



City Council

July 14, 2025
Packet Addendum #1

EMAIL COMMENTS RECEIVED FROM COUNCILMEMBERS FOLLOWING JUNE 17 MEETING

**(UPDATED WITH MISSING COMMENTS FROM COUNCILMEMBER COOPERMAN –
HIGHLIGHTED IN YELLOW BELOW)**

Councilmember Hoefner Comments

NE.1 – Neighborhood Character

- This section would benefit from clarification on how we intend to maintain neighborhood character and accommodate appropriate change, consistent with the Council-approved Vision and Values around Community Character.
- Strategies A and C each state the same idea in different ways and should be combined and clarified (this will also cut down some duplication).
- Strategy F (calling to “protect and promote Downtown Louisville as the heart of the City”) is a downtown-focused action, which is covered in much greater detail under Goal DO.2. To reduce duplication, consider removing or shortening this point in NE.1 and deferring to the Downtown section.

NE.2 – Plan/Map Consistency

- This goal essentially asks that development decisions be guided by the plan, which is a fundamental principle that might not require its own goal statement.
- If NE.2 remains a standalone goal, its strategies should be streamlined. For example, strategies C and D say the same thing different ways and could be consolidated.

NE.3 – Code & Design Updates

- NE.2 and NE.3 are very similar—both address the outcome of aligning development to the plan. They can probably be one goal. There is also duplication within the strategies that can be eliminated. For example, Strategy A duplicates NE.2.B.
- It may be clearer to address all housing-related code changes in one place rather than scattered across NE and HD sections.

HD.1 – Overall Housing Supply

- HD.1 and HD.3 (which also talks about offering a diverse range of housing types for all ages/incomes) are very similar in intent and can likely be combined.

- HD.1 should call out where the plan anticipates new supply being added.
- Consider a strategy around the community input of *“preserve existing single-family neighborhoods, while allowing gentle infill, such as ADUs, duplexes and triplexes.”* It is currently ambiguous as to how these competing goals will be addressed.
- HD.1.B duplicates goal HD.2 and can be removed.
- HD.1.C is also a housing plan strategy so could also be removed (since those are captured in HD.1.A). Alternatively, consider a dedicated list of housing plan strategies that can be cross-referenced, rather than re-stating them in multiple places.

HD.2 – Code Changes for Diverse Housing

- This should point, in general, to where missing-middle forms will be allowed.
- Consider and reduce/eliminate duplication with NE.3, which as noted above has a lot of overlap.

HD.3 – Affordability & Preservation

- HD.3.A duplicates HD.1.C - consolidate
- Many of the strategies in this section appear to be housing plan items - consider listing under HD.1.A for clarity (and to avoid redundancy).

DO.1 – South Boulder Rd. Corridor

- Begin with a one-sentence “today vs. future” snapshot so readers know why change is proposed.
- A zoomed-in inset for the South Boulder Road area with street labels and an “Area 1” annotation would help readers orient themselves, instead of having to cross-reference a color-coded legend. Additionally, the narrative should explain why this area is targeted for mixed-use infill.

DO.2 – Downtown Louisville

- Begin with a one-sentence “today vs. future” snapshot so readers know why change is proposed.
- A zoomed-in inset would help — see similar comment on DO.1
- Correct wording to “complements”
- Strategies A and C are duplicative

- Items pulled from Downtown Vision Plan should be grouped under a heading indicating they are intended to implement that plan

DO.3 – McCaslin Blvd. Corridor

- Begin with a one-sentence “today vs. future” snapshot so readers know why change is proposed. For example, there should be some detail around the current retail landscape, challenges in the corridor, and the current state of development.
- A zoomed-in inset would help — see similar comment on DO.1
- As with other sections, check for overlapping strategies – for example, both DO.1 and DO.3 include general statements about improving bike/pedestrian connectivity and adding green spaces. Those are great practices, but we might not need to restate the full concept in every single area’s list. Perhaps a cross-reference to the transportation section could replace repetitive text and keep the focus on unique actions for McCaslin, etc.

End of Councilmember Hoefner’s Comments

Councilmember Cooperman Comments

General comments

The draft

hardly connects the vision statement and core values to rest of Comprehensive Plan. We should include some form of explanation of these connections.

We should cite and reference all of the City’s other plans, relevant policies, and relevant resolutions, and we should lift all of the City’s principal goals (and strategies) from these sources.

In many places there are sentences that more-or-less consist of lists of catchwords and catchphrases. We should tailor these sentences to the specific context of Louisville.

That each set of goals for each plan element fit on one page strikes me as quite a coincidence. Each set of goals should have as much space as needed; there is no good reason to inflate or limit this space for aesthetic reasons.

Ensure that all mentions of open space align with relevant provisions of the City's charter. In particular, ensure that all terminology associated with open spaces, like greenways and natural areas, accurately reflects these provisions.

Terminology is not used consistently throughout the draft. For instance, "economic vitality", "economic conditions", and "economic vibrancy" are all used for the same plan element, and the FLUM legend does not fully use the same terminology as the land-use type descriptions.

I love to wordsmith my own writing, and I love to reference a thesaurus, but clarity of writing must come first. In many places there are sentences in which the word choice makes these sentences unclear or even incorrect. I would be happy to suggest editing techniques to remedy this issue.

The draft contains insufficient emphasis on preparedness, resilience, and adaptation. Given that the Comprehensive Plan is supposed to guide development over the next decade and provide a vision for Louisville's future beyond the next decade, these topics strike me as particularly important.

Some goals are more overarching than others. For instance, the City's greenhouse gas emissions reduction goals have relevance for land-use, development, transportation, infrastructure, open space, and other realms. Such overarching goals should explicitly inform less overarching goals.

There is very little consideration of the constraints on development presented by natural resource limitations.

Page 4

A comprehensive plan does not just address "future growth"; our description of the comprehensive plan should reflect its comprehensive nature.

I still favor including the boxes with definitions of equity, sustainability, resilience, and vibrancy and examples illustrating these definitions. These definitions need improvement along the lines that I outlined on Tuesday night. The core values do not fully capture equity, resilience, and aspects of sustainability, so I favor having these lenses from the vision statement explained to some extent.

Page 6

I do not understand how the vision statement and core values inform the plan elements and their focus areas. This link should be made much more explicit.

Page 7

I strongly disagree with the organization of the five plan elements. The current organization involves too much lumping, and some of the elements have considerable overlap. I advocate for splitting up some of the elements, especially those of environmental sustainability, recreation, and open spaces and economic vitality, and for reforming some of the elements to reduce overlap, especially those of community services and infrastructure and transportation and mobility.

That each plan elements has three focus areas strikes me as a quite a coincidence. Each plan elements should have as many focus areas as needed; there is no good reason to inflate or limit the number of focus areas for aesthetic reasons.

The focus areas should not themselves be goals as each focus area will have associated goals.

Page 8

I do not like the phrase “neighborhood enhancement” at least not in the current context. All three NE goals apply to the entire City. One could argue that the City is a collection of neighborhoods, but this interpretation does not fully align with the usual usage of the word “neighborhood”.

Not all of goals HD1, HD2, and HD3 directly or fully address housing diversification, so we might consider a more appropriate name for this focus area. Affordability should supersede diversification even if diversification is one step towards affordability.

We should include the 12% affordable housing by 2035 goal as one of the housing goals.

