

PLAN Jeffco



September 3, 2013

Mr. Tom Hoby
Director of Parks and Open Space Program
700 Jefferson County Parkway
Golden, Co. 80401

Re: Comments on Draft Jefferson County Open Space 2013 Master Plan

PLAN Jeffco submits the following comments on the current draft of the Jefferson County Open Space 2013 Master Plan (Draft Plan). Founded in 1972, PLAN Jeffco initiated the Open Space program and continues to work to conserve Jefferson County's Open Spaces. We have divided our comments into two sections. The first section provides general comments and the second provides specific comments by page number.

We are pleased to see measurable and reachable objectives under the Measures of Success. This is an improvement over the goals in the 2008 Plan. Numerical measures of success for land acquisition, for the miles of trails to be constructed, for the number of education program participants, and for the number of volunteer hours plus applying stewardship standards to open space lands so that a larger percent of the lands remain in a natural state are excellent ideas.

However, we are very concerned that the Draft Plan states that the emphasis of the Program is moving away from aggressive land acquisition to land management and not to a Program that emphasizes both acquisition and management. The latter is the balance that the 2011 Citizen Survey tells us that the citizens support, and it is the balance that PLAN Jeffco supports.

Overall, we are concerned that the Draft Plan does not provide sufficient information and analyses in order to develop goals, objectives, and implementation strategies, and does not put forth a clear vision, mission and associated strategies for the next five years.

Additionally, we do not believe that it is possible for the Open Space staff to adequately revise the current draft within the established timeframe, and strongly urge that the timeline be extended so that

staff can develop a robust plan that will strategically focus the Open Space Program operations and meet public expectations. Since there is no emergency that would require finalizing the plan in 2013, there is no compelling reason not to take the time to develop an improved plan and provide the public an opportunity to comment on any revisions made as a result of the current public comment period.

General Comments

I. Do not de-emphasize acquisitions. The Master Plan states that the Open Space Program is shifting from an emphasis on aggressive acquisition to management (page 3). We disagree with this statement, and strongly recommend that we align with the desires of Jefferson County residents who want to see continued aggressive acquisitions, as they recognize that lands are being developed at a rapid rate. We suggest that the need for continued acquisitions should be discussed in the Needs Section below.

We are disturbed by the text on Page 4 that asks “how much is enough open space?” and then continues with a statement that the original vision for open space conservation was 10,000 acres. *That statement is invalid.* The PLAN Jeffco 1972 brochure shows in green that about 50% of the non-federal lands in the county contained desirable open space qualities – about 210,000 acres. All of that land was envisioned as potential protected open space. The original vision during the 1972 campaign did not include a projection on how much open space was to be conserved nor how much would be enough open space. And Plan Jeffco drafted the resolution so that the open space sales tax did not automatically sunset.

Additionally, the Citizen Survey, mentioned on page 4, is used to imply that the public wants less land protected and more opportunities for outdoor recreation. However, we interpret the graphs on page 4 to mean that the public wants an even amount of land purchased for natural areas conservation and recreation, and not, as the text implies, an equal amount of money expended between recreational management and acquisition. Our interpretation is supported by Page 18 of the Citizen Survey which shows that the public wants 68% of funds spent for land acquisition and 30% for improvements that relate to recreation. *Thus the citizens continue to want an emphasis on land acquisition.*

II. The introductory sections should be used to frame the revision. We recommend that the introductory sections of the Master Plan be made more robust so that it effectively sets the stage for this Master Plan revision. We also recommend that the introduction include the following:

The authorities governing the Open Space Program. The Draft Plan should begin with a summary of the authorities governing the Open Space Program, including key excerpts from the voter-approved resolutions of 1972 and 1980 and the County Commissioners 1998 resolution which cover the program purposes and priorities. These authorities provide the legal framework for the System and Program, and therefore should provide the basis for the entire Master Plan

A Discussion of how the goals and objectives described in the 2008 Master Plan have been accomplished and if not why. This revision is not occurring in a vacuum, but rather is following on the heels of a series of previous five-year master plans. Hence, upfront, we recommend that this Master Plan include a recap of the major goals and objectives of the previous plan, what was implemented and what was not, what worked and what did not, what is being changed and why, etc.

