Dear Council Members, Planners and Planning Staff,

Friends advised me to send you the recent Guest Opinion I had the privilege of writing in the Daily Camera, "BVSD and Twin Lakes: Numbers don't add up." I've pasted it below.

I also want to send the link to the recent front-page Daily Camera article "Open-space corridor key to Boulder annexation of Twin Lakes," about how County Open Space policies have never before supported this and how private developers have been denied the same request BCHA is making. (City open space is a bit different and usually involves flagpole annexation.)

Thanks for your time and best wishes,

Matt Samet

**BVSD and Twin Lakes: Numbers don't add up**

*By Matt Samet*

As a community, we are fortunate to have such good schools and excellent teachers. Recent actions by the Boulder Valley School District, however, have left me baffled. In the 1960s, a developer dedicated about 10 acres of land near the Twin Lakes to BVSD for a school or public educational purposes. BVSD says the need for a school never materialized, so now they say they'd like to partner with the Boulder County Housing Authority to build affordable housing for teachers on the field. To do that, the district is requesting that the land-use designation be changed from public to mixed-density residential (which would allow up to 180 units on the 10 acres) and that the field be annexed into the city through county open space.

Affordable housing for teachers sounds noble enough. Here's the pickle: Most teachers in Boulder Valley wouldn't qualify for affordable rental housing (which is what the housing authority has exclusively built in the last 10 years). To be eligible, a family of four must earn less than $59,640, which is 60 percent of the Area Median Income. The average salary for full-time teachers in BVSD is $74,500.

That's a great thing! Teachers should earn even more. It does raise questions, though, about BVSD's plans. Let's look more closely at the numbers, based on salary data obtained Feb. 4 through a Colorado Open Records Act request. To be conservative, we'll assume that the teacher is the sole breadwinner for a family of four.
Out of 1,595 full-time teachers, 1,274 (79.9 percent) make more than the $59,640 cap. That means 321 (20.1 percent) might potentially qualify for affordable rental housing, assuming no summer salary or other household income.

One hundred fifty-five of those 321 teachers make between $55,000 and $59,640 — so if their spouse or any additional income brings in $5,000 a year more, the teacher would be ineligible for affordable rental housing.

Of the 321 teachers who potentially qualify for affordable rental housing, 185 are first-, second-, or third-year teachers. Many of these early-career teachers are probably younger, may have roommates, and will be earning more as they advance. That leaves us with 136 teachers who have been teaching longer than three years and make less than $59,640.

Of those 136 teachers, only four work in Gunbarrel. Sixty-six work in Louisville, Lafayette, Superior, and Broomfield. Twenty-one work in South Boulder; 38 in more central Boulder; two in Nederland; one in Jamestown; and four have floating positions. So building up to 180 units in Gunbarrel makes little sense.

It is true that BVSD may have other options than rentals available, such as the BHP Homeworks program. This raises the eligibility requirements but significantly caps asset growth for teachers trying to build wealth. It’s also true that some non-teaching staff may qualify, but BVSD’s land-use-change application and communications have focused on teachers.

The plan is fraught with other problems, too. Since the development would receive federal funds, strict rules prohibit giving preference to certain workforces. BVSD planners have been unable to show that they could skirt this. Additionally, they have conducted no surveys to find out where teachers want to live and in what type of housing. Even teacher unions have balked at benefits conferred to only a few.

Those in charge at BVSD must know all this. So what might a “backup” plan be? Well, if this rural-residential, unincorporated field were annexed into the city and upzoned to allow high-density, it would be worth significantly more. BVSD could then sell it to another developer for a hefty profit. Although that might be a strategic action, it shouldn't be disguised as altruistic.

Our schools teach about the importance of research, factual accuracy, and intellectual honesty. As regards the Twin Lakes, recent statements by BVSD upper management and the housing authority have been schooling me in skepticism.

The spirit of the original land dedication was to give something back to the people of Gunbarrel. Residents’ requests for this field to be open space honor that intent. Along those lines, Boulder Valley could make this a field-trip destination where kids could come to watch hawks, eagles, and baby owls; track animal footprints; take water samples; and identify flowers and birds. This idea would be low in cost but rich in experiential education.

Matt Samet lives in Gunbarrel.
Dear Planners, Commissioners, and Parks & Open Space staff,

I am writing as a resident in South Boulder to ask you to please not allow the proposed development of the Twin Lakes Field to occur. That field is critical hunting habitat and a wildlife corridor for the Twin Lakes inhabitants. One of the main reasons our wildlife numbers are declining and why our raptors have declined by 90%! is because their habitat is fragmented. If this field is developed, more habitat will be fragmented and species lost from a vibrant area.

If the field is developed we will lose the individuals that live, nest and forage in those fields and in the adjacent stream corridor, including, the bald eagles, the great horned owl pair that nests every year, the Northern Harriers, the lark buntings, the minks, the long and short eared owls that forage in the field and all the meadow voles and snakes that feed them.

As Boulder County becomes more dense and our protected spaces become more trafficked our challenge is to not only connect the wild spaces but also to preserve the ones that are already connected. It was my understanding that the city and county would work together “to preserve, enhance, restore and maintain undeveloped lands critical for providing ecosystem connections and buffers for joining significant ecosystems.” I could not agree with this statement more, it is an essential approach for biodiversity, so please stand behind your words and protect the Twin Lakes field.

Thank you, Jenny Natapow
Dear Members of the City of Boulder City Council and Planning Board, Boulder County Board of Commissioners and Planning Commission,

Thank you for the support from all four review bodies to further study the joint Boulder County Housing Authority (BCHA) / Boulder Valley School District (BVSD) land use designation change request for our Twin Lakes properties. This is an important milestone as BCHA and BVSD seek to work together to bring additional affordable housing to Gunbarrel. I am writing to provide a brief status update as we enter the study phase of the review.

BCHA/BVSD/TLAG Facilitated Process: In addition to advancing our request for further study, Boulder City Council approved a motion to establish a facilitated process among interested stakeholders including BCHA, BVSD, and the Twin Lakes Action Group (TLAG). We look forward to working with neighbors to create a development that brings a range of housing options, neighborhood-serving amenities, and broad community benefit and we appreciate your efforts to coordinate these important discussions.

We will also continue to seek and listen to a broad range of perspectives as we strive to meet the affordable housing needs of the community as a whole. And we invite you to review some recent letters of support for our Twin Lakes proposal.

BCHA & BVSD Memorandum of Understanding: On February 29, BCHA and BVSD executed a Memorandum of Understanding (MOU) to clarify and further strengthen our partnership to build affordable housing on our adjacent Gunbarrel properties. The MOU outlines collaboration on master planning, public engagement, and entitlement processes and limits real estate activities with entities outside of the agreement. The document provides additional clarification about the ways in which this partnership can help serve our community.

Additional Areas of Focus: We expect that the areas outlined in our February 25th letter to you will be important components of the upcoming facilitated dialogue. As a result, we are reaching out to interested parties with a similar update, including our recent RFPs for wildlife and geotechnical / hydrology studies and our commitment to sharing the results of these assessments with the stakeholder group. One quick clarification related to our February 25th letter: The Boulder County Audubon Society has explicitly requested to remain neutral in these conversations. The statement about the future of the Twin Lakes owls was our own. The opinion we expressed was informed by both online research (e.g., published information on Audubon’s website) and conversations with other wildlife experts, all of which indicated to us that the great horned owl is a human-adapted species and one that is currently thriving in Boulder County.

On a personal note, I will soon be out on maternity leave. In my absence, BCHA Executive Director
Frank Alexander will be the primary contact for Twin Lakes. He can be reached at 303-441-1405 or falexander@bouldercounty.org.

Thank you for your commitment to this important process and please let me know if you have any questions.

Sincerely,
Willa

Willa Williford
Housing Director
Phone: 303 441-4529
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2525 13th Street, Suite 204
Boulder, CO 80304
wwilliford@bouldercounty.org
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CAUTION: This email or attachments from the Boulder County Department of Housing & Human Services may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient (or authorized to act on behalf of the intended recipient) of this message, you may not disclose, forward, distribute, copy, or use this message or its contents. If you have received this communication in error please notify the sender immediately by return email and delete the original message from your email system.
Dear City and County Elected Officials and Staff,

As I am sure you are aware, Twin Lakes Action Group (TLAG) was copied on the email below, which was sent on February 28th, 2016.

As residents of Boulder County, we were shocked by the allegations in this email and were very concerned as to why government departments are using this method to justify BCHA and BVSD's comprehensive plan change request for MXR.

Although the claims in this email were very specific, we wanted to verify that this was not a case of a disgruntled employee. We asked for the specified "Red Thread Newsletters" through a CORA request and received them late last week. For those of you who have not seen the newsletters, they are attached below.

Now that we have seen the "Robin's Red Thread Newsletters" and they match the concerns raised by John Doe's email, we question why government employees are writing internal newsletters to pressure their employees to take a particular stance on an issue. We are also deeply disappointed to hear that "class and privilege" were a main theme in the newsletter, thus painting a negative and biased opinion of all Gunbarrel residents. Is this acceptable behavior of our government employees? Is it appropriate to degrade an entire community due to our "class and status", since they are referring to "white" and "middle class"? We know this would not be acceptable if the language referred to other races or social classes.

This method of gaining support for a BVCP change request (or for any other issue) seems unethical, to say the least. It is our understanding that the BVCP process is put into place in order to look at land and determine the appropriate use of that land, regardless of the developer or the special interests involved.

