



**CITY OF BOULDER  
CITY COUNCIL AGENDA ITEM**

**MEETING DATE: June 18, 2019**

**AGENDA TITLE:** Consideration of a motion to accept the study session summaries regarding the May 28, 2019 Study Session on Large Homes and Lots, and Use Tables and Standards

**PRESENTERS:**

Jane S. Brautigam, City Manager  
Chris Meschuk, Interim Director, Planning/Assistant City Manager  
Charles Ferro, Development Review Manager, Planning  
Karl Guiler, Senior Planner/Code Amendment Specialist  
Andrew Collins, Planner II/ Code Amendment Specialist

**EXECUTIVE SUMMARY**

This agenda item provides a summary of the May 28, 2019 study session on large homes and lots, and use tables and standards. The purpose of this study session was to:

1. Update City Council on the progress of the Large Homes and Lots project including but not limited to the results to date on community engagement, presenting the general analysis of the zones within the scope of the project, discussing the land use, density and infrastructural implications of making zoning changes to achieve council's stated goals; and to get specific City Council direction on land use code change options to allow for code drafting to begin.
2. Update City Council on the progress of the Use Standards and Table project and the public engagement to-date, to receive feedback on the project scope, the "why" and purpose statements, the areas of consideration and goals for the project, and the project's timeline, and to check in with City Council on the progress of the use table changes associated with the Opportunity Zone use table analysis to get council's feedback on requested changes that were raised at the April 2nd discussion.

Key takeaways from the study session on large homes and lots were:

- A majority of council members were not interested in pursuing a hard cap on house square footage (Option A).
- A majority of council members were interested in moving forward with Option D: allowing more than one ADU per lot within the existing FAR limits, and Option B:

- Conversion of existing houses into duplexes or triplexes within the existing FAR limits.
- Proceed with additional economic analysis of the Phase 2 options, in preparation for the 2020 council retreat.
  - Wait to conduct any kind of statistically valid survey until direction is provided by council in 2020.

Key takeaways from the study session on Use Table and Standards were:

- Council members generally supported the why and purpose statements, goals and timeline for the Use Table and Standards project.
- Council members provided feedback on the remaining areas for code changes in the opportunity zone.
- Council members generally supported the concept of describing the outcomes for redevelopment of diagonal plaza and affordable housing within the opportunity zone as desired areas of investment.

## **STAFF RECOMMENDATION**

### **Suggested Motion Language:**

Staff requests council consideration of this summary and action in the form of the following motion:

Consideration of a motion to accept the study session summaries (**Attachments A & B**) regarding the May 28, 2019 Study Session on Large Homes and Lots, and Use Tables and Standards.

## **NEXT STEPS**

Based on the feedback from City Council on the Large Homes and Lots project, staff will move forward with drafting potential ordinance language for options B and D for phase 1, and will also move forward with a consultant to perform an economic analysis of phase 2 options. Phase 2 options and a statistically valid survey will occur in 2020, with further input from council at that time.

Regarding the Opportunity Zone and Use Standards and Table projects, staff will move forward with drafting potential ordinance language and options as directed council that address the concerns of redevelopment within the Opportunity Zone, and that bring the zoning districts into greater alignment with the Boulder Valley Comprehensive Plan (BVCP). Opportunity Zone related changes will be brought back to council in July and August of 2019. A prospectus will also be drafted by city staff to help set the desired vision for development projects within the zone. The use table subcommittee will continue meeting in 2019 and into 2020 to study further updates and streamlining of Chapter 9-6, *Use Standards*, B.R.C. 1981, of the Land Use Code.

## **ATTACHMENT**

- A: Summary of the May 28, 2019 study session on Large Homes and Lots
- B: Summary of the May 28, 2019 study session on Use Table and Standards

**ATTACHMENT A**  
**May 28, 2019 Study Session**  
**Large Homes and Lots**

**PRESENT**

**City Council:** Mayor Suzanne Jones, Mayor Pro Tem Sam Weaver, Aaron Brockett, Cindy Carlisle, Lisa Morzel, Mirabai Nagle, Mary Young and Bob Yates

**Staff:** Jane S. Brautigam, City Manager; David Gehr, Chief Deputy City Attorney; Chris Meschuk, Interim Director, Planning/Assistant City Manager; Charles Ferro, Development Review Manager, Planning; Karl Guiler, Senior Planner/Code Amendment Specialist; Andrew Collins, Planner II/ Code Amendment Specialist

**PURPOSE**

The purpose of this study session was to update City Council on the progress of the Large Homes and Lots project including but not limited to the results to date on community engagement, presenting the general analysis of the zones within the scope of the project, discussing the land use, density and infrastructural implications of making zoning changes to achieve council's stated goals, and to get specific City Council direction on land use code change options to allow for code drafting to begin.

