

**To:** Case File CPA 2022-001  
**Subject:** FW: Notice of Public Hearing/Meeting, January/February 2022

**From:** Chris Bolt <[cbolt@puebloplex.com](mailto:cbolt@puebloplex.com)>  
**Sent:** Thursday, January 20, 2022 2:06 PM  
**To:** Howard, Carmen <[howardca@pueblounty.us](mailto:howardca@pueblounty.us)>  
**Cc:** Russell DeSalvo <[rdesalvo@puebloplex.com](mailto:rdesalvo@puebloplex.com)>  
**Subject:** RE: Notice of Public Hearing/Meeting, January/February 2022

Hi Carmen,

Appreciate the phone call. As we discussed here are the comments we have after our recent review. My apologies for the late response as from our initial Comp plan meeting I was under the impression that PuebloPlex would not have any changes, although minor changes were made, it is of most concern that this does not impact our redevelopment of the property upon transfer. As we discussed, the Comprehensive Plan update is more of a guide, and we would like it reflected in more accurate manner to avoid any future conflicts.

#### **Future Land Use Designations for PuebloPlex**

**Issue:** PuebloPlex property is bifurcated into two generic Future Land Use categories that do not reflect the unique nature of PuebloPlex or maximize redevelopment flexibility to the benefit of the Pueblo County.

Pages 101 and 103. Map of Future Land Use: Pueblo County (Northeast) shows PuebloPlex as two Employment Areas – *Employment (EMP)* in the area south of 3<sup>rd</sup> Street and *Transportation-Dependent Industry (TDI)* employment area north of 3<sup>rd</sup> Street. The bifurcation line is arbitrary and does not relate to the PuebloPlex Redevelopment Plan or the current Future Land Use category for PuebloPlex.

Pages 119 and 121. The Employment (EMP) and Transportation-Dependent Industry (TDI) Future Land Use categories do not include the range of use categories in the PuebloPlex Redevelopment Plan such as workforce housing and limit the flexibility of uses throughout the property.

In 2018, PuebloPlex completed a collaborative and joint Comprehensive Plan map and text amendment with Pueblo County that was supported by approval of both the Planning Commission and Board of County Commissioners. That amendment created a unique and single Future Land Use category for the entirety of PuebloPlex. The flexibility it afforded provides a path for broad Pueblo County benefits: job creation, increased local spending, increased tax revenue (local spending, personal property tax), protection of natural and cultural resources, and quality development that reflects community goals, interests and values. The basis of the creation of a single Future Land Use category was to support a mix of uses per the PuebloPlex Redevelopment Plan including residential uses (which can be compatible with other uses at PuebloPlex when sufficiently buffered), industrial uses (which can be buffered from surrounding properties), and most importantly providing development flexibility. Bifurcating the property along an arbitrary line that does not align with the PuebloPlex Redevelopment Plan and the current Future Land Use category, places undue limitations on the future development of PuebloPlex that can jeopardize future economic development for the Pueblo region.

**Request:** Create a single unique employment district for PuebloPlex that mirrors the 2018 Plan amendment for PuebloPlex and includes the range of use categories in the PuebloPlex Redevelopment Plan including Workforce Housing.

#### **Identification of PuebloPlex as Prime Agricultural Land**

**Issue:** The Plan designates PuebloPlex as Prime Agriculture Land and the Measures of Success include protecting Prime Agriculture Land. This designation is incorrect and could inhibit economic growth potential at PuebloPlex.

Page 30 shows a map of Pueblo County Agricultural and Ranch Lands with large portions of PuebloPlex designated Prime Agriculture Land. This is incorrect. The historic use of the property is military / industrial and the existing environmental condition of the property makes it undesirable as arable land. Though the

monumental task and multimillion dollar investment in environmental cleanup has begun, given the historic nature of industrial munitions production and storage, the PuebloPlex property is more akin to a brownfield site than Prime Agricultural Land. The land is unsuitable for and would not be appropriate to grow any vegetation for consumption. Most of the land identified as Prime Agriculture Land is former munitions storage igloos that has no little-to-no agricultural viability.