How do you, our elected and appointed leaders of the Boulder Community, address items of this unethical nature?

The Board Members of TLAG request contact information for Boulder City and County Ethics Departments and Ombudsman's offices in order to further discuss this matter.

Sincerely,

Dave Rechberger
TLAG Chairman

On Sun, Feb 28, 2016 at 3:49 PM, John Doe <concernedcitizen80303@gmail.com>
The Director of the Community Services Department for Boulder County has been on an aggressive campaign to have the employees under her supervision support her stance on the affordable housing plan in Gunbarrel's Twin Lakes area. In the Director's weekly Red Thread Newsletter, which is distributed to all employees within her department, she has steadily authored a biased narrative to influence her subordinates into advocating for her stance on the land development issue. The first newsletter that addressed the Twin Lakes land development was sent out on January 29th, five days before a public hearing was to be held on February 2nd, and it included divisive rhetoric that pitted the Community Services Department against the citizens of Gunbarrel. The Director appears to state that the heart of the issue of whether or not to develop the Twin Lakes area is based mainly on the issue of affordable housing, painting the people against the project as a privileged class that "values their private open space," ignoring any of the other issues or concerns that have been addressed by the Twin Lakes Action Group. Class and privilege issues were a main theme in the newsletter, along with the notion that it's the Community Services Department's obligation to "level the playing field" between the people in need of housing and the citizens of Gunbarrel. Instructions on how to attend an upcoming meeting to support the affordable housing application were detailed in the newsletter, along with suggestions on how to increase effectiveness (e.g. bringing additional people to have increased speaking time). Also included in the instructions was how to submit an email in support of the affordable housing application in Gunbarrel; never once in the Director's instructions did she indicate opposing views or opinions were welcome. A subsequent newsletter was issued on February 5th, with the Director giving accolades to the specific employees who showed their support for the Twin Lakes affordable housing development. Class and privilege were once again themes in the newsletter, along with noting that the Community Services Department will explore ways to elevate its advocacy role in the housing development, in order to "level the playing field." Another newsletter was issued on February 11th, indicating the Community Services Department's managers' team is figuring out ways for Boulder County staff to step into new advocacy roles to help support the Twin Lakes affordable housing development, stating it's the department's responsibility to ensure that "the other side of the story" is being heard.

I am not against the organizing of people to advocate for a shared cause, but I am against a Boulder County Department Director using her level of authority to influence those under her supervision into advocating for an issue others may not agree with. I am not against affordable housing, but I am against the demonizing of a community that simply wants their voices and concerns to be heard.

You may not be a resident of Gunbarrel, but imagine living in a community where your opinions and views on a matter are being organized against by a government entity, a government entity that is supposed to represent all its citizens, not just a particular segment. Imagine being part of a community that is portrayed in a negative light
by an influential government figurehead, without having the opportunity
to refute such hostile speech. At the heart of this issue is the abuse of
power, am I believe that abuse is evident here.

As a Boulder County employee who supports the Twin Lakes
Action Group agenda, I feel intimidated and marginalized by
my employer. After reading the Director's newsletters, I no
longer feel safe participating in events that allow me to have
a voice in the development of the land around my community.
How can I participate without fear of being recognized by my
employer and then being unfairly labeled as a dissenter that
does not want to support the mission of my department?
Could my participation lead to some sort of retribution and
possibly cost me my job? I understand the Director of Boulder
County Community Services wants to advocate for affordable
housing. However, it seems questionable that a county
department director can use her position to implore those
under her supervision to fight a cause that she explains under
a bias light. I am in no way against affordable housing; I have
spent a good part of my career in the human service field,
and am aware of the struggles many people face. I resent
being painted in a negative light simply because my personal
mission outside of work does not line up with my Department
Director's opinion. The Director's approach to this topic feels
wholly incongruent with the Boulder County mission of
inclusiveness. Moreover, as Boulder County is usually careful
to make sure people with different opinions are respected, the
message of this newsletter, whether accidental or intentional,
almost feels like a veiled political move to disenfranchise those
who support a different agenda than the County's.

--
Twin Lakes Action Group
Volunteer in Action

Ralph Millif has volunteered at Boulder County Head Start weekly since the fall of 2015.

He can often be seen writing, drawing or building with children on the floor. Inevitably, Ralph ends up in the House Area, actively engaged in role-play. He is a dynamic addition to play as well as support for strengthening the children’s learning.

As a father, Ralph had some experience with children, but what makes Ralph an amazing volunteer is not what he knows but HOW he engages. Ralph doesn’t just come to volunteer with children. He actually takes the curriculum books home and does his own homework, to familiarize himself with the concepts the children are learning and the areas of interest in the classroom. He brings himself fully to the volunteering experience. For example, Ralph had his grown children help pick out a holiday gift for each classroom. His children chose their favorite childhood books as the classroom gift, linking Ralph’s family life and his volunteering. The children made Ralph a painting for Christmas. This painting is proudly displayed in Ralph’s office, for all of his CU coworkers to admire. Ralph shares the volunteer experience; he is an ambassador for Head Start at work and at home.

Ralph volunteers in honor of his mom, who founded an innovative center in Concord, CA. Ralph says, "I expected to have fun with the kids at Head Start and that has certainly been the case. In addition, I have been pleasantly impressed to see, first hand, what an efficient and effective program Head Start is in the Boulder implementation.

The teachers, teacher-aides, staff and leadership work together in fluid ways that always have the kids’ best interests at heart. It is a privilege to provide my little bit of support to this outstanding team. I am happy to encourage my peers to consider a volunteer experience with Head Start".

Know a fantastic volunteer at Community Services? Highlight them by sending their story to Robin for the Red Thread and thanks to Rachel Hohensee for passing this one along!
Giving a Voice to the Needs in Our Community

After attending Tuesday night’s BOCC/Planning Commission meeting, I left feeling discouraged about how hard it is to talk about issues of class and privilege. At issue is two parcels of land in Gunbarrel owned by Boulder County and BVSD. Both organizations are requesting the land be rezoned in order to build low to moderate income housing. Current residents are opposed to any changes.

I believe the real debate is not about the affordable housing crisis, rather, it’s about our obligation to support those struggling for opportunity in our communities.

At issue are the needs and desires of the existing neighbors, who value the parcels as their private open space versus the use of land to address the needs of people in our community who are struggling with basic survival and housing instability (which have far-reaching negative health, education and employment impacts).

As available land parcels and the opportunity to develop more affordable housing for a variety of incomes becomes more and more scarce, it is important to recognize that the places where we start out in life and our paths to success aren’t even. We don’t all have the same chances in life.

As you might imagine, current neighborhood residents have the time and money to organize, hire attorneys and land use consultants in order to oppose this development in a powerful and impactful way. They also have the means to purchase the properties (through various mechanisms) so that the land can be “theirs.” That is not an option for those who need the housing.

Those we serve, who often struggle with issues (health, income, education, safety), do not have the means to respond in the same way. Many work multiple jobs to support their families and cannot even show up to meetings so that decision-makers can hear the full story.

How do we level the playing field? I believe it is our obligation, given our department’s mission, to do so.

The following is a wonderful cartoon that demonstrates privilege but is also in tune with our Bridges out of Poverty model.
ON A PLATE

THIS IS RICHARD. HIS PARENTS ARE DOING OK.

RICHARD'S HOUSE IS WARM AND DRY. HIS SHELVES ARE FULL OF BOOKS AND HIS FRIDGE IS FULL OF FOOD.

AND THIS IS PAULA. HER PARENTS? NOT SO MUCH.

PAULA'S HOUSE IS FULL OF PEOPLE AND NOT MUCH ELSE. IT'S DAMP AND NOISY AND SHE KEEPS GETTING SICK.
Richard’s parents will do anything for their baby...

...and so will Paula’s. That’s why they’re working two jobs.

Richard goes to a great school. Well resourced, good kids. His teachers love their job.

At Paula’s school, the class sizes are large, the school is underfunded, and looks it. Her teachers are tired, stretched thin from the stress.

Oh man, I need a new job...

So maybe we can see why the expectations set for Richard...

...might be slightly different to those set for Paula...

B+? Oh dear, we need to get you a tutor...

B? Hey, not bad!
... AND OVER THE YEARS ALL THESE LITTLE DIFFERENCES...

(PARENTS PAYING FOR UNI)

... THEY START TO ADD UP TO BUILD INTO SOMETHING BIGGER.

JUGGLING WORK AND POLYTECH, STILL GETTING IN DEBT

I have friends working there - I'll have a word, and get you an internship.

Thanks Dad.

You should be finishing your studies, not looking after me...

Dad, you're sick.

AND BECAUSE EACH LITTLE DIFFERENCE SNEAKS BY UNNOTICED...

Yep, the loan is approved. Congratulations!

Look, we just can't help you. Maybe try Eazee Finance?
Help us tell the other side of the story that the decision makers are not hearing. Attend the upcoming City of Boulder joint hearing of the City Council and Planning Board and speak about the need for our community to stretch and create opportunity for those without the means of privilege, time, social capital and resources. Tell the stories of your clients’ struggles and the impact of housing instability on their lives. Tell the story of your own housing challenges and the cost of housing’s impact on our County’s workforce. You need not be a city of Boulder resident to speak.
If you can attend, you can sign up to speak between 5-6pm. We recommend arriving early to get a seat and to sign up. When you do, please indicate you are speaking on the BCHA Twin Lakes Application. Please note: you'll just have two minutes to speak, however, if you bring two other people with you, your time can be pooled to give yourself four total minutes.

