

## Agenda Item

**Date:****To:** Douglas County Planning Commission**From:** Matt Jakubowski, AICP, Chief Planner *MAJ*  
Scott Weeks, Senior Planner *SK for SW* *SK for CW*  
Curtis J. Weitkumat, AICP, Long Range Planning Manager  
Steven E. Koster, AICP, Deputy Director of Community Development *SK***Subject:** **Post-referral Summary on Proposed Amendments to the 2040 Comprehensive Master Plan**

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### SUMMARY

A process to amend the 2040 Comprehensive Master Plan (CMP) was initiated in the fall of 2025 with proposed updates to Section 8, Environmental Quality, and Section 10, Amendments and Updates. The proposed amendments were sent to referral agencies for review and comment during the referral period of October 23 through December 1, 2025. Staff has collected all of the comments received for the Planning Commission's review and feedback.

### BACKGROUND

The draft 2040 CMP amendment would expand on existing goals, objectives, and policies related to air quality in CMP Section 8 to further describe the County's commitment to air quality. Proposed revisions to Section 10 generally include text cleanup, clarification of the amendment approval criteria, and clarification of amendment submittal requirements.

Staff and the Planning Commission previously reviewed the draft amendment prior to commencing the referral period. Approximately 50 responses were received during the referral period in late 2025, with most expressing no comment or no objection. A few agencies provided suggestions for revising the draft amendment. For example, CORE Electric Cooperative expressed support for efforts to plan for a sustainable future and encouraged alignment with state energy policies to avoid unnecessary costs and infrastructure impacts. Comments from the Louviers Conservation Partnership support policies that address air quality, especially daily operation of industries that generate dust. All comments received are provided in the attachments.

### NEXT STEPS

Following the work session, staff will summarize the Planning Commission's comments and revise the proposed amendments. Staff will also update the Board of County Commissioners on the status of the amendment process.

**ATTACHMENTS**

CMP Section 8.4: Air Quality redlines

CMP Section 10: Amendments & Updates redlines

Referral Response Report and Letters

## **CMP Section 8: Environmental Quality**

### **Goal 8-4: Improve Air Quality.**

Douglas County is actively searching for ways to reduce air pollution and improve air quality. Having good air quality is essential for a healthy lifestyle and environment. Transportation, residential, and industrial emissions play a significant role in the deterioration of air quality. Strategies of encouraging the use of renewable energy sources can help mitigate these impacts and reduce carbon emissions. Community awareness and engagement in air quality monitoring can help empower individuals to act in their communities to reduce air pollution.

The County is part of the Environmental Protection Agency Air Quality Region 8 and participates in the Regional Air Quality Council (RAQC), a regional intergovernmental group committed to maintaining and improving the metro area's air quality through implementing federal and state air quality regulations.

The Denver Regional Council of Governments (DRCOG) performs air quality analyses for the region's transportation plans and is the regional mechanism for implementing air quality standards through development of the federally mandated State Implementation Plan. This plan reduces air pollution by regulating emissions of carbon monoxide, ozone, and total suspended particulates (very fine dust).

Douglas County works with the RAQC and DRCOG to address regional air quality issues and sets forth, in the policies below, a framework to implement regional goals.

### **Objective 8-4A**

Cooperate with governments and businesses to improve air quality.

#### **POLICY 8-4A.1**

Use, at a minimum, standards established by the Colorado Department of Public Health and Environment and the Environmental Protection Agency to improve air quality.

#### **POLICY 8-4A.2**

Encourage clean, non-polluting industries to locate in Douglas County.

#### **POLICY 8-4A.3**

Encourage development patterns that reduce dependence on the automobile for work, shopping, and other trips, and provide for alternative modes of transportation.

#### **POLICY 8-4A.4**

~~Require businesses and developers to control dust and other pollutants resulting from mining, travel on unpaved roads, and similar activities.~~ Support transitioning to renewable energy options.

## **Objective 8-4B**

Implement renewable energy sources and reduce particulate matter emissions with different measures throughout project development and construction.

### **Policy 8-4B.1**

Incorporate air quality awareness by providing access to information for the community to gain knowledge and provisions of opportunities to reduce emissions with communication and engagement.

### **Policy 8-4B.2**

Require policies within developments for proper disposal of waste such as solid waste, recycling, and rural land management techniques to support the reduction of carbon emissions.

### **Policy 8-4B.3**

Support street sweeping programs to reduce the amount of particulate matter produced by but not limited to; dust, debris, and pollutants that are typically found on roadways from tire debris, oils, and heavy metals.

### **Policy 8-4B.4**

Support current construction technologies that reduce carbon emissions. Increase the overall energy efficiency for all development construction types.

### **Policy 8-4B.5**

Encourage a conversion from natural gas to electricity to promote renewable energy systems.

### **Policy 8-4B.6**

Support materials and practices that convert carbon including but not limited to; trees, shrubs, mulch, and native plants that require little to no maintenance.

### **Policy 8-4B.7**

Require land grading techniques, dust mitigation and suppression practices during construction to reduce soil erosion that contributes to dust pollution.

### **Policy 8-4B.8**

Encourage the development of on-site for renewable energy systems.

### **Policy 8-4B.9**

Support rebate and incentive programs for the installation of renewable energy in existing buildings to help offset upfront costs.

## **Objective 8-4C**

Promote communities that provide pedestrian oriented travel and public transit options that

are both user friendly and functional. Create opportunities to reduce vehicle emissions by lessening driving time within built environments.

**Policy 8-4C.1**

Incorporate bike lanes, sidewalks, and crosswalks into development to reduce vehicle emissions.

**Policy 8-4C.2**

Provide access to bus stops, light rail stations and ride-sharing services within mixed-use communities to maximize opportunities to utilize public transit.

**Policy 8-4C.3**

Provide dedicated parking areas for non-vehicular transportation options to reduce travel mode conflict and encourage their use.

