



Colorado Independent Redistricting Commissions

## Colorado Independent Redistricting Commissions Staff

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# MEMORANDUM

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June 23, 2021

**TO:** Members of the Independent Congressional and Legislative Redistricting Commissions

**FROM:** Colorado Independent Redistricting Commissions Staff

**SUBJECT:** Review of Communities of Interest in Submitted Public Comments

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## Summary

From March 12 to June 18, 2021, the Colorado Independent Redistricting Commissions (commissions) received approximately 1,000 public comments. About 900 comments were received by the close of the congressional redistricting public comment period on June 13, with an additional 100 received June 13-18 before the close of the legislative redistricting public comment period. Many of these comments spoke to communities of interest throughout Colorado. Individuals could provide comments using a submission form on the commissions' website or by emailing staff. All comments, including attachments and those submitted by email, are posted publicly on the commissions' website. This memorandum both provides an overview of how the Colorado Constitution defines communities of interest and summarizes the comments the Colorado Independent Redistricting Commissions received about Colorado's communities of interest.

## Communities of Interest Overview

The Colorado Constitution defines "community of interest" as any group in Colorado that:

1. shares one or more substantial interests that may be the subject of legislative action (federal legislative action in congressional redistricting and state legislative action in state legislative redistricting);
  2. is composed of a reasonably proximate population; and
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3. should be considered for inclusion within a single district for purposes of ensuring its fair and effective representation.<sup>1</sup>

The Colorado Constitution provides the following examples of possible shared public policy concerns:

- agricultural areas;
- education issues;
- employment issues;
- environmental issues;
- industrial areas;
- public health issues;
- rural areas;
- trade areas;
- transportation issues;
- urban areas;
- water needs and supplies; and
- issues of demonstrable regional significance.<sup>2</sup>

The Colorado Constitution also says that groups that may comprise a community of interest include racial, ethnic, and language minority groups. Specifically excluded from the definition of community of interest are relationships with political parties, incumbents, or political candidates.<sup>3</sup>

## General Comments

Those who submitted comments to the commissions identified the following communities of interest in Colorado:

- people living in agricultural and rural areas;
- communities whose populations consist primarily of people of color, including Hispanic/Latino communities;
- specific regions such as the Eastern Plains, the San Luis Valley, and the Western Slope;
- communities in homeowners' associations;
- institutions of higher education;
- military personnel and veterans;
- people living in mountain resort areas;
- recreational areas, such as the Arkansas River and Rocky Mountain National Park;
- public health departments and districts;
- school districts;
- shared economic concerns, such as tourism, affordable housing and homelessness, oil and gas extraction, or wind energy;
- shared policy concerns, such as crime or climate change;
- transportation corridors and public transportation networks;
- urban areas; and
- watersheds and river basins.

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<sup>1</sup> Colo. Const. art V, § 44 (3)(b)(I), Colo. Const. art. V, § 46 (3)(b)(I).

<sup>2</sup> Colo. Const. art. V, § 44 (3)(b)(II), Colo. Const. art. V, § 46 (3)(b)(II)

<sup>3</sup> Colo. Const. art. V, § 44 (3)(b)(III and IV), Colo. Const. art. V, § 46 (3)(b)(III and IV).

Many of those who submitted comments to the commissions did not discuss communities of interest, or dismissed them all together. Some commenters suggested that rather than focusing on communities of interest, the commissions should focus on using major thoroughfares, county lines, and rivers to define districts. Other commenters discussed the value of creating competitive districts, or preserving political boundaries, and noted that adhering to these values could conflict with preserving communities of interest. Other commenters asked that disparate areas, such as urban and rural communities, specifically be grouped together to create more competitive districts.

Many commenters provided specific maps drawn using free redistricting software to suggest specific potential districts to the commissions. While not included in this memo, the commissions' nonpartisan staff is cataloging these maps for the commissions' review.

## **Regional Comments**

This section discusses areas of the state where people submitted comments on larger regions containing unique communities of interest. Comments specific to a particular county are discussed in more detail in the next section.

**Eastern Plains.** Three regional advocacy groups submitted comments proposing the creation of a congressional map designating two potential rural congressional districts and six potential Front Range congressional districts. The proposal included all of the Eastern Plains in a single district along with southeastern Colorado, the San Luis Valley, and Pueblo. One of the advocacy groups who authored a comment supporting this proposal, Pro 15, represents interests in the northeastern part of Colorado. They listed the communities of interest for this area as industries related to agriculture, business, education, entrepreneurship, health care, oil and gas, renewable energy, transportation, and water needs. The following counties submitted resolutions from their Boards of County Commissioners supporting this proposal: Baca, Crowley, Kit Carson, Morgan, and Washington.