If attending a meeting in person isn’t a possibility for you, please write an email supporting Boulder County Housing Authority’s Land Use Change request for 6655 Twin Lakes Road to the Tuesday's decision-making bodies:

Boulder City Council: council@bouldercoloardo.gov

City of Boulder Planning Board: boulderplanningboard@bouldercoloardo.gov

For more detailed information about this site development:

https://inbo.boco.co.boulder.co.us/sites/cs/10YPlanAdvisoryBoard/Meeting%20Minutes/Gunbarrel%20Packet%20-%20Jan%20202016.pdf

A Perspective of a Staff Member Who Pulled the Red Thread

Thanks to Vicki Buck, an Employment Advisor at Workforce Boulder County, for submitting her thoughts about joining a countywide coalition addressing the needs of people re-entering society after serving jail sentences:

“Wow,” have you ever been somewhere where you knew you were in the right place? That’s how I felt after the first meeting I attended with the Jail Reentry Council. What a great opportunity to collaborate with people who have such a great knowledge base and experience. I was amazed by the passion and sharing of resources that happens at these meetings to serve this population. I am grateful to participate in this partnership, collaboration, and for the information I will be able to bring back to my own role and all staff here at Workforce Boulder County.

I am very excited that I was asked to participate in the monthly meeting with Jail Reentry council which is a part of Boulder County’s Community Justice Services. It will be a great professional development opportunity for me and an important resource to thread through the rest of our services at Workforce.

Collaborating with this group brings hopeful solutions to serve the community that struggles with criminal histories in accessing employment within a more supportive coalition. In addition to bringing information about our services I am learning that there are so many community partners that share vision to serve this Boulder County population.

Our collective efforts will strengthen our ties within the community and provide greater opportunities to the people we serve.

Thanks for all you are and do - stay safe out there, especially with the threat of the coming snow storm!

Best, Robin
An extraordinary effort

Chris Altier, a CJS Jail Education and Training employee recently received a special commendation from the Sheriff's Office for working collaboratively with Lori Hiza, a Sheriff's Office hourly employee, in order to support an inmate with special needs obtain his high school diploma while incarcerated.

When he arrived at the jail, this inmate was short ½ of one credit to earn his high school diploma. Because of the inmate's interest in completing his high school education through the St. Vrain School District (he was short 1/2 of one credit), it became complicated quickly. It took approximately 2 months of correspondence with the school district and an approved tutor from the school district for this process to start. The two needed classes were officially chosen by the school district and study materials sent to the jail. Lori worked on the curriculum that she was sent and correspondence with the school district. She worked with inmate Scott on his unique requirements. At this same time Chris was working with the inmate with Spanish classes so maintained a structure for the inmate that contributed to his being able to concentrate on his final testing and achieve success.

As Sgt. Mitchell reported:

"I am unsure how to express how elated this inmate is and proud of himself for getting this done. He has talked with me and praised Lori and Chris. His mother has received his official diploma and sent copies to her son and he was anxious to show me and asked me if I wanted copies. We have his diploma, transcripts and a couple of photos of him that show his pride. Without the work that Lori and Chris provided this would not have happened. He is now housed in Transitions and shows strength in himself that I believe has been absent since his arrival. This was more than about a high school diploma, this was helping change someone's mindset about themselves, and allowing them pride in the accomplishment."

Congrats, Chris, and thanks for demonstrating the importance of attending to education for someone involved in our criminal justice system!
Do you work with, or know someone, who is working hard towards self-sufficiency and who would benefit from information around building assets?

Asset | noun | as set

1. a useful and desirable thing or quality

I strongly encourage you to tell your clients, friends and family about our first annual Thrive conference. The Thrive conference will be held on Saturday, February 27th from 8:30 a.m. to 3:00 p.m. at Front Range Community College in Longmont. This is a wonderful opportunity for motivated Boulder County residents to participate in a full day, bilingual, free conference and is perfect for those who want to better themselves in one or more of the following areas:

- Starting and Operating a Small Business
- Enrolling and Getting Financial Aid for College
- Money Skills for Financial Empowerment
- Powerful Steps to Homeownership
- Healthy Eating and Active Living
- Older Adults: Medicare Basics & Medical Bills on a Limited Income
- Social Action

Participants will register for one workshop from 9:30 a.m. to 10:45 a.m., one workshop from 11:00 a.m. to 12:15 p.m., and one interest group from 12:30 p.m. to 2:00 p.m., during which participants will meet others with similar interests and goals, participate in a facilitated conversation, and develop personalized next steps. There will also be a resource fair where participants can learn more about available resources in our community.
303.441.3998 or Cristina Mejia-Lansing at 303.441.4849 for more information.

Oh yeah, and did we mention that lunch is included and there will be prizes?

The Thrive conference is brought to you by Front Range Community College, Colorado Small Business Development Center, AARP, Foothills United Way, Boulder County Community Services, Workforce Boulder County, Boulder County Community Action Programs, Boulder County Area Agency on Aging, Boulder County Public Health and Boulder County Housing and Human Services.

Educating Decision-Makers About Our Work, Those We Serve, and the Impacts of Policy Decisions and Resource Allocations on Vulnerable Populations

Inherent in our department mission is the recognition that in order to adequately serve our target populations, we need to shine the light on their needs, identify the barriers and opportunities to address those needs, and talk about the impact on our community if those needs aren’t met to those who are in positions of power to change this dynamic.

As you’ve read about the recent opportunity (Twin Lakes proposal) to address housing needs and our recent call to action, our managers’ team have been talking about how to support our staff and those we serve in stepping into a new advocacy role that may not come naturally to some, be intimidating to others, or feel outside your essential job function.

Your manager will be talking with you about this in the coming weeks in order to identify how best to sustain an ongoing approach to ensure that the voices who aren’t usually heard are, in fact, part of the decision-making process, resulting in a clear improvement in their quality of life.

There is plenty of room to educate and bring public awareness to the employment, housing, food, and safety needs (social determinants of health) outside of any specific initiative or proposal.

And we have a responsibility to ensure that "the other side of the story" is being heard.

That said, our current call to action is one that we believe is critical and one that we are continuing to ask you to engage in.

Last week, the Boulder Planning Board voted to move forward for further study the Boulder County Housing Authority’s (BCHA) land use change request for the Twin Lakes property. We now have support from three of the four review bodies for this study. After the lengthy public hearing and discussion, the board also moved to study a change request from neighbors of the property who are seeking to designate (and privately purchase) the land as private open space.

As you might know, our request has been bundled with similar requests by the Boulder Valley School District to use two adjacent parcels for the construction of affordable housing for teachers and other school district employees. We think this is an incredible and unique opportunity to create affordable housing for a diverse population that very much needs this support.
on February 29th. The council is accepting letters until that time. Now is an excellent time to let Boulder City Council members know what you think about whether Boulder County Housing Authority's (BCHA's) 10-acre Twin Lakes property should be used for 60 to 120 units of affordable housing. Please consider writing a letter today to let them know your thoughts. In your work in Boulder County, what have you seen in terms of need for affordable housing from your clients or others? Why should we be utilizing unique opportunities like this one to build permanently affordable housing in Boulder County? How is the lack of affordable housing getting in the way of your client's success? How is the high cost of housing impacting you, your family, your friends? Please send your letter to council@bouldercolorado.gov. And please consider cc'ing the Boulder Planning Board (boulderplanningboard@bouldercolorado.gov), Boulder County Commissioners (commissioners@bouldercounty.org), and the Boulder County Planning Commission (planner@bouldercounty.org) when you send your letter. If our request is referred by city council for further study, City and Council Planning staff will do a thorough analysis, and each of these entities will be involved in making a final decision about whether our land receives a designation that would work for affordable housing.

This is an important moment for our community in terms of being clear about what we value, and this is a critical opportunity to partner with the Boulder Valley School District to thoughtfully build quality affordable housing in an area where affordable housing makes up less than ¼ of 1% of the total housing stock.

BCHA’s Twin Lakes What We Know/What We Don’t Know web page has more about their plans, including:

- BCHA will do their due diligence
- They want to partner with willing neighbors
- This is a unique and rare partnership opportunity
- They have a broad perspective about the community need and the scarcity of such land parcels

BCHA has produced an informational packet about the Twin Lakes property and their proposal to build 60 to 120 units of quality affordable housing on it. Please feel free to print this out for your reference.

There is also an in-depth informational web page about the Twin Lakes affordable housing proposal at their public engagement site, OurBoulderCounty.org.

Please note: BCHA has compiled some of the letters of support sent thus far on our public engagement site: http://www.ourbouldercounty.org/twin-lakes-support-letters.

Another way you can make your voice heard is through a letter to the Boulder Daily Camera. Please consider writing about your support for quality, permanently affordable housing. Maximum letter length is 300 words, and you need to provide your name, full address, and daytime phone number with the letter. Submissions must be sent by email to openforum@dailycamera.com. Please be sure to put “Letter to the Editor” in the subject line.
Thank you for considering how you might engage in this process and stay tuned for more pathways to educate our policymakers about those who struggle in our community.

Enjoy your long weekend for some well-deserved R&R!
Community Services Team Supports Affordable Housing

In spite of the snow day on Tuesday, Erin Jones (Workforce Boulder County); Elberto Mendoza (CAP); Monica Rotner (CJS); Mike Stratton (Communications); and Susi Gritton (Head Start) made it to city of Boulder council chambers along with myself and a team from HHS and nonprofit partners to testify about the need for affordable housing in all parts of our community and to testify in support of Boulder County Housing Authority's Twin Lakes affordable housing development.