**Policy 8-4C.4**

Support incentives to promote alternative transportation services for employees.

**Policy 8-4C.5**

Incorporate walkable neighborhood designs in developments.

## **CMP Section 10: Amendments and Updates**

~~Consistency with the Comprehensive Master Plan (CMP) is considered a fundamental criterion for a positive recommendation for land use applications. Any rezoning proposal inconsistent with the CMP Land Use Map should amend the CMP prior. This section contains the standards and procedures for updating the CMP.~~

### **10-1 Types of Amendments**

Generally, two types of amendments may be made to the Comprehensive Master Plan (CMP).

#### **10-1A Amendments Initiated by The Public**

The public may initiate amendments only to the CMP Land Use Map. Such amendments shall be considered Major Amendments.

#### **10-1B Amendments Initiated by The Planning Commission or County Staff**

~~Major or administrative amendments which affect either the Land Use Map or goals, objectives, and policies of the CMP may be initiated by~~ The Douglas County Planning Commission, ~~either on its own or at the request of the public,~~ or Planning Services, ~~may initiate either major or administrative amendments which affect either the Land Use Map or goals, objectives, and policies of the CMP.~~ Members of the public may make a request to the Planning Commission to initiate a major amendment to amend goals, objectives, and policies, in accordance with the procedures outlined in Section 10.3.

1. Major amendments have a significant effect on the intent of the goals, objectives, policies, and maps of the CMP. Examples of these are as follows:
  - A comprehensive update of the CMP conducted ~~approximately every five-~~ years periodically.
  - The revision of elements or portions thereof (including maps) as new information becomes available.
  - The preparation of additional or more specific elements of the CMP or subarea plans.
2. Administrative amendments include changes that do not affect the goals, objectives, policies, or maps in any substantive way. Examples of these are as follows:
  - Updating the Land Use Map to show areas designated as preserved or conserved natural resources.
  - Updating the Land Use Map to show annexed or incorporated municipalities.
  - Updating population and employment forecasts.
  - Formatting changes.

## 10-2 Amendments Initiated by The Public

### 10-2A Approval Criteria

~~All of the following criteria shall be considered by t~~The Planning Commission will consider the diversity of community values, applicable laws and regulations, private property rights, and unique characteristics of each application when approving or disapproving CMP amendment requests. All applications must demonstrate:

1. Consistency with the ~~spirit~~, intent, goals, objectives, and policies of the CMP.
2. Compatibility with surrounding land uses and zoning.
3. Compatibility with existing, natural, and environmental conditions of the site-area and preservation of important natural features and scenic viewsheds, riparian corridors, wildlife habitat and movement corridors, and historic resources.
4. How existing and planned capabilities of the affected special districts can adequately handle the service demand at the time of development, including Adequate water-supplywater supply, water and sewer treatment facilities, transportation networks, access, fire protection, school facilities, and parks and trails for the development.
- ~~5. How existing and planned capabilities of the affected special districts can adequately handle the service demand.~~
- ~~6.5.~~ How ~~social, economic, or land use~~ conditions of the County have changed or are in the process of changing in such a manner to support the proposed amendment to the CMP.
- ~~7.6.~~ How land proposed for urban development is a logical expansion of ~~the Primary Urban Area (PUA), Separated Urban Area (SUA), or Chatfield Urban Area~~Urban Areas, as applicable.
- ~~8.7.~~ How the expansion of ~~the an PUA, SUA, or Chatfield~~ Urban Area results in a compelling public benefit, as applicable.

### 10-2B Procedure for Amendments Initiated by The Public

#### 10-2B.1 Presubmittal Meeting

Prior to submittal of a CMP amendment application, the applicant shall meet with staff to review the proposal and discuss the procedures and submittal requirements. The applicant shall contact Planning Services and schedule a presubmittal meeting which may include other referral agencies, as deemed necessary. The applicant shall provide the following:

1. Project Narrative (per Section 10-2B.2b(4), herein).
2. CMP Amendment Map (per Section 10-2B.2b(5), herein).

Staff shall comment on the proposed amendment; its consistency with the intent of the amendment provisions; and explain the amendment process; ~~and identify any additional submittal requirements~~. A staff comment summary shall be provided to the applicant.

## 10-2B.2 Amendment Application

The CMP amendment application shall be submitted only after the presubmittal meeting has been completed and a copy of the comment summary has been provided to the applicant. CMP amendments shall then be processed as follows:

### 10-2B.2a Submittal Process

1. The applicant shall submit the required information to the Planning Division. The submittal shall be reviewed for completeness within ~~15~~ 7 working-calendar days. The applicant shall be notified of any inadequacies. An incomplete submittal shall not be processed until the deficiencies in the submittal have been remedied.
2. ~~For complete applications, Once the submittal is determined complete, staff will notify the applicant of the submittal information required for distribution to referral agencies. Staff will identify in the written notice which referral agencies are a regulatory referral agency and which referral agencies are an advisory referral agency. Staff shall notify the applicant of the referral agencies to receive referral packets. Referral packets shall be in unsealed envelopes large and durable enough to accommodate referral materials, addressed to the appropriate referral agency, with all information identified in 10-2B.2b (1), (4), and (5), properly folded and compiled. Referral packets response requests shall also be provided to homeowner associations within two miles of the amendment and any other homeowner associations two miles of the amendment and any other homeowner associations potentially affected by the development amendment.~~
3. ~~Staff shall mail the referral packets to the referral agencies. Staff shall mail notification letters to abutting landowners.~~ The applicant shall submit any revised plans or documents for distribution to the referral agencies, as required by staff. Staff will send referral response requests to referral agencies.
- 3.4. ~~Staff shall send a courtesy notice of an application in process and applicable contact information to all abutting landowners and owners of land separated by 300 feet or less from the property by a platted tract. The applicant shall reimburse the County for the cost of materials. Errors in the courtesy notice shall not negatively impact the determination of public notice compliance set forth herein.~~
- 4.5. The referral agencies shall comment within ~~35~~ 21-calendar days of receiving a complete submittal unless the applicant grants an extension of no more than 7 ~~15~~ calendar days. ~~The applicant is encouraged to meet with the referral agencies, staff, and community groups to address any concerns prior to the end of the referral period.~~ The amendment shall be referred to the Division of Planning of the Department of Local Affairs in conformance with C.R.S. §30-28-122. ~~The staff planner will review the referral comments, discuss the concerns with the applicant, schedule a public hearing before the Planning Commission, notify the applicant of the hearing date and time, and prepare a staff report.~~
- 5.6. Staff shall provide a copy of the proposed plan to all adjoining counties, municipalities completely or partially located within the boundaries of the county or within three miles of the county, and any special district that supplies water to the area covered in the plan.