**Mountain Communities.** A number of comments asked that mountain communities, particularly those with a high volume of ski tourism, be included together in a single congressional district. The comments cited shared economic concerns including tourism, housing, and health-care costs. One comment discussed policy concerns resulting from high populations of part-time residents, both transient workers and second-homeowners. Other comments identified shared environmental concerns including water conservation, wildfire and drought, public lands, methane and oil and gas development, and climate change. Counties that would be included in a group of mountain communities varied, with all of the following being proposed at least once: Archuleta, Boulder, Chaffee, Clear Creek, Custer, Eagle, Fremont, Grand, Gunnison, Hinsdale, Jackson, La Plata, Lake, Larimer, Mineral, Ouray, Park, Pitkin, Rio Grande, Routt, Saguache, San Juan, San Miguel, and Summit. The most commonly suggested grouping of counties was Eagle, Grand, Pitkin, Routt, and Summit.

**Southern Colorado/San Luis Valley.** The commissions received a number of comments concerning southern Colorado and the San Luis Valley. Many of these comments requested that the six counties of the San Luis Valley (Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties) be kept together, noting key agricultural, cultural, economic, environmental, geographic, recreational, rural, and water issues that they have in common. Many comments noted the historic ties between the San Luis Valley and Pueblo, dating back to the time when the

Arkansas River was the border between the United States and Mexico, and asked to keep these communities together.

Many comments further supported putting Pueblo and the San Luis Valley in a district with the Eastern Plains, but some had other suggestions. One comment identified the watersheds of the Arkansas, San Juan, and Rio Grande river valleys as a community of interest and drew a congressional district encompassing these watersheds and river valleys along the southern edge of the state. Another comment suggested combining a portion of El Paso County, Pueblo, and some south central counties to create a southern Colorado congressional district.

**Southwest Colorado.** A comment about keeping southwest Colorado together in a single state house district cited geography and economic integration. The comment identified the following counties as being in this potential state house district: Archuleta, Dolores, La Plata, Montezuma, and San Juan. This district would specifically exclude Gunnison, Hinsdale, and Ouray Counties. The comment highlighted that Gunnison County is separated by mountains, and in a different watershed than Archuleta, La Plata, and San Juan Counties. One comment asked to keep the communities of Bayfield, Durango, Ignacio, Mancos, Pagosa Springs, and Silverton together. Another related comment noted that the mountain passes, which can be difficult to traverse in the winter, should be considered as dividing lines between districts. Essentially, this comment argued that a representative should be able to travel easily through all parts of a district.

Other comments requested keeping an existing state house district of Archuleta, Gunnison, Hinsdale, La Plata, and Ouray Counties, stating that they have similar social, environmental, and economic needs, including economies oriented around tourism. These comments suggested that Montezuma County is primarily agricultural in nature and thus contains a community of interest distinct from other southwest Colorado counties.

## County Specific Comments

This section summarizes the comments received concerning communities of interest in specific Colorado counties. While the comments addressed most of the state, no specific comments were received for the following counties: Bent, Cheyenne, Custer, Delta, Hinsdale, Kiowa, Lincoln, Moffat, Phillips, Rio Blanco, and Sedgwick.

**Adams County.** Concerning the placement of Adams County in a congressional district, the commissions received comments arguing that Adams County should be kept whole except for portions of the City of Aurora. Some of these comments suggested that a single congressional district should combine Adams County with Broomfield, the Jefferson County portion of Westminster, and additional portions of Jefferson and Weld Counties as necessary to keep cities (such as Arvada and Brighton) whole and meet the population requirements.

One comment noted as a public policy concern the presence of the state's only oil refinery in Adams County, and the resulting pollution problems.

One comment requested to keep Westminster in a single congressional district, expressing a preference for keeping the Adams County portions of Westminster in the current Congressional District 7 with the Jefferson County portions of Westminster. This comment noted oil and gas development as a policy concern in Westminster and suggested similarities with Lakewood and Arvada. However, several other comments expressed a desire to keep Westminster in two separate state legislative districts split along the Jefferson County and Adams County line.

Some comments suggested that Denver International Airport is a community of interest, with areas in both Adams and Denver Counties, because it is a large employer and economic force in the state. This comment noted a number of policy debates between Adams and Denver Counties over airport-related issues.

Comments were also received describing the Latino community in Adams County, including in Brighton, Commerce City, Northglenn, and Thornton. They noted that rising housing costs in metro Denver have pushed many families, especially Latino families, into the more affordable areas of Adams County, where they have built strong communities. Others suggested that parts of Adams County could be combined with southern Weld County to include more members of the Latino community in a district.

One comment describing Commerce City noted that the city is expanding and needs new affordable housing options and infrastructure. Another comment about Commerce City noted that the city has had policy challenges regarding education, pollution, and water. Comments about Brighton noted that Latino families have established roots in the community because of affordable housing and proximity to jobs. In addition to the Latino community, other comments noted that there are significant African American, Asian American/Pacific Islander, Muslim and Sikh, and Eastern European populations in western Adams County as well.