Testifying in front of the council and planning board isn’t easy. Due to a misunderstanding, our team signed up and were slated to be first, only to find out we were last on the list, meaning sitting through 3.5 hours of others’ (mostly oppositional) testimony before our turns. It was an interesting, although unintentional, experience of feeling marginalized and a reminder of what many of those we serve feel on a daily basis.

Kudos to those who represented the need for affordable housing, putting a voice to those who aren’t often included in policy-making decisions that impact them most.

We will explore ways to elevate our education and advocacy role throughout the department. Our goal is to get in front of an issue by bringing real-life experiences of those we serve to level the playing field.

Today the Daily Camera printed my Guest Opinion about the hard conversation around class and privilege that impact our work:


As with the Boulder County Commissioners and Boulder County Planning Commission, the Boulder City Council and Planning Board approved the affordable housing proposal and the paperwork moved to the County Council for final adoption. This
means plenty of work is ahead of us!

Planning Begins For 2016 Falls Prevention Week

In January, Melissa Pruitt, Wellness Coordinator at the AAA, gathered Boulder County Partners for Falls Prevention to begin planning the 2016 Falls Prevention Week.

The annual week-long event takes place in September and this year’s will mark the fifth one. BCAAA places an emphasis on fall prevention because of its prevalence and potential negative consequences. All too often a fall causes a hip fracture and leads to declining mobility and loss of independence.

Falls Prevention Week 2015 featured thirty-seven events held in twelve different locations with a total attendance of 645 people. The offerings included talks on a variety of subjects including the relationship between medications and falls, feet and footwear, neurological exercises for falls prevention, and cognition and falls. Attendees also had the opportunity to participate in a variety of physical activities including Tai Chi, Nordic Walking, and Fall Proof.

Hazel, an 83-year old Longmont resident, has attended each of the four years. After attending some of the activities in 2012, she signed up for A Matter of Balance classes (offered by the AAA). She had fallen on ice and had some serious complications from the fall. A Matter of Balance helped reduce her fear of falling and also helped her develop strategies for reducing her chances of falling again. “I take good care of myself and am very careful when I go out. I use a cane or the Nordic poles to assist me when walking. The class helped with both my physical balance and personal balance.”

As for Falls Prevention Week she reported: “I have done these programs in previous years and have learned new things each time.” She especially enjoyed the presentation in 2015 on “Balance and the Importance of Foot Care” given by a Longmont United Physical Therapist. “He gave us specific suggestions on casual and dress shoes. He also made me realize ‘the important work of the ankles’ in maintaining balance.”

Thanks to Sherry Leach, BCAAA Division Manager, for this submission!

Workforce Boulder County Presents to HHS Integrated Case Management Core Training to Case Managers

On Thursday, January 21st, WfBC facilitated the Core Training session for county case managers. Using the opportunity to further enhance understanding about the services provided at WfBC, the team led an interactive learning session including a panel of experts.
WfBC) as they examined opportunities to better integrate services across the county, eliminate duplication of efforts, and better serve our community.

Using a "Heads, Heart, and Hands" activity, participants provided the following feedback:

Head-I learned...

- That Workforce offers lots of services
- Learned that monolingual Spanish speakers can meet with Employment Advisors
- I learned more about the opportunities for youth between 16-24 and how to refer to those programs
- Learned interesting employment trends and more about resumes
- Lots of resources in Boulder County to help clients meet their needs
- Learned that there needs to be more of days like these to support community linkage of services
- So many resources for folks looking for employment through workforce
- Loved learning more about GED program offerings
- Action language in resumes

Heart-I feel...

- I feel hopeful that more of my clients can access WfBC services and WfBC staff are collaborative
- Optimism about connecting clients with usable employment trends
- I feel like there is an abundance of resources to help my clients
- Feel more connected to WfBC
- I feel more confident talking to clients about WfBC
- I feel really impressed by the passion & creativity of the WfBC team
- CONNECTION
- Feels like staff services are more accessible than perceived

Hands-I will do __________ moving forward....

- Refer clients
- Share this info with my co-workers
- Look at my caseload & see who can benefit from some of the services I learned about today
• I will tell more people about the career re-training opportunities

• Continue to support community members & CBO’s with connecting to WfBC services

• Attend a workshop for more 1st hand experience so referrals are more knowledgeable

• Great team working to help individuals navigate WfBC. Thank you!

Thanks to Nora Saenz, Workforce Program Manager, for sending this our way!

Not a Snow Day for Everyone

Record snowfall and bad road conditions meant most County employees had Tuesday off. For many Community Justice Services it was work as usual.

Borja Bobadilla, a supervisor in the Juvenile Assessment Center, said that much of Tuesday's activities were like a standard day at the JAC. They had to be ready for new intakes, someone needed to drive to the jail to pick up the day’s meals, and of course the kids housed there required supervision.

"Obviously we can't take the day off, we need to have our people here. The youth in the center have to be monitored, but more than that we have a lot of interaction with them," Borja said. "We always have structured activities to help teach them life skills, and there is recreation time we take part in."

In addition many who are brought into the facility are eligible to be released back to their parents or guardians after processing, depending on their crime. Without a CJS Bond Commissioner on duty, some of these juveniles could spend much more time in custody.

"Just because the weather is bad, we don’t want to keep them here, Borja added. "These are Boulder County’s kids, they could be our kids, and we need to make sure we take care of them."

Nate Thorn, a supervisor with the Bond Commissioners, was also at work Tuesday, and had a similar story to tell.

The jail had an inmate with medical issues. Even though his bond was only $50, he didn’t have the money to post bond and so couldn’t leave to see the doctor.

"The medical staff at the jail had done everything they could with their resources at hand, but this inmate really needed to go to the hospital for treatment," Nate said. "We were able to work with two different judges to have this person released on a Personal Recognizance bond, with a number of conditions including pretrial supervision with CJS."

Taking care of people in and around the justice system is what CJS employees do every day, regardless of the weather.

Submitted by Mike Stratton, CS Communications Specialist
Borja Bobadilla (JAC Supervisor; yes even supervisors work on snow days!) engaging in an educational age appropriate recreational activity (chess) with a youth in custody.

Gabriel Granillo braving the wintery conditions in our meal truck to pick up hot meals from the jail for our youth in custody.
Dear Boulder County Planning Commission,

As a long-time Gunbarrel resident, I want to add my voice to the many in my neighborhood who have expressed concerns about the proposal to annex and rezone parts of our neighborhood and build affordable housing in the fields that currently function as open space.

I’m sure you have read multiple accounts of the concerns that Gunbarrel residents and other Boulderites have about this proposal: distress about how it will affect wildlife in the designated wetland area and along the wildlife corridors; documented concerns about the possibility of increased flooding with further development in an area already prone to flooding due to the high groundwater; the inappropriateness of the area for affordable housing since for most, a car would be necessary to access food, medical care and other basic services, as well as human services such as schools, libraries and government agencies which are non-existent here; and the lack of appropriate infrastructure to support an increase in traffic and population in Gunbarrel, such as adequate shopping areas, parking areas, and multiple incoming and outgoing roads in the neighborhood.

Since I believe these and other concerns have been expressed in detail to you and others involved in these plans, I won’t reiterate the details, other than to say that I have personally experienced problems with some of these issues myself, including my own residential flooding concerns, and already seeing a major difference in traffic and access to gas and groceries with the many new apartments that have sprung up in the Gunbarrel area. I have also experienced so many positives about this area, and have to say that I truly love my neighborhood and care deeply about preserving its tranquility, beauty, and rural, natural character.

Rather than going over details of the above-mentioned concerns, this letter is to express my heartbreak that factions of the Boulder community appear to be disregarding the many legitimate concerns and almost total opposition to this plan by residents of my neighborhood. I have always thought of Boulder, perhaps naively, as a place where concerns for the environment, wildlife and open space were paramount. I’ve thought those governing Boulder had a genuine stake in preserving the welfare and character of its distinct neighborhoods, and honoring the voices of Boulder residents individually and collectively. I had believed that Boulderites were committed to thoughtfully, cautiously and conservatively weighing growth, to giving the land, the environment, and its current residents priority above economic and political concerns.

Contrary to my beliefs about Boulder, I find myself shocked and saddened to hear how this battle is actually unfolding within Boulder’s governing systems, with what appears to be political factions taking over how and why decisions are being made. I ask you, as someone we count on to look out for the well-being of our neighborhood in all respects, to please hear and respect our voices and to listen closely to our arguments against this proposal. I ask you to then take an ethical, honorable stand on this issue.

I hope it will mean something to you that there is basically unanimous agreement among Gunbarrel residents that this proposal would be extremely detrimental to our neighborhood. How could you not take the feeling of all those residents into account? As someone who is positioned to stand up for the rest of us, you have the unique power to take in the concerns of these thoughtful and ethical people, my friends and neighbors, and to stand up for our dissent. I ask you wholeheartedly to do that.

Thank you for your efforts in resolving this issue and for reading this letter.

Sincerely,

Alicia Segal
Gunbarrel Resident
Hi everyone,

I am writing because I had a guest opinion regarding the Twin Lakes parcels published in the Daily Camera on March 5th that I want to be sure you have a chance to read! Here is the link to that article: http://www.dailycamera.com/guest-opinions/ci_29600301/lauren-bond-kovsky-tale-two-lakes-case-open

I have attached it here for you. Thanks for taking the time to read my thoughts on the fate of these parcels.