Goal HD2 does not make much sense as currently written.

Goal DO2 should make reference to our businesses and possibilities for additional housing.

Goal DO3 needs to be completely rewritten. While the McCaslin corridor generates the majority of the City’s sales tax, its revitalization involves so much more than its shopping opportunities.

Goal DO4 needs to be edited. What is “self-sustaining development”? What is the difference between “employment” and “commercial”?

We should include a goal about connections, especially for bicyclists and pedestrians, to the opportunity areas.

We should include a goal concerning consideration and mitigation of development impacts on nearby existing developments.

Page 9

The focus areas of transportation alternatives, multimodal connectivity, and transportation infrastructure are inextricably interconnected. Either reduce the number of focus areas, consolidate these focus areas and introduce new focus areas, or reorganize these focus areas.

We should explicitly include walking as a mobility option, the most important from my perspective.

Goals TA1, TA2, and TA3 are perhaps too broad.

Use the words “paths” and “trails” carefully and appropriately. Should goal MC1 include trails?

The description of the transportation infrastructure focus area is rather listy, making it difficult to understand. I am surprised that “parking strategies” is explicitly mentioned.

Do goals TI1 and TI2 come directly from resident feedback? There is considerably more transportation infrastructure to address in the City—see the Transportation Master Plan—most of which I would rank much higher than these two goals.

Page 10

Goal SRA1 is rather broad but also rather limited. We should include goals concerning risk assessment, emergency preparedness, and hazard mitigation. For instance, such goals should address development in high risk areas, firewise practices throughout the City, preparedness of critical infrastructure and facilities, wildfire mitigation in open spaces, and consequences for insurability.

Goal SRA2 is much too weak: replace “support” with “implement”.

Goal SRA3 is much too weak: replace “encourage” with “require”.

We should include the City’s most current climate action goals passed by resolution last year.

Ensure that goals COS1 and COS2 are fully aligned with the City’s charter.

While I appreciate the sentiment of goal COS3, this goal is rather weak as written, particularly the word “allow”.

We should include a goal concerning acquisition of open spaces.

Ensure that goal RA1 aligns with the City's charter concerning usage of open spaces.

Goal RA2 needs to be completely rewritten. I do not understand what this goals currently says.

Goal RA3 strikes me as out of place. Ensure that goal RA3 aligns with the City's charter concerning usage of open spaces.

We should include goals concerning maintenance and expansion of recreational facilities.

Page 11

The description of the supportive business environment focus area should include existing businesses. If this description calls out particular business districts, then it should call out all business districts.

We should explicitly include language about a mix of uses in the description and goals for this focus area.

Goals SB1 and SB2 say very little of substance.

I do not completely understand goal SB3. Does this goal belong under a different focus area?

The description of the placemaking and public realm focus area and its goal PP2 are quite broad. Could we focus this description and create goals more like PP1, perhaps applying to other areas of the City?

The community heritage focus area does not fully belong within the economic vibrancy plan element.

The community heritage focus area description and goals are among the best of the draft Comprehensive Plan, especially goal CH3: they are concise, clear, and meaningful.

We should include education in goal CH2.

Contextual building design is not the only way to protect and promote.

Page 12

The description of the core community services focus area needs to be rewritten for clarity and simplicity. Does this description include all of the City's core services?

Goal CS1 should probably mention constraints on providing core services to the highest level.

Goal CS3 strikes me as somewhat out of place, especially considering the description of this focus area.

Goal CS4 should mention parks and open spaces as well as the impacts of population growth on providing core services.

Goal CS6 strikes me as out of place.

The City already has water management strategies. We should reference the City's utility master plan.

Goal WI2 is much too weak: replace "consider" with "implement".

Goal WI4 strikes me as slightly out of place, particularly considering the description of this focus area.

The City already has approaches to decision making, so goal AT1 should address improvements.

The City already has approaches to public involvement, so goal AT2 should address improvement. We should reference the City's public involvement policy.

Goal AT3 strikes me as somewhat out of place: while I completely agree with the sentiment, this goal does not fully align with the description of the accountability and transparency focus area.

Goal AT4 strikes me as slightly out of place: while I completely agree with the sentiment, this goal does not fully align with the description of this focus area.

We should address the impact of land-use decisions on the City's fiscal health.

Page 21

Do these four "things we heard" constitute those most frequently cited in feedback? If so, then I recommend stating as much; if not, then I recommend expanding the list of "things we heard".

Pages 22 and 23

Do these five "things we heard" constitute those most frequently cited in feedback? If so, then I recommend stating as much; if not, then I recommend expanding the list of "things we heard".

FLUM

While I very much support policies to preserve “naturally-occurring affordable housing”, I worry a bit about the potential stigma associated with putting such a label on the future land-use map.

We should include potential underpasses at the intersection of Via Appia and South Boulder Road and bridging the east and west sides of McCaslin Boulevard.

Page 40

This page needs to be reorganized. Placetypes are just names for the land uses while the other categories are attributes of placetypes; this structure is not evident from the current organization.

Page 48

We should require bicycle parking at all parks.

Page 49

We should require bicycle parking at appropriate entrances to open spaces.

End of Councilmember Cooperman's Comments

From: [Cathern Smith](#)
To: [City Council](#)
Subject: Comp Plan: Sustainability, Affordable Housing, and Fiscally Sound Planning
Date: Monday, July 14, 2025 3:00:21 PM
Attachments: [image.png](#)

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor Leh and City Council:

I am wondering what I could say about the climate crisis that would tip the scales toward action. Frankly, knowing that our rational minds already know that the timeline for adaptation is short and the consequences of inaction deeply harmful, I am puzzled.

I would like to see the City's greenhouse gas emission and reduction targets (below) explicitly included in the draft Comp Plan. <https://www.louisvilleco.gov/living-in-louisville/residents/sustainability/climate>

1. Meet all of Louisville's municipal electric needs with 100% carbon-free sources by 2025.
2. Reduce energy-related municipal greenhouse gas emissions 60% below the 2016 baseline by 2030 and achieve carbon-neutrality by 2050.
3. Generate 75% of Louisville's residential and commercial/industrial electric needs from carbon-free sources by 2030.
4. Reduce energy-related residential and commercial/industrial GHG emissions 60% below the 2016 baseline by 2030 and achieve carbon-neutrality by 2050.

We are just five years away from Goal 4's 60% reduction in energy-related residential and commercial greenhouse gas emissions. Please center the goals and strategies throughout the Plan to meet Goal 4.

While I applaud the City's awareness of the need for affordable housing, I see the opportunity to meaningfully increase the supply of affordable housing slipping away. Once the City is filled with expensive housing there will not be land for affordable housing. My personal belief is that until the City provides housing for young families, veterans, lower (but not low) wage workers, and others in need, our schools will continue to close, employers of lower wage workers will not come to Louisville, and recruitment of teachers and firefighters will become increasingly difficult. At a bare minimum, the City's goal of designating 12% of its housing units as deed-restricted affordable by 2035 should be explicitly included along with goals and strategies providing necessary support to reach the 12% goal.

Finally, my impression is that the goal of the Comp Plan is to double or triple the size of Louisville through a very large increase in residences. I don't understand how the proposed growth enhances the City. All I know if you want "change." I am particularly concerned because I am not seeing analysis of the impacts on quality of life, levels of service for utilities and amenities, or the fiscal impact. I am quite concerned that my taxes will go up -- essentially that I will pay to have my quality of life reduced while also subsidizing the profits of developers. How is that fair?