One comment suggested that state house and senate districts that cover the Adams County portion of Aurora should also include Commerce City and the Reunion neighborhood due to economic connections such as the airport and the Anschutz Medical Campus. However, a number of comments, which can be found in the Arapahoe County section, suggested keeping northwest Aurora neighborhoods with Arapahoe County portions of Aurora in state legislative districts.

Concerning the placement of Adams County in a state house or senate district, one comment suggested that 104th Avenue and the areas north of it, as well as the entirety of Northglenn, could constitute a single state house or senate district to the extent that population allows. The comment further suggested that a state house or senate district could combine areas south of 104<sup>th</sup> Avenue in Thornton with other areas of Adams County including Federal Heights. Finally, a third district could combine eastern portions of Thornton, east of Holly Street, with portions of Brighton and Commerce City.

**Alamosa County.** The Alamosa Board of County Commissioners submitted a comment requesting that a state senate district combine the counties of the San Luis Valley with portions of Pueblo County and all of the Arkansas River Valley (Baca, Bent, Crowley, Custer, Huerfano, Kiowa, Las Animas, Otero, and Prowers Counties). This comment stated that agriculture is the main economic driver in both the San Luis Valley and southeastern Colorado, and noted that the areas have similar water compacts and similarly declining populations. Additional comments regarding Alamosa County are located under “Southern Colorado/San Luis Valley.”

**Arapahoe County.** One comment asked to keep Arapahoe County whole in a congressional district, noting that in 2024 it will be a whole judicial district. This comment also suggested a single district would promote cooperation between school districts and water districts. Other comments addressed north Aurora, Centennial, and unincorporated Arapahoe County.

Some comments discussing north Aurora noted that while this area is split between Adams and Arapahoe County, state legislative districts should keep north Aurora together. One of these

comments also suggested including far northeast Denver in north Aurora districts. These comments cited policy concerns for this area including economic mobility, housing and homelessness, and human trafficking. One comment suggested that separate congressional districts for Aurora and Denver are no longer appropriate as these areas are closely intertwined.

Other comments expressed the importance of keeping Aurora together in a single congressional district, noting that it has a diverse population with many new citizens. One of these comments explained that while there are not many Asian American and Pacific Islander communities in Colorado, many of them are in Aurora. This comment went on to request that the congressional district including Aurora not include Parker because Parker is much less diverse. Several other comments suggested Aurora and Parker should remain in separate congressional districts. Several commenters of Armenian descent suggested that the commissions should treat the Armenian community in Aurora as a community of interest that shares public policy concerns such as the recognition of genocide in Armenia.

One comment asked that the city of Centennial be kept in one district, but did not cite specific communities of interest justifying this request.

One comment from unincorporated Arapahoe County in the southeastern part of the Denver metro area explained that the commenter's family's interests are most aligned with people living in Aurora, noting that the commenter's neighborhood is part of the Cherry Creek School District and the South Metro Fire District. Another comment about unincorporated Arapahoe County cited policy concerns related to the environment, the economy, public health, health care, immigration, affordable housing, and education.

One comment asked that the Heather Gardens neighborhood of Aurora be kept in a single state house district, but also supported the current state senate districts that split the neighborhood between two state senators. The comment described the neighborhood as an established and secure age-restricted community.

**Archuleta County.** Comments regarding Archuleta County are located under "Southwest Colorado" above.

**Boulder County.** The commission received comments concerning Boulder County that were primarily related to maintaining a congressional district that encompasses both Boulder and Fort Collins, as well as including Longmont with the rest of Boulder County. One comment stated that Boulder County is a community of interest and should not be split in a congressional map. Others suggested that keeping urban areas or mountain areas together would be more valuable than prioritizing county lines. Additional commenters described similarities between the cities of Longmont and Boulder, including shared values and public policy concerns relating to environmental issues, public transportation, outdoor recreation, and affordable housing.

One comment stated that Boulder's economy has little in common with mountain counties and argued that it is tied more closely to the Denver metro area and Larimer County. Another comment noted that the City of Boulder faces public policy challenges concerning development, growth, and traffic.

One comment described Lafayette as drawing families who remain connected to Boulder but choose to live further east due to Boulder's high housing costs.

One comment on Louisville suggested that Louisville residents value access to the outdoors and safe bike commuting opportunities. Additionally, this comment described people in Louisville's commitment to quality K-12 education and the innovation economy.

Regarding state house and senate districts, one comment suggested that the Independent Legislative Redistricting Commission could group Boulder County's state house districts as follows: one for Longmont, one for southeast Boulder County (Lafayette, Louisville, and Superior), one for most of the City of Boulder, one for the mountain areas of Boulder County, and one placing the eastern portion of Longmont with part of southeastern Weld County. This comment also noted that communities along Highway 287 share a relationship with the City of Boulder including policy values regarding open space and the environment.

Additional comments regarding placing Boulder and Fort Collins in the same congressional district are included under Larimer County.