Specific feedback from City Council was requested on preliminary options for additional single-family home size restrictions and zoning possibilities to allowing more modest sized dwelling units, and direction on the scope of the project and whether new regulations should apply beyond the Rural Residential (RR) and Residential Estate (RE) zoning districts.

**SUMMARY OF PRESENTATION & DISCUSSION**

Charles Ferro introduced the item and the staff team.

Karl Guiler and Andrew Collins presented information on the background and purpose of the project, the community engagement to date and the results, the phase 1 options, and phase 2 options. Following the staff presentation, council's discussion was structured around key questions. Responses from the council members and staff is provided beneath each question.

**B. Yates** asked how did nearly 60% of the RE zoned lots become less than the 15,000 SF minimum lot area requirement. **D. Gehr** clarified that many were lots established prior to 1971 and the implementation the 15,000 SF lot area requirement.

**M. Young** asked when did the Floor Area Ratio requirement's come into effect. **K. Guiler** responded with the Compatible Development Regulations in 2008/9.

**L. Morzel** asked when did the setbacks come about. **Staff** responded with the 1971 zoning regulations.

**B. Yates** asked how many houses in RR-1 are under 3,500 SF, and requested a breakdown of the number of houses less than the potential caps square footage. **Staff, et al** clarified how the potential square footage cap numbers could work as part of limiting home size on lots above the corresponding lot size *and greater*.

### **QUESTION 1 FOR CITY COUNCIL**

1. Does City Council agree with the approach to Phase 1 to include Options A, B and D that could be completed by the fall of this year? Should the Residential Mixed – 1 (RMX-1) zone district be excluded from further consideration in the project?

#### *Council Comments and Feedback*

**M. Young** commented the issue began with the demolition and construction of large homes, primarily in North Boulder, and may not be the same issue everywhere such as along Gapter Road. Open to applying rules to the RE and RR zones in North Boulder, but only through a subcommunity process including a statistically-valid survey.

**S. Jones** commented that it's good to keep the overall project purpose and goals statements in mind. It's an overall citywide issue.

**B. Yates** commented that the context matters, and it's a granular issue. Some neighborhoods in North Boulder are fine, and an arbitrary square footage cap is not appropriate. Not in support of restrictions, if forced could be willing to explore additional ADU's.

**A. Brockett** commented it's good keep the goal in mind of attaining more smaller homes. Agrees that the neighborhood context matters. Frasier Meadows is not having the same experience as North Boulder, for example. Would like to see additional ADU's move forward as an option.

**C. Carlisle** commented that subcommunity planning is needed, especially in North Boulder. Not in support of caps, and before anything is done need to hear from the neighborhood. Density is a big issue and is concerned with potential changes.

**M. Nagle** stated that a statistically-valid survey, especially for North Boulder was needed. Not in favor of a cap or other significant changes without a survey and subcommunity planning occurring first.

**S. Weaver** stated not in favor of a cap, the city's energy conservation code update helps to place more restrictions on constructing new larger homes. In support of additional ADU's as it doesn't change the character, and as rental units they help at getting some level of additional affordability. In support of ADU's and conversion of an existing home to a duplex. Agrees that a statistically-valid survey should be done, but should be a citywide survey, not just North

Boulder. Good to be able to breakout neighborhoods as necessary, but keep a city-wide sampling as well.

**L. Morzel** stated yes to all of the options, including a cap on square footage. The embodied energy of the construction materials for larger homes is much greater than that of the existing homes and of a new small home. Stated that it's not just a North Boulder issue, and that the council is making future choices, and by doing nothing now it constrains the future. The city has made deliberate decision before such as open space acquisition, there's an opportunity for this now. In support of additional ADU's, Conversion of existing homes to duplexes/triplexes even 4-plexes. These have minimal impacts and the city should provide the option in these areas.