III. The Plan should include additional sections and information. In its current form, the Draft Plan contains an aggregation of information that appears to be irrelevant because how it relates to the Program is not explained and this information is not utilized in the Master Plan. For instance, the draft contains several pages of information on a changing county, public lands, population, health, and our children. There is no discussion on how these are relevant to the Program.

Below, we describe important sections that are missing and offer recommendations for improvement.

A framework for land acquisitions. As stated in the voter-approved resolutions and in county commissioner resolutions, acquisition of open space lands is a priority activity for the Open Space Program. To fulfill this priority we recommend that the plan provide a strategic framework to guide acquisitions. We believe that such a framework should address, at a minimum, the criteria for setting acquisition priorities, acquisition approaches (phased, fee, easement), the acquisition process, and guiding policies and procedures.

This section should provide a significant amount of information related to acquisition criteria. For example, if one criterion is the scenic mountain backdrop, the Draft Plan should provide a map showing the most important places to acquire to protect the mountain backdrop. Similarly, if a criteria is riparian and wetland protection (one of the critical biological resources), the Draft Plan should include maps of these places showing which are protected and by whom, which are not protected, and the types of ownership.

Baseline description of the Open Space System. We recommend that the plan provide a description of the Open Space System along with maps that are listed in the Appendix. This would provide foundational information to Open Space Staff, decision-makers, and the public. Included in the description should be information on the condition and use of trails and Open Space parks, type of land ownership e.g. fee or easement, protected ecological features and elements (e.g., percent of protected acres in each ecotype), and offered recreational opportunities and settings.

The plan should also include a description of the role of the Commissioners, the Open Space Advisory Committee, and the Open Space Division.

Open Space Program needs. We recommend that the plan include a discussion of Open Space Program needs based on demographics, ecology, and public preferences. The information in this section should be the basis for the development of goals and objectives.

In particular, Colorado State University and the Colorado Natural Heritage Program recently completed an ecological survey of Jefferson County, and found notable resources including globally significant potential conservation areas and species. *The Master Plan should specifically restate and use the information and recommendations in this study (as well as other relevant high quality studies) to identify what lands to acquire, and how existing and new lands with these resources should be managed.* The Master Plan should also utilize and discuss other relevant high quality data sources and studies,

including, for instance, critical habitat determinations under the Endangered Species Act, development trends, etc.

Five year goals and objectives. As written, the Draft Plan provides “Measures of Success” (starting on page 7), which we read as five-year objectives. As previously stated, we agree with the Plan providing measurable objectives. We believe that these measures should flow from clearly stated mission, goals and objectives statements, from the guiding authorities, and a strategic analysis of needs and resources.

Also, it may be useful for the plan to include a Desired Future Condition statement (DFC) to help develop specific goals and objectives and to explain why these are important. DFCs can be a useful way to communicate in prose where the Open Space program is headed in the next five years, thereby making the plan more real and understandable.

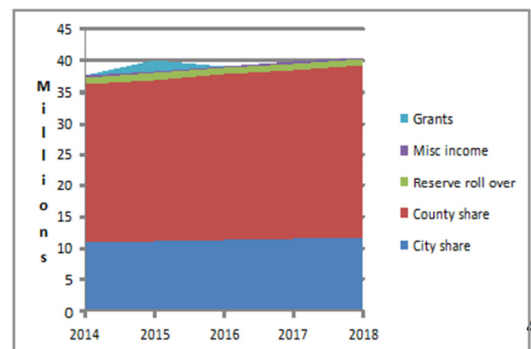
An implementation strategy. An implementation strategy explains how the program priorities will be achieved. This could be organized in a number of ways. For instance, it could be done geographically or topically. Either way, it should address the major projects and initiatives under the identified goals and objectives.

Financial management and strategies. Given the important role of finances in the administration of the Open Space Program including acquisitions, the Master Plan should include a section explaining the current and projected financial situation, and offer strategies for expenses and revenues. We believe it should also discuss the funds anticipated to be used for administration, operations, maintenance and land acquisition. The Draft Plan provides some financial information in pie charts. But those are a 2014 snapshot and not the kind of information or analysis that will sufficiently inform the public. This snapshot in time leaves out important information such as the fact that the 2014 capital budget includes funds for the trail in Clear Creek Canyon and that this expenditure will be over in 2015 and that the allocation between capital projects and acquisitions are flexible.