**City and County of Broomfield.** One comment wrote that Broomfield is a suburban community in between Denver and Boulder that shares economic interests with neighboring communities such as Golden, Lafayette, Louisville, Superior, and Westminster. Comments listed the following policy issues as important to Broomfield residents: transportation, education, development and zoning, health care, tax rates, parks and recreation, environmental concerns related to fracking, protecting individual rights, and social issues.

**Chaffee County.** The commissions received several comments asking to keep Chaffee County whole and include it with other mountain or rural communities in a congressional district. Some of the reasons given for this request were to preserve communities of interest related to environmental and economic reasons. Some commenters highlighted the importance of the Arkansas River to this region. Listed in the comments as considerations for the area were the agriculture, outdoor recreation, tourism economies, as well as affordable housing concerns. One commenter suggested grouping Chaffee County with Eagle, Pitkin, and Routt Counties in a congressional district, while another commenter suggested possibly pairing Chaffee County with Pueblo. Another commenter suggested grouping Chaffee and Gunnison Counties together, along with possibly the northern portion of the San Luis Valley due to the areas all having shared agriculture economies. Commenters discussed not including Cañon City or Colorado Springs with Chaffee County because the areas have different economic drivers. Specific economic drivers for Cañon City and Colorado Springs were listed as corrections and defense, respectively.

One comment discussed Chaffee County's connections to communities to the east and southeast, through the Upper Arkansas Area Council of Governments, the Southern Colorado Economic Development District, and transportation planning regions aligned with the San Luis Valley or other mountain counties.

For state house and senate districts, some commenters felt Chaffee County fits better with Delta, Gunnison, Lake, Pitkin, and Summit Counties than its current state house district with Fremont County. This is a similar configuration to Chaffee's current state senate district, which these commenters support. One comment noted public policy priorities in the county as affordable housing, broadband and technology, wildfire mitigation, and preserving public lands. Another comment noted the importance of farming, ranching, and outdoor recreation to the Chaffee County economy.

**Clear Creek County.** No comments were received specific to Clear Creek County, but some comments addressing Eagle and Gilpin Counties included Clear Creek County.

**Conejos County.** Comments described Conejos County as rural, stating that its economy primarily depends on farming and ranching. This comment noted communities of interest rooted in protecting natural resources including water resources, improving educational opportunities, fostering higher education and technical training, and promoting economic development. Additional comments regarding Conejos County are located under “Southern Colorado/San Luis Valley” above.

**Costilla County.** Comments regarding Costilla County are located under “Southern Colorado/San Luis Valley” above.

**City and County of Denver.** Many comments recommended that the entirety of Denver remain in a single congressional district. One discussed policy concerns such as homelessness and federal funding for Denver International Airport, noting that these issues are unique to Denver proper, rather than the entire metro area.

Conversely, some comments felt Denver should not be its own congressional district, arguing that it shares policy concerns and common interests with the surrounding suburbs. One comment outlined the following five distinct areas for metro Denver: western suburbs, eastern suburbs, northern suburbs, southern suburbs, and the city center.

Other comments addressed specific areas of Denver:

- Baker: this comment cited crime as a legislative concern for the neighborhood and then stated that the community wants a competitive district.
- Bear Valley: this comment said the neighborhood and the southwest portion of Denver have little in common with the rest of the city.
- Central Denver: one comment said this area shares similar concerns with eastern Lakewood and northwest Aurora, including smart growth, gentrification, transportation, and homelessness. Another comment said central Denver neighborhoods share economic and ethnic diversity. One comment described unique features of central Denver residents as: high reliance on public transportation, high environmental impacts, high demand for affordable housing and homeless services, and high reliance on public education despite being largely affluent young professionals.
- Green Valley Ranch: one comment, noting far northeastern Denver’s close economic ties to Denver International Airport, suggested that a new congressional district could center around the airport, although another comment responded that Green Valley Ranch is distinctly a part of Denver and should not be separated from the rest of the city.
- Northeast Park Hill: one comment said many people from this neighborhood move to areas such as Commerce City or Aurora for more affordable housing but maintain ties to the neighborhood. This comment suggested the commission should connect Denver neighborhoods to suburban neighborhoods to preserve connections among Black and Latino populations.
- West Denver: one comment suggested this area shares policy concerns over preserving clean air, water, and wildlife.

**Dolores County.** Comments regarding Dolores County are located under “Southwest Colorado” above.



**Douglas County.** The commissions received comments about Douglas County primarily arguing that it is more of an urban or suburban area, rather than an agricultural area. Some comments asked that the Independent Congressional Redistricting Commission keep Douglas County whole in one congressional district. Other comments specifically requested that the Independent Congressional Redistricting Commission include Highlands Ranch and Roxborough Park in a more urban congressional district, and highlighted the connections between these two communities in regard to education and economy. Another comment asked that the commission group Parker with more urban areas, noting that there is no longer agriculture in the Parker area and that instead most people in Parker are professionals who commute to other parts of the Denver metro area. Conversely, some comments from Aurora expressed concern about Aurora being grouped with Parker in a congressional district, noting that suburban Douglas County is much wealthier and less diverse than Aurora.

