use and possible future expansion.

The Valmont Road corridor continues to rapidly change and now functions as an important connector in Boulder from 55th Street to 28th Street. The City has significant commitments to transportation and infrastructure improvements that can support additional density and mixed uses in the area.

The MUB comp plan designation is consistent with and furthers the City's core values to create compact, contiguous development and infill that supports evolution to a more sustainable form and neighborhood connectivity. The proposed comp plan designation is also compatible with the neighboring properties along Valmont Road that already have business zoning. Thank you for your consideration.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

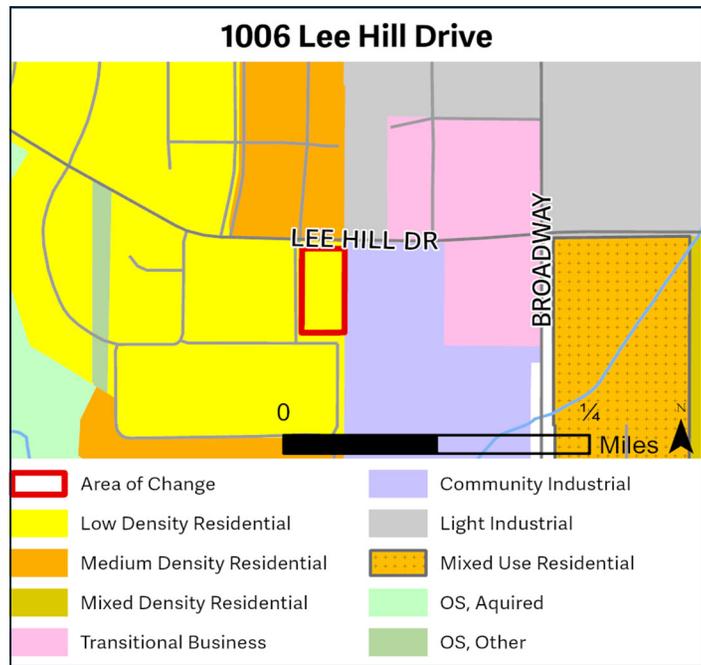
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Business (MUB) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce a designation that aligns with the existing medical and business uses on the properties and allows for potential future expansion. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #13

<b>Address:</b>	<b>1006 Lee Hill Drive</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	Mixed-Density Residential (MXR) or Medium-Density Residential (MR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

1006 Lee Hill Dr is a .95 acre parcel located on the southeast corner of 10<sup>th</sup> & Lee Hill Dr. bound by Zamia Ave to the south, 10<sup>th</sup> St to the west, Lee Hill Dr to the north & the CDOT highway maintenance facility to the east. The current land use designation for the site is Low Density Residential (LR) which generally allows for 2-6 units per acre. The site is currently zoned RL2 which likely needs to be amended given the change in circumstance surrounding the parcel.

RL2 was explicitly excluded from the zoning and use code updates that were part of the Family Friendly Vibrant Neighborhoods (FFVN) project which “continued to evaluate the land use code for other modifications that could remove zoning barriers to housing units that are smaller, modest sized units, typically referred to as ‘missing middle’ housing, with a focus on transit corridors & walkable areas near downtown & neighborhood centers.” The reason for RL2’s exclusion as stated by Karl Guiler at the City Council Meeting on 4/25/24: “RL2 was not included in the FFVN report because it’s a little more complicated when it’s open space per dwelling unit and many of the dwelling units are actually in Planned Unit Developments or discretionary approvals from the past that would require amendments. We’re looking to hire a planner to do more analysis of RL2 and we didn’t want to make any changes before that analysis was done.” I followed up with Karl on 6/6/25 and was informed that the city does not have the staff resources to advance changes to the RL2

zoning district and that it was not going to be addressed in the BVCP update. He further explained the technicalities of the zoning district “in that most properties are governed by Planned Unit Developments (PUD), which are legally bound rights to how the properties were developed. Making changes to these PUDs is very involved from a technical and legal perspective.” No small task!

However, 25 parcels (see attachment) are outliers to adjacent PUD’s. About half these parcels are churches, schools, or clubs and could have been constructed on parcels allocated to such uses as part of a PUD. However, there are 7 parcels of interest that appear to have never participated in the surrounding development. These parcels represent the opportunity to fulfill the intent of the FFVN within the RL2 zoning district and the solution could be to simply re-zone these parcels to what the city desires in their respective locations.

1006 Lee Hill Dr was annexed into the city in the 90s and was presumably given an RL2 zoning designation as part of a broader initiative to convert industrial land to residential on the west side of the Broadway neighborhood center. Large parcels were redeveloped over the years, the

former Boulder County Maintenance Facility immediately south and west of the subject property being the last large parcel to develop in 2016. The developer clustered open space south of Zamia and created a bifurcated outcome.

South of Zamia Ave, the single family homes have a typical LR presentation with 5 units per acre. These single family homes are 1600-2000sf with prices from \$1.3m-1.5m placing them in the upper tier just shy of luxury homes. West of the subject property, single family homes have a presentation more typical of MR at 9 homes per acre. These homes are 1600-2000sf and priced from \$1.25m-1.45m. Given that 10<sup>th</sup> St would likely be the primary 'front' of the subject property under a redevelopment scenario, it would be reasonable to 'book match' the density on both sides of 10<sup>th</sup> St however the size and price of the units still makes them unattainable to the middle market and priced higher than the standard home in Boulder. North of the subject property, single family homes on both sides of 10<sup>th</sup> St from Lee Hill Dr to Lykins Ave present as typical MR at 8 homes per acre. The larger homes on smaller lots puts size at 1500-2500sf and pricing at \$1m-1.3m which aligns with the median home value in Boulder but is still generally considered unattainable by the middle market. Things get interesting on 10<sup>th</sup> St between Lykins Ave & Chinle Ave, where single family homes, duplex's & triplex's present like MXR at 20 units per acre. Homes along 10<sup>th</sup> St between Lykins Ave and Chinle Ave have sizes from 800-1800sf and price points from \$350k-\$850k which exemplifies middle market housing while maintaining compatibility in form with the adjacent mix of residential densities.

Considering the subject site's proximity to a walkable neighborhood center, transportation corridors, multi-use paths, open space & parks, it's an ideal location to meet the objectives of FFVN & the BVCP to bring balance and diversity to Boulders housing stock. In the theme of 'A Boulder Future' I'd like to request a land use designation of Mixed Density Residential with the vision of filling the need for affordable & middle market housing by placing a multiunit along Lee Hill Dr plus single family, duplex, and triplex homes along 10<sup>th</sup> St.

**Screening Analysis:**

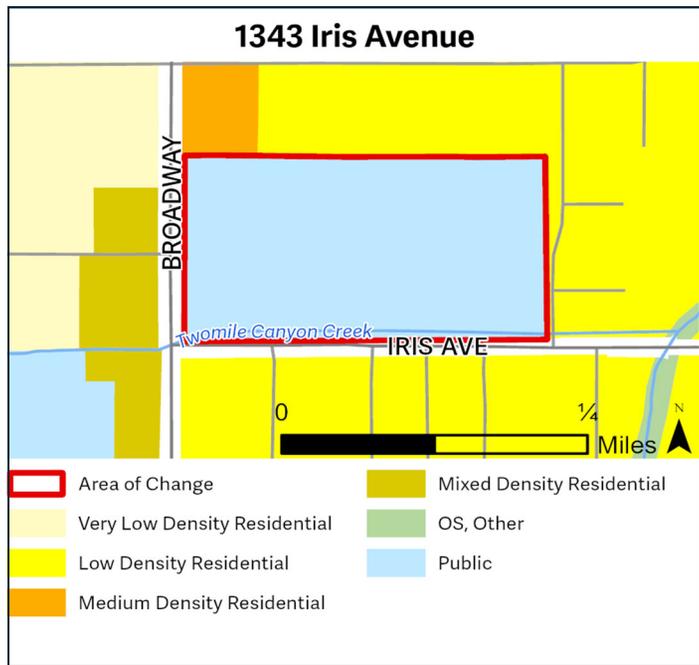
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Density Residential (MXR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to increase housing diversity on the property while maintaining compatibility with surrounding development patterns. The site is well-connected to existing transit, bikeways, and neighborhood services, supporting compact, efficient development that aligns with Boulder’s housing objectives. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #14

<b>Address:</b>	<b>1343 Iris Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB)
<b>Proposed Land Use:</b>	Mixed Use Transit-Oriented Development (MUTOD)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

Boulder County is the current owner of this land. This change request competes with their change request. This request is for a more specific type of land use, compared to theirs. My request is for the land to be zoned Mixed Use Transit- Oriented Development (MUTOD), which is a formal designation of the BVCP, but was not an option in this web form.

This land is adjacent to several bus lines, with the Skip dominant, the 208 providing east-west travel, and the line to Lyons going north. It is therefore very accessible to transit and should have a mixed land use, with both various housing types and retail and other commercial uses. The commercial uses will serve adjacent neighborhoods as well as providing services or products that people can utilize through non-automotive transport.

Boulder needs this kind of development because we officially seek to reduce our carbon footprint. We cannot achieve that through our current system of mandatory car dependency. We must provide both alternative transportation and land uses that depend much less on automobile travel.

The land use should specify that there will be minimal automobile parking with the intent of most access being by walking, bicycling, bus, and the various new forms of micro-mobility.

Automobile parking will exist but will be priced separately from individual property units.

Neighborhoods adjacent to this property are considered among the least walkable in Boulder. Adding commercial uses here will help address that problem.

We need this kind of development also because we seek to provide a bigger supply of affordable or “attainable” housing, especially missing-middle housing. So this parcel should not get a zoning that results in high-priced housing; i.e., single-family zoning.

Housing types will predominantly service lower-middle and middle-income households, which means they will rent or sell at attainable or affordable prices. Some will be duplex, triplex, or quadplex with private areas of lawn and garden. Some will be medium density condos. Some will be high density apartments. There is no need for single-family zoning on this property.

All "open space" requirements in current zoning will be satisfied by permanent dedication of the eastern half of the property to public recreational use. Although the current use is baseball, that zoning can allow other sports and even a public park, playground, and picnic tables.

The sale of this county property provides a fabulous opportunity to advance Boulder's official environmental and housing goals. (But the sale is premature. The government planning should occur before the sale so potential buyers know in advance what uses are allowed.)

**Screening Analysis:**

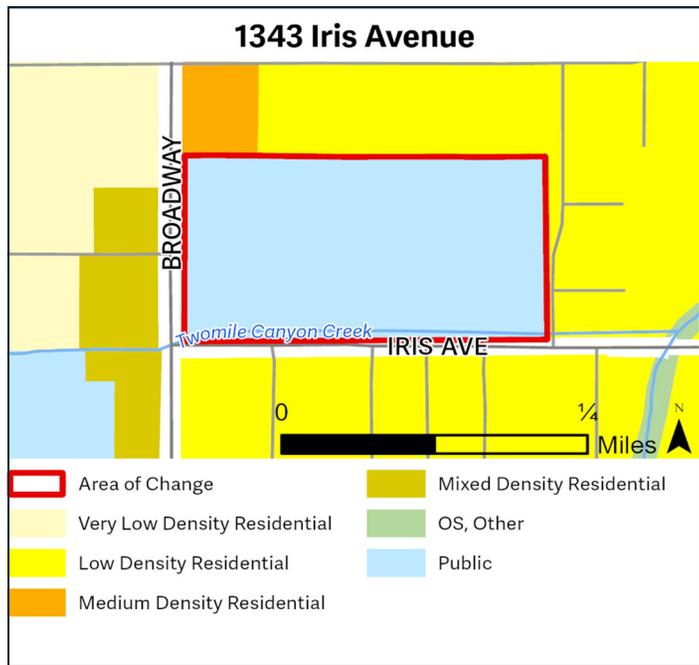
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Transit-Oriented Development (MUTOD) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to support a mix of residential, commercial, and public recreational uses in a transit-accessible location. The site is adjacent to multiple bus lines, is well-connected to neighborhood services, and can provide a range of housing types. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #15

<b>Address:</b>	<b>1343 Iris Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB)
<b>Proposed Land Use:</b>	Mixed Use Residential (MUR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

The Boulder County Commissioners' plan to sell this property creates an excellent opportunity to address the acute shortage of attainable housing for middle income residents, in a way that reduces the need for automobile use - in line with our climate action goals.

This area is ready-made for transit-oriented development, with the Skip, 208 and Lyons busses running immediately adjacent, and the 204 within reasonable walking distance. The planned safety improvements to Iris Avenue will make walking and bike use attractive to residents of this future neighborhood.