We propose replacing the pie charts and the accompanying text with the following:

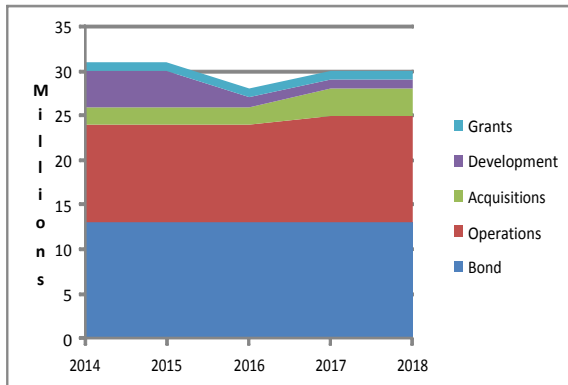
“In 1998, an initiative to bond \$160 million solely for land acquisitions was placed on the ballot and passed with more than 72% of the electorate supporting the measure. In May 1999, \$100 million in bonds were successfully issued and the cities and recreation districts within Jefferson County received an acquisition commitment to a portion of the bond funds for priority projects based upon population figures. In May 2001, \$30 million in bonds were issued, with the final \$30 million issued in 2004. Although the Bond Funds have been expended, the remaining debt service totals nearly \$93 million. With annual debt service payments between \$12 million and \$13 million annually, the anticipated debt payoff extends to 2024.

Open Space budgets on a five year basis with the budget updated annually. The five-year basis allows for planning and scheduling development and acquisitions. The adjacent chart shows the anticipated revenue for



the next five years. Assumptions included are a 3% sales tax increase in 2014 and 2% in the subsequent years. A \$1.8 million grant will be received from GOCO in 2015.

If the revenues are larger than budgeted, the additional funds should be utilized for the acquisition of additional open space lands.



The adjacent chart shows the budgeted expenditures for the next five years. The bond repayment is almost \$13 million annually. The operations also are about \$13 million annually and are budgeted to increase by 3% per year. The budget for development for the next two years is larger than the acquisitions budget in order to provide matching funds for the GOCO grant - The Peaks to Plains Trail in Clear Creek. The budget for acquisitions then becomes larger than that for development. “

This section should also address approaches to funding acquisitions in a post-bond era, and should provide the necessary data for establishing financial goals, objectives, and implementation strategies.

IV. Ensure and reflect public involvement in Open Space decisions. An important function of the Master Plan is to establish a “contract” with the public around the management of the Open Space Program. The Master Plan therefore should explain the public involvement process and provide a response to comments related to the Master Plan process

Specific Comments

Page 1. Introduction, Mission and Vision.

- The introduction mentions balancing land acquisition alongside of a changing backdrop of social change. What does this mean? Why does social change impact land acquisitions and what is the balance that the plan hopes to achieve? Please discuss.
- The introduction states that partnerships take on a star role as we balance conservation, health, and stewardship. We believe that the balance should be among open space lands conservation, management, and stewardship.
- What does the reference to health mean? Health of open space lands? Health of the flora and fauna indigenous on Open Space lands? Economic health of the county? Human health? Children’s health? If the reference is to human health, then we believe it is an important management consideration, and a desired outcome of our Open Space program. But, we believe that it should not be a **primary** emphasis of this plan.

- The mission and vision statements are vague and not specific to the Jefferson County Open Space system. OSAC and staff worked hard to develop the 2008 Master Plan mission statement. **We believe that the 2008 mission statement is still valid and request that the mission statement not be changed.** Since the existing mission statement is a result of a cooperative effort among OSAC, staff and the public any changes should be developed with a similar cooperative effort.

Page 1. Core Values

- The core values do not appear to add value to the Master Plan. They seem to be direction to staff and not Master Plan core values. We recommend that there be a discussion on how they are relevant to the Master Plan or that they be deleted.

Page 3. From Legacy to Living Room

- The description of recently purchased properties should include the following: Booth Ranch (park not named), Southwest corner of Highways 72 and 93, Section 16 - transferred to the US Fish and Wildlife Service, parcels adjacent to White Ranch, Reynolds Ranch, and Centennial Cone, and two properties purchased in partnership with Lakewood.
- Also the reference to the 1972 resolution does not include some critical language. The 1972 resolution states that the sales tax revenues “shall be expended **only** for the planning for” **The word “only” is very important and should be added to the text in the draft plan.**

Page 5, Population

- The discussion at the top of the page speaks to data on population increases, as provided by the State Demographer. We request a discussion on how future increases in the population of Jefferson County will impact the Open Space Program and its lands.
- The last sentence of the Population Section says, “How and where these new residents recreate and if they have easy access to the outdoors are questions considered in the Plan.” We do not see where these questions are considered.