Lauren Bond Kovsky
Naturalist and Canoe Guide
Twin Lakes resident: 6495 Twin Lakes Rd.

A Tale of Two Lakes: Making a case for open space

It is a spring of hope for the Twin Lakes area in Gunbarrel. Great blue herons swoop over the grassy fields, bald eagles perch on tree branches and the great horned owl babies have just been born. The fledglings, who can't fly for several months, obtain most of their food from the field near the nesting tree.

It's this field and the adjacent one to the south that have become the center of a land-use designation debate. As part of the Boulder Valley Comprehensive Plan update, the Twin Lakes Action Group has requested these fields be designated as Open Space. This is a change from their current designations of Low-Density Residential/Open Space and Public, respectively.

More than 760 people have signed a petition supporting the creation of a Greater Twin Lakes Open Space. And 2,000-plus people have signed a petition to make an owl preserve for Colorado's most famous owls.

In a competing proposal, the Boulder County Housing Authority and Boulder Valley School District are requesting to change the fields to Mixed Density Residential (MXR), which allows up to 18 dwelling units per acre.

Boulder County bought the north field using General Funds in 2013. In 2015, TLAG requested a formal review for making the land open space, but instead, the county transferred it for $0 to BCHA, with a zero-interest promissory note due in 2025. As regards the south field, a developer gave the site to BVSD in 1967 for a school, but a need never materialized. In the County, developers are required to set aside some land for a school, park or open space for public use.

The grassy Twin Lakes fields meet all the criteria for open space. Both have designated wetland and/or riparian areas and are habitat for several Boulder County Wildlife Species of Special Concern, including great blue herons, meadow voles, the
belted kingfisher, tiger salamanders, garter snakes and bald eagles. This designation means the species are “present infrequently or in small numbers; are undergoing a significant regional, national or global decline; or are limited to specific, small or vulnerable habitats,” according to the Boulder County Comprehensive Plan.

Red tailed hawks, Cooper’s hawks, sharp-shinned hawks, American kestrels and the occasional northern harrier forage here as well.

The fields also are a vital wildlife corridor, linking the Twin Lakes with the Johnson/Coen Trust and Walden Ponds to the south. A wildlife camera has captured photos of coyotes, herons and hawks using this corridor. It is also heavily traveled by red foxes, skunks and raccoons and even sometimes deer and mountain lion.

The USDA/NRCS designates this fertile land as being of prime/statewide agricultural importance; and the Twin Lakes Open Space webpage aptly describes the area around the lakes, saying, “With grasses, wildflowers and trees surrounding the wetlands, these areas are biologically diverse both in and out of the water.”

Development would pave over this habitat and sever the wildlife corridor. The hydrology of these fields is a major concern as well, with the water table as little as 2 feet below the surface. Development and water-mitigation efforts would likely flood nearby houses and drain wetland areas.

This is unnecessary. Supporters of the open-space request, who hale from around the county, have identified nearby alternate sites for the proposed development that are closer to stores, bus stops, and jobs.

If we truly want to provide more diverse and integrated housing, we need to explore other solutions, such as supporting well-planned co-op and mobile homes, giving direct rent assistance and closing the cash-in-lieu option.

Taxpayer money bought the north field, and the south field was dedicated for public use. So the public—by the County’s own policies—should have a say in open-space acquisitions. Residents have offered to purchase the fields as open space, creating a win-win and saving this natural land.

It’s true that homes and commercial areas are on the east and west sides of the lakes, and yes, annual mowing is a stressor. But animals are clinging tooth and claw, beak and talon to what remains. Will we take these fields from them too?

In the coming months, Boulder planners will be analyzing the Open Space and MXR proposals. By creating a Greater Twin Lakes Open Space, they can preserve something irreplaceable for all people for generations to come.

—Lauren Bond Kovsky, Naturalist in Gunbarrel
To the Planning board:

I prefer hope to despair, and so have embraced **Soil Sequestration of Carbon**, a hopeful new strategy to combat Climate Change. **Soil Sequestration of Carbon** uses specific agricultural, range management and forestry practices to sequester more carbon in the soil than these practices produce. In addition to locking up atmospheric carbon, soil sequestration practices can also lead to healthier soils with greater fertility, better water retention, lower fertilizer/fuel costs, and increased crop yields. Examples of soil sequestration practices, used in other areas, include reforestation with more resilient drought-tolerant southern species, cover crop cocktails, conservation crop rotation, no-till farming, mob grazing, composted green waste soil applications, biochar applications, and fungal soil inoculations using no-turn composting. (Table of various techniques for Boulder in email below.)

I ask you to please consider including language about **Soil Sequestration of Carbon** to the current Boulder Valley Comp Plan update. I have included some proposed language below. Most of my proposed language is lifted straight from Boulder’s draft Climate Commitment Plan. ([https://www-static.bouldercolorado.gov/docs/Boulder_Climate_Commitment_Doc-1-201510231704.pdf](https://www-static.bouldercolorado.gov/docs/Boulder_Climate_Commitment_Doc-1-201510231704.pdf) page 44)

Currently in the Comp Plan, the word “soil” appears only once when the Comp Plan says not to build houses on unstable “soil”. The Agriculture section of the Comp Plan does not mention the word “soil” at all. Yet our soils are incredibly important. We carbon-based life forms are totally dependent on this thin skim of dark earth covering our planet. The soil provides us with plants and animals to eat, oxygen to breathe, and materials for shelter and clothing. We spring from the soil and to it we shall eventually return.

I urge you educate yourselves about healthy soils and **Soil Sequestration of Carbon**. I have included some links you can explore below, and I will give talk about soil sequestration at Alfalfa’s at noon Friday 3/18, for PLAN Boulder. And again, please consider adding language about **Soil Sequestration of Carbon** to the current BVCP update.

Thanks for your consideration, Elizabeth Black

**PROPOSED LANGUAGE FOR BVCP UPDATE, SOIL SEQUESTRATION OF CARBON**

I ask Planning Board and City Council to support the following additions to Sections 4 and 9 of the Boulder Valley Comp Plan:

- **Section 4.09 Soil Sequestration of Carbon**: The City and County will identify and implement innovative and cost-effective actions to sequester carbon on their agricultural, range and forest lands. The City will develop strategies to educate landowners about how to sequester carbon on their own properties. Partnerships with public and private entities will be pursued
to amplify the effectiveness of these actions.

- **Section 9.09 Soil Sequestration of Carbon:** Although many agricultural practices generate carbon, other agricultural practices can sequester large amounts of carbon in soils, enrich agricultural lands, and increase water retention and soil fertility. The City and County will encourage and support the development of Best Management Practices for soil sequestration of carbon along the Front Range. They will identify suitable sites to run Pilot Projects for Soil Sequestration of Carbon, implement soil protection actions for their own properties, and explore opportunities to incentivize “Carbon Farming”.

Climate Change is the overwhelming challenge of our century. We must make rapid progress to decrease CO₂ generation and eliminate more carbon from our atmosphere. A new and hopeful way to combat climate change is soil sequestration of carbon, which uses specific agricultural, range management and forestry practices to sequester more carbon in the soil than these practices produce. In addition to locking up atmospheric carbon, these practices can also lead to greater soil fertility, better water retention, lower fertilizer/fuel costs, and increased crop yields. Examples of these practices, used in other areas, include reforestation with more resilient drought-tolerant southern species, cover crop cocktails, conservation crop rotation, no-till farming, mob grazing, composted green waste soil applications, biochar applications, and fungal soil inoculations using no-turn composting. Boulder County contains large swaths of agricultural and forest lands which, if managed appropriately, have the potential to annually sequester a large percentage of the CO₂ produced by County residents.

Soil sequestration of carbon is a new science and Best Management Practices for our local climate and soils are still being developed. Very small capital outlays now to support local studies will pay huge future dividends. Boulder has the opportunity to be a Front Range leader in soil sequestration of carbon, in partnership with CSU, a recognized leader in soils. Pilot Project opportunities to test different practices exist on City of Boulder and Boulder County agricultural lands, as well as private farms which are already using many soil sequestration methods.

Currently, most people do not understand the vocabulary or concepts of Soil Sequestration of Carbon. Knowledge about healthy soils is lacking, and most people do not realize that carbon can be sequestered in lawns, mulched flower beds, vegetable gardens, farm fields, rangelands and forest lands. With education, landowners can take simple steps to sequester more carbon themselves.

**WANT TO LEARN MORE? HERE’S SOME LINKS TO EXPLORE:**

1. **The Carbon Underground,** an advocacy group for soil sequestration of carbon, has a good website with lots of video clips and links to research. This might be a good place to start. [https://www.thecarbonunderground.org/](https://www.thecarbonunderground.org/)
2. **Rattan Lal,** Ohio State University professor has many video lectures on the web. He is the main numbers guy (How much carbon can those little microbes sequester anyway?) and is working on sequestration internationally too. A short video of him speaking: [https://www.youtube.com/watch?v=mTb63CDJ5sA](https://www.youtube.com/watch?v=mTb63CDJ5sA)
audience does not “believe” in Climate Change, and so have shifted their vocabulary.

4. The NRCS also has videos and pdfs of individual farmers who are using different carbon sequestration/soil health techniques across the nation. Go to http://www.nrcs.usda.gov/wps/portal/nrcs/detail/co/soils/health/?cid=nrcseprd416103 for pdf’s of Colorado farmers. Go to https://www.youtube.com/watch?v=nWXCLVCJWTU&list=TLsE9MAyLxRnP6v5rPy4Brwyu453ENSUDv8 for video interviews of farmers who are using soil sequestration techniques nationally.