Don't get me wrong. I support well-planned, sustainable, and responsible growth in digestible

chunks.

Thanks for reading!

Best,

Cathern Smith

Ward III

From: [tamar krantz](#)
To: [City Council](#); [Diana Langley](#)
Subject: Re: Please Let Residents Weigh in on the Draft Comp Plan Draft in a Meaningful Way!
Date: Monday, July 14, 2025 12:43:45 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear City Council Members,

I was just reminded that this is preliminary draft of the plan that will likely undergo significant edits. In that context, I realize that the tone of my email regarding the public engagement summary was overly critical. It will be an extremely difficult task to summarize so much data into a few pages!

I still believe that asking a large enough sample of residents the right questions will lead to credible results during the last phase of public input.

Thanks for all you do.

Tamar

On Sun, Jul 13, 2025 at 1:19 PM tamar krantz <tamarkrantz@gmail.com> wrote:

Dear City Council Members,

Moving forward, please let residents weigh in on the Draft Comp Plan draft in a meaningful way!

I strongly object to the summary of community engagement found on pages 20 through 23 of the preliminary draft plan. It completely ignores data from the community survey and misrepresents other data. Please hire an independent entity to draw conclusions from all of the existing data. There is a scientific way to summarize data, even with such a variety of questions and sample sizes.

It looks great on page 20 to see that there were nearly 2,000 survey responses, but the following pages don't reflect this data. The May 24 Community Engagement Summary provides an analysis methodology and tabulates responses to 12 questions. Though the demographic responses show it wasn't perfect, the methodology was valid. The survey was open for one month and a real effort was made to engage residents. Please take the time to review the results of this survey. Here are some things the draft comp plan missed:

- Respondents were asked to rank the values from the 2013 plan. The top 2 values

were: Safe Neighborhoods followed by Integrated Open Space and Trail Networks.

- Of the 1516 responses to the question, “what are your biggest hopes for the future of Louisville?” The top two themes were affordable housing and preservation of small town feel.
- 1641 participants responded to the question, “What would you like to see emphasized in future development?” The top two responses were “Dedication of Open Space and Public Lands” followed by “Increased opportunities for small business development and business-friendly development.”
- Regarding what types of housing do we have too little of, the top responses were “Tiny Homes or Cottages” followed by “ADUs”.

The summary on pages 21, 22 or 23 doesn't reflect these responses. Given that what residents want to see emphasized most in new development is dedication of open space and public lands, how did this point not make it into the summary? Why is preservation of “small town feel” completely ignored? Given that residents want to see tiny homes and cottages more than row homes and apartments, why does the summary emphasize mid density residential?

Adding that “93% of open house participants supported more mixed use/mid density residential in Louisville” is an absurd way to cherry pick data! This activity only had 43 responses– or dots placed under pictures of 3 story buildings with ground floor retail. Why not mention that in a survey with 1,600 responses, most thought we needed more tiny homes and cottages? The results of the survey with a larger sample size should be given more weight in the conclusions.

Please correct the flawed conclusions in the preliminary draft.

To prevent this type of error moving forward, please hire a new consultant skilled in conducting statistically significant surveys, designing relevant questions, and analyzing and summarizing data.

Otherwise, please don't pretend that this comp plan reflects public input.

Sincerely,

Tamar Krantz

From: [Tawnya Somauroo](#)
To: [City Council](#)
Subject: Comp Plan needs an affordability goal
Date: Monday, July 14, 2025 10:07:30 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Council,

I urge you to strengthen Louisville's Comprehensive Plan by explicitly **committing to preserve affordability for current residents**. Many peer cities, including Boulder, Portland, Minneapolis, and Denver, include clear goals in their comprehensive plans to prevent displacement, preserve middle-income housing, and ensure existing residents can stay in their communities. Louisville's draft plan acknowledges housing cost pressures, but doesn't commit to address them. Without that, we risk becoming a city that is charming and green, but increasingly unaffordable for the people who built it. I've written more about these concerns here:

<https://tsomauroo.substack.com/p/nice-city-if-you-can-afford-it?r=4fzagg>

Tawnya Somauroo

From: [Matt Jones](#)
To: [City Council](#)
Cc: [Adam Blackmore](#); [Ember Brignull](#)
Subject: Comprehensive Plan comment.
Date: Monday, July 14, 2025 9:15:19 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Thank you for the opportunity to comment on the Comprehensive Plan Draft.

I have a comment on open space direction and another on the over-focus on converting commercial to residential. I also support the Open Space Advocates letter sent separately.

The plan is structured to start with the general in Plan Elements and Goals. Then be more specific for Land Classifications and Uses. For Open Space guidance the opposite is true, it now goes from general to even more general.

On the Plan Elements and Goal summary for Sustainability, Recreation and Open Space Focus Areas, in Conservation and Open Space Goals, thanks for including the more general open space protection language for "Preserve, restore and maintain the integrity of open spaces and habitats." Also, please add the acquisition language to the Open Space goals that is included and Recreation Asset Goals under RA.3.

On page 49, Open Space under Uses, it just reads a general "Trails and open spaces." We already have the more specific language in the City Charter so we should use it because it is already required management direction and for constancy. For "Uses", "Primary" please use the more specific city charter language: "Preserve and promote native plants native wildlife and their habitats and preserve and promote cultural resources, agriculture, scenic vistas and appropriate passive recreation activities."

More generally, I am concerned about what appears to be a wholesale changing of commercial and industrial areas to residential areas. First, as residential is a net drain on the tax base compared to commercial which subsidize residential, it undermines the city's tax base when the city is already facing a structural budget deficit problem. Second, at best it will have no impact on affordability for middle class workers like teachers. Third, it undermines the small town character we cherish and hear so much from residents.

One residential example is the jaw-dropping 18 to 30 dwelling units for the downtown area. This is in Land Use Classifications – Downtown/Central Business District under Uses for the downtown area multi use. This could lead to tearing down old buildings in downtown that are essential to its historic character and sets us apart from other communities. Please don't kill our downtown golden goose.

Thanks for all your and staff's work on this important document.

My best, Matt Jones

From: [Cathern Smith](#)
To: [City Council](#); [Diana Langley](#); [Rob Zuccaro](#); [Adam Blackmore](#); [Ember Brignull](#)
Subject: LOSA's 1st Comment on the Draft Comprehensive Plan
Date: Monday, July 14, 2025 8:01:19 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor Leh, City Council Members, and City Manager Langley:

Louisville Open Space Advocates (LOSA) appreciates the continued work on the Comprehensive Plan and the opportunity to provide constructive feedback. While each iteration of the Plan is better than the previous version, with regards to Open Space substantive concerns remain.

Louisville Open Space Lands provide benefits that quietly—but profoundly—support biodiversity, climate resilience, and public and environmental health. The Comprehensive Plan must align with and champion the Charter’s conservation mandate and place Open Space protection and restoration at the heart of land use planning. We urge the City to revise the Comprehensive Plan to explicitly prioritize the acquisition, restoration, and protection of Open Space Lands in accordance with the Charter and the will of the voters. Doing so affirms Louisville’s commitment to conservation, sustainability, and community health.