Page 7, Focused Initiatives

The Draft Plan does not explain what a *Focused Initiative* is and what establishment of such implies regarding Program administration or on-the-ground impact. What are the objectives and outcomes of these initiatives?

- Conservation Initiative. The plan puts forth a troubling presumption – that is, it presumes land protection and recreation are in tension against one another, that they would need to be “balanced”, one against the other. This implies that “preservation of remarkable places” is somehow getting in the way of “public access.” Also, “Remarkable places” should be defined. What does it mean? Interesting architecture? Historical interest? There are a lot of “places” in Jefferson County, and some of them are “remarkable.” But are they “open space”?

- Health: We agree that open space staff should cooperate with other entities that are working on health issues and definitely should take these into consideration when managing and administering open space lands. However, the Draft Plan implies that the Open Space Program’s major focus will be on tackling health issues. If that is what is envisioned, we do not believe that is the proper role of the Program.

Page 8, Measures of Success

- It is a good idea to include measures of success in this plan.
- Item #1, “Preserve 1,700 additional acres of land that meet JCOS Acquisition Criteria.” What is the basis for this number? What characteristics should these 1,700 acres possess in order to meet the identified System needs? Are these fee simple acres, easements, or a combination?

We strongly request that this measure of success be revised to “preserve at least 1,700 additional acres of land...”

- Item #3 – Publication of five regional maps. Since this is being implemented by the Foundation and not the Open Space Program, we question why this is listed as #3. The role of the Open Space Program and the Foundation should be explained.
- Item #4 - Education. What is the “Transportation Program” listed here?
- Item #7 - “Refine and apply Stewardship Standards to Open Space properties that lead to a larger percent of lands in a natural state and smaller percent for public enjoyment.” We applaud the intent of this item, which we think is to ensure that the Open Space properties are managed in a natural state as much as possible. However, we are befuddled by the wording of this Measure of Success. Does having more lands in a natural state necessarily lead to less public enjoyment? Moreover, the laundry list of “to-do’s” under this measure of success do not seem to add up to achieving the stated Measure.

Page 9, Acquisition Criteria

- The Master Plan states that any property nominated for acquisition must meet the criteria. It then goes on to list 27 separate criteria under seven categories. Does a property have to meet all the criteria? One in each category? Are there priority criteria? Does Open Space want Open Space properties to be distributed in a particular way through the county (e.g., as evenly as possible, concentrated in particular areas)? Is there a social equity criteria that should be included so that low income residents and affluent ones alike can access Open Space parks and trails? 27 criteria is a lot – can these be focused?
- 2D – what does this mean?

- Congruence with other Plans – this criterion refers to the Statewide Comprehensive Outdoor Recreation Plan and the Jefferson County Public Health Improvement Plan. What do these plans say regarding acquisition priorities? What elements in these plans should be considered? How do these plans relate to the Open Space Program? Please discuss why these are listed here.

Appendices

We request that the following be included in the appendices.

(1) The 1972 and 1980 resolutions (maybe these are part of the JCOS Founding resolutions),

(2) The County Commissioner's 1998 resolution, and

(3) The executive summary from the "Survey of Critical Biological Resources of Jefferson County, Colorado 2010-2011" by the Natural Heritage Program of the State of Colorado.

(4) Map 3 (page 85) from the CSU survey is especially important. We recognize that the 2013 Natural Areas map includes all of the areas on map 3, however, it does not differentiate between outstanding, very high and significant areas nor does it show which areas are already protected and which are not.

(5) Map 3, described above, overlain with the areas that are already protected open lands.

(6) Maps that show wildlife migration corridors, and maps that show areas of high wildfire risk, as identified by the Jefferson County Wildfire Protection Plans.

(7) Maps that were shown at the public input meetings, but have not been included in the draft of the 2013 Open Space Master Plan, including but not limited to:

- Mountain backdrop
- Scenic areas
- Open Space trail connections between protected areas such as Forest Service, Fish & Wildlife Service, State, Cities and Special District lands.

Thank you for the opportunity to provide these comments.

Sincerely,



Margot Zallen, Chairperson, PLAN Jeffco

cc. OSAC