I live adjacent to the Iris-Broadway property, in the Melody-Catalpa neighborhood. Though I enjoy the transit options mentioned above, my neighborhood is considered among the least walkable in Boulder. I would look forward quick, no-car access to cafes, shops and services that might be part of a nearby new residential-commercial neighborhood.

I would like development of this property to be focused on the west side, preserving the public use designation on the east. This segment could provide a picnic area, playground and gardens, while preserving the much-beloved Little League fields that have existed there for decades. This "new" park would provide a vibrant amenity for both residents of

new housing on the west side of the property and for adjacent older neighborhoods.

I strongly feel that Boulder does NOT need more detached single-family or high-end (3K+ sq.ft. houses or luxury condos) housing. Any residential development on the parcel at Iris and Broadway should be created for middle income folks – singles, couples, or families – who fill essential jobs in Boulder but have difficulty affording a place to live.

Thank you for considering a changed land-use designation at northwest Broadway & Iris that will help address Boulder's interconnected housing, transit and climate goals

**Screening Analysis:**

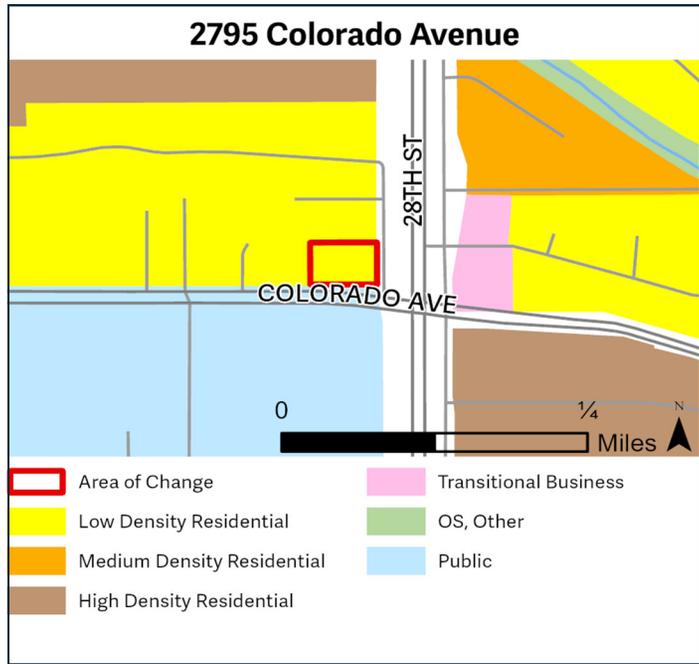
	<p><b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>                  Accessible &amp; Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe</p>	<p><b>Yes</b></p>	<p><b>No</b></p>
		<p>X</p>	
	<p><b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>                  Is the request within the policy level scope of the Comprehensive Plan?</p>	<p><b>Yes</b></p>	<p><b>No</b></p>
		<p>X</p>	
	<p><b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>                  Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?</p>	<p><b>Yes</b></p>	<p><b>No</b></p>
		<p>X</p>	
	<p><b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>                  Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?</p>	<p><b>Yes</b></p>	<p><b>No</b></p>
		<p>X</p>	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Residential (MUR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to support a mix of residential, commercial, and public recreational uses in a transit-accessible location. The site is adjacent to multiple bus lines, is well-connected to neighborhood services, and can provide a range of housing types, while minimizing automobile dependence. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #16

<b>Address:</b>	<b>2795 Colorado Avenue</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	High Density Residential (HR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

Change the land use designation for our property to high density residential

Justification: This change would better align faith-based and non-profit properties along Colorado Avenue with Boulder's housing and community goals. These sites are uniquely located across from CU Boulder and along a key transit corridor, making them potentially well-suited for thoughtfully designed housing that supports students, staff, faculty, young families, and essential workers who are increasingly priced out of Boulder.

Allowing more density on these properties maximizes community benefit, promotes equity and inclusion, and advances sustainability by placing housing in walkable, bikeable, and transit-rich areas. It also ensures the long-term presence of our faith-based institutions by creating opportunities to serve the broader community while sustaining our spiritual and service missions.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

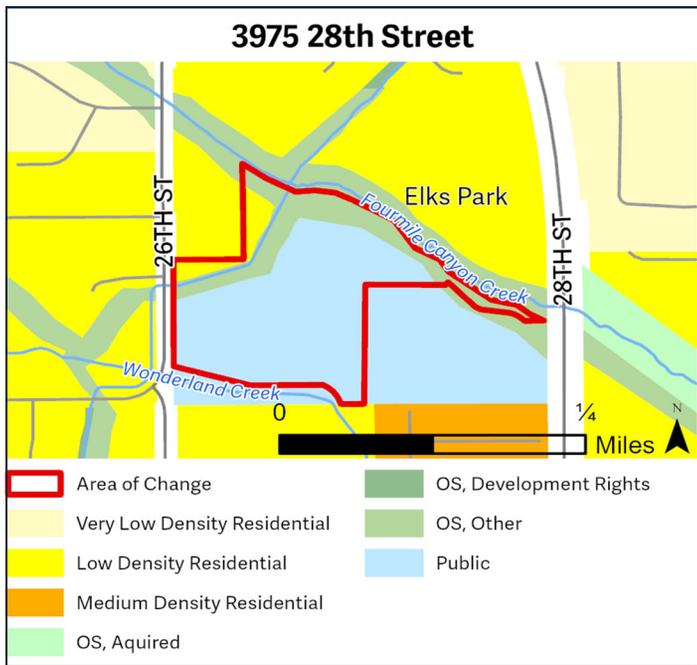
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the High Density Residential (HR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to allow higher-density residential development on a faith-based and non-profit property along Colorado Avenue. This site is well-located across from CU Boulder and near transit, services, and employment centers, making it suitable for thoughtfully designed housing for students, staff, faculty, young families, and essential workers. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #17

<b>Address:</b>	<b>3975 28<sup>th</sup> Street</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Public (PUB); Open Space – Other (OS-O); Low Density Residential (LR)
<b>Proposed Land Use:</b>	Medium Density Residential (MR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

The Elks Club in North Boulder has a long history of providing a quasi-public property and swimming pool for the use of Boulder’s citizens. Multiple forces have changed the composition and leadership of the Elks in Boulder. This has led to a reevaluation of the possible uses of its facilities and how an Elks property land use change could potentially fit into the surrounding Boulder landscape. It is a change to the future land use which has led to this request.

This request for a revision to the current land use designation is not without precedent on this property. In 2001 the Elks worked with the City of Boulder to sell Elk’s Park for permanent designation as a City park space. Along with this was a companion request to change land use designation on what was the eastern most portion of Elk property. Land use was changed during that process to allow the Sunrise Memory Care facility to be built in 2005.

With this submittal we are respectfully requesting a Land Use Designation change from the existing P (Public) to MR (Medium Density Residential). This change would help set the stage for a zoning change that would allow the Elks to redevelop portions of their property consistent with the neighbors to the south and create a vibrant mixed-use community with a revitalized Elks facility at its center.

### Alignment with Goals of the BVCP Update:

- **Economic Vitality** – through the community uses provided at an affordable cost, and through their philanthropic work, the Elks have helped fill needs not affordably met in other ways. Nationally, the Order spends more than \$80,000,000 every year in their communities for scholarships and other philanthropy.
- **Environmental Sustainability** – the introduction of medium density at this location, along with an affordable housing component, would allow folks now living outside of Boulder and commuting, to live in town at a location adjacent to our bikeway system and close to public transit. This would result in a large SOV trip reduction.
- **Healthy and Socially Thriving** – we envision a connected community centered on the Elks club, where residents and visitors can socialize, exercise, and congregate. A change to MR would help the financial health of organization and allow their facilities to be updated to continue to serve the community.

- Livability – the Elks Park that was dedicated to the City along with the associated paths and connections make this location ideal for families to live and grow. The added benefit of proximity to revitalized Elks Club and pool could make a new neighborhood one of the most livable in Boulder.

BCVP goals:

- 1.08 Physical Expansion Limits – converting the currently underutilized land to medium density residential will help Boulder meet its substantial housing needs inside our current boundaries in well served and connected location.
- 1.10 Growth – at a minimum, the addition of residential to the site would contribute 25% of units (or cash equivalent) to the affordable housing stock.
- 1.11 Jobs/Housing Balance – the change to MR would allow the addition of housing with a minimum, if any, addition of commercial uses.
- 1.12 Community Benefit – the Elks organization has been and plans to continue to be an enormous benefit to the community through their philanthropic work, and the provision of a community pool and gathering spaces.
- 2.03 Compact Development – an MR designation would pave the way to zoning that would allow for compact and efficient development of this underutilized property.
- 2.14 Mix of Land Uses – we are requesting the MR designation, in part due to its consistency with neighboring land use to the south.
- 2.16 Mixed Use – we envision a community that marries residential uses with a revitalized Elks Club – the mix of uses helping to create a vibrant neighborhood.
- 4.01 Reduced Emissions – a well-connected, well served, medium density neighborhood would allow folks to live in town and avoid vehicles.
- 4.07 Efficient Land Use – an MR designation allows for a much more efficient use of the land the current P zone would allow
- 5.10 Role of Arts and Recreation – the Elks currently provides and plans to continue to provide a pool facility that gives Boulder families much needed affordable access to swimming opportunities.
- 6.05 Reduction of SOV trips – a well-connected, well served, medium density neighborhood would allow folks to live in town and avoid vehicles.
- 7.02 Affordable Housing – In addition to Inclusionary Housing requirements, we believe medium density housing could help contribute to the missing middle with duplexes, triplexes and other forms of family focused attached housing.
- 7.07 Mix of Housing Types – an MR designation would allow for a wide variety of housing types.
- 8.13 Community Facilities – the Elks Lodge includes not only the swimming pool, but multiple event and gathering spaces within the facility that are made available to the public.

Respectfully submitted on behalf of the Boulder Elks

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

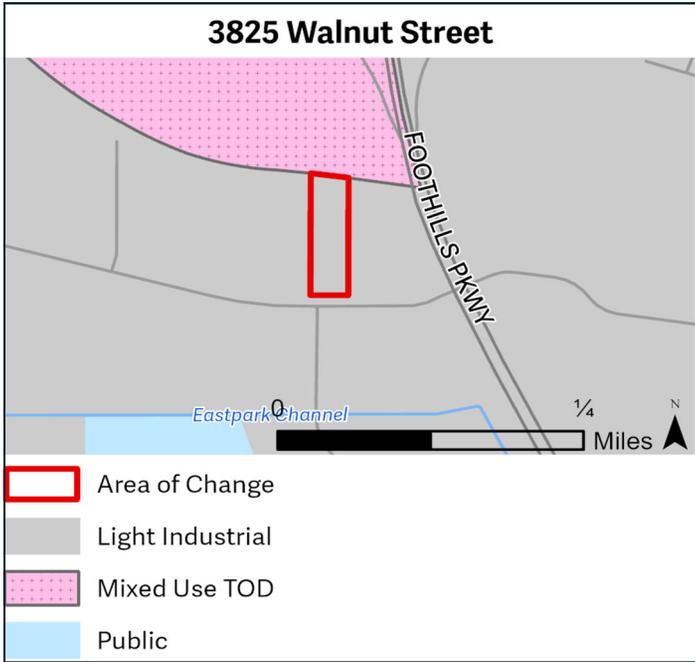
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Medium Density Residential (MR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce medium-density residential housing while retaining community-serving recreational uses. The property is well-connected to existing transit, bikeways, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

**Request #18**

<b>Address:</b>	<b>3825 Walnut Street</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Light Industrial (LI)
<b>Proposed Land Use:</b>	Mixed Use Residential (MUR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



**Applicant Narrative:**

We request changing the land use designation for 3825 Walnut Street from Industrial to Mixed Use Residential. This change would better reflect the current and anticipated conditions of the surrounding area, support Boulder’s updated comprehensive plan goals, and provide substantial community benefits by enabling housing and compatible uses in a location served by existing infrastructure and transit.

**Alignment with BVCP Goals**

The Boulder Valley Comprehensive Plan (BVCP) update emphasizes compact, sustainable growth, directing new development toward areas already served by municipal infrastructure and transit. Mixed Use Residential at 3825 Walnut Street aligns with these goals by providing opportunities for housing while supporting compatible commercial or service uses that activate the corridor. This approach reduces the need for greenfield development, concentrates growth in appropriate locations, and advances Boulder’s climate, equity, and livability objectives. The BVCP also highlights land use flexibility, recognizing that some legacy industrial areas may no longer serve the city’s highest-priority community needs.