Page 33. The “Measure of Success” for Prime Agricultural Land is to maintain the number of acres of Prime Agricultural Land. Since PuebloPlex is designated Prime Agricultural Land, retaining the acreage associated with this designation could inhibit economic growth potential at PuebloPlex, particularly as consistency with the Comprehensive Plan is a customary evaluation criteria for development.

Page 119 and 121. The Employment (EMP) and Transportation-Dependent Industry (TDI) Future Land Use categories do not specify agriculture as a primary or supporting land use. The designation of PuebloPlex as Prime Agricultural Land is inconsistent with the Future Land Use categories as proposed for the property.

Page 57. POLICY-5.2.2: PROTECT EMPLOYMENT LANDS, states “ensure that the land use plan prioritizes the region’s planned employment areas and investing in infrastructure and amenities that are needed to support retention and attraction of employers within the region’s target industries to employment lands.” Since the Plan identifies PuebloPlex as Employment Future Land Use, the Prime Agricultural Land designation is inconsistent with this Policy to protect employment lands as it applies to PuebloPlex.

***Request: Remove the Prime Agriculture Land designation on the PuebloPlex property.***

### **Identification of PuebloPlex as a Biodiversity Conservation Area**

***Issue: The designation of PuebloPlex as a Biodiversity Conservation Area is incorrect and could inhibit economic growth potential at PuebloPlex.***

Page 254 contains a map titled Conservation Areas Capacity Analysis. This map shows, among other things, large portions of PuebloPlex as a *Biodiversity Conservation Area*. There is no discussion of this analysis map in the Plan narrative, how the map relates to the Plan, the meaning of items on the map, or the implications of the designation for development. The designation of PuebloPlex as a Biodiversity Conservation Area is incorrect. As previously noted, the historic use of the property is military / industrial and the existing environmental condition of the property makes it more akin to a brownfield site due to the historic industrial munitions production and storage activities. As consistency with the Comprehensive Plan is a customary evaluation criteria for development, this incorrect designation of PuebloPlex could inhibit economic growth potential at PuebloPlex and affect economic development within the region.

Page 57. POLICY-5.2.2: PROTECT EMPLOYMENT LANDS, states “ensure that the land use plan prioritizes the region’s planned employment areas and investing in infrastructure and amenities that are needed to support retention and attraction of employers within the region’s target industries to employment lands.” Since the draft 2022 Pueblo County Comprehensive Plan Future Land Use identifies PuebloPlex as Employment, the designation of Biodiversity Conservation Area is inconsistent with this Policy to protect employment lands as it applies to PuebloPlex.

***Request: Remove the map from the Plan or clarify the map in the Plan and remove the Biodiversity Conservation Area designation at PuebloPlex.***

### **Statement that PuebloPlex will be transferred to the City of Pueblo in 2022**

***Issue: The report incorrectly states that in 2022, ownership of the PuebloPlex site will transition to the City of Pueblo.***

Page 234 includes a narrative for the PuebloPlex Redevelopment Plan. This narrative incorrectly states that “in 2022, as weapons decommissioning concludes, ownership of this site is anticipated to transition to the City of Pueblo.” There is no plan to transition the PuebloPlex property to the City of Pueblo. The plan is to transition the property from the Department of the Army to PuebloPlex – the local redevelopment authority, over a number of years.

***Request: Remove this misstatement from the Plan.***

We appreciate the complexities of developing a regional plan and hope due consideration is given to the information presented, so that the inconsistencies are addressed and the draft 2022 Pueblo County Comprehensive Plan can be adopted without issue.

Appreciate your time and consideration.

Christopher J. Bolt  
Director of Operations



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**Subject:** Notice of Public Hearing/Meeting, January/February 2022

Please find attached the Notice of Public Hearing/Meeting for the following case:

- 2022 Pueblo Regional Comprehensive Plan No. 2022-001  
Pueblo County Planning and Development (Applicant)

If you have any questions, please do not hesitate to call this Department and ask for Ms. Carmen Howard, Director, (719) 583-6100 or by e-mail at [howardca@pueblounty.us](mailto:howardca@pueblounty.us).

Sincerely,

*~Sandra Smith*



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