As explained below, the current Comprehensive Plan Preliminary Review does not fully align with the City Charter; needs to prioritize the preservation, restoration, and protection of open space; and fails to clearly call for the acquisition of additional open space zoned land. These omissions undermine Louisville’s long-standing commitment to conservation and risk compromising the irreplaceable benefits that open space provides. The importance of the decisions before you cannot be overstated. We are in the midst of an ecological crisis brought on in part by global land use choices. The community expressed its strong support for existing Open Space and also for open space acquisitions when 2C passed with 70% of the vote. The City has a clear mandate to honor the commitments made in 2C and continue investing in land that aligns with our community’s values.

With regard to the proposed re-zoning of open space lands without the approval of registered electors, we request both that (1) City Council review the requirements of Section 15-3 of the City Charter/Open Space Zone District and then direct the staff to make appropriate revisions to the draft Plan, including the Future Land Use Maps (FLUM); and (2) the City provide a written response that explains what adjustments will be made. Please include a copy of any updated FLUM in the response.

Please also carefully consider and specifically address the suggested edits during Monday's meeting.

I. THE PROPOSED REZONING OF LAND PLACED IN AN OPEN SPACE ZONE DISTRICT VIOLATES THE CITY CHARTER’S REQUIREMENTS.

The City Charter establishes and prioritizes the legal framework for the preservation of open space in Louisville and enshrines open space preservation as a core civic responsibility. Throughout the Future Land Use Maps (FLUM), land zoned open space or open space use land is being converted to other uses. Examples include:

- South Boulder Road Corridor/Open Space Hecla Lake converted to a park;
- South Boulder Road Corridor/Many open space corridors converted to other residential, mixed neighborhood or parks; and

- McCaslin Corridor and Davidson Mesa Adjacent open space future use planned or designated as a park or mixed neighborhood or residential neighborhood.

The FLUM's proposed rezoning of open space land at Hecla Lake to park land and rezoning or use changes to other open space corridors to residential or other public uses in the FLUM violates section 15-3 of the City Charter. Section 15-3(d) of the City Charter only permits rezoning with "the approval of the registered electors." Re-zoning open space land without complying with the procedure set out in the City Charter sets a bad precedent that will erode public trust and create municipal liability. Due to the significance of the proposed rezoning, we request that the City Council re-evaluate the proposed rezoning and direct that appropriate revisions are made. Due to the unprecedented nature and significance of the proposed FLUM, we request a written response from the City addressing which - if any - of the proposed open space rezonings it is approving or recommending. Please include a copy of any updated FLUM maps in that response.

II. WORDSMITHING FOR POLICY REASONS AND FOR CLARITY.

Although good work has been done between drafts, there is more to be done to align the Comprehensive Plan with the City Charter.

Open Space is unique in that the governing structure, including the purpose of Open Space is set out in the Section 15 of the City Charter. A very important edit needed to align the Comprehensive Plan with the City Charter is to change the primary use for open space on page 28 of the PDF to "Preserve and promote native plants, native wildlife, and their habitats; and preserve and promote cultural resources, agriculture, scenic vistas, and appropriate passive recreation activities." This language paraphrases Section 15-1 of the City Charter. As you can see, the use from the most recent draft, which simply says "Trails and open spaces", falls far short of the mark.

Below are some additional suggested edits that address inconsistency of terms, organization, the requirements of the City Charter (again), and conceptual issues.

1. Strengthen Articulation of City Charter-Based Open Space Land Mandate and Consistent Use of Terms.

The opening pages of the Comprehensive Plan must more prominently reflect the City Charter's core environmental mandate: the preservation, protection, and promotion of open space land. This is not a peripheral issue – it is the foundational ecological and environmental principle of Louisville's city charter.

a. Clear and Consistent Use of Term Open Space in Vision Statement (Page 4) and Throughout the Plan: The current draft defines sustainability vaguely, using the phrase "achieved by... the preservation of open spaces"—a term that may be misinterpreted to include undeveloped or vacant parcels.

For clarity, we recommend using language consistent with the City Charter such as:

i. "Achieved by... the preservation of open space land"

or

ii. "Achieved by... the preservation of open space" (using the singular collective noun as defined in the Charter).

b. To reduce confusion and improve clarity, the selected re-wording should be applied consistently throughout the document. The term "open spaces" appears over thirty times in varied and often inaccurate contexts—sometimes referring to charter-defined open space, but other times referring to public plazas, parks, or recreational facilities (e.g., Pages 10, 23, 41 and

42).

2. Incorporate the preservation of open space into the definition of environmental sustainability. Core Values Section (Page 5):

- a. Incorporate the preservation of open space into the environmental sustainability definition with phrasing that aligns with the city charter's language and reinforces the ecological value of Louisville's open space lands.

Change from "We value climate action, environmental resilience, and adaptation to promote environmental sustainability."

Change to "We value climate action, environmental resilience, adaptation, *and the preservation and protection of native plants, wildlife, and their habitats to promote environmental sustainability.*"

- b. Expand and clarify the definition of Community Places with a comprehensive list that values recreation, parks, culture, and the arts. Reordering and refining this list reinforces community identity, avoids ambiguous usage of "open spaces," and ensures recreational and cultural assets are prominently acknowledged.

Change from "We value community places that bring people together and support healthy living including parks, open spaces, and other public places."

Change to "We value community places that bring people together and support healthy living—including recreation, culture and art facilities, parks, open space (not open spaces), and other public places."

3. Clarify and separate open space and recreation. Page 10, Plan Goals and Summary Section: Sustainability, Recreation, and Open Space Focus Areas.

There are significant language and organizational issues that warrant revision of this section—particularly in how it addresses open space land versus recreational land use. Conflating these two distinct categories obscures critical conservation goals and undermines the planning for recreation facilities and parks. This distinction is foundational to sustainable open space land management and must be consistently maintained throughout the Plan.

- a. Clarify and separate open space and recreation designations.
- b. Edit and relocate Recreation Asset Goal RA.3 for clarity and alignment.

Change from "Support the enhancement of new public space through land acquisition, conservation, and restoration." While this is a high-priority concept, the language is confusing, vague, and better aligned with conservation goals than recreational objectives.

Change to "COS.2. Support the preservation of new open space land through land acquisition, conservation, and restoration." NOTE THAT we are recommending first revising this goal and then relocating it to the Conservation and Open Space section, as a new goal!

- c. To maintain strategic clarity, preserve the conservation mission of open space planning, and strengthen the plan's alignment with Louisville's land use priorities, rewrite RA.3 under Recreation Assets to clearly focus only on recreation-specific development. For example, this could be re-written as "RA.3. Support the enhancement of new recreation facilities and parks through land acquisition, infrastructure development, and appropriate management resources."

Thank you for taking the time to read our comments. We look forward to seeing the next version of the Comprehensive Plan and to receiving your response about the rezoning of open space.

Best,

/s Cathern Smith and Helen Moshak for Louisville Open Space Advocates

cc: Rob Zuccarro, Community Development Director
Adam Blackmore, Director of Parks, Recreation, & Open Space
Ember Brignull, Open Space Superintendent
OSAB (via email to Ember Brignull)

From: [Cathern Smith](#)
To: [City Council](#); [Diana Langley](#); [Rob Zuccaro](#); [Adam Blackmore](#); [Ember Brignull](#)
Subject: LOSA's 2nd Comment on the Draft Comprehensive Plan
Date: Monday, July 14, 2025 8:01:14 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor Leh, City Council Members, and City Manager Langley:

Louisville Open Space Advocates (LOSA) appreciates the continued work on the Comprehensive Plan, including the initial efforts to incorporate Open Space preservation, restoration, and protection into this important document.

