**Franktown Citizens Coalition Preliminary Input on CMP 2040 Update**

**Including Details on CMP Modifications**

**July 19, 2018**

**Topics**

**Section 4 – Rural Communities**

**Section 4.1 – Franktown Rural Community**

**Douglas County Residential Growth**

The Franktown Citizens Coalition provides the following summary of our recommendations for modifying the Douglas County Comprehensive Master Plan for the 2040 CMP update.

**A: Preserve and Protect Rural Communities**

**A.1: Preserve the CMP objectives for the three Rural Community areas designated in Section 4**: Franktown, Louviers, and Sedalia. The concept of maintaining strongly differentiated Rural Communities is critical to the future diversity of Douglas County. Without strong definition, and strong protection from growth, these areas will undoubtedly be overrun by the dense urban and suburban development patterns that press on the rest of Douglas County. These CMP objectives should be preserved and reinforced.

**A.2: Prevent encroachment of urban areas on the Rural Communities:** To prevent the boarders of the Rural Communities from shrinking through actions such as annexation by municipalities, establish open spaces, community separation buffers, or low-density zones. To the degree possible, establish this protection in the CMP through the designation of low density zones and strict density objectives in the Rural Community areas bordering the higher density areas of the County.

**B: Reinforce elements of the Section 4-1 to protect Franktown Rural Community**: Preserve the intentions of sections 4-1A through 4-1D to implement and enforce rural character and scale, and low density development. Apply these objectives broadly across the full Franktown Rural Community area. Remove reference to Franktown Village Area in these sections (see point C, below). Review these policies and redraw map to reflect the removal of the Franktown Village Area and to reinforce boundary protection of the Franktown Rural Community (see point A.2, above).

**C: Remove the Franktown Village Area (FVA) from the CMP:** Remove the objectives and definition of the Franktown Village Area, as described in sections 4-1E through 4-1M and on map 4.3.

As a feature of the CMP, the Franktown Village Area (FVA) has been proven to be contrary to

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the goals of maintaining the essence of the Franktown Rural Community area.

The concept of the Franktown Village Area is based on false assumptions and faulty logic. The development of the FVA has been shown to be economically and financially infeasible (See documents and testimony in recent Franktown Village Planned Development hearings, 2017). As recently experienced in the hearings on the Franktown Village Planned Development (FVPD), the presence of the Franktown Village Area in the CMP poses the threat of urban development in the heart of a Rural Community. This must be removed for the following reasons. All of these reasons were exposed during the Planning Commission hearings on the Franktown Village Planned Development (FVPD) in 2017:

* The demand for growth in the Franktown Village Area (FVA) is based on faulty economic analysis. Prior economic studies are seriously flawed. It is not economically feasible to drive accelerated commercial and residential development around the Franktown intersection. This was show, by fact, in the FVPD hearings.
* The FVA plan, within the current CMP, envisions driving growth at a significant cross-roads, and then calls for significant infrastructure development (central water and sewer), in turn justifying the need for dense residential development. The idea of solving environmental and natural resource shortfalls by increasing the density of development is entirely illogical. This is also strongly contrary to the Rural Community pattern of development – which is a guiding principle of Section 4 of the CMP.
* The FVA is not consistent with the land planning architecture of the CMP. To encourage urban-density development in the center of a designated Rural area, isolated from the urban infrastructure and population concentrations of the municipal areas, is just very poor land planning design.
* The concepts driving the development of central sewer and water for the FVA are based on false assumptions, and are dangerous to the environment. The FVA is not on the Cherry Creek alluvium, thus use of septic systems for the development densities that are already zoned will not pose a risk to that water source. Central sewer is not needed. However, the high-density development that would be driven by the FVA plan would pose a serious threat to the non-renewable aquifers that are critical to the sustained occupation of the Franktown area. This was proven by fact during the FVPD hearings.
* The development of infrastructure for the FVA, even if supported by tax income from highly dense residential housing, is not financially feasible. Based on professional analysis of the FVPD development models, the tax base would not be sufficient, nor could the capital improvements be reasonably funded. Capital costs for infrastructure were also found to be higher than the proposed models assumed. In essence, the most aggressive development model, providing the highest possible income for development of the FVA, was bound to collapse in bankruptcy. This was proven by fact during the FVPD hearings.

