

Justin –

Here are my thoughts on the current LDC updates. At this point, I have no true issues with the info presented (except maybe the artificial turf stuff in 6.2.2.), but this is more of my general thoughts. Take them or leave them. For my references, I am using the paper draft copy you gave us last meeting. I tried to tie a page number to paragraph title to hopefully make it easier.

Landscape and Water Conservation Manual

- Skipping ahead to the Appendices, this was really confusing to me and I got totally turned around. Appendix A is the Water Wise list AND according to the first paragraph on page A-6, LDC Section 6.2. Then Appendix B is the “new” LDC 6.2 (according to Page B-1 and all the headers) and the Recommended Landscape Material List (Page B-11). But then the text of the document alludes to Appendix A being the LDC Section 6 (See Page 1 – Applicability and Relationship to the LDC). Then, for example, on Page 2 in “When Landscaping is Required” and Page 4 in “Use of Xeric Vegetation” it says the list is in Appendix B. I thought this list was the Water Wise list in Appendix A. My suggestion would be two-fold. 1) I would make Appendix A, LDC 6.2 and then Appendix B, all the good plant stuff, and Appendix C all the “bad” plant stuff. 2) I’d go through the document one more time to make sure all the Appendix references are pointing to the correct one.
- Page 2 – Additional Information: With a bit of trepidation...and curiosity, I went to look at xratedgardening.com. It doesn’t exist. Also, the [csu](http://csu.org) and xeriscape.org websites do not exist. You probably need to double check this.
- Page 6 – Conflicts with Sign Distance and Sign Triangles – I think you want to say “Trees that are delimbed up to 6 feet above the ground...” To me limbed up to six feet would have limbs from the ground to six feet and be in the sight triangle.
- Page 6 – I think you can combine “Species of Trees Limited In or Near ROW” into “Avoid Interference with Sidewalks and Roads” and have that paragraph titled, “Avoid Interference with Sidewalks, Roads, and ROW” stating, “The location and spacing of trees and plant materials should allow for the growth characteristics of the plants without adversely affecting the maintenance of structures, walks, drives, or vehicular and pedestrian traffic. The LDC limits the planting of *Acer negundo*, *Salix* sp., and most *Populus* sp. trees in or near rights-of-way because of their invasive roots which cause problems with utilities and roads; and due to their weak branches.”
- Page 7 – Determining Project Area: Suggest to read: “In instances where an entire parcel or lot is not used for the proposed development, the project area may be determined to be **smaller** by the PCD Director. The minimum landscaping requirements may apply to just that **smaller** project area; however, if additional landscaping (including buffering or screening) is necessary due to certain circumstances, the PCD Director may require that landscaping.” Less is used for number; smaller is used for size.

- Page 8 – Minimum Roadway Landscaping Areas: I’d delete the parenthetical information. Not sure it adds anything meaningful beyond the MTCP.
- Page 10 – Bluegrass Discouraged: Ok, I have to stop here and say now I am a bit more confused. In the draft we were given last week this paragraph says one thing, so then I went to cut and paste to make a suggestion, so I opened up the EDARP version which says something else. And that something else calls a plant list the “No Water Plant List” which doesn’t exist as far as I can tell. Anyway, my suggestion (and to somewhat prove my point), I would be to direct the reader to the appropriate Appendix A or B or whatever it turns out to be vice calling it out by name which can clearly be changed and, in the end, leave a reader searching for something that doesn’t exist.

(B) Bluegrass Discouraged

Bluegrass sod is discouraged in rural areas [and would require an alternative landscape plan](#); native grasses or other xeric turfgrasses, [including grasses listed on the No-Water Plant List](#) are more appropriate. [See No-Water Plant List for additional details.](#)

- Page 10/11 – Policies and Exceptions: I don’t see how (A) and (B) are either policies or exceptions. Suggest to make them paragraphs 1.3.5. and 1.3.6.
- Page 12 - Parking Area Islands: This just seems like a direct rehash of LDC 6.2.2.(C)2. It seems like you can just point the reader to this part of the LDC and in case there are changes in the future, you are not having to redo this manual as to not create conflict or highlight any amplification with something like “In addition to the LDC 6.2, the following applies to parking islands ...”.
- Page 20: Buffer and Screen Areas between Differing Uses or Zone Districts: Suggest to delete “or Zone Districts”. I think the main point is different uses vice the actual zone districts because you can have non-residential uses in residential zoning districts and at the same time you don’t want to abutting, but differing residential zoning (e.g., RR-0.5 and RS-2000) districts to have to abide by these rules (e.g., trash collection areas). Page 20 - Buffer and Screen Areas between Differing Uses or Zone Districts: Here is my concern, the guidance and code is lacking with regards to screening between residential and other use types. If you get a chance, take a look at VA198 regarding Mountain Splendor. The picture below is from a resident whose property abutted the commercial property. There are other pictures in that file. The screening below was (shockingly) deemed by the County at the time as acceptable. My argument was that screening did absolutely nothing as I can actually look over, under and through these evergreens and it would have been worse with deciduous trees as seen in the third picture. This type of screening is pathetic and these pictures should be used as examples in the Manual as what screening should not look like. It’s almost an insult to the neighbors and county as a community. In the end, I would think that screening does not need to be generalized as non-residential, but more specific to the actual uses being screened.



