

February 16, 2015

Lor Pellegrino, AICP,
Senior Planner
Teller County Community Development Services
P.O. Box 1886,
Woodland Park, CO 80866

Dear Ms. Pellegrino,

RE: Application by Sanborn Western Camps for a text amendment to the Teller County Land Use Regulations in respect of the Teller County, Camps, Retreats, and Outdoor Education Facilities.

In response to the discussions at the November 25 Planning Commission meeting and January 27 work session, we attach a revised text amendment which is intended to address some of the issues raised. The changes made are as follows:

1. Removal of the separate definition for Camps, Retreats and Outdoor Recreational Facilities. These will continue to be included in the Resort definition.
2. Clarification that it is only existing camps that are legal non-conforming uses which are to be redefined as permitted uses to bring them into conforming status. This is based on the fact that any impact from the existing camps is absorbed already into the infrastructure and environment of the County.
3. Under the Resorts definition we continue to include the Administrative Review process for minor expansions, which would now apply to all Resort uses. Any major expansion or new resort would still require an SUP. Much was made during the Planning Commission discussions about the inappropriateness of this approach. However, I would point you to the approach in the LUR to Human Care Services. Based on varying degrees of impact, there are several categories of Human Care Services that are considered permitted uses in the Agricultural Zone District based on their scale/impact. Section 8.3.Q.6 – 8.3.Q.8 of the LUR then makes provision for facilities with progressively greater impacts to be dealt with through Administrative, Conditional, and Special Use Permit review process respectively. This same approach is proposed in this LUR amendment – a progressive approach based on the level of impact – from permitted uses to Special Review Uses.
4. The definition of minor expansions has been streamlined. Changes were made to the original submittal to address issues raised by review agencies and the public. Some of these changes helped in clarifying the application of

the proposed 20% or 40-bed threshold, and these have been retained in this revision. However, the definition of intensity of use will be a matter for Staff to determine in the context of each application.

5. For clarification, the basis of the 20% or 40-beds limit (whichever is the smallest) for minor expansion is to stay below the threshold of 99 trips per day that triggers the need for road improvements. This assumes that each new bed will generate 2 trips a day. For the smaller facilities, 20% will be less than 40 beds.
6. It is still proposed that the site plan requirements and Chapter 4, 5, and 6 analyses be limited to the area impacted by the proposed minor expansion, rather than the entire site.
7. It is still proposed that anything other than a minor expansion, as defined in the amendment, be subject to the current Special Use Permit review process.
8. The proposed change to the Child Care Center definition has been deleted.

These changes will address the concerns of the Camps by bringing all camps into a legal conforming status, and providing a less onerous process for minor expansions to existing facilities. At the same time it is hoped that the simplified approach proposed proves more acceptable to Staff from an administrative perspective and provides the required transparency for the public.

If you have any questions regarding the content or intent of the proposed text amendment prior to the Planning Commission meeting in March please do not hesitate to contact me at 719.471.0073 or abarlow@nescolorado.com.

Sincerely,

Andrea Barlow
N.E.S. Inc.