5. Gabe Brown has some very informative interviews about his farming practices in North Dakota to increase soil health. He has been able to wean his conventional farm off most synthetic fertilizers, pesticides and herbicides and increase his soil organic matter to 5-6% using these practices. http://brownsranch.us/category/videos/

6. The Comet Farm Tool was developed by CSU to help farmers figure out changes that will help them sequester more carbon themselves voluntarily: http://cometfarm.nrel.colostate.edu/

7. CSU has just published exciting new study results on a way to maximize carbon sequestration in agricultural soils: http://source.colostate.edu/csu-study-proposes-new-approach-to-retaining-soil-carbon/ for a video short on the study’s findings, and link to the complete results of this study and others. CSU is a leader in soil sciences and carbon sequestration.

8. The Soil Will Save Us, by Kristin Ohlson is a highly readable account of various strategies and people who are working on soil sequestration of carbon. http://www.kristinohlson.com/books/soil-will-save-us

9. The Marin Carbon Project is perhaps the best known group in California currently working on rangeland carbon sequestration: http://www.marincarbonproject.org/ Their website has descriptions of various projects they are running with numbers of tons of carbon saved and more.

10. The Quivira Coalition, a Santa Fe based land stewardship organization promotes the “radical center” between ranchers, land managers and environmentalists and endorses carbon ranching, sequestering carbon through regenerative food production and progressive livestock management in New Mexico: http://quiviracoalition.org/Carbon_Ranch/index.html Their website contains links to many past and present projects they are running with local ranchers and livestock.

11. The Rodale Institute, the longest running organic ag experimental station in the country researches organic carbon sequestration farming methods and compares them to conventional methods in decades-long field trials. http://rodaleinstitute.org/regenerative-organic-agriculture-and-climate-change/

12. New Mexico State University molecular biologist David C Johnson has several PowerPoints on the web on studies he has done with fungal-rich no-turn compost and carbon sequestration: http://quiviracoalition.org/images/pdfs/3/6253-
Unfortunately there is no sound and you have to spend some time figuring out his graphs yourself. After defining soil health history/basics/problems, he shows a simple way to make no-turn compost, and presents the results of 3 different experiments plus field trials using no-turn compost. He concludes by comparing costs/risks/benefits of soil sequestration of carbon using Ag practices with industrial techniques (carbon capture and storage or geo-sequestration) and outlines needed legislative fixes to benefit New Mexico.


### POSSIBLE SOIL SEQUESTRATION TECHNIQUES – AND CHALLENGES - FOR BOULDER COUNTY

<table>
<thead>
<tr>
<th>Practice</th>
<th>Description</th>
<th>Suitable</th>
<th>Current use</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prompt reforestation post-burn w/ climate change considerations</td>
<td>Examples of climate change considerations for reforestation include using southern/low elevation seed sources, choosing species with larger root masses, increasing spacing between seedlings, planting in micro-shade or duff, prompt post-disturbance planting to decrease competition from grasses/forbs, soil amendments, and more.</td>
<td>Forests</td>
<td>Unknown</td>
<td>Requires research to determine best management practices for Boulder County’s varied elevations and forests. May be more labor intensive.</td>
</tr>
<tr>
<td>Forest-thinning combined with biochar/mulch production</td>
<td>Small mobile biochar or chipping units are deployed to the thinning site and produce biochar/mulch, instead</td>
<td>Forests</td>
<td>COB mulches 90% of slash</td>
<td>Requires specialized equipment. More labor intensive. May not be feasible on some sites.</td>
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<tr>
<td><strong>Biochar</strong></td>
<td><strong>Biochar</strong> uses pyrolysis to create a solid residue resembling charcoal. Organic waste is burned anaerobically, creating oil, syngas, and biochar. Burying biochar reduces CO2 in the atmosphere, because it prevents the organic waste from decaying and releasing CO2, as it would otherwise. Slash, beetle-killed pines and borer-killed ash are all suitable for biochar production.</td>
<td>Cropland, Pasture, Rangeland</td>
<td>Currently not practiced and no supplier.</td>
<td>Requires research on short term soil and crop health, and cropland business return-on-investment. Specialized equipment required.</td>
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<td><strong>Green waste compost</strong></td>
<td><strong>Green waste compost</strong> is made largely from municipal garden waste. It can be composted on the farm where it is used, or at a centralized facility. It is spread on the surface of the field and sometimes tilled in.</td>
<td>Cropland, Pasture, Rangeland</td>
<td>Western’s municipal compost is used on some farms.</td>
<td>Contaminants in municipal compost (glass, plastics, etc.) and cost of hauling and spreading it have made it a hard sell. Other regional compost vendors (not Western) have a superior product, from agricultural inputs.</td>
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<tr>
<td><strong>No-turn Compost</strong></td>
<td><strong>No-turn Compost</strong> hosts a larger and more diverse fungal community than regular compost. When applied to soil, it changes the soil microbial population from a bacterial-dominated to a fungal-dominated community</td>
<td>Cropland, Pasture, Rangeland</td>
<td>Unknown</td>
<td>Not currently practiced by large scale compost producers.</td>
</tr>
<tr>
<td><strong>Mob grazing</strong></td>
<td><strong>Mob grazing</strong> mimics the</td>
<td>Cropland,</td>
<td>Don’t see</td>
<td>Management</td>
</tr>
<tr>
<td>managed intensive rotational grazing</td>
<td>Pasture, Rangeland</td>
<td>intensive. More research is needed on best management practices for Boulder County’s short-grass rangelands. Crop producers may not have access to grazing animals.</td>
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<td><strong>Mulch tillage</strong>&lt;br&gt;<strong>Mulch tillage</strong> partially incorporates organic material left on the soil surface after harvest</td>
<td>Cropland&lt;br&gt;Sometimes used in Boulder County</td>
<td><strong>Specialized equipment</strong> is needed to only partially incorporate surface organic material and to operate in high residue situations. Mulch tillage precludes the removal of organic residue by burning, baling or grazing.</td>
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<tr>
<td><strong>Strip tilling</strong>&lt;br&gt;In <strong>Strip tilling</strong>, narrow strips, 6 to 12 inches wide, are tilled in crop stubble, with the area between the rows left undisturbed. Often, fertilizer is injected into the tilled area during the strip-tilling operation. The tilled strips correspond to planter row widths of the next crop, and seeds are planted directly into the tilled strips.</td>
<td>Cropland&lt;br&gt;The primary conservation tillage used in Boulder County for corn and sugar beets</td>
<td><strong>Specialized equipment</strong> with high resolution GPS to accurately position the machine in the field, as well as skilled operators, are needed to till/fertilize/seed accurately in evenly spaced rows. Often includes herbicide and GMO seed use.</td>
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<td><strong>No-till farming</strong>&lt;br&gt;In <strong>No-till farming</strong> the soil is left relatively undisturbed from harvest to planting.</td>
<td>Cropland&lt;br&gt;Used in Boulder County with barley or</td>
<td><strong>Specialized equipment</strong> is needed to penetrate crop residue, and prepare narrow strips</td>
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</table>
Specialized equipment drills holes for seeds or prepares narrow strips for planting for planting or drill holes for seed. Residue, weeds, crop rotations, water, disease, pests, and fertilizer **must be managed differently** in no-till farming than in conventionally plowed farming.

| Conservation crop rotation | Conservation crop rotation is a multi-year system for growing several different crops in planned succession on the same field. At least one of the crops is soil-conserving, such as a perennial hay or clover | Cropland, Pasture | 90% of growers in Boulder County practice crop rotation. | Hay or clover may or may not be appropriate for all farm businesses. |

Conservation crop rotation

| Cover Crop Cocktails | Cover Crop Cocktails use a mixture of up to 50 legumes, grasses and broadleaf plants such as peas, vetch, rye, radishes, or turnips. The cover crop is planted when the field would normally be bare. It grows quickly and is turned under, grazed or crushed. Each variety of cover crop is associated with a unique microbe community. Using a cocktail of cover crops diversifies the microbe community of the soil. | Cropland, Pasture | A challenging sell in Boulder County | Challenges include soil moisture losses, dryland production with no irrigation to germinate and grow a cover crop, lack of income from a cover crop (if no grazing or haying potential), and timing and space constraints on farms to seed and grow a cover crop (some farms need to crop all ground every year to make a sufficient profit). |

Cover Crop Cocktails

Thanks very much for your consideration of Soil Sequestration of Carbon, a hopeful new strategy to deal with Climate Change. Please do not hesitate to contact me with any questions you may have, Elizabeth

Elizabeth Black
Climate Wise-Guy says:
The SOIL can SAVE US!
It can sequester CO₂!
There’s HOPE?

There’s always hope. Plants and their soil microbes can put CO₂ back into the soil, if we treat them right.
Commissioners:

The attached letter follows TLAG's March 11 letter specific to the Wildlife RFP. This one addresses all three RFPs issued by BCHA for the Twin Lakes parcels which are the subject of BVCP change use requests, and pending facilitated discussions.

TLAG looks forward to discussing these matters with the County, the City, BHCA, BVSD, and other stakeholders.

