



# Land Use

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

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

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

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

Questions are grouped in the following sections:

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

## **Affordable Housing**

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

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

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

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<sup>1</sup> For additional information on the City of Boulder's Inclusionary Housing program, see: <https://bouldercolorado.gov/housing/ih-program-details>.

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

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

### **Annexation of Open Space**

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

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

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<sup>3</sup> Sources: 1) Boulder Valley Comprehensive Plan. 2015-2040 Projections Methodology. Available at: [https://www-static.bouldercolorado.gov/docs/BVCP\\_Projections\\_Methodology\\_Formatted\\_082815-1-201508281638.pdf](https://www-static.bouldercolorado.gov/docs/BVCP_Projections_Methodology_Formatted_082815-1-201508281638.pdf). 2) Boulder Valley Comprehensive Plan Trends Report. December 8, 2015. Available at: [https://www-static.bouldercolorado.gov/docs/Trends\\_Report\\_12-8-15-1-201512091328.pdf](https://www-static.bouldercolorado.gov/docs/Trends_Report_12-8-15-1-201512091328.pdf)

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

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

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

<sup>4</sup> Cornett, Linda, “Gunbarrel Area Voters Reject Annexation,” *Boulder Daily Camera*, November 2, 1978.<sup>5</sup> Colorado Land Planning and Development Law. Seventh Edition, 2006. Chapter 8, page 186.

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

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

### **Traffic Impacts, Road Infrastructure and Cross-Jurisdictional Concerns**

9. Won’t the traffic and parking impacts of medium density development be unreasonably high?
  - Traffic impacts would be assessed as part of the development review process. At the time of site review, the city would require a Traffic Impact Analysis and Travel Demand Management (TDM) plan. The plan would outline strategies to mitigate traffic impacts created by the proposed development, and implementable measures for promoting alternate modes of travel, in accordance with section 9-2-14(D), B.R.C., 1981 and section 2.03(I) of the City of Boulder Design and Construction Standards. During the site review process, the applicant must address impacts related to circulation which include, without limitation: discouraging high speeds, minimizing potential conflicts with vehicles, ensuring safe and convenient multi-modal travel/connections, promoting alternatives to single-occupant vehicles, use of TDM techniques, providing on-site facilities for external linkages for other modes of transportation, minimizing the amount of land devoted to the street system, designing for types of traffic expected from all modes of travel, and controlling noise and exhaust (Boulder, CO Municipal Code 9-2-14. h-2). At the time of annexation, the development would also be subject to the guidelines established in the City of Boulder’s Land Use Code, Section 9-9-8. D, and the city’s Design and Construction Standards.
  - No information available at this time indicates that the potential impacts of traffic and parking could not be mitigated, or that traffic or parking concerns should preclude a change in land use designation.
  
10. How would road infrastructure needs be addressed since the development would be in city jurisdiction but would have impacts on county-owned road infrastructure?
  - The city and county would coordinate to address the infrastructure needs of any development. As additional infill development occurs in the BVCP service area it will become increasingly important for the city and county to work together and develop additional arrangements to address infrastructure needs. This is an area that can potentially be addressed through an agreement between the City of Boulder and Boulder County.

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<sup>6</sup> Ibid. page 187.