**Addressing Housing Needs and Equity**

Boulder continues to experience a shortage of housing, particularly workforce and moderate-income units. Redeveloping this property for mixed use residential will contribute new housing supply while preserving some commercial or service activity on site. Locating housing near transit, employment centers, and services reduces commuting burdens, lowers transportation costs for households, and improves equitable access to opportunity. Mixed-use development also supports neighborhood vitality by fostering a more diverse and active streetscape.

**Climate and Transportation Benefits**

Mixed-use residential development encourages walking, biking, and transit use, reducing vehicle miles traveled and supporting Boulder’s greenhouse gas reduction targets. By situating housing in a location already served by transit and multimodal infrastructure, this change enhances mobility options and creates a more sustainable urban environment.

**Consistency with HB24-1313**

Colorado House Bill 24-1313 directs local governments to facilitate housing in transit-oriented communities. 3825 Walnut Street is proximate to transit service, making it an ideal candidate for mixed-use residential development consistent with state law. The change also allows Boulder to leverage potential state infrastructure support for redevelopment, ensuring efficient use of public resources.

**Community Benefits and Mitigation**

Converting 3825 Walnut Street to mixed-use residential provides multiple benefits:

Expanded housing supply in a central, accessible location.

A more vibrant, active corridor by combining residential and compatible commercial uses.

Reduced environmental impact through transit-oriented, compact development.

Efficient use of existing infrastructure, reducing the need for extensions.

Long-term land use flexibility, adapting to evolving community and market needs.

Potential impacts to neighboring properties can be mitigated through thoughtful site design, including building orientation, setbacks, landscaping, and buffering. While preserving some industrial activity is valuable, this property’s location and underutilization make mixed-use residential a higher-priority community benefit.

**Conclusion**

Changing the land use designation for 3825 Walnut Street to Mixed Use Residential reflects current and anticipated conditions, supports BVCP housing, equity, and climate goals, aligns with HB24-1313, and delivers meaningful community benefits. This change enables Boulder to add housing in a well-served, transit-accessible location while creating a more vibrant, resilient, and sustainable corridor.

**Screening Analysis:**

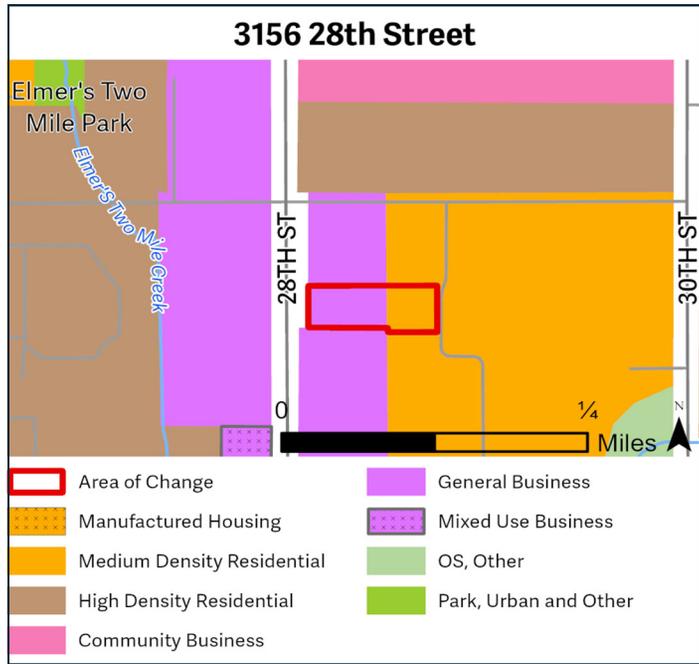
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Residential (MUR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce mixed-use residential development that provides housing while supporting compatible commercial or service uses. The property is well-served by transit, existing infrastructure, and nearby services, supporting efficient, compact growth. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #19

<b>Address:</b>	<b>3156 28<sup>th</sup> Street; 3158 28<sup>th</sup> Street</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	General Business (GB); Medium Density Residential (MR)
<b>Proposed Land Use:</b>	Mixed Use Residential (MUR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

We request changing the land use designation for 3156–3158 28th Street from split General Business (west) and Medium Density Residential (east) to Mixed Use Residential. Consolidating the property under a single high-density residential designation reflects current physical conditions, better supports BVCP housing goals, and positions the site to meet Boulder's growing demand for housing near transit and services.

### BVCP Alignment

The BVCP update encourages compact, infill development near existing infrastructure and transit corridors. Consolidating this site under a High Density Residential designation supports these objectives, allowing a coherent redevelopment strategy that maximizes housing potential, reduces greenfield development pressure, and aligns with city goals for equity, climate action, and land use flexibility.

### Housing and Equity Benefits

This property is in a central, transit-accessible location where housing is in high demand. High-density residential use would provide additional units, diversify housing types, and reduce pressures on surrounding neighborhoods, advancing equity by providing more affordable transportation options and access to jobs, services, and amenities.

### Climate and Transportation Benefits

High-density residential development encourages multimodal transportation, reduces vehicle miles traveled, and supports Boulder's greenhouse gas reduction targets. Transit-accessible housing also fosters a more walkable, active, and connected community.

### Consistency with HB24-1313

HB24-1313 promotes housing in transit-oriented communities. This site is directly adjacent to transit infrastructure, making high-density residential development consistent with state law while also allowing the city to leverage potential infrastructure support for redevelopment.

### Community Benefits and Mitigation

Consolidating land use and enabling high-density residential development would create a more vibrant, active corridor while using existing infrastructure efficiently. Future development can include landscaping, buffering, and building orientation to ensure compatibility with neighboring

commercial and medium-density uses. While commercial activity is important, the site’s location and infrastructure make residential use a higher-priority benefit for the community.

Conclusion: Changing the land use designation to High Density Residential reflects current and future conditions, advances BVCP housing, climate, and equity priorities, supports state policy, and provides substantial community benefits by adding housing in a central, transit-accessible location.

**Screening Analysis:**

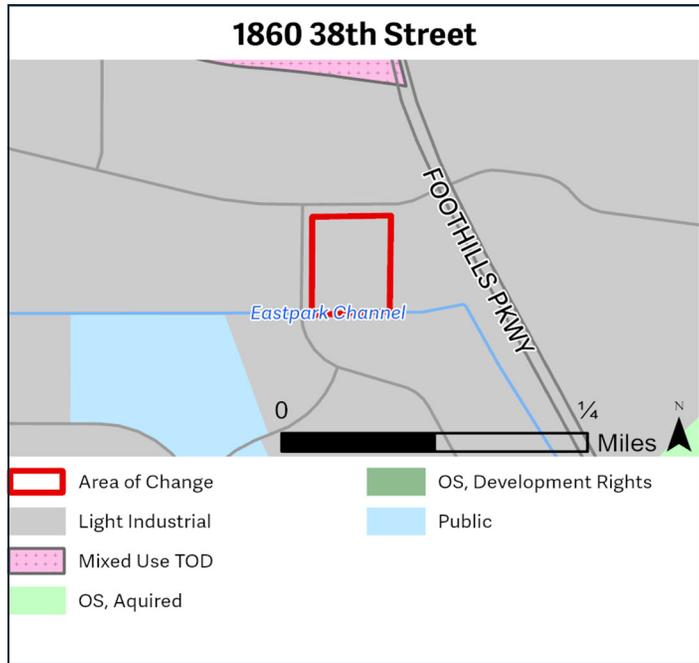
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Residential (MUR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to consolidate the property under a higher-density residential designation to maximize housing opportunities in a transit-accessible location. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #20

<b>Address:</b>	<b>1860 38<sup>th</sup> Street</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Light Industrial (LI)
<b>Proposed Land Use:</b>	Mixed Use Residential (MUR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

We request changing the land use designation for 1860 38th Street from Industrial to Mixed Use Residential to better reflect the site's context and support Boulder's updated comprehensive plan goals. Like the neighboring 1800 38th Street property, this site is underutilized for industrial purposes, and residential use would better serve current and projected community needs.

### BVCP Alignment

The BVCP update prioritizes housing in locations already served by infrastructure and transit. This property is within a well-served corridor, allowing new residential development without the cost or environmental impact of extending infrastructure to new areas. Residential designation also supports BVCP objectives of land use flexibility, compact growth, and climate-conscious development.

### Addressing Housing Needs and Equity

Boulder faces housing shortages and affordability challenges, particularly for workforce and moderate-income households. Redeveloping this site for residential use directly increases the housing supply and provides proximity to transit and services, enhancing access to opportunity and reducing transportation costs.

### Climate and Transportation Benefits

New housing here encourages walking, biking, and transit use, reducing vehicle miles traveled and supporting Boulder's climate goals. Locating residential development in a transit-accessible corridor maximizes multimodal connectivity and community sustainability.

### Consistency with HB24-1313

HB24-1313 encourages residential development in transit-oriented areas. 1860 38th Street is adjacent to a HB24-1313 designated transit corridor, making it a prime candidate for higher-density residential development consistent with state policy, while allowing the city to leverage potential infrastructure support.

### Community Benefits and Mitigation

Residential use contributes to a more vibrant and active neighborhood while efficiently using existing infrastructure. Site design can ensure compatibility with surrounding industrial and commercial uses through building orientation, landscaping, and buffering. While preserving industrial land is important, this property’s location and underutilization justify residential designation as a higher-priority community benefit.

**Conclusion**

Changing the land use designation to residential reflects evolving conditions, supports BVCP goals for housing, equity, and climate, aligns with state law, and maximizes the property’s contribution to Boulder’s transit-accessible, sustainable growth.

**Screening Analysis:**

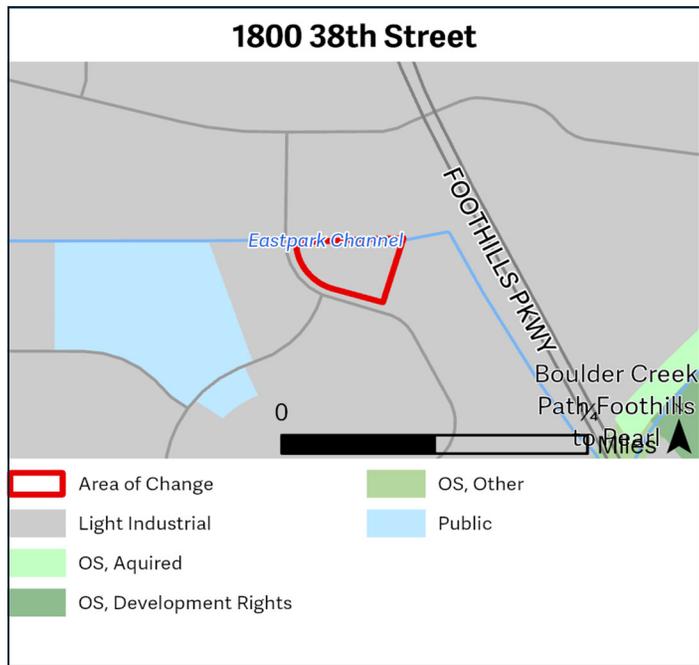
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Residential (MUR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce residential development on an underutilized site to better meet current and projected housing needs. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #21

<b>Address:</b>	<b>1800 38<sup>th</sup> Street</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Light Industrial (LI)
<b>Proposed Land Use</b>	Mixed Use Residential (MUR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

We request changing the land use designation for 1800 38th Street from Industrial to Mixed Use Residential. This property is currently underutilized for industrial purposes, and a residential designation would better reflect current and future conditions in the surrounding area, support Boulder's updated comprehensive plan goals, and address pressing community housing needs.

### Alignment with BVCP Goals

The Boulder Valley Comprehensive Plan (BVCP) update emphasizes compact, sustainable growth and encourages new housing in areas already served by infrastructure and transit. Residential use at 1800 38th Street aligns with these goals by leveraging existing water, sewer, transportation, and transit services, reducing the need for greenfield development, and concentrating growth in locations where it supports efficiency, livability, and climate action. The BVCP also emphasizes land use flexibility, recognizing that legacy industrial areas may no longer meet current economic or community priorities.

### Addressing Housing Needs and Equity

Boulder faces an ongoing shortage of housing, particularly affordable and workforce housing. Converting this property to residential use provides new housing opportunities in a location that is accessible to jobs, services, and transit. Housing near transit reduces

transportation costs, supports equitable access to opportunity, and improves community resilience.

### Climate and Transportation Benefits

Residential development at this site reduces vehicle miles traveled, supports transit ridership, and encourages walking and biking. These outcomes help Boulder achieve its greenhouse gas reduction targets while promoting multimodal transportation.

### Consistency with HB24-1313

Colorado House Bill 24-1313 encourages municipalities to allow additional housing in transit-oriented areas. 1800 38th Street is within a HB24-13-13 designated transit corridor, making it a strong candidate for residential development consistent with state law. The change also positions the city to leverage potential infrastructure funding to support redevelopment.