~~6.7.~~ Staff shall schedule a public hearing before the Planning Commission and notify the applicant of the hearing date and time.

~~7.8.~~ The applicant shall be responsible for public notification in accordance with Section 10-2C, herein.

~~8.9.~~ Staff shall prepare a staff report for the Planning Commission. All oral and written public comments will be accepted by staff and provided to the Planning Commission for its consideration.

~~9.10.~~ \_\_\_\_\_ The Planning Commission shall evaluate the application, referral comments, staff report, and public testimony during consideration of adopting an amendment. and take one of the following actions:

- Approve the request.
- Approve the request with conditions.
- ~~Table for further study.~~
- Continue the request to a time and date certain in order to obtain more information and to take additional public testimony.
- Deny the request.

~~10.11.~~ \_\_\_\_\_ The Planning Commission's decision shall be based on the evidence presented and compliance with the standards for approval, as listed in Section 10-2A. ~~and The decision~~ shall be in the form of a resolution.

~~11.12.~~ \_\_\_\_\_ The Planning Commission resolution shall identify the approved amendment map and be signed by the Planning Commission Chair and Secretary.

~~12.13.~~ \_\_\_\_\_ If the amendment request is ~~approved~~adopted, all post-approval requirements shall be completed, as identified in Section ~~10-4~~ 10-5, herein.

#### 10-2B.2b Submittal Requirements

Application forms, maps and additional resources can be found at (insert CMP webpage link).

1. Completed Land Use Application Form ~~(copy available from the Planning Office).~~
2. Application Fee ~~(fee schedule available from the Planning Office).~~
3. Proof of Ownership, for parcel-specific requests, in the form of an updated or current title insurance policy or title commitment no more than 30 days old from the date of application.
4. Project Narrative (8-1/2 x 11-inch document) supplemented with appropriate maps that describes s the following:
  - a) Intent of amendment.
  - b) Consistency Alignment with the goals, objectives, policies, and intent of the CMP.
  - c) Consistency with maps contained in the CMP.
  - d) ~~Compatibility~~Demonstrate compatibility with surrounding land uses and zoning.
  - e) Environmental conditions and hazards existing on the site.
  - f) Identify i important natural features, scenic viewsheds, riparian corridors, and wildlife habitat movement corridors as defined in Appendix A.
  - g) Identify h historic resources.

- h) Impacts on the existing road network.
  - i) Capabilities of, and impacts on, existing or planned special districts affected by the amendment.
  - j) Water supply and provision of water and sanitary sewage treatment.
  - k) Availability of public facilities such as schools, parks and trails, libraries, fire stations, etc.
  - l) Conditions that have changed in the county to warrant the amendment.
  - m) If applicable, evidence to support approval criteria 10-2A (7) and (8), herein.
5. CMP Amendment Map (24 x 36 inches) illustrating or containing the following:
- a) Vicinity map at a scale ~~of 1 inch = 2,000 feet~~ that clearly showing the location of the amendment in relation to major roads, section lines, existing subdivisions, and other pertinent features.
  - b) Legal description and acreage of the property under consideration.
  - c) Drawing of the proposed amended area, at an appropriate scale determined by staff, that includes the following:
    - Topography in the area at 10-foot contour intervals.
    - Major roads on, or adjacent to, the site and their functional classifications according to the Douglas County Transportation Plan.
    - ~~Existing and proposed CMP Land Use Map land use designations.~~
    - CMP Land Use Map designation of adjacent areas.
    - Any significant natural features or environmental conditions on or adjacent to the site.

~~6. The applicant shall also provide stamped letter sized envelopes addressed to all abutting landowners, and other landowners as requested by staff. Staff shall mail a courtesy notice of an application in process and applicable contact information to the landowners, along with a copy to the applicant.~~

~~7. A copy of the staff comments from the presubmittal meeting and any additional information as requested by staff. A written response to all questions and comments raised through the presubmittal process is recommended.~~

~~8. Evidence of ability to develop a sufficient water supply in accordance with the Water Supply Overlay District, Section 18 A of the Douglas County Zoning Resolution, as amended.~~

### **10-2C Public Notice Requirements for Amendments Initiated by The Public**

The applicant shall be responsible for public notification. In calculating the time period for public notification, the day of publishing, posting, or mailing shall be counted toward the total number of days required. The day of the hearing shall not be counted toward this total.

The degree of accuracy required for the information contained in these public notices shall be that of substantial compliance with the provisions of this section.

### 10-2C.1 Written Notice

At least 14 calendar days prior to the Planning Commission hearing, the applicant shall mail a written notice of the hearing by first-class mail to the address of each abutting landowner at such address shown in the records of the Douglas County Assessor's Office. The notice shall read substantially the same as the published notice also required by this section.

At least 7 calendar days prior to the public hearing, the applicant shall submit the following to the Planning Services Office:

1. An alphabetical list of the abutting landowners.
2. A map showing the site and the location of the abutting landowners.
3. A copy of the notice sent to the landowners.
4. The certificate of mailing.

The person completing the mailing of the written notice shall execute a certificate of mailing. Such certificate shall read as shown in Figure 10.1.