**Eagle County.** The commissions received several comments stating that Eagle County should be contained in congressional and legislative districts with mountain towns because the ski industry and tourism are key components of the county's economy. Some comments stated that Eagle County, and other mountain areas, have similar legislative concerns about issues such as: affordable housing, broadband access, education, health care and insurance costs, housing, and environmental issues. One comment also referenced the 40 percent Hispanic population in the county.

Several comments specifically asked to keep Eagle and Routt Counties in a shared state legislative district, identifying policy concerns like drought and water conservation, wildfire mitigation, public lands, oil and gas development, climate change, affordable housing, health insurance, higher education, transportation, and family agriculture. One comment noted that Eagle and Routt Counties each have only one health insurance plan available on the state exchange.

Specific to the Town of Avon, a comment listed communities of interest rooted in outdoor recreation, land and water conservation, wildlife conservation, and hunting. The comment highlighted land and water use as a public policy concern for the area, and outlined the following geographic features of the area: the Holy Cross Wilderness Area, White River National Forest access, and wildlife corridors. The comment concluded by discussing concerns about water resources and discussed the Homestake Reservoir and Ogallala Aquifer.

Specific to Basalt, some comments indicated it should be in a legislative district with other mountain communities because of shared economic and policy interests, such as outdoor recreation and environmental issues. One comment suggested using watersheds for legislative district boundaries and highlighted affordable health care as a public policy concern. One comment noted that Basalt is split between Eagle and Pitkin Counties but should be in the same legislative district as the surrounding mountain resort areas.

Some comments identified the communities in the Vail Valley as a community of interest and suggested the commissions place the mountain resort communities together in the same legislative and congressional districts. One specific suggestion was for the commissions to group the Town of Eagle with the rest of the Vail Valley. Another comment listed the following municipalities as an appropriate grouping for legislative districts: Avon, Beaver Creek, Eagle, Edwards, Gypsum, and Vail. The comment discussed how the economies in this area are tied together, including through retail and basic services. The comment also discussed public policy matters that are common to this area including those related to affordable housing, education,

energy, environment, health care, infrastructure, need for essential workers, public utilities, and water resource management.

More about shared interests among mountain counties are located under “Mountain Communities” above.

**Elbert County.** Some comments the commissions received regarding Elbert County suggested the Independent Congressional Redistricting Commission place Elbert County in the same congressional district as either Denver or Colorado Springs, rather than Eastern Plains counties. One comment suggested the commission place northwest Elbert County in a more urban legislative district because many residents in northwest Elbert County work in Denver metro area and utilize services, such as retail and medical services, from the metro area. Another comment suggested the commissions combine Arapahoe, Douglas, and Elbert Counties, possibly with a portion of Colorado Springs, into a single congressional district because of economic and educational factors. One comment described wind energy generation on the commenter’s family’s farmland in Elbert County, noting that wind energy generation is linked to the companies that produce the turbines and those that transmit it to consumers. This comment noted that the commenter’s wind farm is part of a wind energy project that includes turbines in Arapahoe, Cheyenne, Elbert, Kit Carson, and Lincoln Counties.

**El Paso County.** Comments highlighted that El Paso County has a significant active military population and a large number of veterans. One comment identified the Pikes Peak Rural Transportation Authority as a community of interest for El Paso County. One comment cited common interests in El Paso County about water supplies and wildfire response. Some comments expressed the importance of keeping El Paso County in a single congressional district, while other comments expressed a desire for the commissions to split El Paso County between two congressional districts, combining the southern portion with Pueblo and southern Colorado.

Several comments from Manitou Springs asked that the commissions keep it in legislative districts that also include Colorado Springs, rather than El Paso County’s more rural communities to the west. One described communities of interest as the area’s art and music economies and its school system. Another noted that Manitou Springs shares public transit lines and utilities infrastructure with Colorado Springs.

Regarding the city of Colorado Springs, one comment described the following older neighborhoods as having similar character and commercial interests, along with Manitou Springs: West Colorado Springs, Garden of the Gods, Cheyenne and Bear Creek Canyons, Ivywild, Monument Creek, Old North End, Shooks Run, Fountain, Memorial Park, and downtown Colorado Springs. This comment drew a distinction the Upper Ute Pass communities of Cascade, Chipita Park, Green Mountain Falls, and Crystola, arguing that these more rural communities have more in common with Woodland Park in Teller County.

Some comments discussed current state house District 17, which covers portions of southeast Colorado Springs near the Colorado Springs airport. These comments state that this district is one of the most diverse districts outside of Denver, with large numbers of nonwhite residents.

One comment requested that the Independent Legislative Redistricting Commission unite the El Paso County communities west of Interstate 25 in single state house and state senate districts, stating that these communities are similarly situated without providing specific details.

Additional comments about El Paso County are located under “Southern Colorado/San Luis Valley” above.