**S. Jones** commented she was surprised by council's direction thus far. Stated that the original compatible development regulations (2008/9) haven't done enough to solve the problem. Supports a cap on home size as well as the option for additional ADU's and conversion of existing homes to duplexes/triplexes. Also supports a city-wide statistically-valid survey.

**A. Brockett** suggested he'd be open to exploration of a square footage cap as part of phase 2. Also stated the 2015 BVCP included a statistically-valid survey that was conducted city-wide, and which showed a majority of respondents in support of the concept of conversion of houses to duplexes/triplexes, as well as cottages, and that this project builds on that direction. Commented that if allowing conversion of existing homes to duplexes/triplexes, the regulations should be tuned to avoid unintended demolition of small homes.

**M. Young** stated that in being future thinking, she's in support of the conversions to Duplexes/triplexes, and allowing an extra ADU. Reiterated that the context matters, and that the survey should be city-wide but be able to be broken down to see neighborhood and North Boulder responses as well.

**S. Weaver** suggested the statistically valid survey be done as part of the phase 2 work, MY agreed.

**C. Carlisle** stated that traffic, density, growth are major concerns, and that this project doesn't do anything to address these concerns. The city needs to limit commercial space and jobs. Stated her concern with speculative developers taking advantage of any changes. Agreed that the survey should be both city-wide and allow for a neighborhood breakdown including North Boulder.

**B. Yates** stated that the ADU's ordinance was just passed a year ago, and the council should give it time before moving forward with allowing additional ADU's with this project.

**L. Morzel** stated she was fine with the survey approach for phase 2, but that it should also capture in-commuters and workers who don't currently live within the city. Similar to the housing survey that was also conducted recently.

*Direction. Straw Poll* - Five council members in favor advancing Options B and D as part of phase 1, with refinement/limitations on the size of an addition as part of a duplex/triplex conversion could theoretically do. Majority of council members do not support option A, a square footage cap on home size or other floor area limitations.

Staff will take Options B and D forward per council's feedback as Phase 1, for the RE and RR zones only.

### **QUESTIONS 2 & 3 FOR CITY COUNCIL**

2. What is City Council's feedback on the proposed Phase 2 (i.e., Options B, E and F) options?
3. Should a statistically valid survey be conducted based on the options council advises to advance?

**L. Morzel** asked if staff considered an overlay zone approach, in order to create poplar style housing. Areas where someone could do this, but restrict adjacency. **K. Guiler** responded that yes it was considered but there are limiting factors to overlays or appendices within the city's Land Use Code, and that a criterion based approach might be a better alternative.

**A. Brockett** asked how much we should go into the phase 2 options, given the impending election this fall.

**S. Jones** asked how much affordability a part of the options was, and if they would include permanent affordability. **K. Guiler** responded that staff is in the process of hiring an economist to study this.

**S. Weaver** suggested that the stud be structured like the ADU study, where it includes a market return for the units as well as a deed restriction analysis, including rent and sale prices comparisons. Is in support of all of the phase 2 options B, E, F and the survey as a part of Phase 2.

**B. Yates** asked what the timing would be of phase 2 options and the survey. **S. Weaver** responded the survey should until after retreat 2020, with the next council.

**A. Brockett** commented that an overlay or saturation threshold for cottage courts could be considered, as well as opportunities for shared parking to minimize impacts and to include other design criteria. Should also look at co-housing options as a part of the cottage court option if appropriate, and options to do so with needing a typical subdivision. Is potential open to a cap on home size if coupled with phase 2 options - but should be further explored in a city-wide survey.

**M. Young** suggested cottage courts would be most appropriate near transit lines, and other criteria could be explored.

*Direction.* Staff will move forward with a consultant to perform an economic analysis of phase 2 options during 2019. A statistically-valid citywide survey will be a part of phase 2 work in 2020 with further direction from City Council at that time.

**ATTACHMENT B**  
**May 28, 2019 Study Session**  
**Use Table and Standards Project**

**PRESENT**

**City Council:** Mayor Suzanne Jones, Mayor Pro Tem Sam Weaver, Aaron Brockett, Cindy Carlisle, Lisa Morzel, Mirabai Nagle, Mary Young and Bob Yates

**Staff:** Jane S. Brautigam, City Manager; David Gehr, Chief Deputy City Attorney; Chris Meschuk, Interim Director, Planning/Assistant City Manager; Charles Ferro, Development Review Manager, Planning; Karl Guiler, Senior Planner/Code Amendment Specialist; Andrew Collins, Planner II/ Code Amendment Specialist

**PURPOSE**

Update City Council on the progress of the Use Standards and Table project and the public engagement to-date, to receive feedback on the project scope, the “why” and purpose statements, the areas of consideration and goals for the project, and the project’s timeline, and to check in with City Council on the progress of the use table changes associated with the Opportunity Zone use table analysis to get council’s feedback on requested changes that were raised at the April 2nd discussion.