**Community Benefits and Mitigation**

Residential use would provide a more vibrant, mixed-use neighborhood while using existing infrastructure efficiently. Future development could include design features to ensure compatibility with adjacent uses, including setbacks, landscaping, and thoughtful site orientation. While industrial land remains important for Boulder’s economy, this site’s location and underutilization make residential use a higher-priority community benefit.

Conclusion: Changing the land use designation to residential reflects the current and future context, supports BVCP housing, equity, and climate goals, aligns with state law, and provides tangible community benefits by delivering new housing in a well-located, transit-accessible site.

**Screening Analysis:**

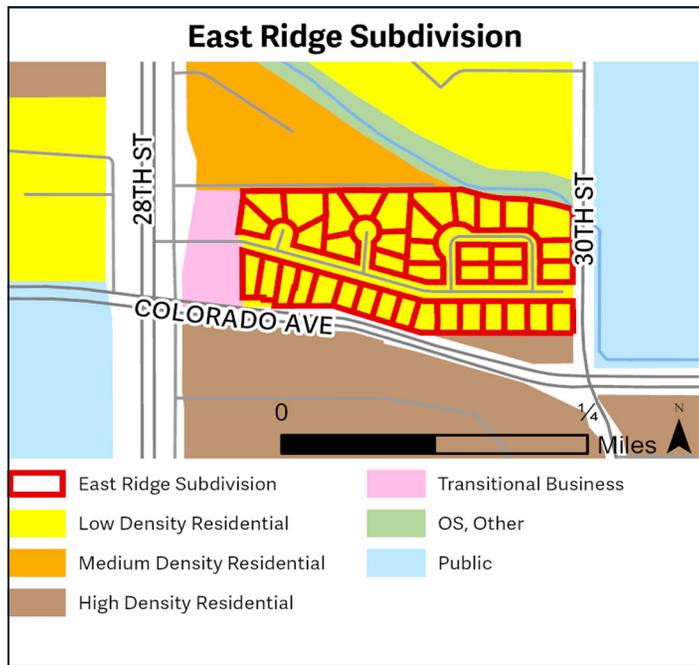
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Mixed Use Residential (MUR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce residential development on an underutilized site to better meet current and projected housing needs. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #22

<b>Address:</b>	<b>East Ridge Subdivision</b>
<b>Request Type:</b>	Land Use Map Change
<b>Current Land Use:</b>	Low Density Residential (LR)
<b>Proposed Land Use:</b>	Medium Density Residential (MR)
<b>Staff Recommendation:</b>	Yes, consider further under the new draft Future Land Use Map



### Applicant Narrative:

THIS APPLICATION IS FOR THE ENTIRE EAST RIDGE SUBDIVISION OF 40 PROPERTIES per What's Up Boulder visit and staff email Sept 11; SUPERMAJORITY SUPPORT DOCUMENTATION TO FOLLOW as directed

"The best place to put more student housing is right between both CU Boulder academic campuses." There, I said it. The BVCP or Comp Plan is virtually silent on student housing (a major driver of our local economy with almost 39,000 students and the "elephant in the room"), which is the main reason staff will recommend against this proposal. But nearly all reasons and rationales provided by staff for increasing density in all efforts in the past few years also apply here, and are incorporated by reference.

Boulder East Ridge, excluding multi-story office and residential buildings, is a small neighborhood of 40 detached houses between 28th and 30th, north of Colorado Ave. and south of Gold Run condominiums. It is the only neighborhood currently low density that is virtually adjacent to both main and east University of Colorado Boulder campuses and is essentially the "land bridge" between them.

When this neighborhood was built circa 1955-1958 it stood alone. Since then CU has grown around it and it has also become essentially surrounded by higher density

residential housing. It is already designated as part of the Colorado University sub-community in the Comp Plan p. 117. Since our previous land use change applications in the 2000's, more CU academic departments have moved to east campus, and we are now essentially in the middle of the CU Engineering School. Due to its close proximity to both main and east CU campuses, the natural use of these properties is for student and staff housing. The land use designation should reflect the changes in the surroundings to help meet the demand for student housing, even if this is essentially ignored in the current BVCP.

City Council Resolution 922 Part 3B states "Consider the potential for higher housing densities on parcels adjoining the University of Colorado." We are now virtually adjacent to both CU Boulder academic campuses. Redevelopment for private student housing continues along 28th St. and its Frontage Rd. between Baseline and Arapahoe. Lisa Morzel, former City Council and Planning Board member, said she used to live in this neighborhood while a student, and if any neighborhood should have higher density, it is this neighborhood.

Upon rezoning from low to medium density, I anticipate some duplex conversions, subject to off-street parking requirements. We are already a Neighborhood Parking Permit program neighborhood given our proximity to main campus. There will also probably be a few additional structures built and possibly a few pop-tops depending on lot size. This would help meet student housing demand in close proximity to academic campuses. This is largely sustainable use of existing structures to adjust to changes in surroundings.

A land use change for our neighborhood would meet many criteria in the Comp Plan. BVCP Ch. 3 Policies Section 7 Housing goals to Support Community Housing Needs, Preserve & Enhance Housing Choices, and Integrate Growth & Community Housing Goals are all clearly met if students are considered. All 6 amendment criteria a-f p. 161 are met as part of the “Colorado University” sub-community. We are adjacent to 28th, 30th, and Colorado transportation corridors. We are within walking distance of 29th St., Basemar, The Village, and 30th/Baseline retail areas.

Staff has previously been opposed to this land use change because of glaring omissions in the Comp Plan, that use of existing structures can and will change without change in the basic structures themselves due to changes in surroundings, and that student housing is essentially not addressed in the Comp Plan (nominally left for CU to address), a significant proportion of our population and the “elephant in the room.”

There is already precedent for up-zoning moderate areas nearby, especially along the west side of 30th between Colorado and Baseline, that are adjacent to and largely surrounded by higher density. However, increasing the housing density of East Ridge will not set a precedent for increasing the density of other neighborhoods since no other low density neighborhoods have our particular location, virtually adjacent to not just one but two CU academic campuses, and are not already surrounded by higher density.

When I moved into East Ridge 45 years ago, most houses were owner occupied. Now, with the changes in surroundings including the growth of CU, most houses are student rentals. Nearly all of us property owners would like to be able to better utilize our properties to help meet the demand for student housing in close proximity to both campuses, otherwise students will live elsewhere in the city. Changing the land use designation for East Ridge will be an appropriate step in adjusting to the changes in CU and the surrounding neighborhoods.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

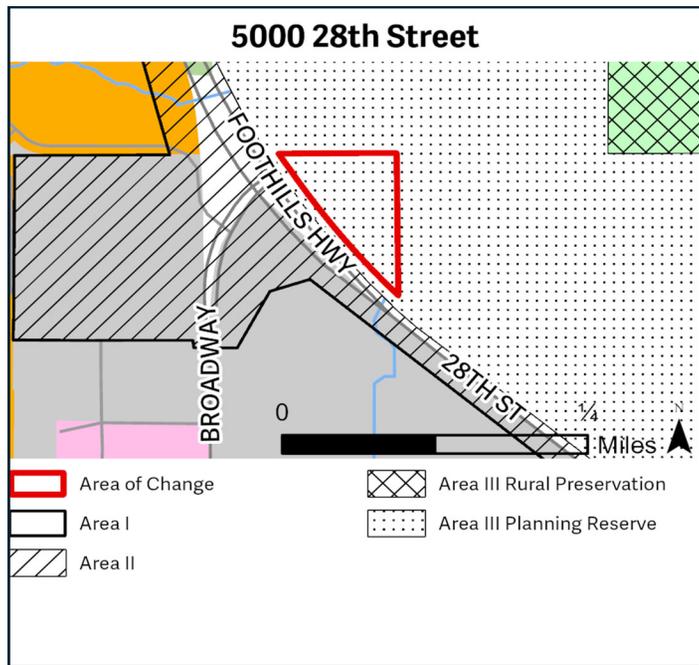
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further under the new draft Future Land Use Map**

Staff recommends further consideration of this request within the context of the new draft Future Land Use Map. Although the Medium Density Residential (MR) land use designation will be consolidated through the Comprehensive Plan update, the request reflects the intent to introduce medium-density residential housing in a neighborhood adjacent to both University of Colorado Boulder campuses to better meet evolving housing needs. The property is well-served by existing transit, infrastructure, and nearby services, supporting efficient, compact development. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

## Request #23

<b>Address:</b>	<b>5000 28<sup>th</sup> Street</b>
<b>Request Type:</b>	Planning Area Map Change
<b>Current Planning Area:</b>	Area III – Planning Reserve
<b>Proposed Planning Area:</b>	Area II
<b>Staff Recommendation:</b>	Ineligible, do not consider further



### Applicant Narrative:

5000 28th St is a 2.38 acre parcel located immediately east / southeast of the intersection of Broadway and 28th St. The site is bound by 28th St to the southwest, a vacant parcel to the north, and a commercially operated parcel owned by City of Boulder Housing and Human Services to the east (leased to Atlas Flooring). Currently, this site is part of the Area III Planning Reserve. I'd like to request changing this parcel from Area III Planning Reserve to Planning Area II. I understand this request is running in parallel with the broader discussion of Area III Planning Reserve but I submit this request separately with the intent of offering an alternative to a potential 'all or nothing' outcome of the broader conversation. It's stated in BVCP Exhibit B Sec.A.2.a.ii that "While service area expansion into the Area III Planning Reserve may occur over time in several separate actions, it must result in a logical expansion of the Service Area." The subject parcel's unique location at a prominent intersection and with approximately 1/3 of it's perimeter abutting existing city limits presents a logical opportunity to establish a beachhead from which to expand into the Area III Planning Reserve. By making this planning area change, it opens the door to possibilities and conversations with details and permissions to be worked out through annexation, zoning, and site plan review processes. It's reasonable to envision the intersection of Broadway and 28th becoming a 4 way intersection with the new connecting street being the neighborhood arterial street that serves the future development of the broader Area III Planning Reserve. In addition to this transportation interconnect, this site could facilitate

the underground utility interconnects and be a foundational building block to the future of the broader area. Considering the fact that this parcel abuts the 30 acre parcel immediately to the west which is owned by City of Boulder Housing and Human Services (4920 28th St), the establishment of the aforementioned 4 way intersection could facilitate future access and civil infrastructure being brought to the northwest corner of the City of Boulder owned property at 4920 28th St. Alternatively, it seems illogical that existing access off 28th St would remain when City of Boulder develops it's parcel. This is a meaningful factor in considering the critical need being met by the annexation of all or any of the Area III Planning Reserve and I understand this critical need is currently being discussed. I don't think the subject parcel by it's self can really move the needle on filling the critical need for middle market and affordable housing. However, creating access to 30 acres of developable land would certainly move the needle in fulfilling this critical need. Possibilities beyond those being discussed more broadly around Area III Planning Reserve could include: annexing this parcel to allow for the relocation of an existing and critical service out from a site within existing city limits which would in turn allow for the redevelopment of the subsequently vacant site inside city limits (consider the possibilities! CDOT?). Alternatively, perhaps in the interim, this site could be a fun place to establish an art installation (think large sculptures like the dinosaurs on 93) that would

enhance the gateway to the city and play off the North Boulder Arts District. And further outside the box, could this be a site to re-establish an artistic version of the Holiday Drive-in Theatre ahead of the Sundance Film Festival? These creative interim ideas could conceivably become part of the North Boulder Sub Community Plan which has an emphasis on the arts. Beyond the obvious absence of municipal services, the existing Transitional Zoning under Boulder County jurisdiction establishes a very narrow range of possibilities for this property. An assignment of a Land Use Designation in line with it's current use would be a welcomed backdrop to the current and intermediate term use of this site. Please know that ownership is eager to be an engaged partner with the City and County in both the near and long term visions for the Area III Planning Reserve.