**Fremont County.** One comment asked that Fremont County be in a separate legislative district from Colorado Springs, but did not offer any specific communities of interest. The Fremont County Board of Commissioners submitted a resolution supporting the proposal for two rural congressional districts, one on the Western Slope, and one with the Eastern Plains and Southern Colorado. This proposal is described above under “Eastern Plains.” The Teller County section of this memo also includes discussion of a Fremont County community.

**Garfield County.** One comment from Glenwood Springs noted that there are significant Latino populations throughout Colorado, including in mountain communities in Eagle, Garfield, and Pitkin Counties. Other comments asked that the commissions not link Garfield County with any Front Range counties in a congressional district, noting that Garfield County shares economic interests of tourism, agriculture, and natural resources with other Western Slope counties.

**Gilpin County.** The comments concerning Gilpin County requested that the commission keep the county whole in any legislative districts. One comment listed Gilpin County’s rural nature and school district as factors for the commissions to consider in redistricting. Comments suggested the commissions draw legislative districts keeping Gilpin County with Nederland in Boulder County and Idaho Springs in Clear Creek County because of municipal services, retail and economic, and environmental factors. Another comment suggested the Independent Congressional Redistricting Commission keep Gilpin County with current Congressional District 2, but did not list specific factors or communities of interest. One comment listed Black Hawk, Central City, Rollinsville, and unincorporated Black Hawk as a community of interest because of their rural nature. Another comment listed a number of community services, such as a community center, athletic fields, and transportation services, as communities of interests, as well as the gaming industry and sewer and water policies.

**Grand County.** Conflicting comments were received regarding Grand County. Some comments suggested the Independent Congressional Redistricting Commission should ensure that Grand County remain in the same congressional district as Boulder and Larimer counties, while other comments suggested the commission instead include Grand County in a congressional district with the Western Slope. One comment suggested that Grand County is most similar to Eagle, Pitkin, Routt, and Summit Counties. Some of the comments identified the tourism economy as a concern that Grand County shares more with the current Congressional District 2. Others suggested that Grand County shares rural economic drivers, such as agriculture and hunting, more with the current Congressional District 3. One comment highlighted water, public lands, and natural resources as of importance to Grand County. Others discussed wildfire mitigation and affordable housing as public policy concerns in Grand County.

**Gunnison County.** Comments on Gunnison County are located under “Southwest Colorado” and “Mountain Communities” above.

**Huerfano County.** The commission received one comment received stating that the commission should not include Pueblo and Huerfano Counties in a congressional district with the Western Slope, but the comment did not list any specific communities of interest or areas of public policy concern. Additional comments are located under “Southern Colorado/San Luis Valley” above.

**Jackson County.** Comments on Jackson County are located under “Mountain Communities” above.

**Jefferson County.** A large number of comments focused on Jefferson County. Some comments asked that the Independent Congressional Redistricting Commission keep Jefferson County whole in a single congressional district, and cited the county's single school district as a shared community of interest. Many others focused on specific regions of the county.

Regarding rural communities in Jefferson County, comments expressed concerns about placing foothill areas with Denver suburbs like Lakewood. One identified access to broadband as a public policy concern for mountain communities. One said that Evergreen area residents share policy concerns over fire mitigation. Another comment said that the commission should not group Conifer with Park County or Colorado Springs. One comment suggested that the Independent Legislative Redistricting Commission could divide unincorporated areas of Jefferson County into two state legislative districts – one with more mixed suburban areas and one with more foothills and open space. Several comments asked that the commissions keep unincorporated foothills communities, such as Dakota Ridge and Morrison, be in separate state legislative districts from the municipal areas of Jefferson County like Golden.

Regarding Lakewood, many comments asked that the Independent Congressional Redistricting Commission not place Lakewood in a congressional district with Douglas County, noting that Lakewood has more in common with other Jefferson County cities like Arvada, Golden, and Wheat Ridge. One comment asked that commission keep Lakewood together in a single district and discussed shared transportation, community resources, economic development, and housing needs. This and other comments noted that many science and technology jobs in the region are shared between Lakewood (federal center) and Golden (National Renewable Energy Laboratory and the Colorado School of Mines). One comment described high-density housing, public transportation, and services for people living in poverty as shared needs between Lakewood and the northern portions of Jefferson County, while another noted that many northern Jefferson County municipalities are serviced by Denver Water. Other comments described the Green Mountain area in Lakewood, particularly its parks and cultural spaces, and added that many people in the area often spend time in Arvada, Golden, and Wheat Ridge for shopping and cultural activities.

One comment described transportation issues as legislative concerns in Jefferson County, noting that it is difficult to move between cities that are otherwise close together, such as Arvada, Golden, Lakewood, Westminster, and Wheat Ridge. Additional comments about Arvada and Wheat Ridge asked to keep the two communities together. A member of the West Metro Fire Protection District Board wrote to suggest that the Independent Congressional Redistricting Commission keep this special district whole as a community of interest in the same congressional district. One comment detailed the aerospace industry in Jefferson County, particularly in Golden and Arvada. Another comment asked that the Independent Congressional Redistricting Commission keep Arvada whole in a congressional district, noting shared policy concerns of attainable housing, transportation, and climate change.