**SUMMARY OF PRESENTATION & DISCUSSION**

Karl Guiler and Andrew Collins presented information on the background and purpose of the project, the community engagement to date and the results, and detailed information on the options for changes to the zoning districts in the opportunity zone. Following the staff presentation, council’s discussion was structured around key questions. Responses from the council members and staff is provided beneath each question.

**QUESTION 1 FOR CITY COUNCIL**

1. What feedback does City Council have regarding the subcommittee’s project scope, why and purpose statements, the preliminary goals, timeline and areas of consideration for the Use Table & Standards project?
  - Are there others that are missing?
  - Are there any considerations that should be modified or removed?
  - Are 15-minute neighborhoods a priority area of consideration for this project?

*Council Comments and Feedback*

**S. Jones** suggested that the project *why statement*, should be changed from “...may be out of alignment...” to “...are out of alignment...”.

**L. Morzel** commented that any change and goals should seek to accommodate homegrown businesses and that some flexibility should be given to the current limits on “neighborhood serving uses” to allow business that may have their main client base elsewhere, yet still provide opportunities to walk to work and that add to the fabric of the neighborhood.

**A. Brockett** agreed with the elements of the project as defined by the subcommittee, and commented that yes 15-minute neighborhoods should be a priority area of consideration.

**L. Morzel** suggested that 15-minute neighborhoods not just be defined by commercial uses, but also incorporate parks and open space uses.

**S. Weaver** liked the overall work thus far and the fact the subcommittee meetings were held at a variety of locations that were representative of uses the subcommittee was focusing on for further exploration.

## **QUESTION 2 FOR CITY COUNCIL – OPPORTUNITY ZONE**

2. What feedback does council have regarding the proposed use table changes to address concerns about future development within the Opportunity Zone?
  - (1) **Efficiency Living Units (ELUs)** – Should ELUs be required to be permanently affordable if over a specific percentage?
  - (2) **Single-family Dwelling Units in High Density Residential zones**– Should single-family dwelling units be revised to be prohibited uses in the high-density residential zones to encourage attached housing in those zones?
  - (3) **Residential in Business Regional (BR) zones**- Should residential uses in the Business Regional (BR) zones be restricted from the ground floor like in Business Community (BC) zones?
  - (4) **Restaurants in Industrial (I) zones** – Should the city revise the current regulations for restaurants in the Industrial Zones to encourage them?
  - (5) **Office in Residential zones** – Should the city allow offices in the residential zones through Use Review if the square footage is capped at 1,000 square feet per property?
  - (6) **Office as a conditional use in the Business zones** – What specific requirement to incentivize permanently affordable housing in exchange for allowing more office should be applied to the Business zones?
  - (7) **Preservation of existing market rate affordable units in the Opportunity Zone** – How should the city preserve existing market rate affordable units from demolition in the Opportunity Zone?



*Council Comments and Feedback*

**(1) Efficiency Living Units (ELUs)** – Should ELUs be required to be permanently affordable if over a specific percentage?

**C. Carlisle** expressed some concern about the maximum number of units, however large projects would trigger Site Review process.

*Direction.* Council supported Option B - modify the Use Table to make ELUs an allowable use in most zones.

**(2) Single-family Dwelling Units in High Density Residential zones**– Should single-family dwelling units be revised to be prohibited uses in the high-density residential zones to encourage attached housing in those zones?

**A. Brockett** suggested that criteria be added to Use Review criteria for new construction of single-family homes in these zones, to raise the bar otherwise they would sail right through.

**S. Weaver** suggested a lot size criteria, historic element, or square footage threshold for expansion of an existing home that would only then trigger a Use Review – create a de minimis rule.

*Direction.* Majority of council supported Option C - modify the Use Table to make single-family homes a Use Review use in the RH (residential high density) zones.