In the event the applicant fails to mail a notice to an abutting landowner or otherwise fails to comply with the written notice required in this section, the landowner who did not receive such complying notice may waive such notice by submitting a written waiver to Planning Services prior to the hearing.

### 10-2C.2 Published Notices

At least 14 calendar days prior to the Planning Commission hearing the applicant shall:

1. Publish a notice in at least one publication of a daily or weekly newspaper of general circulation in the County in a manner sufficient to notify the public of the time, place and nature of the public hearing. ~~printed or published in whole, or part, in Douglas County.~~
2. Provide a publisher's affidavit of said published notice to Planning Services at least seven calendar days prior to the public hearing. ~~The Planning Commission may direct that the notice be published in one or more additional newspapers of general circulation in Douglas County.~~ The notice shall read as shown in Figure 10.2.

### 10-2C.3 Posted Notice

At least 14 calendar days prior to the Planning Commission hearing, the applicant shall post a notice on the land under consideration. The notice shall consist of at least one sign facing each abutting public or private street open for travel, within 10 feet of the property line abutting such street, placed at posts at least four feet above ground level. In the event the staff planner determines a sign cannot be placed abutting such street and visible from such street or that there is no abutting public or private street open for travel, the staff planner may require an alternate location for a sign. ~~Additional signs may be required by the staff planner.~~ Each sign shall measure not less than 3 x 4 feet. Letter size shall be a minimum of three inches high and a minimum of six inches high for the sentence that reads, "For more

information call Douglas County Planning at 303-660-7460.” The notice shall read as shown in Figure 10.3.

Figure 10.1

<b>CERTIFICATE OF MAILING</b>
I hereby certify that a true and correct copy of the attached written notice was placed in the U.S. mail, first-class, postage prepaid this ___ day of _____, 20___, and addressed as follows: <i>(list of addresses)</i>
_____
(signature of person completing the mailing)

Figure 10.2

<b>NOTICE OF PUBLIC HEARING BEFORE THE PLANNING COMMISSION</b>
A public hearing will be held on <i>(date)</i> , at <i>(time)</i> , in the Commissioners’ Hearing Room, 100 Third St., Castle Rock, Colorado, for an amendment to the Douglas County <del>2030</del> 2040 Comprehensive Master Plan. The subject property is located approximately <i>(distance and direction from nearest major intersection)</i> . For more information, call Douglas County Planning at 303-660-7460.
File Name and Number: _____

Figure 10.3

<b>NOTICE OF PUBLIC HEARING BEFORE THE PLANNING COMMISSION</b>
This land shall be considered for amendment to the Douglas County 2040 Comprehensive Master Plan. The public hearing is (date), at (time), in the Commissioners’ Hearing Room, 100 Third St., Castle Rock, Colorado. For more information call Douglas County Planning at (303) 660-7460.
File Name and Number: _____

10-2C.4 Affidavit of Sign Posting

An affidavit of sign posting and newspaper publishing shall be submitted for the file in Planning Services at least ~~seven~~7 calendar days prior to the hearing. The sign(s) shall be photographed by the applicant and attached to the affidavit as shown in Figure 10.4.

The applicant shall remove the sign within ~~two weeks~~14 calendar days following the final decision by the Planning Commission. The Planning Commission submits a certified copy of the amended CMP to the Board of County Commissioners and the planning commission of all municipalities within the county.

Figure 10.4

**(Attach photo here)**

*(sign lettering must be legible in photo)*

I, (print name of applicant/representative/person posting sign), attest that the above sign was posted on (date), abutting (name of street).

File Name and Number: \_\_\_\_\_

(signature)

STATE OF COLORADO )

) ss.

COUNTY OF \_\_\_\_\_

Acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by \_\_\_\_\_ as \_\_\_\_\_.

My commission expires: \_\_\_\_\_

Witness my hand and official seal

\_\_\_\_\_  
Notary Public

### **10-3 Amendments Requested by the Public to be Initiated by the Planning Commission**

#### **10-3A Presubmittal Requirements**

A presubmittal meeting as discussed in Section 10-2B.1 shall be completed.

#### **10-3B Submittal Requirements**

Information submitted to the Planning Commission should be of sufficient detail to clearly explain the proposed amendment. A narrative describing reasons for the proposed amendment and maps or data supporting the amendment shall be included.

##### **10-3B.1 STAFF EVALUATION**

Staff shall evaluate the public initiation request and prepare a staff report for the Planning Commission.

##### **10-3B.2 PLANNING COMMISSION**

The Planning Commission, at a work session, shall consider the public initiation request using the information submitted, the staff report, and take one of the following actions:

- Allow the public to initiate the amendment request.
- Not initiate the request.
- ~~Table for further study in order to obtain more information.~~

If the request from the public is to be initiated, the proposed amendment shall be processed in accordance with Section 10-2.

## **10-4 Amendments initiated by the Planning Commission or County staff**

### **10-4A Submittal Requirements**

Information submitted to the Planning Commission should be of sufficient detail to clearly explain the proposed amendment. A narrative describing reasons for the proposed amendment and maps or data supporting the amendment shall be included.

### **10-4B Major Amendment Procedure**

#### **10-4B.1 REFERRALS**

All major amendments shall be sent out to appropriate referral agencies for comment. The referral agencies shall comment within ~~35~~ 21 calendar days of receiving a complete submittal unless the applicant grants an extension of no more than 7 ~~15~~ calendar days. The amendment shall be referred to the Division of Planning of the Colorado Department of Local Affairs in conformance with C.R.S. §30-28-122.

#### **10-4B.2 PUBLIC HEARING**

Planning Services shall schedule a public hearing before the Planning Commission and prepare a staff report. Public notice shall be in accordance with Section 10-2C, herein.