Some comments suggested that the commissions should continue to divide Westminster into separate legislative districts along the Jefferson County and Adams County line, noting that the school districts and public health departments are different in the two counties.

One comment from a member of the Edgewater City Council explained that the City of Edgewater is more connected to Jefferson County than Denver, citing specifically the city's partnerships with Golden, Lakeside, Mountain View, and Wheat Ridge. Another comment suggested that the Independent Congressional Redistricting Commission should place the portions of Jefferson

County that are in the current Congressional District 1 in the same congressional district as the rest of Jefferson County.

**La Plata County.** One comment pointed out that La Plata County contains both urban and rural areas and would be better served in a large district across the southern portion of the state. This comment suggested that if the Independent Congressional Redistricting Commission put the entire Western Slope in one congressional district, it would dilute the voting power of the state's rural areas. The comment further argued that creating southern and northern congressional districts would incorporate a better mix of urban and rural communities. Some comments suggested that a common interest between La Plata and Gunnison Counties was their public institutions of higher education, Fort Lewis College and Western Colorado University. Several comments discussed keeping Montezuma and La Plata Counties separate. Additional comments on La Plata County are located under "Southwest Colorado" above.

**Lake County.** Comments about Lake County are located under the Summit County section and under "Mountain Communities" above.

**Larimer County.** A large number of comments focused on Larimer County. Many comments suggested that the Independent Congressional Redistricting Commission should include the county, and Fort Collins in particular, in the same congressional district as Boulder because of similarities such as their location in the foothills and their major universities leading to similar economies. Other comments cited environmental concerns as similar for the two areas, as well as Estes Park and Loveland. Additional comments listed the following factors in common for the two areas: research components and high-tech relationships, aeronautical science and development, tourism, outdoor recreation, clean energy, health-care systems, the pharmaceutical industry, forest fires, and the Poudre River. Another commenter highlighted the importance of Rocky Mountain National Park to Larimer County, noting that the park extends into Boulder and Grand Counties. A few comments responded that the commission should place Larimer and Boulder Counties should in separate congressional districts. One said that Larimer County maintains a more agricultural economy.

One comment suggested that a region of shared interests for Larimer County would extend north to the Wyoming border, south to Interstate 70, west to the Continental Divide, and east to Interstate 76.

Some comments suggested the Independent Congressional Redistricting Commission place Larimer County with Weld County in the same congressional district due to agricultural, economic, energy, and transportation issues. Other comments were very adamant about the commission not placing Larimer County in the same congressional district as Weld County, stating that they have very different economic concerns. One comment from Loveland asked that the commission keep Loveland distinct from Weld County due to differing approaches to oil and gas development.

Comments were received that Berthoud, which is in both Larimer and Weld Counties, is no longer rural in nature and the commission should include Berthoud in a more urban legislative district. Some commenters highlighted the connection that Berthoud has with Boulder, Longmont, and Loveland in terms of economic ties.

In Fort Collins, one comment said Colorado State University (CSU) is the largest employer and economic contributor in the area, and suggested that residential areas near the CSU campus should be in the same state legislative districts.

Finally, a comment suggested that Larimer County could have four wholly contained state senate districts, and another comment requested that the Independent Legislative Redistricting Commission keep state house and senate districts wholly within Larimer County.

**Las Animas County.** One comment noted the large Latino population in Las Animas and Otero Counties as a reason for the commissions to place these counties in a district with Pueblo County and the San Luis Valley counties.

**Logan County.** Comments regarding Logan County discussed grouping it with counties with similar interests, specifically agriculture and energy production.

**Mesa County.** One comment from a group of individuals suggested that Mesa County would be better represented in a district stretching along Interstate 70 into the mountains. They noted that this grouping would increase representation for Latino and Native American communities.

**Mineral County.** Comments about Mineral County are located under the “Southern Colorado/San Luis Valley” section above.

**Montezuma County.** Some comments discussed the Independent Legislative Redistricting Commission keeping Montezuma County in separate legislative districts from La Plata County. See further discussion under “Southwest Colorado” above.

**Montrose County.** Comments about Montrose County noted the economic drivers of tourism, farming, ranching, and hunting, similar to the rest of the Western Slope. They also noted the large population of retirees in the area.

**Otero County.** One comment noted the large Latino population in Otero and Las Animas Counties as a reason for the commission to place these counties in legislative districts with Pueblo County and the San Luis Valley counties. A comment suggested that the Southeast Colorado Power Association, a large electric cooperative, be treated as a community of interest for southeast Colorado. The Otero County Board of Commissioners submitted a resolution supporting a proposal for two rural districts, one on the Western Slope, and one with the Eastern Plains and Southern Colorado. More information about this proposal is located under “Eastern Plains” above.