**Screening Analysis:**

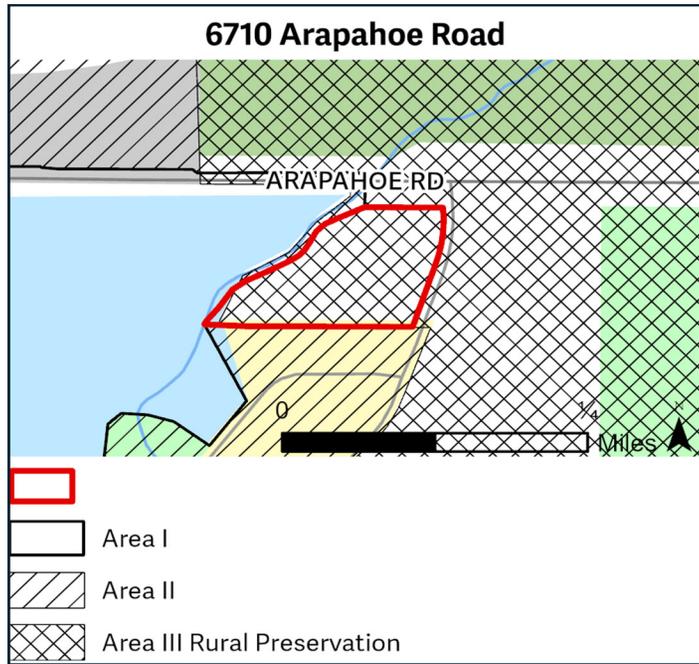
	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	N/A	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	N/A	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	N/A	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	N/A	

**Staff Recommendation: Ineligible, do not consider further**

Staff does not recommend further consideration of this request. The request involves a change that cannot be made through the Community Change Request process. Under the Amendment Procedures outlined in Exhibit B of the Boulder Valley Comprehensive Plan, only the City may initiate amendments affecting properties within the Area III Planning Reserve; therefore, this request is not eligible to advance.

**Request #24**

<b>Address:</b>	<b>6710 Arapahoe Road</b>
<b>Request Type:</b>	Planning Area Map Change
<b>Current Planning Area:</b>	Area III – Rural Preservation
<b>Proposed Planning Area:</b>	Area II
<b>Staff Recommendation:</b>	Yes, consider further



**Applicant Narrative:**

Westview Church is located at the southwest corner of Arapahoe Road and Westview Drive. The property consists of approximately 5.16 acres that borders the annexed Boulder Valley School District Education Center on the west boundary, and the City of Boulder owned land on the east. Currently the property consists of a 6,000 square foot sanctuary and fellowship space, and a 3,200 square foot residential dwelling with city water and sewer service supplied by the Hoover Hills Water and Sanitation District. In the basement below the sanctuary space there is a Forest School that is in operation five days each week (Monday-Friday). The remaining property (acreage) is open space that is not developed. Westview Church is a continuation of the congregation of the former Mount Calvary Lutheran Church (3485 Stanford Court) in south Boulder that is now home to the new Hilltop Affordable Senior Living Center. Following discussions with Planning Staff, Westview Church believes there are better opportunities for the future of the community by pursuing a Planning Area Designation change to allow for future annexation into the City of Boulder.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

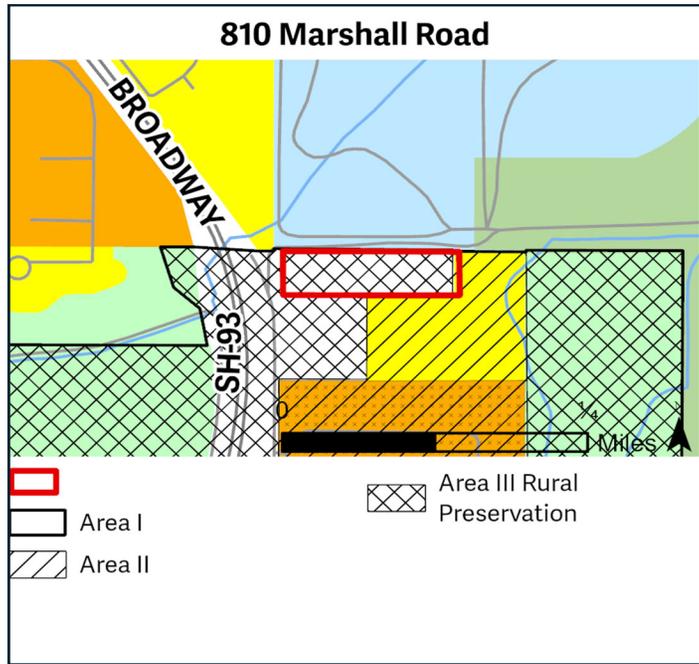
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further**

This request seeks a Planning Area Designation change for the Westview Church, located at the southwest corner of Arapahoe Road and Westview Drive, to allow potential future annexation into the City of Boulder. A Planning Area designation change from Area III – Rural Preservation to Area II would enable integration into the City’s municipal services. The property’s adjacency to city limits and the Boulder Valley School District Education Center, along with existing infrastructure, supports compact, efficient growth. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

**Request #25**

<b>Address:</b>	<b>810 Marshall Road</b>
<b>Request Type:</b>	Planning Area Map Change
<b>Current Planning Area:</b>	Area III – Rural Preservation
<b>Proposed Planning Area:</b>	Area II
<b>Staff Recommendation:</b>	Yes, consider further



**Applicant Narrative:**

To the Boulder Valley Comprehensive Plan Review Committee: I respectfully submit this request for a change in Area Designation for my property at 810 Marshall Road, Boulder, CO 80305, from Area III to Area II. This change would make the property eligible for City of Boulder services and consideration for future annexation. Property Overview: The subject property is a 2-acre parcel located in unincorporated Boulder County. It is bordered by CU South to the north, an Area I property undergoing significant planned development by the City and the University of Colorado. Along with two other small acreage remaining Area III adjacent properties, it is bordered by Table Mesa Village Mobile Home Park, a medium-density Area II neighborhood to the east and south. Rationale for Area II Designation: The parcel is surrounded by Area I and Area II-designated properties. It currently relies on an on-site wastewater treatment system, despite being adjacent to existing City sewer infrastructure. It lies within 600 feet of an active public transit line, further supporting urban-level serviceability and access. The Area III designation is no longer consistent with the BVCP’s long-term vision for urban infill, efficient infrastructure expansion, and sustainable community development. Continued classification as Area III does not align with the public health and safety interests of the community, particularly as surrounding development intensifies. Given these conditions, a reclassification to Area II would better reflect the property's physical context, infrastructure potential, and alignment with comprehensive planning principles. Thank you for your time and consideration of this request. Sincerely,

Don Bushey

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: Yes, consider further**

This request seeks a Planning Area Designation change for the property at 810 Marshall Road, Boulder, CO, to allow for potential future annexation into the City of Boulder. The site is currently served by an on-site wastewater treatment system but is adjacent to existing City sewer infrastructure and within 600 feet of active public transit. A Planning Area designation change from Area III – Rural Preservation to Area II would enable integration into City municipal services. The property’s proximity to surrounding Area I and II parcels, and existing infrastructure supports compact, efficient growth. This request is generally consistent with draft Comprehensive Plan policy and Future Land Use Map direction.

**Request #26**

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	N/A
<b>Staff Recommendation:</b>	No, do not consider further

**Applicant Narrative:**

I actually cannot accurately answer the above existing policy and text fields so I just used "yes" on both. And will take this opportunity to add my concern.

We and the BVCP should have a high-level requirement for a comprehensive commitment and approach to wildfire threat remediation. I am \*well\* aware of the current state of things esp. within the city of Boulder; my 5.3.25 Daily Camera opEd summarizes my journey since mid 2024, culminating in getting OSMP to formally add and operationalize (to what degree tbd) our wildfires' root cause, human ignition (hereinafter "HI"), and its mitigation and deterrence—which had been totally absent from both the city and county CWPPs, even though HI is prominently featured throughout the website and documents hosted by the National Wildfire Cohesive Strategy upon which at least the city CWPP is based. (<https://www.dailycamera.com/2025/05/03/guest-opinion-bart-windrum-its-time-for-a-yellow-line-and-a-boulder-valley-wildfire-summit-2/> )

I'm calling for a Vision-level expressed regional commitment to combat this existentially threatening issue with its focus on the parcels and areas from which the threat primarily emanates. For cities that means urban-adjacent upwind. "Vision" level means a formalized, named, funded, and operationalized multi-pronged and sustained effort that produces meaningful results. "Meaningful" means data-driven and experientially-driven reduction of risk to all the relevant aspects: human ignition (root cause of nearly all our threatening fires), fuel loads, widespread structural hardening with equity aspects accounted for, and continued development of agencies' safe/effective response.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?		X
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?		X

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. However, the topic of wildfire mitigation is a core focus of the draft Boulder Valley Comprehensive Plan, including emphasis on resilience at the urban–wildland interface, hazard awareness, and regional coordination. This request highlights the importance of reducing wildfire risk, which aligns with the Plan’s broader intent to prioritize safety, climate resilience, and protection of the community.

While the Comprehensive Plan already addresses wildfire mitigation at a vision level, the specific operational elements suggested in the request such as parcel-level targeting, human ignition mitigation, fuel management, structural hardening, and emergency response improvements are implementation strategies that fall outside the policy level scope of the Comprehensive Plan update. These operational steps would be more appropriately considered in coordinated City and County programs, funding initiatives, and multi-agency wildfire mitigation strategies. Staff recognizes the alignment of this request with the Comprehensive Plan vision for wildfire safety, while also recognizing that the detailed, actionable components are inappropriate for the Plan’s policy-level framework.

## Request #27

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	9.01 Support for Agriculture
<b>Staff Recommendation:</b>	No, do not consider further

### Applicant Narrative:

Proposed addition to BVCP text in Section 9, Food and Agriculture:

“Section 9.01A: Sustainable Water Use: Boulder’s Ag-water delivery system depends on 160-year-old legacy irrigation ditches, which present many opportunities for system upgrades to minimize water loss and maximize the yield of dwindling water supplies. The City and County will partner with local ditch companies, farmers and ranchers to upgrade our Ag-water delivery systems to maximize Ag-water efficiencies, and to ensure the survival of viable agriculture in the Boulder Valley.”

Explanation:

Supplemental irrigation is imperative for successful agriculture on Boulder’s arid Front Range. Boulder Valley Ag-water supplies are under pressure from both climate change and stressors to the Colorado River and C-BT water. At the same time as droughts and increasing summer heat indexes require additional water for crops, diminishing snow packs and downstream demands on the Colorado River are reducing available water for agriculture.

Boulder’s non-profit ditch companies maintain their ditches on shoe-string budgets, with limited capacity for infrastructure upgrades. Upgrades to watering systems are also out of reach of many OSMP and BCPOS lessees as they have only 3 to 5-year-long lease contracts. Our Ag-water users and providers need the City’s and County’s help to make Ag-water upgrades. Some of the ways the City and County could jump-start Ag-water upgrades include:

1. Increase OSMP & BCPOS investment to Ag-water delivery systems supplying OSMP & BCPOS lands
2. Increase the use of volunteer, AmeriCorps and Ready-to-Work crews to maintain ditches
3. Provide grant writing assistance to ditch companies and lessees for EQIP and CWCB grants and loans.
4. Fund a grant program for ditch companies to make Ag-water delivery system upgrades

This proposed addition to the BVCP ensures that agriculture remains viable in the Boulder Valley in the face of looming water shortages by building on current BVCP policies, such as:

- Section 3.13: “The city and county will promote the conservation of water resources through...policies that promote efficient water usage”
- Section 3.27: “Water resource planning efforts will...consider climate change and incorporate the goal of water...conservation”
- Section 9.01: “The city and county will emphasize the importance of sustainable water use” and “will support farmers and ranchers in this area as they negotiate the challenges of operating in a semi-arid environment”.

Possible Ag-water upgrades which will maintain local agriculture in the Boulder Valley by maximizing the beneficial use of every drop of our Ag-water include:

- installing pivots or other more efficient sprinkler irrigation
- switching from flood irrigation to drip systems or gated irrigation pipe where appropriate
- installing irrigation ponds and pumps for farms to extend their water season
- solarizing electric & diesel pumps
- lining sections of leaking earthen ditches
- installing telemetry on water measuring flumes
- rebuilding headgates
- metering water flow to direct users
- installing divider boxes
- maintaining tail water ditches for return flows.

We must keep our rural lands in green cover, with living roots, to provide their full ecosystem benefits to Boulder Valley residents, and to mitigate climate change by sequestering CO2 in soils. Without supplemental irrigation, our Ag-lands will rapidly desertify, losing CO2 to the atmosphere as climate change intensifies, and will produce more dust storms, grass fires, soil erosion and reflected heat. The future benefits which well-irrigated Ag-lands can provide to our citizens - local food, cooling of neighboring heat islands, wildlife habitats, soil carbon sequestration and pastoral view-scapes - all depend on increasing the efficiency of our Ag-water delivery systems.

Working in partnership with Boulder farmers, ranchers and irrigation ditch companies, the City and County can contend with our future Ag-water supply challenges and ensure the survival of local agriculture and all its ecosystem benefits.