#### **10-4B.3 PLANNING COMMISSION ACTION**

The Planning Commission shall evaluate the proposed amendment, referral comments, staff report, and public testimony, and take one of the following actions:

- Approve the request.
- Approve the request with conditions.
- ~~Table the request for further study.~~
- Continue the request to a date and time certain in order to obtain more information and to take additional public testimony.
- Deny the request.

#### **10-4B.4 PLANNING COMMISSION RESOLUTION**

The Planning Commission's decision shall be in the form of a resolution. The Planning Commission resolution shall identify the proposed amendment map or narrative specifically and be signed by the Planning Commission Chair and Secretary.

#### **10-4B.5 POST-APPROVAL**

All post-approval requirements shall be completed as identified in Section 10.5.

### **10-4C Administrative Amendment Procedure**

#### **10-4C.1 PLAN REVISIONS**

Staff shall revise the CMP to reflect all mapping and narrative amendments. All amendments approved shall be included in the next publication of the CMP.

#### 10-4C.2 APPROVAL OF PLAN REVISIONS

The Community Development Director shall approve all administrative amendments and notify the Planning Commission. No public notice shall be required.

#### 10-4D Public Notice – Planning Commission or County Staff Initiated Amendments

At least 14 days prior to the Planning Commission hearing, staff shall publish a notice in at least one publication of the daily, or at minimum, a weekly newspaper of general circulation in the County in a manner sufficient to notify the public of the time, place and nature of the public hearing. ~~printed or published in whole, or part, in Douglas County.~~

### 10-5 Post-Approval Requirements

#### 10-5A Document Revision

The staff planner shall revise the CMP to reflect all mapping and narrative amendments. All amendments approved shall be included in the next publication of the CMP.

#### 10-5B Plan Certification

The Planning Commission shall certify a copy of the amended CMP to the Board of County Commissioners, as well as the planning commissions of all municipalities in the county. The Planning Commission shall submit the master plan or amended master plan to the division of local government in the department of local affairs pursuant to Section 30-28-106(8).

#### ~~10-5C Regional Plan Amendment~~

~~After the Douglas County CMP is amended, all regional plans shall be amended, as necessary. For amendments initiated by the public, applicants shall be responsible for preparing regional plan amendment submittals for the Denver Regional Council of Governments (DRCOG). All such amendments shall be submitted to the Douglas County Department of Community Development for review and approval prior to submission to DRCOG.~~

**Referral Agency Responses Received**

**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

**Project File #:** DR2025-010

**Date Sent:** 10/23/2025

**Date Due:** 12/01/2025

<b>Agency</b>	<b>Date Received</b>	<b>Agency Response</b>
Arapahoe County Public Airport Authority-Centennial	10/24/2025	Excerpt: "The Arapahoe County Public Airport Authority has reviewed the documents and has no objection to the proposed development." See attached letter for full detail.
Cherry Creek Basin Water Quality Authority	11/11/2025	Received: The Cherry Creek Basin Water Quality Authority (Authority) acknowledges notification from Douglas County that the proposed development plans for DR2025-010, 2040 Comprehensive Master Plan Amendment - Section 8, Environmental Quality and Section 10, Amendments and Updates have been or will be reviewed by Douglas County for compliance with the applicable Regulation 72 construction and post-construction requirements. Based on the Authority's current policy, the Authority will no longer routinely conduct a technical review and instead the Authority will defer to Douglas County's review and ultimate determination that the proposed development plans comply with Regulation 72. If a technical review of the proposed development plan is needed, please contact LandUseReferral@ccbwqa.org. The review may include consultation with the Authority's Technical Manager to address specific questions or to conduct a more detailed Land Use Review, if warranted.

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**Date Sent:** 10/23/2025

**Date Due:** 12/01/2025

<p>CORE Electric Cooperative</p>	<p>12/01/2025</p>	<p>Received: CORE Electric Cooperative Comments on Douglas County’s 2040 Comprehensive Plan</p> <p>CORE Electric Cooperative (CORE) appreciates the opportunity to provide input on Douglas County’s 2040 Comprehensive Plan. We recognize the significant effort required to develop a comprehensive vision for future growth and land use, and we value the County’s commitment to planning for a sustainable future.</p> <p>After reviewing the proposed plan, CORE offers the following considerations related to CMP Section 8: Environmental Quality:</p> <p><u>Carbon Emissions</u></p> <ul style="list-style-type: none"> <li>•The State of Colorado requires utilities to achieve 80% carbon-neutral energy generation by 2030. This mandate is already increasing costs for electric customers statewide, including CORE members in Douglas County.</li> <li>•Additional local carbon-reduction requirements beyond state law would further increase electric rates, require additional infrastructure, and potentially impact reliability.</li> <li>•Recommendation: Align any carbon-related policies with existing state requirements to ensure Douglas County remains competitive and avoids unnecessary cost burdens for residents and businesses.</li> </ul> <p><u>Renewable Energy</u></p> <ul style="list-style-type: none"> <li>•CORE is actively rebuilding its generation portfolio to meet Colorado’s mandate of 80% carbon-neutral energy by 2030, primarily through utility-scale renewable resources. These projects deliver the same greenhouse gas (GHG) reductions as rooftop solar but at significantly lower cost, ensuring compliance with state requirements while maintaining affordability and reliability.</li> <li>•Because rooftop solar generates electricity at the same time as utility-scale solar already installed to meet state GHG requirements, additional rooftop mandates do not provide incremental emissions benefits. Instead, they increase costs for homeowners, businesses, and developers without advancing the County’s sustainability objectives. Large energy users (e.g., manufacturing facilities, data centers) cannot meet their demand through rooftop solar alone due to space limitations, making such mandates impractical.</li> <li>•Recommendation: Maintain focus on utility-scale renewable electricity development as the most cost-effective and reliable approach to achieving state-mandated emissions reductions.</li> </ul> <p><u>Natural Gas to Electric Conversion</u></p> <ul style="list-style-type: none"> <li>•Policies promoting conversion from natural gas to electricity will significantly increase electric demand, requiring new generation, transmission, and distribution infrastructure. These projects will affect land use and increase rates for CORE members.</li> <li>•While beneficial electrification can reduce emissions under the state’s carbon-neutral mandate, requiring homeowners and businesses to replace existing natural gas systems will impose major costs.</li> <li>•Eliminating natural gas service represents a substantial policy shift that warrants extensive public engagement beyond the comprehensive planning process to ensure community understanding and input.</li> </ul>
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**Date Due:** 12/01/2025