The information presented here is intended to deepen your understanding of Open Space as you chart the course of the City through the Comprehensive Plan. This letter provides important information about why Open Space lands exist, a description of Louisville's key ecosystems, highlights some of the results of the 2025 BioBlitz to give you an appreciation for how varied the life forms on our open spaces are and the threats that some of them face, the ecosystem services provided by Open Space, and its direct benefits to humans. After reading this letter you should have a clear understanding of (1) why restoration (along with protection) of existing Open Space is essential; and (2) why we think that strategic acquisition is also essential. To that end, we would like to see the Open Space Advisory Board's (OSAB's) recommended acquisition list included in the Comprehensive Plan.

Big Picture - Why Invest in Open Space?

Open Space is not simply a matter of land use – it is a profound investment in ecological biodiversity and resilience, community well-being, climate action, and the legacy we leave for future generations. Protection of biodiversity is vital because it preserves the intricate web of life that sustains ecosystems, builds resilience against climate change and environmental disruption, and supports human health and food security.

What Kinds of Ecosystems Does Louisville Have?

Louisville's open space lands are made up of these unique and irreplaceable ecosystems:

- Shortgrass prairie and mixed grasslands that support native grasses and other plants, pollinators, mammals, and ground-nesting birds;
- Riparian corridors along Coal Creek and other waterways, vital for amphibians, small mammals, and pollinators;
- Wetlands and seasonal ponds that provide breeding grounds for insects, birds, and aquatic species; and
- Shrublands and rocky outcrops, offering shelter for birds such as the Grasshopper Sparrow. (A ground-nesting bird that lives in mixed grass-shrub habitat. The Grasshopper sparrow is declining regionally and is considered a species of concern due to prairie habitat loss and predation by foxes, coyote, badgers, ringtails, and other mammals.)

What are Some of the Plants and Animals Living in Our Open Space?

The City of Louisville Open Space Department and Colorado State University 2025 BioBlitz

Survey revealed hundreds of species in our Open Space including rare plants, native grasses, insects, birds, and amphibians all under severe pressure from habitat loss and fragmentation, invasive species, climate change, and development. Conserving and adding to Louisville's open spaces will serve as a lifeline for rare and declining native plants and animals whose survival depends on intact grasslands, wetlands, and migration corridors. Preserving these landscapes isn't just about scenery—it's about safeguarding a living legacy that includes:

Preble's Meadow Jumping Mouse: With its long tail, distinctive stripe and ability to hibernate up to 9 months, this mouse is recognized federally as threatened and found only in parts of Colorado and Wyoming. It prefers riparian corridors such as Coal Creek and connections between Harper and Hecla Lake.

Lark Bunting: Colorado's state bird is rarely seen nesting in Boulder County anymore. Open prairie habitat is critical to restoring its presence.

Loggerhead Shrike: A rare and remarkable songbird known for its hunting behavior, sighted sporadically in Louisville's open areas.

Bald & Golden Eagles: Majestic predators observed near Harper Lake and other open tracts—require ecosystem health and abundant wildlife.

Calliope & Rufous Hummingbirds: Migratory gems that rely on native flowering plants and undisturbed feeding grounds.

Long-billed Curlew & Upland Sandpiper: Grassland shorebirds requiring extensive, uninterrupted prairie for nesting and foraging.

Western Bumblebee: Once common, now in steep decline across the West. Sightings in Boulder County are increasingly rare due to habitat loss and pesticide exposure.

Mason Bees: Solitary native bees that are critical pollinators of early spring wildflowers and fruit trees. Some species are highly localized and sensitive to disturbance.

Astragalus schmollii (Schmoll's milkvetch): A rare legume found in limited prairie habitats, sensitive to soil disturbance and invasive species.

Penstemon harringtonii (Harrington's beardtongue): A native wildflower with striking purple blooms, found in dry, open meadows and rocky slopes. Considered vulnerable due to habitat fragmentation.

Oenothera coloradensis (Colorado evening primrose): This delicate white flower is a CO state-listed species officially designated as endangered, threatened, or of special concern based on its status within CO's borders. It prefers sandy soils and open grassland and is threatened by development and recreational use.

Physaria bellii (Bell's Twinpod): This yellow flower is endemic to Colorado's Front Range, grows in shale-rich soils, often near Louisville's eastern open spaces and is listed as globally imperiled (G2 rank).

Each of these species tells a story of adaptation, fragility, and connection to land. Renowned biologist E.O. Wilson advocated for setting aside half the planet's lands and oceans to preserve biodiversity. As Louisville faces growing development pressure, preserving open space becomes essential not just for biodiversity, but for safeguarding habitat and

protecting the natural resources, environment, views, and wildlife that make our community unique and support a sustainable future. Protecting Wildlife corridors and habitat quality is an essential component of planning. Larger, contiguous tracts of land offer higher-quality habitat and enable species to complete essential life cycle activities.

Which Ecosystem Services do we Get From our Open Spaces?

Open space buffers against climate extremes, improves air and water quality, and supports pollinators and healthy soils. These ecosystem services are vital to both environmental and human health and include:

- Open space vegetation absorbs heat, reducing the urban heat island effect and cooling surrounding areas.
- Open space provides opportunities for floodwater retention and detention, reducing flood risks and impacts.
- Trees and grasses filter airborne pollutants like ozone, nitrogen dioxide, and particulate matter.
- Vegetation sequesters carbon, helping offset greenhouse gas emissions and improves overall air quality.
- Native plants and healthy soils filter runoff, trapping sediments and pollutants before they reach waterways.
- Wetlands and riparian zones in Open Space store excess water, reduce erosion and improve stream bank stability.
- Open Space habitats support seasonal blooms from spring through fall, ensuring year-round nectar and pollen sources.
- Undisturbed soil in Open Space areas hosts diverse microbial communities that aid nutrient cycling and plant growth.

What Direct Benefits do Humans Get From Ecosystem Services?

Finally, open space provides direct benefit to humans as access to open space enhances mental and physical well-being, fosters environmental stewardship, and supports appropriate passive recreation such as hiking, birding, volunteering, photography, stargazing, wildlife viewing, fishing, canoeing, citizen science events, nature education opportunities, and strengthens community identity. Research shows that time in nature reduces stress, improves cognition, and cultivates a sense of awe and belonging.

Thank you for taking the time to read our comment. As you can see, Open Space is a vital component of our City. To enshrine our values in the Comprehensive Plan, we think that it is essential to emphasize restoration, protection, and through the inclusion of OSAB's recommended acquisition list and other appropriate edits, acquisition. We look forward to seeing the next version of the Comprehensive Plan.

Best,

/s Cathern Smith and Helen Moshak for Louisville Open Space Advocates

cc: Rob Zuccarro, Community Development Director
Adam Blackmore, Director of Parks, Recreation, & Open Space
Ember Brignull, Open Space Superintendent
OSAB (via email to Ember Brignull)

From: [John Leary](#)
To: [City Council](#)
Cc: [Rob Zuccaro](#)
Subject: Misnomer
Date: Sunday, July 13, 2025 9:26:49 PM
Attachments: [CompPlanCC2.docx](#)

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Council members,

See the attached letter for my comments on the Draft Comprehensive Plan.