For background information on Colorado River shortages which will affect Boulder Valley municipal and Ag-water supplies, go to <https://gcrq.us18.list-manage.com/track/click?u=b2ce3363654c27c81b37333a7&id=9dec8fd895&e=dbcefe57ba>. This report says that if both precipitation and California & Arizona water withdrawals stay the same as in 2025, by the end of 2027, Lakes Mead and Powell will both reach functional “Dead Pool”. California & Arizona will then strong-arm Colorado to send more of its water downstream to them. Boulder uses Colorado River water in Gross Reservoir, South Boulder Creek, and as CB-T shares, which fill Boulder Reservoir, supply summer water to city residents, and keep our farms and rural lands irrigated and green. I strongly urge you to read this report and consider its implications carefully for all the agricultural and ecosystem services which the Boulder Valley so carefully stewards.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?		X

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?		X

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. The proposed policy addition addressing sustainable Ag-water use and modernization of irrigation infrastructure aligns broadly with the draft Boulder Valley Comprehensive Plan’s emphasis on supporting viable agriculture, efficient water use, and climate resilience. The request highlights important challenges facing agricultural water systems under changing climate and water supply conditions, which are already reflected in existing and draft comprehensive plan policy direction.

However, the specific elements of the request such as funding mechanisms, partnerships with ditch companies, infrastructure upgrades, and on-site farm irrigation improvements are implementation strategies that fall outside the scope of the Comprehensive Plan’s vision-level framework. Additionally, for Boulder County, policies related to supporting private ditch infrastructure are more appropriately considered at a countywide scale rather than within the geographically limited Comprehensive Plan planning area.

As the draft Comprehensive Plan already addresses sustainable water use and agricultural viability at a high level, there is no need to advance this specific policy addition further. The detailed actions described in the request are better addressed through existing water management programs, capital planning, grant programs, and interagency implementation efforts.

## Request #28

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	N/A
<b>Staff Recommendation:</b>	Ineligible, do not consider further

### Applicant Narrative:

Under Exhibit B: Boulder Valley Comprehensive Plan - Amendment Procedures

A. Types of Changes 1. Land Use Map Changes Decision-making:

Change "Land Use Map changes in Area I and II are a city decision, with call up to the county as described in the referral & call up procedures.

Changes in Area III are a city and county decision" to:

"Land Use Map changes in Area I are a city decision. Changes in Area II and Area III are a city and county decision."

Also, under 2. Area II/III Boundary Changes Decision Making:

Change "Minor Adjustments to the Service Area boundary are a city decision for areas five acres and under. For areas greater than five acres, the Board of County Commissioners may call up a city decision for its review under the procedures described below." to:

"Minor Adjustments to the Service Area boundary are a city and county decision."

Also, make these changes on the Summary Matrix on page 160 of the BVCP.

The Boulder Valley Comprehensive Plan is a joint policy document legislatively adopted by the City of Boulder and Boulder County. Area II and Area III properties are in unincorporated Boulder County and decisions concerning these properties should have full County input. Citizens owning and residing on these properties outside the City of Boulder boundary are unable to vote in City of Boulder elections for City Council and city ballot issues. If Land Map Changes and Adjustments to the Service Area boundary for these properties are only a City of Boulder decision (without voting decisions from the County Commissioners and the County Planning Commission) then that is legislation without representation for those citizens who own and reside on those Area II and Area III properties. This needs to be corrected.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	N/A	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	N/A	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	N/A	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	N/A	

**Staff Recommendation: Ineligible, do not consider further**

Staff does not recommend further consideration of this request. The request proposes changes to the Amendment Procedures for Land Use Map and Area II/III boundary decisions. These procedures are contained in the Intergovernmental Agreement (IGA) between the City of Boulder and Boulder County and, while included in the Comprehensive Plan for reference, are not formally part of the plan itself. As such, the Community Change Request process cannot directly modify these procedures.

## Request #29

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	N/A
<b>Staff Recommendation:</b>	Ineligible, do not consider further

### Applicant Narrative:

Comments from Westland Development Services, Inc. (“Westland”) regarding the East Boulder Subcommunity Plan & Station Area Master Plan:

Westland and its President, Peter Aweida, are proponents of the East Boulder Subcommunity Plan and the Station Area Master Plan (the “STAMP Area Plans”). Mr. Aweida served on the East Boulder Working Group and the STAMP Subcommittee, in connection with the City’s development and adoption of the STAMP Area Plans. Westland owns over a dozen commercial properties in and around the STAMP Area (and elsewhere in Boulder) and provides a variety of light industrial / flex / manufacturing / retail / restaurant / gallery and office spaces for local businesses. Westland’s comments concern “office” uses in the STAMP Area, specifically “medical office” uses.

Since the City’s adoption of the STAMP Area Plans, the BCH Foothills Hospital Campus has continued to grow, develop and influence East Boulder and particularly the STAMP Area around 55th & Arapahoe. From the BCH Campus on the West, traveling along Arapahoe Ave. to 55th St. on the East, there is growing influence from the BCH Campus and increased pressure for the area to accommodate new medical office uses and complementary health services. However, the City’s own Land Use Code (LUC) is not aligned with these current conditions influencing the STAMP Area, and the City’s LUC Appendix K actually conflicts with several of the Vision Statements, Outcomes and Policies expressed in the STAMP Area Plans.

For example, East Boulder Plan Outcomes purport to “improve access to services that benefit health and wellbeing” including “health services”. Another desired Outcome is to foster and create “opportunities for new types of services to locate in East Boulder.” While some of the desired Outcomes appear to be happening in and immediately adjacent to the BCH Campus, in the nearby off-site areas, additional new medical office and complimentary health services are discouraged and prohibited from locating in the STAMP Area.

The STAMP Area is seeing increased demand from hospital affiliates, doctors, medical groups, and related health service providers seeking to locate and integrate new medical practices near the BCH Campus, close to existing services and amenities around 55th & Arapahoe. The STAMP Plan recognizes that the City should encourage the “opportunity for increased mix of uses,” and the Plan specifically recommends that the City should “apply zoning that aligns with the uses and locations” of the STAMP Area.

Unfortunately, the City’s own Land Use Code (LUC, Appendix K) presents obstacles by prohibiting “medical office” uses in the STAMP Area, even as conditional uses where the City could reasonably control the conditions for any new re-development. New medical office and health services uses are discouraged by Appendix K and re-directed to East Pearl, despite the growing influence of BCH Campus and existing Vision Statements in the STAMP Area Plans.

Although the existing Plans purport to foster and encourage “S.T.E.A.M. Zone” uses (specifically including medical) in the STAMP Area, regrettably, several of Westland’s existing multi-story office buildings: (i) 5445 Conestoga Court (ii) 5450 Western Ave (iii) 1600 Range and (iv) 1705 Range, have been forced to turn away medical / health services providers seeking to locate new uses in the STAMP Area. On one hand, the

BCH Campus and STAMP Area Plans create pressure on the STAMP Area to accommodate new health services, but on the other hand, the City’s own LUC Appendix K discourages medical office uses. The result is forcing new users away from East Boulder to relocate in more hospitable areas including Longmont, Louisville, and Lafayette.

As the STAMP Plans acknowledge, “current land use designations and zoning have created constraints” to reaching the stated goals of the STAMP Area Plans. Therefore, as the Plans themselves suggest, it is Westland’s request that the City “review the City’s building and land use codes and remove unnecessary barriers.” Specifically, Westland requests that the City review LUC Appendix K in connection with reviewing the STAMP Area Plans, and reconsider allowing “medical office” as a conditional use in the STAMP Area, especially in existing established office buildings. Thank you for your consideration.

**Screen Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	N/A	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	N/A	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	N/A	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	N/A	

**Staff Recommendation: Ineligible, do not consider further**

Staff does not recommend further consideration of this request. The request relates to the City’s Land Use Code (Appendix K) and the allowance of conditional uses in existing buildings. These regulations are governed by the Boulder Revised Code, not the Comprehensive Plan. The Comprehensive Plan provides high-level policy guidance and land use designations, but it does not regulate conditional uses or detailed zoning allowances. Changing Appendix K to allow medical office uses would therefore require a Boulder Revised Code amendment, following the city’s formal code amendment process.

**Request #30**

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	2.07 Delineation of Rural Lands
<b>Staff Recommendation:</b>	No, do not consider further

**Applicant Narrative:**

Under Community Identity & Land Use Pattern 2.07 Delineation of Rural Lands -

Change: "The Boulder Service Area includes urban lands in the city and lands planned for future annexation and urban service provision." to: "The Boulder Service Area includes urban lands in the city and lands that may be annexed into the city in the future if there is an interest by the residents of those Area II areas."

Also under 2.07 add this paragraph:

"c) Area II

Area II lands provide a buffer between Rural Area III lands and Urban Area I lands. The majority of the residences in Area II are zoned County Rural Residential with either Low Density Residential or Very Low Density Residential Land Use Designations in the Boulder Valley Comprehensive Plan. The rural character of these Area II land will be preserved."

Reason:

There has been very low interest in annexation into the City of Boulder from residents in Area II over many years. The residents in Area II prefer a more rural, less dense community and not a busy, dense, urban way of life that is confined to city living. This is why many of them have chosen to live outside City of Boulder boundaries in more rural, quiet, and less bustling neighborhoods. If the City of Boulder needs or wants to grow it should do so within its own boundaries and not impose that growth on surrounding unincorporated areas. Also, Area II lands provide a buffer between urban Area I lands and rural Area III lands.

**Screening Analysis:**

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe		X
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	

	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?		X

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?		X

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. Annexation into the City of Boulder requires the property owner’s initiation through a property owner petition; under state law the City cannot forcibly annex an Area II property. Existing Comprehensive Plan policy already reflects this principle; however, staff recognizes that this could be clarified and that community concerns regarding forced annexation may be relieved by doing so.

The Comprehensive Plan does not anticipate rural-character preservation in Area II as these lands are already developed at a suburban scale. Lands intended for long-term rural preservation are specifically designated as Area III-Rural Preservation. Staff does not recommend the policy be changed to consider Area II a Rural Preservation Area.

## Request #31

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	2.35 Building Height
<b>Staff Recommendation:</b>	No, do not consider further

### Applicant Narrative:

At the end of 2.35 it should read: (as described in Policy 1.12). It now has Policy 1.11 there. 1.11 is for Jobs: Housing Balance. 1.12 is for Enhanced Community Benefit.

I am requesting to add on to the end of 2.35 paragraph the following text:

"A community benefit will not guarantee additional building height. Aesthetics, view protection, and community input will be given very high consideration in deciding whether or not to allow additional building height."

Reason:

The impact of additional building height will be the same to the surrounding community whether or not there is a community benefit in the building or not. The effects of additional building height on the surrounding community needs to take preference over any community benefit. There may be developments where a community benefit is provided and the additional height has no or minimal impact on aesthetics, view protection, or the surrounding community. These developments could be given consideration for additional building height in the site review. However, if the additional height requested in a project has negative effects on aesthetics, view protection, and the surrounding community, it should not be given the additional building height just because it is providing a community benefit.

The height restrictions need to be maintained in the Boulder Valley in order to protect the aesthetics, views, and community character of Boulder Neighborhoods and Centers.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?		X
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. The requested correction to the policy reference at the end of Section 2.35, changing it from Policy 1.11 to Policy 1.12, is accurate and will be incorporated as administrative correction. The Boulder Revised Code already provides that decisions regarding additional building height are evaluated through site-specific review processes (see section 9-2-14), which consider aesthetics, view protection, and community input. This ensures that community impacts are appropriately weighed when determining allowable height.

## Request #32

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	1.17 Annexation
<b>Staff Recommendation:</b>	No, do not consider further

### Applicant Narrative:

Under 1.17 i.

Change the following sentences: "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." to:

"Although interest in voluntary annexation has been limited, if resident interest in the annexation of Gunbarrel does occur in the future, the city and county will negotiate new terms of annexation with the residents."

Reason:

Over many decades, the interest from residents of unincorporated Gunbarrel for annexation into the City of Boulder has been very low to none. The protection of the rural character of the Gunbarrel area is very important to the citizens of Gunbarrel and higher density and urbanization are of little interest to them. The Area II and Area III lands in Gunbarrel do not need to be annexed into the City of Boulder. The Gunbarrel community can work together with the City of Boulder and Boulder County to further the policies of the Boulder Valley Comprehensive Plan while also protecting the rural character of Unincorporated Gunbarrel. Requests for annexation of Unincorporated Gunbarrel into the City of Boulder should come from the citizens of Unincorporated Gunbarrel and not be dictated by the City of Boulder.