Agency	Date Received	Agency Response
		<ul style="list-style-type: none"> <li>•Recommendation: Facilitate broader discussions with utilities and residents before implementing policies that restrict or eliminate natural gas service.</li> </ul> <p><u>Rebates</u></p> <ul style="list-style-type: none"> <li>•Rebates require funding through taxes or utility fees, which ultimately increase costs for customers.</li> <li>•Incentives for rooftop solar provide minimal benefit compared to utility-scale renewable projects, which deliver carbon-neutral energy at one-quarter the cost of rooftop systems.</li> <li>•Recommendation: Direct resources toward utility-scale renewable development rather than rooftop solar incentives to achieve the greatest environmental and economic benefit.</li> </ul> <p><u>Summary</u></p> <p>CORE supports Douglas County’s efforts to plan for a sustainable future and encourages alignment with state energy policies to avoid unnecessary costs and infrastructure impacts. Utility-scale renewable energy is the most effective and affordable path to achieving carbon-neutral goals while maintaining reliability and affordability for residents and businesses.</p>
Douglas County Conservation District	12/01/2025	The Conservation District recommended changes to the proposed amendments. See attached letter for detail.
Douglas County Health Department	11/26/2025	Excerpt: “The Colorado Department of Public Health and Environment Air Pollution Control Division regulates air quality. DCHD does not currently have an air quality program.” See attached letter for detail.
Highlands Ranch Community Association	10/24/2025	<p>Received:</p> <p>The Highlands Ranch Community Association (HRCA) appreciates the opportunity to review and opine on this application. HRCA takes no exception to the proposed CMP amendments; changes are policy- and process-oriented with no direct impact to HRCA governing documents or authority.</p> <p>The proposed staff-initiated amendments to the 2040 Comprehensive Master Plan (CMP) — specifically to Section 8.4 (Air Quality) and Section 10 (Amendments &amp; Updates) — do not present any direct impact to HRCA’s governing documents, private covenants, or internal design review authority. The Air Quality amendments appropriately modernize County policy by incorporating goals related to renewable energy, emission reduction, and energy efficiency. These objectives align with HRCA’s long-standing commitment to sustainable design and community stewardship, and would primarily influence how the County evaluates future land-use applications rather than impose new requirements on existing neighborhoods.</p> <p>The proposed revisions to Section 10 are procedural and clarify the County’s internal processes for CMP administration, including referral distribution and alignment of review timelines. HRCA notes that a shortened referral period may require future calendar adjustments but otherwise finds no conflict or concern.</p>

**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

**Project File #:** DR2025-010

**Date Sent:** 10/23/2025

**Date Due:** 12/01/2025

Agency	Date Received	Agency Response
Jefferson County Planning and Zoning		<p>Received: Jefferson County Planning and Zoning has the following comments:</p> <p>Section 8. Goal 8-4- Expand the goal to include commercial emissions as a contributing factor to air quality deterioration.</p> <p>Policy 8-4B.1 Recommendation to rephrase statement to “Promote air quality awareness by ensuring the community has access to relevant information, and by creating opportunities for education, engagement, and emission reduction through effective communication strategies.”</p> <p>Policy 8-4B.3 Recommendation to include another intent of street sweeping is to prevent pollution in stormwater drains.</p> <p>Policy 8-4B.7 Incorporate potential dust impact from agricultural practices. Although this use is not included in the objective. Comment greatly depends on future land use of the county.</p> <p>Policy 8-4c.1 &amp; Policy 8-4C.5 could be consolidated considering the intention and purpose is very similar.</p> <p>Section 10: In general it seems like much of the content of Section 10 is more regulatory and may belong in the County’s Zoning Resolution. It seems like having the detail of the process, including referral timeframes and notification requirements, would be better in a regulatory document. 10-4D Public Notice should be bolded with less indentation to be consistent with the rest of the formatting.</p>
Louviers Conservation Partnership		<p>Received: LCP has the following comments:</p> <p>Policy 8-4A.4: sentence is being removed which would address dust control and other pollutants from businesses at all times even after development and construction. Require businesses and developers to control dust and other pollutants resulting from mining, travel on unpaved roads, and similar activities.</p> <p>Objective 8-4B: The new Objective 8-4B Policies only state dust control during development and construction. Implement renewable energy sources and reduce particulate matter emissions with different measures throughout project development and construction.</p> <p>Policy 8-4B.7: Require land grading techniques, dust mitigation and suppression practices during construction to reduce soil erosion that contributes to dust pollution. Ongoing dust and other pollutants from businesses should still be addressed in the policies.</p>
Open Space and Natural Resources	11/05/2025	<p>Received: The language in policy 8-4B.8 is unclear. Perhaps remove the word "for".</p> <p>Policy 8-4B.8: Encourage the development of on-site <del>for</del> renewable energy systems.</p>