Thank you.

Members of the City Council,

The topic of your July 14th meeting has a major misnomer. You are not reviewing a Comprehensive Plan. You are reviewing a long document that contains many good ideas and policies, and some that are not so good because they are very ideological and not supported by real world experiences. But, long cannot be equated with comprehensive. The clear goal of the plan is to change Louisville's small-town character via densification and urbanization under the guise of creating affordable housing. The plan contains no information on the impact of attaining this goal. The public has the right to know what these impacts will be, and without this knowledge, has no way of judging the desirability of the plan. This can only be done by providing data on these impacts, that at a minimum, is directionally correct.

Affordable housing is a laudable goal that has not been fully explored and defined and can likely be achieved without changing the overall nature of our community. It should not be approached in a "tokenism" manner that does not address underlying root causes. Much of the reason houses are incrementally more expensive in Louisville than in similar neighboring communities is simply because people want to live here for our city's character. We should not erase the attributes that create this demand as the solution to the affordability problem.

Here are some of the impacts that need to be evaluated.

1. Crowding. How much will congestion increase on our streets? How will city trails and city facilities be impacted?
2. Capital funding. What city facilities will need to be expanded and how will these expansions be funded?
3. Service demands. Will the city's service levels for things like public safety, recreation programs and plowing snow need to be increased and how will these increases be funded?
4. Fiscally sustainable land use mixture. What land use mixture is needed to ensure the city can adequately fund future capital and service needs? What will be the impact of repurposing current commercial land use designations to residential uses? Currently, even with increased household on-line spending, households do not cover the cost of the services they receive. Revenues from the commercial sectors is used to offset these deficits. Various land use mixes must be modeled to identify an acceptable land use mix. To do this our fiscal model needs to be updated. Retreating from fiscal modeling would be a step backwards for Louisville. (Please "google" "land use planning and fiscal modeling" to see an AI summary of this issue).

The timing of development is also important. It is very dangerous to make land use based on demand at a moment in time. "Banking" vacant land must often be done for long term fiscal sustainability. We should not succumb to calls for using property for its

“highest and best use” at a point in time; and using the term “underutilized” land illustrates a misunderstanding of the importance of pursuing a fiscally sustainable land use mixture.

5. Parking impacts. As an old town resident, I add this concern. The draft plan calls for redeveloping the downtown area while protecting its historical character. REALLY? Between the lines is the implication that parking requirements would have to be relaxed to make three story residential units feasible. Reducing parking requirements does not reduce parking. It simply pushes more of it into adjoining neighborhoods.

Let me add a couple of side comments. The plan has statements about what the plan is not. One says it is not a detailed budget. Of course it is not. This statement leads me to believe there is a misunderstanding of the difference between budgeting and fiscal sustainability. This is very concerning. Another statement says it is not a zoning document. This is true, but misleading since our City Code requires developments to be consistent with the Comprehensive Plan.

The public’s right to know cannot be ignored by the desire to move on. Democracy can only work when we have full information. Furthermore, our national government’s abandoning the exploration of cause and effect should not be duplicated at the local government level.

Thank you,
John Leary

From: [Ann](#)
To: [Christopher Leh](#); [City Council](#)
Cc: [Diana Langley](#); [Rob Zuccaro](#); [Jeff Hirt](#)
Subject: Proposed changes to Comp Plan Preliminary Draft
Date: Sunday, July 13, 2025 7:30:35 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Mayor Leh and Council:

I provided the email below on 6/17 before your last meeting on the Preliminary Draft. I am resending this to bring it back to your attention. I appreciate that "resilience" is now part of our vision, but the plan has many gaps and inconsistencies related to actualizing this part of our vision.

I would like to note that none of the linked "Summary of Round Two of Boards and Commissions Input" have directly addressed disaster preparedness or risk mitigation for wildfires, urban conflagrations, or other large-scale disasters. The only mention was by the Open Space Advisory Board which urged the City to manage "competing goals around recovery and resilience, e.g., between hazard mitigation and compromising the ecological value of these areas." Pretty clear where their priorities lie. In their 4/9/25 memo to Council and Mr. Hirt, there was not a single mention of disaster preparedness and mitigation in our Open Spaces. Similarly, the Sustainability Board did not mention these topics in their feedback or their 6/25 memo to Council. They didn't even note the connection between carbon released by urban conflagration and the City's decarbonization goals.

Because citizens concerned about preparedness and risk mitigation do not have a formal way to provide input to the City, I urge you to be open to our feedback by email and public comments. The residents who have been advocating on these topics are informed and experienced through professional and volunteer activities at the regional and national levels. There are many ways to make our community better prepared for future disasters and emergencies, and the Comp Plan is the place to begin to make this real for Louisville.

I ask you to instruct staff to incorporate specific goals and actions related to disaster preparedness and risk mitigation as outlined in my feedback below and feedback from other residents.

Ann Brennan

On Tue, Jun 17, 2025 at 3:06 PM Ann <ahbrennan52@gmail.com> wrote:

Mayor Leh and City Council,

I've reviewed the Comp Plan Preliminary Draft. This is clearly a huge piece of work, and I commend all who have been involved in pulling this together. Its vision, values, and goals are well aligned with the Louisville we all know and love.

The primary focus of my review was for coverage of emergency preparedness, resilience, and adaptation. I am pleased that "resilient" is now included as one of four values in the center of our Core Values. However, I see many gaps and inconsistencies in treatment of these topics throughout the Draft. Examples:

- Land Use and Development: All Land Use Classifications should address issues of resilience, potential for urban conflagration or flooding, proximity to other hazards such as manufacturing or train risks, egress, and evacuation.
 - NE2: goals for managing scale, size, aesthetics, affordability are to be commended. Lessons can be learned from the dramatic shift in character of the Marshall Fire Rebuild Neighborhoods, which were only held to setbacks and height limits of pre-fire neighborhoods. If we had also been held to a % lot coverage, and if height limits had been enforced by vertical survey data, we might have retained some of our prior character and affordability.
 - NE: Neighborhood Enhancement: should have a goal related to safety and resilience
 - Development Opportunity Areas: I support bringing medium-density and workforce residential housing to these areas, but they should be designed for safety, resilience, and evacuation.
- Transportation and Mobility: Shifting away from vehicles and toward multi-modal transport, and calming traffic speeds may come at the expense of efficient evacuation in the event of a disaster or emergency. These goals should be balanced, and all projects should be evaluated for design, maintenance, and signage to support evacuations. Specific goals should address the need for efficient egress and evacuation routes and plans.
- Parks, OS, and Sustainability:
 - Council should consider the right balance between acquisition and maintenance/enhancement of existing lands and facilities.
 - Resilience and mitigation should be added as explicit goals for parks and open space.
 - Open Space and, to a lesser degree, Parks, should have a secondary use defined as disaster mitigation--i.e., as fire breaks to prevent wildfire from entering developed areas, or for absorbing floods. Specific goals should be added to address these uses.
 - Goals for OS should include their impact on adjacent land use categories.
- Economic Vitality: A goal should be added to understand and address insurability of homes and businesses in our community. Mitigation and preparedness for disasters will help keep people in their homes to be good customers for local businesses. Insurability will help keep Louisville affordable.
- Public Services and Infrastructure: Perhaps the most glaring gap in the entire Draft is the lack of explicit goals around risk assessment and emergency preparedness and operations. The plan should include specific goals including:
 - the City's development, maintenance, and training on emergency planning and operations
 - an explicit partnership with the LFPD that defines roles, responsibilities, and areas of collaboration on risk reduction and emergency response
 - the Police Department must be expected to have a defined role that is clear to the public
 - Goal CS.1 and CS.5 address "well-being" and traditional policing. Where is emergency preparedness and operations? Public education on these topics?