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe		X
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?		X

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. The City and County continue to support the eventual annexation of Gunbarrel. Gunbarrel contains major employment centers and already adjoins city-served infrastructure, including water, sewer, and multimodal transit corridors, making it a logical candidate for service integration. Annexation would remain entirely contingent on initiation by the residents of Gunbarrel. This approach maintains the Plan’s long-term aspirational guidance for urban expansion while respecting the community’s rural character and the principle of voluntary annexation.

### Request #33

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	Land Use Map accuracy
<b>Staff Recommendation:</b>	No, do not consider further

#### Applicant Narrative:

On the previous question I could only provide one designation, however this request is for more than one property and more than one designation - therefore other designations are requested in this Change in Land Use Request. I made this request during the 2020 Boulder Valley Comprehensive Plan (BVCP) mid-term update. Staff recommended at that time that my request not be considered further as part of the 2020 BVCP Mid-Term Update and wrote: "While this effort is not within the scope of the mid-term update, staff is anticipating this effort to be completed in the next major update to the comprehensive plan." We are now at the next major update of the BVCP during this 2025 Update.

More details on my 2020 BVCP mid-term update request can be found on pages 107-115 at <https://documents.bouldercolorado.gov/WebLink/DocView.aspx?id=172861&dbid=0&repo=LF8PROD2> as well as pages 22-26 at <https://pub-bouldercounty.escribemeetings.com/FileStream.ashx?DocumentId=3044>

Page 26 of this document lists additional open space-related changes to be addressed prior to or during the next BVCP Major Update. These and other properties need to be updated for accuracy in this 2025 BVCP Major Update.

Please review my 2020 BVCP mid-term change of land use request as well as city and county documents associated with that request. During this 2025 major update of the BVCP, I am resubmitting my 2020 BVCP midterm change in land use request which requested for the review of land use designations in the unincorporated areas (and possibly some in the City of Boulder boundary) of the BVCP to ensure their accuracy and also to a change in the range of colors used on the BVCP Land Use Map for Open Space (Acquired), Open Space (Development rights), and Open Space (Other) to improve readability.

#### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	

	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?		X

**Staff Recommendation: No, do not consider further**

Staff does not recommend further consideration of this request. The draft Comprehensive Plan consolidates open space into a single designation and removes separate classifications including the Open Space categories previously referenced by the applicant, such as *Open Space (Acquired)*, *Open Space (Development Rights)*, and *Open Space (Other)*. Because these classifications are not carried forward in the draft Comprehensive Plan, staff does not recommend they be considered further as part of this request. Further, land use map accuracy and legibility improvements, including color updates, are already underway through the drafting of the new Future Land Use Map.

## Request #34

<b>Request Type:</b>	Policy or Text Change
<b>Current Policy # or Text Section:</b>	Section 6 Transportation; policy 6.01 to policy 6.22
<b>Staff Recommendation:</b>	Yes, consider further

### Applicant Narrative:

Please see **Attachment C: Community Cycles Change Request**

### Screening Analysis:

	<b>CRITERIA #1 – CONSISTENCY WITH COMPREHENSIVE PLAN GOALS</b>	<b>Yes</b>	<b>No</b>
	Accessible & Connected, Economically Vital, Environmentally Sustainable, Healthy and Socially Thriving, Livable, Responsibly Governed, Safe	X	
	<b>CRITERIA #2 – WITHIN THE POLICY LEVEL SCOPE OF THE COMPREHENSIVE PLAN</b>	<b>Yes</b>	<b>No</b>
	Is the request within the policy level scope of the Comprehensive Plan?	X	
	<b>CRITERIA #3 – CAPACITY FOR TIMELY ANALYSIS</b>	<b>Yes</b>	<b>No</b>
	Can the scope of the impact of the potential change be accommodated within the Comprehensive Plan update process and timeline?	X	
	<b>CRITERIA #4 – CONSISTENCY WITH PROPOSED PLAN DIRECTION</b>	<b>Yes</b>	<b>No</b>
	Is the request consistent with the latest Comprehensive Plan policy and new draft Future Land Use Map direction?	X	

### Staff Recommendation: Yes, consider further

Staff recommends further consideration of this request. The request demonstrates strong alignment with the Boulder Valley Comprehensive Plan 2025 Update goal to prioritize equitable, multimodal transportation, safety, emissions reduction, and reduced single-occupancy vehicle travel. The request identifies meaningful opportunities to strengthen active mobility outcomes and reflects strong familiarity with the existing plan framework.

However, because the comprehensive plan policies are undergoing substantial revision – including consolidation, modification, and removal of some policies – not all proposed language edits can be evaluated or incorporated in a direct, one-to-one manner. Additionally, portions of the request that call for funded or operational programs (e.g., creation of a dedicated TDM fund, development of a Transit Strategic Plan, updates to the Design and Construction Standards) fall outside the vision-level scope of the Comprehensive Plan update and are more appropriately

addressed through future implementation, budgeting, or operational planning processes. Staff recommends consideration of applicable vision-level policy direction within the submitted request.

## Section 6

### TRANSPORTATION

The vision is to create a safe, accessible and sustainable multimodal transportation system connecting people with each other and where they want to go. The system should be safe, equitable, reliable, [comfortable, and](#) provide travel choices and support ~~clean air and~~ the city, county, and state's [air quality and](#) climate commitment.

The transportation system should accommodate increased person trips by providing travel choices and by reducing single-occupant automobile trips and vehicle miles traveled (VMT). Plans should also prepare the community for future technology changes, such as electric/low emission vehicles, autonomous vehicles, and demographic and social shifts, such as an aging community, and increasing bicycle [use](#), micromobility and car sharing.

A mature community like Boulder has little opportunity, [desire](#) or ability to add road capacity, as widening streets and building new roads ~~would~~ have significant negative environmental, ~~community character and~~ financial [and societal](#) impacts. Consequently, the strategies of [all the city's strategic plan](#)~~the city's Transportation Master Plan (TMP)~~ center on maintaining a safe, [comfortable, attractive](#) and efficient system [for all modes of transportation](#).

[A reimagined transportation system is not built in response to the current conditions, but is designed to shape public travel choices by providing options to single-occupancy vehicles that are at least as efficient, safe, comfortable, and cost-effective as driving. This policy goal requires a commitment of money, road space, and time to implement, and must be a vision shared across jurisdictions and departments.](#)

The policies in this section generally reflect the focus areas of the city's TMP and the adopted Boulder County Transportation Master Plan (TMP), including:

- Complete Transportation System;
- Regional Travel;
- Funding & Investments;
- Integration of Land Use & Transportation with Sustainability Initiatives; and
- Other Transportation Policies.

#### **Complete Transportation System**

##### **6.01 All-Mode Transportation System & Safe and Complete Streets**

The Boulder Valley will be served by an integrated all-mode transportation system, developed cooperatively by the city and county. The city's and county's transportation system focuses on moving people, and is based on complete streets reflecting the unique contexts [of urban](#)~~er~~

[urban](#), suburban, and rural areas. These streets include completed networks for each mode, making safe and convenient connections between modes, providing seamless connections between the city and county systems and promoting access and placemaking for the adjacent land uses and activities. Improvements to urban travel corridors will recognize pedestrian travel as the primary mode of transportation and preserve or improve the safety of all modes of transportation. For more suburban and rural parts of the Boulder Valley, the transportation system is focused on sustainable mobility through development of a safe, multimodal system, [enabling creating](#) the complete trip [regardless of mode](#) and investing in key regional transportation corridors.

### **6.02 - Equitable Transportation**

The city and county will equitably distribute transportation investments and benefits in service of all community members, particularly vulnerable populations, ensuring that all people benefit from expanded mobility options. Providing more transportation options - like walking, biking, transit and shared options - in areas where people are more reliant on various modes will have a greater benefit to overall mobility. New transportation technologies and advanced mobility options provide Boulder with an opportunity to expand affordable transportation choices to those who need them the most, including those who cannot use existing fixed route transit such as service and shift workers. [Investments and policies will also consider modal equity, prioritizing modes that have historically received less investment and physical space.](#)

### **6.03 Low Stress Walk and Bike Network**

The city and county will create a connected walking and cycling network for people of all ages and abilities to travel along and across streets safely and comfortably. [The safe network shall include providing safe access to destinations within a development such through parking lots.](#) The county has a goal to develop a low stress, [-direct, and all-season](#) bike network between communities within the county. Low stress walk and bike networks will attract a broader population of people [because walking and bicycling will be more safe, comfortable, efficient, and fun as confident and comfortable pedestrians and cyclists.](#) These walk and bike networks also support the city and county Vision Zero safety goals.

### **6.04 Renewed Vision for Transit**

The city and county will integrate transit investments and improvements to address service, capital infrastructure, policies, programs and implementation [through a Transit Strategic Plan.](#) These [activities](#) will expand the Community Transit Network (CTN) and improve regional transit service and connections outside the city, such as bus rapid transit (BRT) along state highways and regional key [corridor](#)~~searider~~, as identified in the Northwest Area Mobility Study.

### **6.05 Reduction of Single Occupancy Auto Trips**

The city and county will support and promote the greater use of multimodal travel options to reduce vehicle miles traveled (VMT) and single-occupancy automobile travel. The city will continue progress toward its specific objective to reduce vehicle miles of travel (VMT) 20 percent from 1994 levels through the year 2030 within the Boulder Valley to achieve transportation and GHG reduction goals. The county's goal is to reduce VMT to 2005 levels,

and to achieve regional air quality goals and state greenhouse gas reduction targets. The city and county will include other communities and entities (especially [trip](#) origin communities such as Longmont, Lafayette, Louisville and Erie) in developing and implementing integrated travel demand management (TDM) programs, new mobility services, [all-season bicycle commuting facilities](#), and improved local and regional transit service. The city will require TDM plans & [enforcement](#) for [all applicable](#) residential and commercial developments within the city to reduce the vehicle miles traveled and single-occupant vehicle trips generated by the development [and will develop and adopt strategies and incentives for VMT reduction for existing residential properties and businesses in the appropriate Departmental Strategic Plans](#).

#### **6.06 Transportation System [Priorities Optimization](#)**

The transportation system serves people using all modes, and maintaining [safety is its highest priority](#). [Other goals including GHG reduction and VMT reduction are also to be considered, but will always be secondary to safety. Its efficient and safe operation benefits all users. The city and county will monitor the performance of all modes as a basis for informed and systematic trade-offs supporting mobility, safety, GHG reduction and other related goals.](#)

#### **6.07 Integrated Transportation Demand Management (TDM) Programs**

The city and county will cooperate in developing comprehensive Transportation Demand Management (TDM) programs for residents and employees, which include incentives, such as developing a fare-free local and regional transit system; promoting shared-use mobility, ridesharing, bikesharing, carsharing, vanpools and teleworking; and supporting programs for walking and biking, such as secured long-term bike parking ([including retroactively-applied bike parking requirements](#)). The city will employ strategies such as shared, unbundled, managed and paid parking (i.e., "Shared Unbundled, Managed, and Paid" - "SUMP" principles) to reflect the real cost of Single Occupancy Vehicle (SOV) travel. The city will require TDM plans for applicable residential and commercial developments. [In order to optimize return on TDM investment, the city will implement an optional TDM cash-in-lieu program, to allow investments to be made where they are most effective.](#)

#### **6.08 Accessibility and Mobility for All**

The city and county will continue development of a complete all-mode transportation system [equitably](#) accommodating all users, including people with mobility impairments, youth, older adults, non- English speakers and low-income persons. This will include increased support for mobility services for older adults and people with disabilities, reflecting the expected increases in these populations. Efforts should focus on giving people options to live well without a car and may include prioritizing affordable  [& frequent](#) public transportation and transit passes, [youth fares](#), new technologies such as electric bikes, [addressing barriers to using mobility devices in public spaces](#), [on-demand](#) mobility services and prioritizing connections between multimodal transportation and affordable housing to facilitate affordable living.

#### **6.09 Transportation Safety**

The city and county recognize safety for people of all ages using any mode within the transportation system (i.e., walking, bicycling, transit riding and driving) as a fundamental goal.