**(3) Residential in Business Regional (BR) zones**- Should residential uses in the Business Regional (BR) zones be restricted from the ground floor like in Business Community (BC) zones?

**S. Weaver** suggested changing to a Conditional or Use Review use, with requirements for non-residential uses be located along street frontages., or something similar to preserve ground-level frontage mostly for active commercial uses. Context dependent.

**M. Young** commented more residential could be appropriate if affordable.

**A. Brockett** commented that 75% makes some sense, allows for ground floor retail.

**M. Nagle** commented residential could be more appropriate if the residential was at the back of the building, not along the street frontage.

**L. Morzel** stated that affordability should be central for residential uses in these zones. The Parc Mosaic project is an example of exorbitant priced multi-family. Suggested there should be a requirement for more permanent affordable residential.

**S. Jones** commented she was concerned about getting more affordable residential development in the Opportunity Zone as part of the larger goal of the moratorium.

**C. Carlisle** stated that an overall Opportunity Zone plan should be done first before any changes made, concerned about unintended consequences. The goals for Opportunity Zone changes are to maximize public benefit, reduce excess office, and get more affordable housing.

**K. Guiler** clarified that these zones would be lifted from the moratorium should council decide to move in the direction upon adoption of the changes.

*Direction.* Modify Option C – possibly a conditional or limited use with requirements for street frontage and other elements as suggested by council.

**(4) Restaurants in Industrial (I) zones** – Should the city revise the current regulations for restaurants in the Industrial Zones to encourage them?

**L. Morzel** commented that it makes sense to allow restaurants along the major streets.

**S. Weaver** agreed there should be flexibility for restaurants uses, but that it needs more careful consideration, so supports option C deferral.

**B. Yates** clarified with staff that by going with Option C the industrial zones would still be lifted out of the moratorium.

**S. Weaver** stated that while some level of additional restaurants and housing and industrial zones make sense, that it should be done through the subcommunity process for East Boulder, that is already underway (anticipated 2020 completion).

**S. Jones** stated to bookmark industrial zone changes for a later time as part of the implementation of the East Boulder Subcommunity Plan outcomes.

**C. Carlisle** commented that would be good to know how much industrial we have lost, and should do subcommunity planning before we make changes in these zones.

*Direction.* Council supported Option C. Defer changes to industrial zones pending the outcome of the East Boulder Subcommunity Planning process. Remove Industrial zones from the moratorium.

**(5) Office in Residential zones** – Should the city allow offices in the residential zones through Use Review if the square footage is capped at 1,000 square feet per property?

**C. Carlisle** suggested that a saturation limit be considered as a possibility.

**C. Ferro** clarified that existing Se Review criteria speak more to operational characteristics and impacts to existing uses that are around it. **K. Guiler** added that one criterion has a presumption against conversion of residential to office that could be built upon.

**B. Yates** clarified with staff that existing offices would be grandfathered in (as a non-conforming use), and could continue to operate and exist.

**K. Guiler** clarified that the 1,000 SF cap in option C is envisioned to apply per parcel.

**A. Brockett** stated he is concerned about the limiting factor of a square footage cap. Believes allowing office helps to create a live work neighborhood, and increases walkability.

**S. Weaver** commented that the changes needed more thought and alternatives. Criteria for new construction, versus criteria for conversion of existing homes to office uses. Should be treated differently, a difference between purpose built projects, versus conversion of homes to office.

**A. Brockett** suggested that drafting something directed at preventing the conversion of homes to office, perhaps an overall cap on the percentage. Does not support in the current form.

**B. Yates** suggested a cap on new builds and a cap on conversions (a lower number), and subject to use review. **S. Jones** suggested developing criteria then for conversion, and separate criteria and cap for new builds.

**S. Weaver** stated we do not want to lose existing residential units to non-residential uses within these zones.

**K. Guiler** clarified that non-residential uses are automatic call-ups to Planning Board in residential zones.

*Direction.* Keep as a Use Review, but with new criteria for conversions of existing residential uses to office use, and criteria for new office developments. Including possible percentage caps, with the primary goal to reduce/prevent conversion of residential to office.

**(6) Office as a conditional use in the Business zones** – What specific requirement to incentivize permanently affordable housing in exchange for allowing more office should be applied to the Business zones?