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

### **Wildlife and Open Space Preservation**

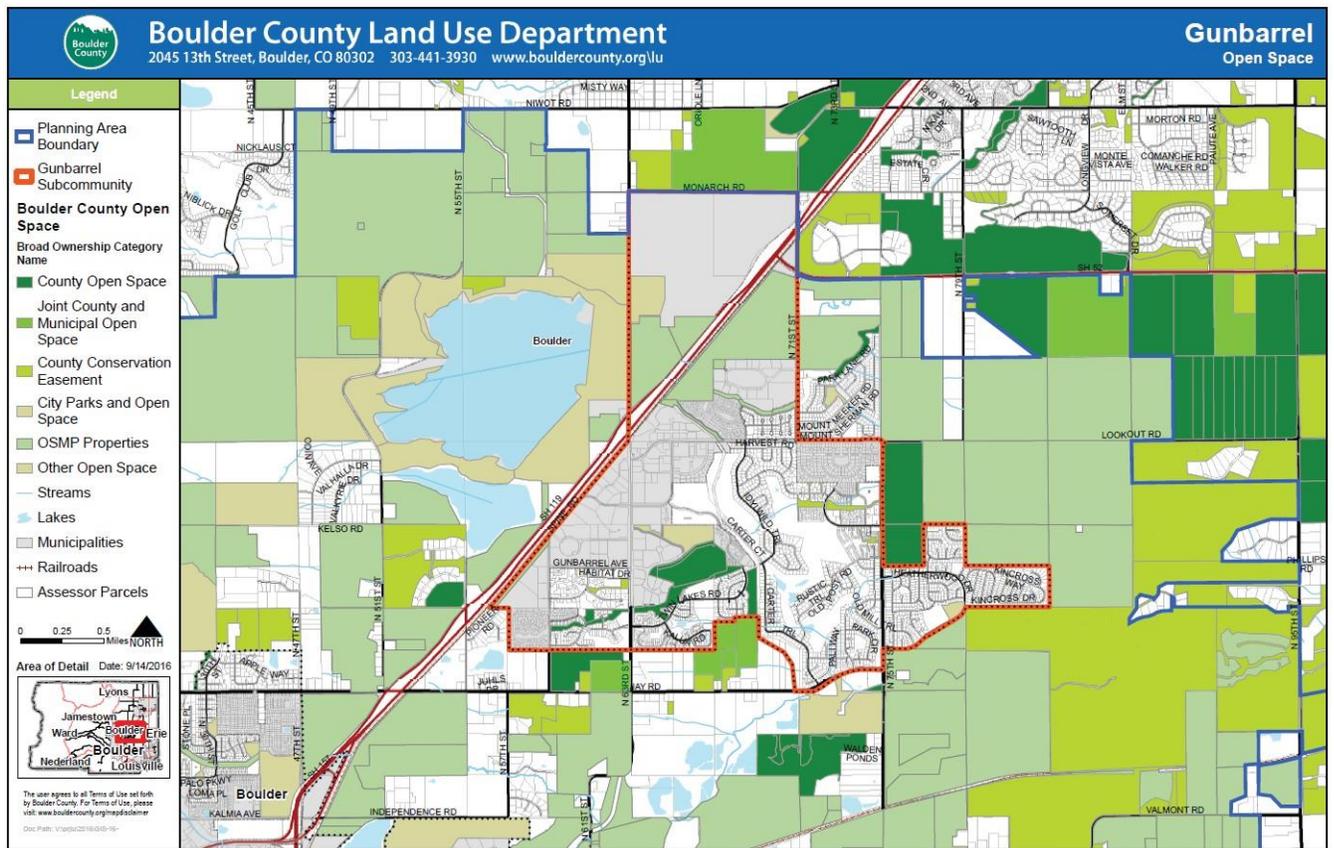
13. Doesn't the county want to preserve land to support biodiversity?
  - A fundamental principle of land use planning and the BVCP is to be deliberate about where development will go, and what areas will remain undeveloped. The parcels south of Twin Lakes have been part of Area II of the BVCP and envisioned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

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

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

Source: City of Boulder GIS

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



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

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

<sup>8</sup> Ibid.