Sustainability Resilience, and Adaptation:

- Goal SRA.1 Why are "adapt to economic and social change" in the same goal as "respond to natural disasters"?
- The actions under Goal SRA.1 are traditional resilience goals, and do not reflect a lens being applied to the entire plan.

Thank you for your consideration.

Ann Brennan
888 Larkspur Court

From: [tamar krantz](#)
To: [City Council](#); [Diana Langley](#)
Subject: Please Let Residents Weigh in on the Draft Comp Plan Draft in a Meaningful Way!
Date: Sunday, July 13, 2025 1:20:13 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear City Council Members,

Moving forward, please let residents weigh in on the Draft Comp Plan draft in a meaningful way!

I strongly object to the summary of community engagement found on pages 20 through 23 of the preliminary draft plan. It completely ignores data from the community survey and misrepresents other data. Please hire an independent entity to draw conclusions from all of the existing data. There is a scientific way to summarize data, even with such a variety of questions and sample sizes.

It looks great on page 20 to see that there were nearly 2,000 survey responses, but the following pages don't reflect this data. The May 24 Community Engagement Summary provides an analysis methodology and tabulates responses to 12 questions. Though the demographic responses show it wasn't perfect, the methodology was valid. The survey was open for one month and a real effort was made to engage residents. Please take the time to review the results of this survey. Here are some things the draft comp plan missed:

- Respondents were asked to rank the values from the 2013 plan. The top 2 values were: Safe Neighborhoods followed by Integrated Open Space and Trail Networks.
- Of the 1516 responses to the question, "what are your biggest hopes for the future of Louisville?" The top two themes were affordable housing and preservation of small town feel.
- 1641 participants responded to the question, "What would you like to see emphasized in future development?" The top two responses were "Dedication of Open Space and Public Lands" followed by "Increased opportunities for small business development and business-friendly development."
- Regarding what types of housing do we have too little of, the top responses were

"Tiny Homes or Cottages" followed by "ADUs".

The summary on pages 21, 22 or 23 doesn't reflect these responses. Given that what residents want to see emphasized most in new development is dedication of open space and public lands, how did this point not make it into the summary? Why is preservation of "small town feel" completely ignored? Given that residents want to see tiny homes and cottages more than row homes and apartments, why does the summary emphasize mid density residential?

Adding that "93% of open house participants supported more mixed use/mid density residential in Louisville" is an absurd way to cherry pick data! This activity only had 43 responses— or dots placed under pictures of 3 story buildings with ground floor retail. Why not mention that in a survey with 1,600 responses, most thought we needed more tiny homes and cottages? The results of the survey with a larger sample size should be given more weight in the conclusions.

Please correct the flawed conclusions in the preliminary draft.

To prevent this type of error moving forward, please hire a new consultant skilled in conducting statistically significant surveys, designing relevant questions, and analyzing and summarizing data.

Otherwise, please don't pretend that this comp plan reflects public input.

Sincerely,

Tamar Krantz

From: [joy brook](#)
To: [City Council](#)
Subject: Comprehensive plan
Date: Saturday, July 12, 2025 10:10:27 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

I would like to see our quality of life enhanced or at least maintained. There is no option on the comprehensive plan for a little or no growth. This looks like it has been created by developers and businesses are running our town with little or no concern for Citizen's quality of life. We need to address our traffic issues, pollution, and water shortage. What about affordable housing? The new requirement has never been enforced and the loophole has always been used. We need to preserve land for the future not destroy it. Commercial development has more potential for income for the city, and those zonings should not be given up for residential. Please think about our future and our quality of life!

Tane Mahuta E Tu!

Blessings to the Creator, trees! Stand Tall!

From: [Tawnya Somauroo](#)
To: [City Council](#)
Subject: Please Amend Draft Comprehensive Plan for Wildfire Resilience and Climate Adaptation
Date: Friday, July 11, 2025 7:26:20 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor and Councilmembers,

I write to request specific amendments to ensure the Comprehensive Plan meaningfully addresses climate adaptation and wildfire risk reduction. Several sections in the draft plan contain narrow or misleading language, exclude the lived experience of residents, and fail to incorporate lessons learned from the Marshall Fire.

1. Don't Oversell the Wildfire Risk Assessment and Over-Emphasize WUI

Page 81 of the plan states:

“The City completed a Wildfire Risk Assessment in 2023. This developed valuable new wildfire hazard and vulnerability information that is aiding decision making. Grasslands, which dominate many open spaces, present a high fire risk due to their fuel load and connectivity. Evaluating and maintaining natural ecosystems, WUI zones, and resilience-focused land use policies can help reduce future disaster risk while supporting healthy environments.”

This language weighs the scales toward mitigating buildings only in WUI zones. Our Fire Chief has already recommended focusing on conflagration risks city-wide, not just applying WUI code. This distinction is critical: the WUI code protects individual buildings from embers, but conflagration mitigation protects neighborhoods from the conditions that allow a wildfire to spread uncontrollably.

The draft plan also puts too much emphasis on the 2023 Wildfire Risk Assessment (WRA). The WRA was purposefully under-scoped to address only City property through open space mitigation on fair weather days—it does not address protection of homes under red flag conditions. Its scope and recommendations are so minimal that I have come to suspect it was a performative ruse created under a previous city manager who openly denied that the City needed to do anything to address risk because he believed the Marshall Fire was a fluke.

The plan must incorporate the forthcoming Wildfire Conflagration Risk Assessment (WCRA) being developed by the Louisville Fire Protection District. The recommendations of the WCRA should take precedence over the WRA in shaping City wildfire mitigation

strategies.

2. Expand and Clarify the List of Mitigation Strategies

The statement on page 81 that:

“Evaluating and maintaining natural ecosystems, WUI zones, and resilience-focused land use policies can help reduce future disaster risk while supporting healthy environments.”

is far too narrow. The plan should clearly state that the City will consider any and all methods to reduce fire risk—especially anything the LFPD recommends in the forthcoming WCRA.

I recommend amending the sentence as follows:

“Mitigating disaster risk in open space areas may require a range of strategies—including prescribed burns, grazing, mowing, thinning, and ecosystem restoration—alongside resilience-focused land use policies and maintenance of fire breaks in WUI zones.”

3. Clarify Intent of Goal SRA.1

The current goal reads:

“Support programs and strategies to adapt to economic and social change and respond to natural disasters.”

This is really unclear. What does adapting to economic and social change have to do with natural disasters? It is highly unlikely that the community linked these concepts in their feedback.

Residents are asking for more than just disaster response. We recognize that climate change is well underway and want the City to close the adaptation gap, the growing divide between what we know about our community’s climate risks and the actions we’ve actually taken to protect people, homes, and infrastructure from those threats. The City must commit to reducing the likelihood that homes and businesses are destroyed in the next climate-fueled disaster.

Proposed rewording:

“Support programs and strategies that close the climate adaptation gap to reduce the risk of natural disaster to homes and businesses, and improve capacity to respond to natural disasters.”