Respectfully,

/s/

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Boulder CO 80302
mikechiropolos@gmail.com
303-956-0595
This message may be privileged, confidential, or otherwise protected from disclosure
March 16, 2016

Deb Gardner, Chair
Elise Jones, Vice Chair
Cindy Domenico
Boulder County Commissioners

Transmitted via email c/o Commissioners Deputy Michelle Krezek -- mkrezek@bouldercounty.org and commissioners@bouldercounty.org

re: Joint Formulation, Selection, and Administration of Pending Studies & RFPs for Twin Lakes Properties Subject to BVCP Change Requests & Facilitated Discussions

Dear Commissioners:

I write on behalf of the Twin Lakes Action Group (TLAG) with regard to three pending requests for Proposals (RFPs) issued by the Boulder County Housing Authority (BCHA) in February 2016. This letter follows up on TLAG’s March 11, 2016 letter specific to the Wildlife RFP. These requests are:

- Wildlife Habitat Study RFP # 6425-16 ("Wildlife Study")
- Geotechnical and Hydrologic Investigation RFP # 6426-16 ("Hydrology Study")
- Architecture, Master Planning & Design Services RFP # 6427-16 ("Design Study")

All four reviewing bodies involved in the Boulder County Comprehensive Plan Update voted to forward two change requests with regard to the Twin Lakes parcels at 6655 Twin Lakes Road (currently owned by the County/BCHA) and Kalua Road (Boulder Valley School District, or BVSD). Request 35 seeks Mixed Density Residential (MXR), whereas Request 36 is the consolidated requests of TLAG and residents seeing Open Space, Natural Ecosystems, and/or Environmental Preservation.

First, all studies, RFPs, and resulting recommendations must proceed consistent with the Motion approved by the Boulder City Council and Boulder County Commission regarding facilitated discussions for the Twin Lakes properties. The first part of Motion explicitly provides for joint formulation of studies and selection of experts: (emphasis added):
1. **Jointly formulate** recommendations for areas of expertise and selection of experts to inform the desired land use patterns for the area. The areas for study should include the suitability for urban development, desired land use patterns, and environmental constraints.

We recognize that some or all of the three pending RFPs were formulated before the motion was passed. Now that the motion has been approved and facilitated discussions are pending, it is incumbent on the County and BCHA to put these studies on hold to allow compliance with the express terms of the motion.

Various officials have told TLAG representatives that proceeding with the studies at this time constitutes “standard operating procedure.” That may be the case where BCHA or other public agencies have an uncontested right to develop the property under the existing BVCP or other applicable land-use plan and zoning designations, or have submitted uncontested change requests for the subject parcels. However, none of those factors are present here.

Proceeding with studies and RFPs would violate both the letter and the spirit of the terms by which TLAG and other stakeholders agreed to participate in facilitated discussions.

**Second**, the design study is premature. It pre-supposes that development will occur. Prejudging the outcome and proceeding now would fail to account for the findings and recommendations of studies relating to hydrology, wildlife, habitat, environmental, and open space attributes and values of the parcels.

BCHA already commissioned a first design study for 6655 Twin Lakes Road, which the County and BCHA have both stated is now repudiated, because that initial study was uninformed by any community input and involved densities which the County and BCHA now state are higher than any they would now request for this site.

One of the reasons for performing hydrology, habitat, environmental, and open space studies is to inform design and density options – in the event that the County desires to propose some development after those essential studies are completed. Failing to wait for the results of those studies would be bad business from a financial perspective inefficient government and a misallocation of public staff and budget resources.

**Third**, proceeding with premature design studies could be reasonably construed by TLAG and the public as pre-judging the outcome – or the County’s position – on change requests #35 and #36 currently pending before the four bodies voting on the BVCP Update. Additional staff analysis and recommendations and additional public input are required before final decisions are made.

**Fourth**, in light of the above the County and/or City needs to put the three pending RFPs and studies on hold until they can be addressed through the facilitated discussions.
The hydrology, wildlife, habitat, environmental and open space studies and analyses should occur first, to inform any other analyses. In the event the current BVCP designations are affirmed or the protective #36 open space and environmental change requests are approved in the BVCP Update, no development will ensue. In the event a change request and other future decisions pave the road for some development, all parties have acknowledged that such development is at least three years out – so there will be ample time to conduct design studies informed by the other issues and BVCP decisions.

Fifth, any additional studies to be pursued, such as traffic and transportation, should be jointly formulated and administered.

Joint formulation and expert selection on studies is required by the Motion. A holistic approach and collaborative processes are the path to informed decisions, BVCP compliance, and meaningful community involvement. We look forward to discussing these issues with the County and the City, and expect a positive response to the TLAG requests stated above.

Respectfully,

Mike Chiropolos
Attorney for TLAG

cc: Ben Doyle, County Attorney
    Willa Willaford and Ian Swallow, BCHA
    Glen Segrue, BVSD
    Mary Young, Bob Yates, Lisa Morzel, and Mayor Elise Jones, Boulder City Council
    Dave Rechberger, TLAG Chair
Dear Council members and Planning Board members;

Elizabeth Black's proposed amendments would "identify and implement innovative and cost-effective actions to sequester carbon" in agricultural soils, forest lands, and range lands on City of Boulder and Boulder County properties. She has made her presentation to the Indian Peaks Group, Sierra Club's Executive Committee, and we wholeheartedly approve both of the basic message and her thorough and responsible activism in promoting it. We hope that both the Council and the Planning Board will agree and support her amendments.

Even in the days before climate change became a household word, agronomists recognized the importance of dark soils containing stable carbon compounds (if not the free element itself) as being more fertile than others, i.e. more capable of retaining water and plant nutrients, and more tillable. The climate change crisis has forced us to revisit the vast potential for removing excess carbon, as CO2, from the atmosphere and storing it for hundreds of years as stable carbon compounds in soils by using proper surface vegetation management. The successful carbon storage techniques identified by Elizabeth Black are numerous and should not significantly disrupt the usual land management practices on city and county lands.

Thank you for considering her proposal and the Sierra Club's opinion in this matter.

Kirk Cunningham, Conservation Chair
Indian Peaks Group
Boulder CO 80302
303-939-8519 / kmcunnin@juno.com
To all concerned parties,

I am a Gunbarrel resident who would be directly impacted by the outcome of the decisions made about the property on Twin Lakes Rd. I have read and heard a lot of information from both sides. I honestly do not think that property can support the type of high density mixed use development that seems to be proposed. I also don't know if the space warrants an open space designation. It is a wildlife corridor, but animals are adaptable. The water table is very high there as well (evidenced by reports and the fact that there are no prairie dogs on the land when there is a massive population of them in the area) but with proper foundations building is still possible. The infrastructure of Gunbarrel is aging and that would also need to be addressed with any development. Plus there is only one road in and out of that area, Twin Lakes Rd, and that alone cannot support a high density development. However, I do believe there must be a compromise.

My opinion is that, if the land must be developed, it should be kept with low density residential zoning and have some permanently affordable houses built that people can own. It is done in other areas around Boulder, and that type of housing is much more conducive to attracting and keeping young working families in the area. Boulder wants to attract families and ownership encourages people to take good care of the property. A residential development that matches the surrounding neighborhoods and also supports the local wildlife would be a wonderful addition to the Gunbarrel community. A piece of land like the lot on Jay Rd and 63rd street would be a much better candidate for the mixed use residential type development since it is right on the bus line and has more access and available space for additional roads. The lot on Twin Lakes Rd does not have any available space to build in new access, and putting that heavy burden of cars on one small neighborhood road would be dangerous for all the children who walk through the neighborhood including my own.

A small addition of a few houses, one or two per acre, that are permanently affordable, with a little playground or something, would build community and fit in with the rural feel of Gunbarrel that everyone loves.

Boulder is a city and a county that I love. I love it here because we value nature and wildlife, we protect our lands, and look out for our people. I happily pay more taxes to live in such a beautiful place, in a city and county that cares about its residents.

I am asking you to please consider changing the lot on Twin Lakes Rd to open space, but if that is not possible, I beg you to keep it at a low density residential zoning and build permanently affordable housing that people can buy and raise a family in. Build a development that matches the subdivisions surrounding it and respects the adjacent open space and limited infrastructure. There are places in Gunbarrel where a mixed use higher density development can work well, but this lot is not that place.

Thank you for your time and consideration.
Sincerely,
Alexandra Niehaus
March 16, 2016

Re: Formal Objection - Annexation of 4525 Palo Parkway

Dear Boulder City Council, Planning Commission & Parks and Open Space Advisory Board,

Cc: Boulder Housing Partners, City Manager, City Attorney, Staff Liaison

This letter is notice of a formal objection to the annexation of 4525 Palo Parkway – passed by City Council on 1/5/16, and effective 2/4/16.

Under Article 7-1308 of the Land Use Code, there is a requirement that all dedicated lands of school districts and local government entities must undergo review by both Planning Commission and the Parks and Open Space Advisory Board prior to any disposition or sale. In the case of the 4525 annexation these requirements were not met during the sale, leading to defects in the property title. Neither the Commission nor the Board undertook formal review of the sale of dedicated Outlot E at 4525 Palo Parkway. City officials from Land Use and County officials from Open Space have independently confirmed this finding.

Additionally, Article 7-1308 also prescribes a flow of funds by which all sale proceeds are first taken into custody by The Board of County Commissioners, to be released for prescribed public uses only:

“3. Such moneys shall be held and released in accordance with the processes established by Section 7-1307 of this Code. C. Funds may be released to the appropriate school district or local government entity if the Board finds that the proposed use of the funds is compatible with the intent of the cash-in-lieu payment or sale of the land. At the time of release of funds, Boulder County shall retain a reasonable management fee for the holding and maintenance of such escrow accounts.”
In the case of 4525 Palo Parkway Outlot E, the dedication was clearly described as being for “school purposes,” as laid out in Article 7-1304. The dedication makes no mention of any intent for private residential housing use. (See attached platting records.) Each of the other four Outlot dedications at 4525 Palo Parkway (A,B,C, and D) were used for the express and specific purposes outlined in the plat, making the current proposed private residential use non-conforming with precedent set by each of the other 4 dedications on the Palo plat.