**Referral Agency Responses Received**

**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

**Project File #:** DR2025-010

**Date Sent:** 10/23/2025

**Date Due:** 12/01/2025

<b>Agency</b>	<b>Date Received</b>	<b>Agency Response</b>
Roxborough Village Metro District	11/14/2025	<p>Received:</p> <p>The Roxborough Village Metro District Board reviewed the proposed amendments to sections 8 and 10 of the 2040 Comprehensive Master Plan. The Board requests that the following changes be made to section 10:</p> <p>10-2B.2a Submittal Process - Section 2: To avoid missing residents in non-HOA areas, special districts should receive referral requests. In addition, there is a concern that removing the two mile radius requirement, there is too much reliance on Douglas County staff to know how each project affects nearby residents. Therefore, the two mile requirement should remain in place. Our recommended version of the second sentence would read as follows: "Referral response requests shall be provided to special districts and homeowner associations within two miles of the amendment and any other special districts or homeowner associations potentially affected by the amendment."</p> <p>10-2B.2a Submittal Process - Section 6: This section should be amended to include all special districts, not just water districts.</p> <p>10-2B.2b Submittal Requirements - Section 4: Add another bullet point to include "Impacts to emergency evacuation times and routes"</p> <p>10-2C.2 Published Notices and 10-4D Public Notice: Because few people read physical newspapers anymore, change the publishing requirements to allow for digital news outlets instead of just physical newspapers.</p> <p>Thank you for your consideration.</p>

**Referral Agency Responses Received**

**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

**Project File #:** DR2025-010

**Date Sent:** 10/23/2025

**Date Due:** 12/01/2025

Agency	Date Received	Agency Response																						
RTD - Planning & Development Dept	11/25/2025	<p>Received: Project Name: 2040 Comprehensive Master Plan Amendment - Section 8, Environmental Quality and Section 10, Amendments &amp; Updates - DR2025-010 - 1st Submittal</p> <table border="0"> <thead> <tr> <th data-bbox="560 527 808 554"><u>Department</u></th> <th data-bbox="824 527 948 554"><u>Comments</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="560 558 808 588">Bus Operations</td> <td data-bbox="824 558 948 588">No exceptions</td> </tr> <tr> <td data-bbox="560 590 808 619">Bus Stop Program</td> <td data-bbox="824 590 948 619">No exceptions</td> </tr> <tr> <td data-bbox="560 621 808 651">Commuter Rail</td> <td data-bbox="824 621 948 651">No exceptions</td> </tr> <tr> <td data-bbox="560 653 808 682">Construction Mgmt</td> <td data-bbox="824 653 948 682">No exceptions</td> </tr> <tr> <td data-bbox="560 684 808 714">Engineering</td> <td data-bbox="824 684 948 714">No exceptions</td> </tr> <tr> <td data-bbox="560 716 808 745">Light Rail</td> <td data-bbox="824 716 948 745">No exceptions</td> </tr> <tr> <td data-bbox="560 747 808 777">Real Property</td> <td data-bbox="824 747 948 777">No exceptions</td> </tr> <tr> <td data-bbox="560 779 808 808">Service Development</td> <td data-bbox="824 779 948 808">No exceptions</td> </tr> <tr> <td data-bbox="560 810 808 840">Transit Oriented Dev.</td> <td data-bbox="824 810 948 840">No exceptions</td> </tr> <tr> <td data-bbox="560 842 808 871">Utilities</td> <td data-bbox="824 842 948 871">No exceptions</td> </tr> </tbody> </table> <p>This review is for Design concepts and to identify any necessary improvements to RTD stops and property affected by the design. This review of the plans does not eliminate the need to acquire, and/or go through the acquisition process of any agreements, easements or permits that may be required by the RTD for any work on or around our facilities and property.</p>	<u>Department</u>	<u>Comments</u>	Bus Operations	No exceptions	Bus Stop Program	No exceptions	Commuter Rail	No exceptions	Construction Mgmt	No exceptions	Engineering	No exceptions	Light Rail	No exceptions	Real Property	No exceptions	Service Development	No exceptions	Transit Oriented Dev.	No exceptions	Utilities	No exceptions
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Real Property	No exceptions																							
Service Development	No exceptions																							
Transit Oriented Dev.	No exceptions																							
Utilities	No exceptions																							
South Metro Fire Rescue	11/13/2025	Received: South Metro Fire Rescue (SMFR) has reviewed the provided documents and has no objection to the proposed amendment to the 2040 Douglas County Comprehensive Master Plan.																						
South Suburban Parks and Recreation District	11/26/2025	South Suburban suggested revisions to some proposed policies in Section 8 regarding incorporation of parks, open space, and trails into development; preserving natural features; ensuring adequate capacity for recreational amenities.																						

## REFERRAL RESPONSE REQUEST – CMP AMENDMENT

Date sent: October 24, 2025

Comments due by: December 1, 2025

**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

**Project File #:** DR2025-010

**Project Summary:** Staff has initiated an amendment to Section 8 and Section 10 of the 2040 Douglas County Comprehensive Master Plan (CMP). The intent of the request is to replace an existing policy and include new objectives and policies that advance the County’s commitment to air quality (Section 8); and to clarify the role of the CMP map and CMP goals, objectives, and policies in review of development applications including approval criteria, distribution of referrals and length of the referral period, and application submittal requirements (Section 10).

A public information session is scheduled for Wednesday November 19, 2025 at 3:30 pm in the board of County Commissioners Hearing Room, 100 Third St., Castle Rock, CO 80104.

Information on the identified development proposal located in Douglas County is enclosed. Please review and comment in the space provided.

<input type="checkbox"/> No Comment	
<input type="checkbox"/> Please be advised of the following concerns:  _____	
<input checked="" type="checkbox"/> See letter attached for detail.	
<b>Agency:</b> Arapahoe County Public Airport Authority	<b>Phone #:</b> 303-218-2919
<b>Your Name:</b> Zachary Gabehart <i>(please print)</i>	<b>Your Signature:</b> <i>Zachary Gabehart</i>
	<b>Date:</b> 10/24/2025

Agencies should be advised that failure to submit written comments prior to the due date, or to obtain the applicant’s written approval of an extension, will result in written comments being accepted for informational purposes only.