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

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

### **Parcel History and Land Use Designations**

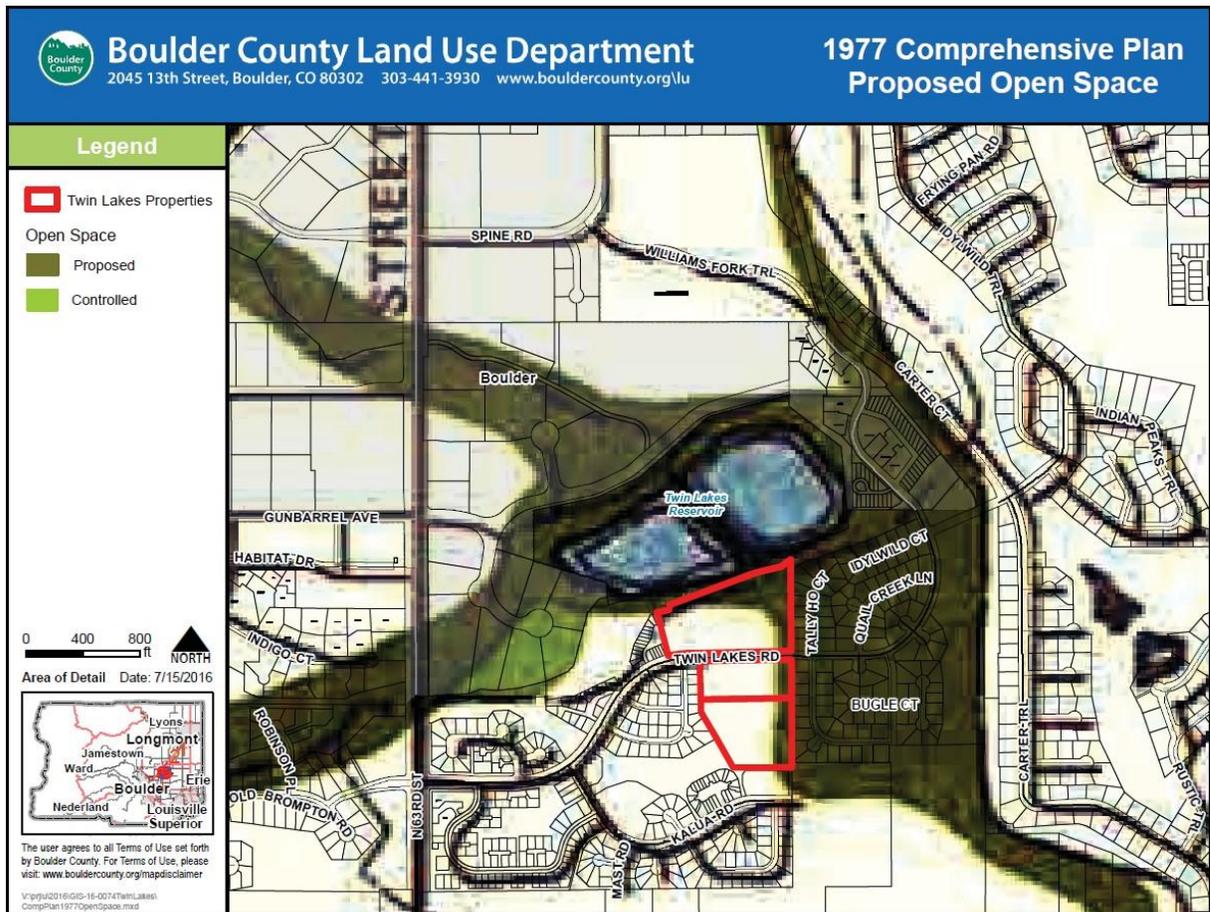
17. Weren't the BCHA and BVSD parcels envisioned as open space and community park area in the original 1977 comprehensive plan?
  - No. In the original 1977 BVCP, areas to the south and east of the Twin Lakes were identified as proposed open space, part of a north-south greenbelt. A 40-acre community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

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

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

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



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

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

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

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

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

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

### **Timing of Studies & Process**

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

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<sup>12</sup> 2010 Boulder Valley Comprehensive Plan, pg. 68.

<sup>13</sup> Ibid. pg. 68

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

### **Agricultural Land of Significance**

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



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

Tables — Farmland Classification — Summary By Map Unit				
Summary by Map Unit — Boulder County Area, Colorado (C0643)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AoC	Ascalon-Otero complex, 3 to 5 percent slopes	Prime farmland if irrigated	2.0	0.1%
AoD	Ascalon-Otero complex, 5 to 9 percent slopes	Farmland of statewide importance	70.4	2.9%
CoC	Colby silty clay loam, 3 to 5 percent slopes	Farmland of statewide importance	15.3	0.6%
CoD	Colby silty clay loam, 5 to 9 percent slopes	Farmland of statewide importance	18.1	0.8%
Ct	Colby-Gaynor association	Not prime farmland	71.7	3.0%
HeB	Heldt clay, 0 to 3 percent slopes	Prime farmland if irrigated	17.5	0.7%
HeC	Heldt clay, 3 to 5 percent slopes	Farmland of statewide importance	206.6	8.6%
KuD	Kutch clay loam, 3 to 9 percent slopes	Farmland of statewide importance	9.2	0.4%
LoB	Longmont clay, 0 to 3 percent slopes	Farmland of statewide importance	373.7	15.6%
NuB	Nunn clay loam, 1 to 3 percent slopes	Prime farmland if irrigated	892.5	37.2%
NuC	Nunn clay loam, 3 to 5 percent slopes	Prime farmland if irrigated	528.1	22.0%
NuD	Nunn clay loam, 5 to 9 percent slopes	Farmland of statewide importance	26.1	1.1%
Ro	Rock outcrop	Not prime farmland	16.1	0.7%
SaD	Samsil clay, 3 to 12 percent slopes	Not prime farmland	4.5	0.2%
VaB	Valmont clay loam, 1 to 3 percent slopes	Prime farmland if irrigated	104.3	4.3%
VaC	Valmont clay loam, 3 to 5 percent slopes	Prime farmland if irrigated	7.0	0.3%
VcE	Valmont cobbly clay loam, 5 to 25 percent slopes	Not prime farmland	5.3	0.2%
W	Water	Not prime farmland	30.1	1.3%
WeB	Weld fine sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated	3.0	0.1%
<b>Totals for Area of Interest</b>			<b>2,401.5</b>	<b>100.0%</b>

**Description — Farmland Classification**

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

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