**S. Weaver** suggested that permanently affordable commercial space be included as well.

**A. Brockett** stated he is not in support, that the proposal goes too far in the Business zones. Supports the idea of encouraging more residential uses in business zones, but should not limit office uses this much in the business zones.

**S. Weaver** stated that these changes are intended to be more neighborhood serving business zones, and would not affect all business zones.

**L. Morzel** asked how many affordable residential units would be required. **K. Guiler** clarified the number of on-site affordable units would be based on the existing inclusionary housing provisions – a minimum of two units, but depends on how many market-rate residential units a

development contains. Housing has recommended meeting half the on-site affordable housing requirement on the property.

**B. Yates** suggested adjusting the percentage numbers of Option C. to strike a better balance, and to also allow some flexibility for office replacement.

**M. Young** stated that the option C provides a balance and is good with the recommended percentages. **L. Morzel** states she's in support of Option C.

*Direction.* Majority of council members were in support in Option C. Build on Option C with adjustments / options to the percentages (25% office use by-right, and up to 50% if providing affordable units).

**(7) Preservation of existing market rate affordable units in the Opportunity Zone – How should the city preserve existing market rate affordable units from demolition in the Opportunity Zone?**

**M. Young** clarified with staff that the recommended option to keep the moratorium in place in the RH-4 and RM-1 zones would not preclude rehabilitation of the residential units.

**B. Yates** suggested that there be small-unit exception for developments with 2,4, 6 units, or whatever the appropriate threshold may be. Data on the size of the existing development in these zones would be useful.

**M. Young** and **L. Morzel** stated their concern for displaced people should exceptions be made for reconstruction of buildings.

**S. Jones** suggested to allow rebuilds if priced to the same economic range.

**C. Carlisle** stated she in support of option B. keeping the moratorium in place.

**S. Weaver** stated that there needs to be an outlet for rehabs of buildings, or a use review option for any project that is under the moratorium.

**A. Brockett** suggested any outlet process should allow a “rehab-type” of project, versus a percentage of value. Similar to the demolition code update.

**D. Gehr** clarified that the council's feedback and goals suggest the need to create new Land Use Code regulations, similar to the existing historic preservation regulations, and not simply keeping or amending the Opportunity Zone moratorium ordinance.

**S. Jones** commented that changes should be applied city-wide if successful at preserving existing market-rate affordable residential units.

**B. Yates** suggested keeping the moratorium in place, and drafting a city-wide regulation in the interim period to go into effect at the end of the moratorium in June 2020. **A. Brockett** cautioned against unintended consequences of a citywide regulation.

*Direction.* Keep the moratorium in place for these zones (Option B.) providing an outlet for review of projects/rehabs as needed (with criteria for keeping the same rent/price range), and to draft a broader demolition regulation in 2020, with the intent of preventing the replacement of market-rate affordable units with higher rent/priced developments. Extension of moratorium may be necessary at the end of current expiration period.

### **Opportunity Zone and Affordable Residential Discussion**

**S. Jones** queried what other options are there to get a further amount of affordable residential development in the Opportunity Zone, a primary goal of the moratorium enactment.

**K. Guiler** stated that the ELU's relaxation and additional affordable housing provisions for office uses in Business Zones were the staff suggestions that pertain to increasing affordable housing units.

**B. Yates** suggested increased Inclusionary Housing requirement for project the demolish, existing market-rate housing

**S. Weaver** suggested an overlay zone and higher commercial linkage fees could be further leveraged for increased inclusionary housing. **D. Gehr** stated this would have to be studied further.

**S. Jones** asked what types of incentives the city can provide to get what we want.

**C. Meschuk** stated that an option for the city is to create a prospectus that lays out the vision for what the city wants (projects that incorporate a greater degree of affordable housing), and to streamline the process for developers who meet that vision. There is a limited window for investors to take advantage of the federal Opportunity Zone program.

**C. Carlisle** requested that the city track real estate transactions as part of the Opportunity Zone work.

**S. Weaver** asked what incentives the city can provide. **C. Meschuk** responded the city could create incentives and a clear vision for what we want.

- Options or incentives for potential developers could include get front of the review line, reduced review times, and potential affordable housing adjustments as warranted (middle and low-income amounts).

**J. Brautigam** stated that many other cities are taking prospectus route, and the State of Colorado is encouraging others to do so as well.

*Direction.* Council was in support of creating a prospectus of the vision we want in the Opportunity Zones, and studying potential incentives.