- Page 25 – Policies and Exceptions: I don't see how (A) and (B) are either policies or exceptions. Suggest making them paragraphs 1.5.5. and 1.5.6.
- Page 22 – Specifications: Again, the EDARP version used the term “No Water Plant List” and I am pretty sure that does not exist.
- Page 24 (Weird the page numbers jumped back – looks good in the EDARP version) – Recommended Conservation Techniques: I was about to make the comment below and when I went to cut and paste from EDARP it says you can get a waiver for sprinklers, the packet you gave us says sprinklers are discouraged.

- Page 24 – Recommended Conservation Techniques – Something that isn’t included but I think is correct is that watering should not occur during daylight hours due to evaporation and higher wind speeds. I have always heard to water after midnight and before dawn. It seems to make sense, but maybe that’s incorrect.
- General Comment: Would it be good to include a Table of Contents? If you have the headings set up in Word as a “style”, Word can easily create a TOC.

Section 6.2.

I have a bunch of questions and comments about fences as I think 6.2.1. is somewhat light, but I will leave those for the big rewrite.

- Throughout: Unless there is a Landscape and Planting Manual, the name of the Landscape and Water Conservation Manual is called out incorrectly.
- Page 5 – Type of Tree Limited: Suggest to change to read “The types of roadway landscaping trees utilized ~~are~~ ~~shall be commonly known to grow in the Colorado Springs area and~~ listed in the Landscape and Water Conservation ~~Manual~~. As written, the person has to meet two hurdles. 1) it has to be in the manual and (*not or*) 2) it has to be commonly grown in the Colorado Springs area. Not sure how you prove commonly grown in the area. Just have them follow the manual. Additionally, why should someone in the Ramah or Rush areas be held to a standard that they need to plant trees found in the Colorado Springs area. They should be told try to find one in the Manual OR find something that is growing in your area. If you are saying Colorado Springs area is really somewhere in El Paso County, then say El Paso County area.
- Page 5 – Single Family PUD Roadway Landscaping: Am I reading this correctly, a PUD can put landscaping wherever it wants? (Overall 6.2.2. does not apply to PUDs, correct?) Could this not in the long term cost the County at risk due to maintenance due to landscaping issues? I can see flexibility in a PUD, but this seems like a bad idea if I am reading this correctly.
- Page 5 – Required Trees: The name of the manual in the last sentence is incorrect. It is the Landscaping and Water Conservation Manual.
- Page 9 – Outside Storage Area Landscaping Requirements: Out of curiosity, does this cover dust control in these open storage areas? Or is there another part of the LDC that covers something like Dust Control Plans?
- Page 10 – Flexibility in Design Allowed: Suggest to read: “The types of trees selected ~~shall be commonly known to grow in the Colorado Springs area and~~ should be a type listed in the Landscape and Water Conservation Manual.” Or “The types of trees selected should be a type listed in the Landscape and Water Conservation Manual ~~or known to grow in the vicinity~~.” Why should someone in the Ramah or Rush areas be held to a standard that they need to plant trees found in the Colorado Springs area. They should be told try to find one in the Manual OR find something that is growing in your area. If you are saying Colorado Springs area is really somewhere in El Paso County, then say El Paso County area.

- General Comment: I'm not sure that the use of synthetic landscape material is a great idea. Just recently at least two states have bans on the use of artificial grass. I'm not Mr. Environment, but there are studies that artificial turf that contains PFAS can leach the chemical into the groundwater and be hazardous to some people's health. I just hope we aren't trying to "solve" one problem and at the same time creating another for our citizens through second order effects. I just don't want the County and especially the PCD holding the bag if this does become an issue in the future.

As an overall general comment, and this may be personal preference, this handout was tough to read. I'd accept all the format changes before passing it on to the BOCC. All of the format changes in the margin really don't matter to the content changes. This is especially true since no one saw this manual prior (it's revision 0) you can make all the format changes, and no one would be the wiser. As is, it just makes the reading/reviewing that much harder. Again, personal preference.

Thanks for all your hard work on this.

Eric