In our objection to the annexation we seek evidence of formal review of the sale by both Planning Commission and the Parks and Open Space Advisory Board, as well as the opinion of the City Attorney that private residential development is a legal use of dedicated BSVD lands that were received on a discounted basis from the original owner, Pinecrest Homes Inc., expressly for “school purposes.” (See 7-1308 B.2.a.b.c.) Even if that opinion is offered, formal dedication vacation proceedings are still required under the Code. Finally, we are also seeking documentation that the flow of funds prescribed in Article 7-1308, and related to the sale of 4525 Palo Parkway was followed as prescribed.

If these requirements of the Code have not been met, we seek a nullification of the annexation until these issues are remedied though formal review by the Planning Commission and the Parks and Open Space Advisory Board, and until the City Attorney and the Board of County Commissioners makes public finding that the sale from dedicated Outlot E for private residential development is “compatible with the intent” of dedications received expressly for “school purposes,” as prescribed in Article 7-1308.

Thank you in advance for your inquiry into these Code requirements. Electronic copies of related documentation is respectfully requested to minimize taxpayer cost, and for ease of review by our advisors.

Sincerely,

The 166 signatory residents of “Stop High Density Housing Development of 4525 Palo Parkway, Boulder, CO”
Dear Boulder County Commissioners, Boulder County Planning Commission, Boulder City Council, Boulder Planning Board, and Boulder County Housing Authority,

Please read and view the attached letter concerning recent flooding of the field at 6655 Twin Lakes Road.

Thank you for your attention to this matter,

Donna George
Dear Boulder County Commissioners, Boulder County Planning Commission, Boulder City Council, Boulder Planning Board, and Boulder County Housing Authority,

I live at 4661 Tally Ho Court, adjoining the parcel of land owned by Boulder County Housing Authority at 6655 Twin Lakes Road. Early on Wednesday morning of March 30, 2016, I received a call from one of my neighbors who had noticed a stream of water running down the sidewalk on Twin Lakes Road by the south side of my house while waiting for her kids to get on the bus. At first I thought this could possibly be a water leak as our HOA is having work done on Red Fox Hill’s sprinkler systems. Or possibly my own sprinkler system had a leak in it – although it is still shut down from the winter so I suspected not. When I went out to check on the situation I followed the flow of water to the back southwest corner of my lot and was quite shocked to see that the back of my fence was again flooding (as was the case last Spring during an extended period of rain) and water was flowing at a steady rate out onto the side walk in a southeasterly direction into the storm drain at the corner of Twin Lakes Road and Tally Ho Court. On further inspection I noticed that a good deal of water had pooled in the field behind my next door neighbor’s house as well as further into the central part of the field at 6655 Twin Lakes Road. Water was also pooling by my raised vegetable beds along the back fence in my backyard. Another resident of Red Fox Hills subdivision noticed that the ONLY water running into the storm drains in the Red Fox Hills (RFH) neighborhood was coming from the flooded field at 6655 Twin Lakes Road. There was no other water within RFH running down the streets and into the storm drains – this was only happening at the northwest corner of Twin Lakes Road and Tally Ho Court. The water was not flowing down Tally Ho Court to the storm drain but only down Twin Lakes Road to the storm drain which is why my neighbor originally thought it was a problem with either Red Fox Hill’s or my sprinkler systems.

I am quite concerned that the field is flooding early in the spring season. Last year the flooding occurred in May after about a week of steady rain. This year, flooding is occurring after a snowfall and a brief downpour the night before. The hydrology in our area has changed since the 2013 flood event. In the 17 years I have lived here before 2013 we never had any flooding in our backyard or along our back fence. However, this now appears to be a yearly event. Last year, the water flowed down the side walk by my house for at least a week after the initial flooding. I invite you all out to our area during periods of heavy precipitation to witness the flooding of the field at 6655 Twin Lakes Road and the continuous steady flow of water coming off the field and flowing down the sidewalk into the storm drain. In
addition to what is happening at my house, many homes along Tally Ho Court, Tally Ho Trail, and Bugle Court (where the storm drains flow out) are experiencing high sump pump output. My next door neighbor’s house at 4673 Tally Ho Court experienced some flooding in their basement during this recent flooding event. Pictures of the wet carpet and the water pooling in the field directly behind their house are shown below.

Another neighbor on Tally Ho Court has noticed a 3 inch increase in the water table under his house from November 8, 2015 to March 31, 2016.

November 8, 2015 ..... 8-3/4” below floor level            March 31, 2016 ..... 5-3/4” below floor level

Ducks have begun to use the flooded field as a pond. Pictures of the ducks are attached. Also on Thursday, March 31, 2016, the day following the flooding of the field, I saw a pair of Great Blue herons spending time in the center of the field before the two flew off toward the Twin Lakes Open Space.

On Wednesday, the initial day of the flooding, I drove by Boulder Creek on 61st street to check on the creek flow. It appeared to be running at a normal level with no increased flow velocity or volume. In other words, this is not a flood event like the 2013 flood. Thorough hydrology studies of the Twin Lakes fields need to be completed before any decisions allowing development on the Twin Lakes Road parcels
occur. I am quite concerned about the hydrology conditions of the fields and what may happen if they are developed. Please take these hydrology issues seriously and come out and view for yourselves the conditions in the field. See below for additional pictures of the recent flooding of the field. I also have video of the flooded field from last May which I will send out soon.

Sincerely,

Donna George
From: Andy Baker
To: council@bouldercolorado.gov; ellis@bouldercolorado.gov; HyserC@bouldercolorado.gov; ZachariasC@bouldercolorado.gov; hirtj@bouldercolorado.gov; Fogg, Peter; Shannon, Abigail; Giang, Steven; #LandUsePlanner; boulderplanningboard@bouldercolorado.gov
Subject: Retractions of wildlife statements
Date: Monday, April 18, 2016 12:46:36 PM

Dear elected officials and planners,

I noticed that the Boulder Audubon Society and Cornell Lab of Ornithology asked the Boulder County Housing Authority to retract the use of their name from a letter BCHA sent to the governing bodies. Since the retraction only appears on their website, I thought I would forward it along.

Twin Lakes Letter From BCHA and BVSD | Our Boulder County

Looking at BCHA's letter to you, I'm also curious where they got the number of "over 20 public meetings" to present their plans and hear neighbors' concerns. I know of only one meeting, unless they are counting regularly scheduled board meetings, etc.? That is very creative.

Sincerely,

Andy
Dear Commissioners,

I am a long time (20 + years) Boulder County resident and registered voter. Generally speaking, I agree with the land use policies and decisions of our local government. I'm writing today because I am very concerned with the sudden explosion of building and development in the Gunbarrel area. I am asking you to please preserve the open space and wetlands around the Twin Lakes area. There are owls, raptors, herons, songbirds, foxes, rodents, and many more species which will be harmed if we continue to subtract their habitat.

Surely there are sensible ways to manage the human population growth without sacrificing our natural ecology.

Sincerely,

Jen Rodehaver, CPD, CNCS
Boulder, Colorado

303 993 5431
I am a long time (20 + years) Boulder County resident and registered voter. Generally speaking, I agree with the land use policies and decisions of our local government. I'm writing today because I am very concerned with the sudden explosion of building and development in the Gunbarrel area. I am asking you to take action to preserve the open space and wetlands around the Twin Lakes area. There are owls, raptors, herons, songbirds, foxes, rodents, and many more species which will be harmed if we continue to subtract their habitat.

Surely, there are sensible ways to manage the human population growth without sacrificing our natural ecology. My college degree is in Environmental Studies & Planning, and we students were reminded frequently "you can't just do one thing". All our actions create numerous effects, some of which are only evident over time. These decisions you are making today have long term consequences. Please consider carefully.

Sincerely,

Jen Rodehaver, CPD, CNCS
Boulder, Colorado

303 993 5431
Dear Boulder County Planning Commission,

The Boulder Valley Education Association, the professional organization representing 80% of the licensed professional educators in the Boulder Valley School District, is in support of affordable housing and the partnership that BVSD is entering into with the Boulder County Housing Authority. We therefore support a change in the land use designation of the Twin Lakes area property in question to allow future development of affordable housing.

The increasing lack of affordable housing within our school district boundaries presents a challenge for both BVSD employees who can’t afford to live here and for our students and families. BVEA works collaboratively with BVSD to recruit and retain high quality employees, and the availability of housing within our boundaries is key to our ability to successfully do that. A recent poll of BVSD employees indicated significant interest in affordable housing and in this project particularly. Additionally, as educators, we experience firsthand the alarming effects of homelessness on our students and families. Recent dramatic increases in homelessness among our BVSD students make this project (and hopefully other local affordable housing efforts) especially important.

We recognize that there are complexities and issues related to the development of affordable housing on the Twin Lakes property that have yet to be resolved, but we encourage you to move ahead with the appropriate processes. We are hopeful that the change in land use designation will ultimately be approved so this worthy project can proceed.

Thank you for your consideration,
Tina Mueh
BVEA President
April 22, 2016

Dear Boulder County Planning Commission,

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Thank you for your consideration,

Tina Mueh
BVEA President