The city's and county's Vision Zero policies aim to eliminate traffic ~~deaths~~deaths and severe injuries involving people using all modes of travel, focusing on crash trends and mitigation strategies identified in the Safe Streets Boulder Report and on-going local, regional and statewide safety assessments. Improving travel safety is based on a holistic pre-emptive application combination of a Safe System approach, the four E's: Engineering, Education, Enforcement, Evaluation and relies upon our whole community to keep people safe. To achieve Vision Zero, improvement of our infrastructure is critical in achieving safety and shall be referenced in all of Boulder's applicable Strategic Plans. ~~the four E's approach helps ensure we are addressing travel safety from all angles. This means dangerous travel behaviors, such as distracted and impaired travel, can be countered through enforcement efforts and safety education outreach, while engineering treatments and innovative street design can help prevent intersection conflicts for example. Applying all four E's is the most comprehensive way to help prevent crashes.~~

## **Regional Travel**

### **6.10 Regional Travel Coordination**

Local transportation and land use decisions have regional transportation impacts. The city and county will work to develop regional consensus for multimodal improvements to regional corridors through working with the Colorado Department of Transportation, the Regional Transportation District (RTD), Denver Regional Council of Governments (DRCOG), Northwest Mayors and Commissioners Coalition and other providers to develop high-quality, high-frequency regional transportation options, including improvements identified in the Northwest Area Mobility Study (NAMS), FasTracks arterial bus rapid transit (BRT) service, managed lanes and commuter bikeways between communities; and to set land use policies that will focus development around these improvements in order to maximize their benefits for the region. The city and county will continue development of first- and last-mile connections to local systems and longer-term transit planning.

### **6.11 Regional Transit Facilities**

The city will develop and enhance the regional transit anchors that serve the primary attractors and employment centers, including ~~of~~ Downtown Boulder, the University of Colorado campuses and Boulder Junction adjacent to the Boulder Valley Regional Center. In particular, Boulder and Boulder County shall prioritize amenity-rich development along existing and projected transit routes, emphasizing goods and services for residents and employees in emerging transit-oriented development projects. Developing "Mobility Hubs" and first and last mile connections to these facilities is a priority to support employees commuting into and throughout Boulder and Boulder County and to reduce single-occupancy auto travel and congestion on regional roads.

## **Funding & Investment**

### **6.12 Investment Priorities**

To protect previous investments and ensure safe and efficient use of existing travel corridors, the city will prioritize investments for travel safety for people using all modes, such as Vision

Zero improvements; system maintenance, such as street and bridge repair; and system operations, such as signal enhancements. The city will give medium priority to system efficiency and optimization, such as enhancement of pedestrian, bicycle and transit systems; ~~electrical vehicle charging infrastructure and electrification of streets; neighborhood roadway~~ speed management, and person-carrying capacity improvements (rather than adding capacity for vehicles). ~~Where possible, investments will be designed to minimize lower long-term maintenance costs, such as by narrowing motor vehicle travel routes streets, directing larger or heavier vehicles to restricted routes, and accommodating smaller, lighter vehicles where possible when repaving or reconstructing.~~ Lower priority will be given to investments in quality of life improvements, such as sound walls. The county will prioritize transportation investments based on several criteria, including, multimodal operational efficiency, safety, partnership opportunities, maintenance, and resilience. The city and county will manage and price any additional significant regional single-occupancy vehicle road capacity to provide reliable and rapid travel times for transit, high-occupancy vehicle lanes and other carsharing options.

## **Integration of Land Use & Transportation with Sustainability Initiatives**

### **6.13 Access Management & Parking**

The city considers vehicular and bicycle parking as a component of a total access system for all modes of transportation (bicycle, pedestrian, transit and vehicular). Such parking will be consistent with the desire to reduce single-occupant vehicle travel, balance the use of public spaces, consider the needs of residential and commercial areas and address neighborhood parking impacts. The city will accommodate parking demands in the most efficient way possible with the minimal necessary number of new spaces and promote parking reductions through a variety of tools, including parking maximums, shared parking, unbundled parking, parking districts and transportation demand management programs. ~~The city will implement appropriate pricing on all publicly-owned parking, both off-street and on-street, to avoid externalizing the costs of pricing and raise revenue from a valuable city resource. Any such pricing will be crafted in such a way as to be equitable and progressive, to the extent feasible. The city will expand and manage parking districts based on SUMP principles (shared, unbundled, managed and paid) to support transportation and GHG reduction goals as well as broader sustainability goals, including economic vitality and neighborhood livability.~~

### **6.14 ~~Safety~~ Transportation Impacts Mitigated**

~~Safety~~ Transportation or traffic impacts from a proposed development ~~that cause unacceptable transportation or environmental impacts, or parking impacts, to surrounding areas~~ will be mitigated. All development will be designed and built to be multimodal and pedestrian-oriented and include TDM strategies to reduce the vehicle miles traveled generated by the development.

Supporting these efforts, new development will provide continuous multimodal networks through the development and connect these systems to those 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.

### **6.16 Integrated Planning for Regional Centers & Corridors**

Land use in and surrounding the three intermodal regional centers (i.e., Downtown Boulder, the University of Colorado and the Boulder Valley Regional Center, including at Boulder Junction) will support their function as anchors to regional transit connections and Mobility Hubs for connecting a variety of local travel options to local and regional transit services. [Community Hubs shall be integrated into the planning of these services.](#)

The land along multimodal corridors, the major transportation facilities that provide intra-city access and connect to the regional transportation system, will be designated as multimodal transportation zones where transit service is provided on that corridor [and the highest intensity of land use is allowed.](#) In and along these corridors and centers, the city will plan for a highly connected and continuous transportation system for all modes, identify locations for mixed-use and higher-density development integrated with transportation functions, emphasize high-quality urban design and pedestrian experience, develop parking maximums and encourage parking reductions.

### **6.17 Complete Missing Links**

The city's and county's goal is to complete missing links in trails, paths and sidewalks, including connections to all transit stops. The city and county will work to complete missing links throughout the transportation grid through the use of connection plans and at the time of parcel redevelopment, ~~as appropriate.~~ Of particular interest are missing bicycle facilities and sidewalk links that connect to transit stops, recognizing that for some members of the community and workforce, transit is the primary travel option. [As city streets or County roads are maintained, achieving complete streets must be mandatedaddressed.](#)

### **6.18 Transportation Facilities in Neighborhoods**

The city will strive to protect and improve the quality of life within city neighborhoods while developing a balanced multimodal transportation system. The city will [improve neighborhood prioritize improvements to](#) access by [walking and rollingall modes](#) and [increase](#) safety within neighborhoods by controlling vehicle speeds and [prioritizingproviding](#) multimodal connections over vehicle mobility. The city and county will design and construct new transportation facilities to minimize noise levels to the extent practicable. Neighborhood [access to transit, walking, and biking facilities will be prioritized, needs and goals will be balanced against the community necessity or benefit of a transportation improvement.](#) Additionally, the city will continue its neighborhood parking permit (NPP) programs to seek to balance access and parking demands of neighborhoods and adjacent traffic generators.

### **6.19 Transportation Infrastructure to Support Walkable 15-Minute Neighborhoods**

The city will [identify 15-Minute Neighborhood centers and develop specific plans for each to ensure that they are easily and safely accessible by foot, bicycle, and where applicable, transit. Such plans will provide direct linkages to the existing and planned cycling and pedestrian networks that permit seamless access to central amenities without a decrease in real or perceived user safety. These plans will extend continue to build improvements to transportation](#)

~~facilities in neighborhoods that create a variety of neighborhood supporting activities and infrastructure~~ within approximately a one-quarter-mile ~~walk~~ radius where residents and employees can fulfill more of their daily needs through safe, healthy and convenient walking and biking. Such infrastructure also has health and fuel consumption-reducing benefits. The city will require private development to support walkable and bikeable neighborhood access through its TMP, development code, and review processes.  
The city and county will amend zoning rules to allow small “bodega” types of retail and professional businesses within residential neighborhoods so that residents can easily walk or use other non-automobile mobility devices to acquire basic necessities and simple amenities of common life.

## **6.20 Neighborhood Streets & Alleys Connectivity**

The city recognizes neighborhood streets and alleys as part of the public realm and will plan a well-connected and fine-grained pattern to facilitate public access, promote safe and convenient travel for all, disperse and distribute vehicle traffic and maintain safe street characteristics character and community cohesion. The city recognizes alleys in historic districts as particularly important for maintaining the permeability of such neighborhoods by and character and providing travel routes for pedestrians and bicycles.

## **6.21 Mobility Hubs**

As guided by the TMP, the city will establish Mobility Hubs that provide seamless integration between transit and pedestrian and bicycle facilities, car/ridesharing and a context- appropriate parking supply for people of all physical abilities. The city will encourage Mobility Hubs associated with neighborhood centers to emphasize excellent pedestrian infrastructure within a quarter ~~mile –to-half-mile~~ walk shed, connections to the bicycle network and high-quality urban amenities design of structures and public spaces.

## **Other Transportation Policies**

### **6.22 Improving Air Quality & Reducing Greenhouse Gas Emissions**

Both the city and county are dedicatedecommitted to reductions in GHG emissions, with the city committing to an 80 percent reduction from 2005 levels by 2050 and the county committing to a 45% reduction by 2030 and a 90% reduction by 2050. The city and county are also committed to reducing emissions that lead to ozone and particulate matter levels that currently exceed EPA air quality standards. The city and county will design the transportation system to minimize air pollution and reduce GHG emissions by incentivisingpromoting the use of active transportation (e.g., walking and bicycling) and low-emission transportation modes and infrastructure to support them, reducing auto traffic, and encouraging the use of fuel-efficient and clean-fueled vehicles that demonstrate air pollution reductions ~~and maintaining acceptable traffic flow.~~

### **6.23 Municipal Airport**

Boulder Municipal Airport is a general aviation airport that has been in existence since 1928. The airport will continue to ensure it meets the needs of the community by providing a safe

environment for ~~aviation business and business-related travel~~, scientific and research flights, recreation and tourism, flight training and vocational education, aerial fire-fighting, emergency medical flights as well as flood and other disaster-related support for the city and county. The city will seek to mitigate noise, safety and other impacts of airport operation while assuring that new development in proximity will be compatible with existing and planned use of the airport. At the time of the next Airport Master Plan, the city will work with the community to reassess the potential for developing a portion of the airport for housing and neighborhood-serving uses, [with multimodal transportation options](#).

## **6.24 Emergency Response Access**

The city and county will continue to assess and develop solutions to coordinate transportation policies, infrastructure planning and response plans in the event of a disruption or emergency. [The city and county will balance the need for efficient emergency services response times with the imperative for street designs that increase overall resident safety and access, and reduce the rate of traffic crashes that directly impact residents and visitors on a regular basis, outside of emergency or disaster conditions.](#)

### **Additional policies**

1. [In order to improve safety, comfort, and efficiency for pedestrians, the city will update its Design and Construction Standards to widen sidewalk standards, specify that intersection corner radii be minimized, and require bulbouts or neckdowns at all pedestrian crossings where on-street parking is present or lane width allows.](#)
2. [Recent private and public developments have avoided creating public streets because the DCS allowable street designs are not consistent with current desires for safe, calm, people-centric streets. The city will update its DCS to allow much greater flexibility in street design in achieving these goals.](#)
3. [The city will create a Transportation Demand Management fund and an in-lieu payment schedule for new development, and allow the option for development to meet its TDM requirements via a fee in lieu of on-site TDM implementation. The fund will be used to reduce SOV trips and meet other Transportation Master Plan goals by the most efficient means necessary.](#)
4. [By dramatically reducing the time cost of driving, the advent of autonomous vehicles threatens to significantly increase motor vehicle congestion. The city will proactively implement regulations and incentives to ensure that streets remain usable by all, and in particular to ensure that transit remains an efficient and desirable choice.](#)
- 4-5. [The city departments of Transportation, Public Works, and Parks and Recreation will create a program to repurpose underutilized street space and parking as green infrastructure such as bioswales, micro-parks, and stormwater absorbers. These will be designed to reduce stormwater runoff, mitigate the urban heat island effect, add green space, and calm traffic.](#)
- 2-6. The city will create a comprehensive traffic signals policy, in order to ensure *consistency* of signals decisions with BVCP, TMP, and Vision Zero; *transparency* of decision-making regarding signals; and *equity* of signals treatment for all modes, locations, and populations. The policy will address signals warrants (where signals are,

and where signals are not, to be used for traffic control); signal design; and signal operation (including conditions under which signals should be coordinated versus free-running, signal cycle length and progression speed, use of pushbuttons for pedestrian service versus automatic pedestrian service, and transit priority policy).

3.7. As e-bikes become cheaper and facilities like the Highway 119 MUP come online, planning should anticipate and accommodate a major shift toward individual e-mobility devices over car use.

## Map A-2 (Land Use Map)

Historically and currently, the land use map has, as its name suggests, exclusively shown land use designations, with no regard for transportation facilities. However, transportation and land use are inextricably linked, and the best planning results from considering them in concert, each affecting the other. We therefore suggest that a land use and transportation map should replace the exclusively-land use map. Not every street and sidewalk need be featured, but major transportation facilities (streets, transit routes, pedestrian and bicycle facilities) should be shown so that the relationship between those and the land use is more apparent and easily understood. (See also current policy 6.15)