**D: Add further broad controls and protection to limit development in Douglas County, in general, such as:**

* No rezoning in rural areas.
* Conformance or harmony with proposed Initiative 66, which would limit growth to 1% of prior year’s levels.
* Stronger measurements and checks and balances against growth levels. The CMP should identify specific growth levels and consider excessive growth initiatives to be in conflict with the objectives of the CMP.

**Detailed Change Recommendations and Concerns**

Change Map 4.2: Remove Franktown Village Area (FVA) from Map 4.2 (blue area). Include all former FVA districts of in “Area B” (maximum 1 residence per 5 acre), except that the district shown as Community Estate on Map 4.3, should now be included in “Area A” (maximum 1 residence per 17.5 acre)

Remove Map 4.3: Franktown Village Area

Strengthen Policy 4-1 A.1 which calls for a clearly defined regional edge and community separation buffer. How will that be enforced or clarified?

Policy 4-1 C.3 and 4-1 D.3: Remove last sentence which refers to FVA.

Objective 4-1 D: Add new Policy to disallow any rezoning from current zoning – preventing increase in the density of residential development on in “Area B.”

Create a new Objective to guide industrial and commercial development that will apply to the Franktown Rural Community as a whole. Preserve the following policies in that Objective:

* Policy 4-1 E.1: Encouraging rezoning of commercial and industrial to agricultural or residential use
* Policy 4-1 F.6: Discouraging franchise style architecture
* Objective 4-1 G and all Policies 4-1 G.1 through 4-1 G.7: These are guidelines for commercial development that used to apply to FVA, and now will apply to “Area B”. Relevant mostly to the Commercial zone around the 83/86 intersection.
* Policy 4-1 J: These are policies that limit industrial development
* Policy 4-1 O: Encourages future development of pedestrian and trail infrastructure

Remove the policies that related to intense and concentrated development in the FVA:

* Remove Policy 4-1 C.2 (referrers to density transfers to FVA)
* Remove 4-1 H entirely (Community Residential District of the FVA)
* Remove 4-1 I entirely (Community Center District of the FVA)
* Remove 4-1 K: This district (Community Estate of the FVA) will be included in the policies of “Area A”
* Remove 4-1 L entirely (Commons District of the FVA)
* Remove 4-1 M entirely (Transition District of the FVA) No longer relevant since Community Residential District is removed.
* Remove 4-1 N entirely (Transportation) This is specific to the development of FVA and refers the reader to CMP Section 7 on Transportation for general guidance.
* Remove 4-1 P entirely (Local Street Access) This is specific to the development of the FVA
* Remove 4-1 X entirely (Waste Water Strategy) This objective could be revisited, starting with correct assumptions about risk to Cherry Creek Alluvium, considering removal of the FVA development objectives.

Keep the following Objectives. These are general Objectives for the Franktown Rural Community that should be maintained and possibly strengthened including:

* 4-1 Q: Consistency with the Natural landscape and Rural environment
* 4-1 R: Preservation of the night sky
* 4-1 S: Preservation of Franktown history
* 4-1 T: Preservation of ecosystem and agricultural environs
* 4-1 U: Protection and restoration of Cherry Creek ecosystem, flora, and fauna
* 4-1 V: Preservation of existing agricultural operations and vegetation
* 4-1 W: Manage water resources [Note, this Objective should be thoroughly revised to remove FVA context and to strengthen appropriate protection for Rural / Agricultural uses]
* 4-1 Y: Storm water control