4. Amend SRA.1.B to Empower Residents

“Empower community partners, including leaders within churches and faith-based organizations, with information on hazard response options and ways to help shape updates to the Boulder County Natural Hazard Mitigation Plan.”

This must be changed to empower **Louisville residents**. City staff have shut fire survivors out of hazard mitigation discussions for over three years. The principles of climate justice dictate that the people most impacted by climate disasters should have a voice in shaping future responses.

Please revise to:

“Empower Louisville residents and community-based organizations with information on hazard response and opportunities to shape updates to the Boulder County Natural Hazard Mitigation Plan.”

5. Update SRA.1.E to Reflect Existing Commitments

“Adopt a Wildland Urban Interface (WUI) code in compliance with the state minimum code, and explore more stringent code options for areas of the city with high fire hazard conditions.”

The City has already committed to anti-conflagration code city-wide, yet this section creates an opening to backtrack on the City's commitment to harden *all* new construction.

Please update this section to state that the city will continue to support the policy being the the anti-conflagration code that has already been adopted and remove any implication that resilience might be optional or negotiable.

6. Clean Up and Refocus SRA.1.F

“Promote structure hardening, defensible space Firewise™ principles and green infrastructure for reducing hazards, balancing hazard mitigation needs...”

I am not sure what “green infrastructure for reducing hazards” means, but it sounds like an attempt to conflate hazard mitigation with decarbonization. Decarbonizing does *not* protect our neighborhoods from wildfire, however. Moreover, “balancing hazard mitigation needs” is vague and suggests competing priorities where there should be clarity.

Please revise to:

“Promote structure hardening, defensible space, and Firewise™ principles to reduce wildfire risk.”

7. Delete COS.1.H – False Tradeoff Between Environment and Fire Risk Reduction

“When considering public land management adjacent to residential

development near open space, particularly fire-prone areas such as Davidson Mesa, balance hazard risk with ecological and community values.”

This is absolutely chilling. The Marshall Fire was the largest environmental catastrophe in Louisville’s history, preventing another megafire in Louisville IS an ecological value. And why is reducing fire risk being portrayed as something in opposition to “community values.” If a resident prefers tall invasive grasses on Davidson Mesa, that preference cannot outweigh the need to prevent future destruction of property and toxic contamination of neighborhoods and schools due to fire.

Please delete this entire statement.

8. Fix SRA.1.J – No Unfunded Open Space Purchases

“Evaluate all potential land acquisitions in terms of their ability to minimize natural hazard.”

Mitigation should not be used as a justification to acquire more open space that the City may not financially commit to maintain. Please amend this section to read:

“Evaluate whether the City can afford to maintain and mitigate any potential new open space acquisition for natural hazard risks before deciding to purchase.”

Thank you for your time and consideration. These changes are necessary to reflect what we’ve learned, what we’ve lost, and what we must do to avoid repeating the mistakes that left us vulnerable in 2021.

Sincerely,

Tawnya Somauroo

Louisville Resident and Marshall Fire Survivor

From: [Betty Solek](#)
To: [City Council](#)
Subject: Re: Boulder County Guidance for Green Site Design
Date: Friday, July 11, 2025 11:03:17 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Website explaining Resilient Landscape Toolkit

This website could provide some quick context for the toolkit that I just sent by email.

<https://bouldercounty.gov/climate/resilient-landscapes/>

Thanks

Betty Solek

On Fri, Jul 11, 2025 at 10:44 AM Betty Solek <betzgirls@gmail.com> wrote:

Hello City Council members:

I am forwarding design guidelines which were developed recently by Boulder County. I believe the language and guidance in this document could be suitable for giving direction in the Louisville Comprehensive Plan for revision of Louisville municipal code to reflect better site grading and landscaping of new buildings.

I hope you find the attached "toolkit" helpful for looking at drafts of Comprehensive Plan update.

Betty Solek

1101 N Franklin Ave

Louisville



Designing-Resilient-Landscapes.pdf

From: [Tawnya Somauroo](#)
To: [City Council](#)
Subject: Draft Comp Plan Preserves Louisville's Exclusionary Zoning Legacy
Date: Thursday, July 10, 2025 5:57:53 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor and Councilmembers,

I write to express my disappointment that the draft Comprehensive Plan seeks to lock in Louisville's exclusionary zoning practices for the next 10 years. Specifically, I am concerned about draft language that appears to expand support for low density zoning, prioritizing single-family housing over making Louisville more inclusive and affordable.

The language of policy NE.2 is in line with decades of zoning and planning practice designed to block housing diversity under the guise of protecting "character":

Value and enhance the unique character of both new and established neighborhoods, emphasizing appropriate scale, size, aesthetics, and land uses.

Across the country, terms like "scale," "aesthetics," and "neighborhood identity" have historically been used to prevent modest forms of housing such as duplexes and triplexes that would allow more people to live in stable, well-located neighborhoods. In practice, this kind of exclusionary zoning has reinforced racial and economic segregation and made Louisville less accessible to middle and working class families.

This language also directly conflicts with the Plan's other stated goals: promoting diversity, equity, and inclusion (DEI); expanding housing affordability; and supporting a mix of housing styles. We cannot achieve those goals while committing to preserve restrictive zoning across the vast majority of Louisville using language that historically has been used to *prevent* inclusivity.

The Plan's vision of neighborhood character is also problematic:

Maintain a quiet, residential character with open spaces and green corridors.
Use cohesive architectural styles and consistent setbacks for neighborhood identity. Ensure smooth transitions to higher-density areas with small-scale community services like parks, schools, and places of worship.

By suggesting that higher-density housing needs to be buffered or mitigated rather than integrated, this clause expands the scope of protection for single-family zoning. Surely this can't be what Council meant when they expressed a desire to promote economic diversity and housing diversity?

I recently wrote a Substack piece, [What's With All the Big Houses?](#) about how exclusionary zoning accelerated gentrification in my middle-class neighborhood post-Marshall Fire. Instead of bringing back the pre-fire economic demographic, single-family zoning incentivized investors to build McMansions that only law partners and tech founders can afford to buy. I

received **A LOT** of feedback on that piece, so many Louisville residents are frustrated by the scale and inaccessibility of those new homes. What I learned is that not everyone who says they want to preserve neighborhood character is referring to single-family housing. When some say they want to maintain character, they mean that they want to ***preserve the economic character*** of their neighborhoods, the ability for teachers and firefighters and nurses and police and city employees to live there. In order to preserve the economic demographic of a neighborhood, we need to allow more people to live in the community, not fewer.

Some may naively believe that the recent state-mandated legalization of ADUs addresses the problems with exclusionary housing, but that is not true. ADUs are small rental apartments. They may help expand rental options, but they don't offer co-equal homeownership or long-term stability. If we want to truly preserve community and affordability, the city needs to go further and allow duplexes, homes that can be owned by two households, especially in neighborhoods where only large single-family homes are currently allowed.

Louisville cannot claim to value equity, affordability, and housing diversity while continuing to center its planning on the tools of exclusion. Please revise how neighborhood character is defined to include a neighborhood's ***economic demographic***. Please remove the commitment to preserve the physical characteristics of low density housing and mitigate higher density housing. Finally, please include a goal to preserve affordability for the residents that already live here.

Sincerely,

Tawnya Somauroo

Cornerstone