Sincerely,  
*Scott M Weeks*  
Scott Weeks, Senior Planner  
*Enclosure*



CENTENNIAL AIRPORT  
ARAPAHOE COUNTY AIRPORT AUTHORITY

7565 South Peoria Street, Unit D9  
Englewood, Colorado 80112  
main: 303-790-0598 | fax: 303-790-2129  
[www.centennialairport.com](http://www.centennialairport.com)

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October 24, 2025

Scott Weeks  
Douglas County Community Development Department  
100 Third St.  
Castle Rock, CO 80104

Re: DR2025-010 - 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

Dear Mr. Weeks,

Thank you for the opportunity to review the proposed changes to the Douglas County 2040 Comprehensive Master Plan. The Arapahoe County Public Airport Authority has reviewed the documents and has no objection to the proposed development.

Please feel free to call me if you have any questions.

Sincerely,

Zachary Gabehart  
Planning Specialist - Noise & Environmental



www.douglas.co.us

Department of Community Development  
Planning Services

## REFERRAL RESPONSE REQUEST – CMP AMENDMENT

Date sent: October 24, 2025

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**Project Name:** 2040 Comprehensive Master Plan Amendment – Section 8, Environmental Quality and Section 10, Amendments & Updates

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<input type="checkbox"/> No Comment	
<input type="checkbox"/> Please be advised of the following concerns:  _____	
<input checked="" type="checkbox"/> See letter attached for detail.	
<b>Agency:</b> Douglas County Conservation District	<b>Phone #:</b> 303 218 2622
<b>Your Name:</b> David Shohet, President	<b>Your Signature:</b> <small>Signed by:</small> <i>David Shohet</i>
(please print)	<b>Date:</b> 12/1/2025

Agencies should be advised that failure to submit written comments prior to the due date, or to obtain the applicant’s written approval of an extension, will result in written comments being accepted for informational purposes only.

Sincerely,  
*Scott M Weeks*  
Scott Weeks, Senior Planner  
Enclosure



**DOUGLAS**  
—CONSERVES—

**DOUGLAS COUNTY CONSERVATION DISTRICT**

PO Box 688 / 7519A E. Hwy 86 Franktown, CO 80116 / Phone 303-218-2622

DATE: December 1, 2025

RE: DR2025-10

The Douglas County Conservation District provides development responses for Douglas County in accordance with Senate Bill 35. District comments are made on the suitability of soils for the proposed land uses, floodwater management, and watershed protection. In addition, the District submits advisory comments regarding rural water supply issues, agricultural land use conversion, and endangered species protection if the development plan affects those issues.

#### CMP Section 10 Amendments Comments

1. 10-2A Approval Criteria, Item 4 – request to keep “Adequate water supply”
2. CMP 10-2B.2b Submittal Requirements - Item 4 Project Narrative, Item J – request that “Adequate water supply” in place of “water supply.”

#### CMP Section 8.4 Air Quality Comments, additions in red

1. Policy 8-4B.7, Require **minimal** land grading techniques, dust mitigation and suppression practices, **noxious weed mitigation plans**, during construction to reduce soil erosion that contributes to dust pollution.

Thank you for the opportunity to review this project. Direct any questions to Heather Kelly, District Manager, at [Admin@DouglasConserves.org](mailto:Admin@DouglasConserves.org) or (303) 218 – 2622.

November 26, 2025

Scott Weeks  
100 Third St.  
Castle Rock, CO 80104

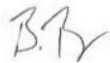
RE: DR2025-010

Thank you for the opportunity to review and comment on the proposed amendments for the 2040 Comprehensive Master Plan Amendment. Douglas County Health Department (DCHD) staff have reviewed the application for compliance with pertinent environmental and public health regulations. After reviewing the application, DCHD has the following comments.

The Colorado Department of Public Health and Environment Air Pollution Control Division ([cdphe.colorado.gov/apcd](http://cdphe.colorado.gov/apcd)) regulates air quality. DCHD does not currently have an air quality program.

Please contact me at 720-907-4888 or [bfreyer@douglas.co.us](mailto:bfreyer@douglas.co.us) if you have any questions about our comments.

Sincerely,



Brent Freyer  
Environmental Health Specialist II  
Douglas County Health Department

4810 East County Line Road  
Littleton, CO 80126  
303.798.5131

November 26, 2025  
Douglas County Planning Services  
100 Third Street  
Castle Rock, CO 80104

Re: Comments on Proposed Amendments to the 2040 Comprehensive Master Plan (CMP) – Sections 8.4 and 10

Dear Planning Commission Members,

South Suburban appreciates the opportunity to provide comments on the proposed amendments to the Douglas County Comprehensive Master Plan. We commend the County's efforts to strengthen policies related to air quality, renewable energy, and sustainable development practices and have the following comments.

We strongly support the inclusion of objectives and policies that promote air quality improvements, renewable energy adoption, and reduction of carbon emissions. These measures align with South Suburban's mission to provide healthy, sustainable, and accessible recreational environments for our community.

1. Parks, Open Space, and Trails Integration
  - We encourage the County to ensure that new development patterns incorporate regional trail connectivity, safe pedestrian and bicycle routes, and access to public transit as outlined in Objective 8-4C. These elements are critical for reducing vehicle emissions and promoting active transportation.
2. Preservation of Natural Features
  - We support the CMP approval criteria requiring protection of riparian corridors, wildlife habitat, scenic viewsheds, and open space. These resources are essential for recreation, ecological health, and community character.
3. Construction and Land Management Practices
  - We appreciate the emphasis on dust mitigation, erosion control, and native landscaping during construction. These practices help maintain air quality and protect adjacent parks and trails from environmental degradation.
4. Public Facilities and Service Capacity
  - We request that parks and trails be considered essential infrastructure in evaluating development proposals. Adequate provision of recreational amenities should be integrated into planning for growth and urban expansion.

5. Incentives for Sustainability

- We encourage the County to explore developer incentives for renewable energy systems and green infrastructure that benefit public spaces and reduce long-term maintenance costs.

Sincerely,

AnaClaudia Magalhaes  
Planning Supervisor  
amagalhaes@ssprd.org