**Ouray County.** Comments about Ouray County are located under “Southwest Colorado” above.

**Park County.** The commissions received several comments that the commissions should keep Park County whole. Some comments highlighted the rural nature of Park County. One comment noted the large ranching presence in Park County, noting that the county’s interests are different from those of Boulder or other metro Denver communities. One comment suggested that the commissions should group Park and Jefferson Counties together, while keeping Park County separate from Colorado Springs due to taxation levels, as well as general political and lifestyle interests. Other comments suggested placing Park County in a congressional district with Boulder County, but did not specify any communities of interest. See the section on Teller County for additional discussion of a Park County community of interest.

**Pitkin County.** Comments about Pitkin County highlighted public policy concerns for the area as affordable health and child care, the importance of immigrant labor, public lands, and gun control. Additional comments regarding the commissions grouping Pitkin County with other ski area counties can be found under “Mountain Communities” above.

**Prowers County.** One comment from Prowers County discussed wind energy creation on the Eastern Plains. It also described a wind power transmission line from Brush to Douglas County as a reason for the commissions to keep the Eastern Plains together with Douglas County.

**Pueblo County.** The commissions received many comments asking that Pueblo County be kept in a single congressional district and arguing that Pueblo County has more in common with the San Luis Valley than the Western Slope. Several commenters, including major advocacy groups for the region, thought the Independent Congressional Redistricting Commission should group Pueblo in a congressional district with the Eastern Plains, but other comments expressed a preference for the commission to keep Pueblo in a congressional district with the rural communities of the Western Slope. Some comments in the latter group cited the presence of the Colorado State Fair in Pueblo as evidence of a shared interest in agriculture with the Western Slope.

One comment asked that the commissions place Pueblo in the same legislative districts as the rest of the Arkansas River Valley. Common public policy areas and communities of interest related to economic development, educational needs, transportation, and water resources. Some comments suggested that Pueblo is more urban than rural. Some noted the large number of veterans residing in Pueblo County. Another said that many retirees live in Pueblo and Pueblo West. One asked that the commission not split Pueblo West into a different legislative district from the rest of Pueblo. Another comment identified Pueblo as a Front Range city, distinct from major cities on the Western Slope.

One comment provided extensive information about a potential congressional district for Pueblo that would split El Paso County in two at Pikes Peak Avenue in Colorado Springs, and then include any area south of that boundary with Pueblo County. This would create a congressional district focused on the south central portion of the state.

One comment from Beulah stated that the Independent Legislative Redistricting Commission should return Beulah to the same state senate district as Pueblo County, rather than the state senate district including the San Luis Valley. Some comments objected to including a portion of Pueblo in a state house district with the San Luis Valley, but others argued that these areas should be kept together as a way to preserve historic ties and increase Hispanic representation.

Additional discussion of Pueblo County are located under “Southern Colorado/San Luis Valley” above.

**Rio Grande County.** Comments about Rio Grande County are located under “Southern Colorado/San Luis Valley” above.

**Routt County.** Many comments came in from Routt County. Comments identified the skiing, recreation, and tourism industries as a community of interest for Routt County. Several requested that the commissions distinguish Routt County from more rural ranching and agricultural communities to the west. Commenters also discussed environmental issues such as climate change as public policy concerns for Routt County. Another comment described the vibrant visual and performing arts communities in Routt County.

Conversely, other comments from Routt County said it was more appropriate for the Independent Congressional Redistricting Commission to keep Routt County in a congressional district with Western Slope counties, noting the ranching, agriculture, and energy industries in the county.

One comment noted policy interests in preserving oil and gas development and preventing urbanization.

More discussion about grouping Routt County with other mountain counties are located under “Mountain Communities” above.

Regarding state legislative districts, one commenter suggested Routt County has more in common with Grand and Jackson Counties than with Garfield, Moffat, and Rio Blanco Counties. Several comments specifically asked that the Independent Legislative Redistricting Commission to keep Eagle and Routt Counties in a shared state legislative district, identifying policy concerns like drought and water conservation, wildfire mitigation, public lands, oil and gas development, climate change, affordable housing, health insurance, higher education, transportation, and family agriculture.

**Saguache County.** Comments about Saguache County are located under “Southern Colorado/San Luis Valley” above.

**San Juan County.** Comments about San Juan County are located under “Southwest Colorado” above.

**San Miguel County.** Some comments asked that the commissions place Telluride in districts with other mountain communities and kept separate from more urban centers.

**Summit County.** Comments frequently addressed Summit County in conjunction with other mountain communities dependent on tourism. More comments on are located under “Mountain Communities” above. The Summit County Board of County Commissioners wrote jointly to ask that Summit County the Independent Congressional Redistricting Commission include Summit County in a congressional district with other central mountain communities and the Front Range. They cited as common interests the construction industry, the environmental impacts of recreational and tourism activities, and affordable workforce housing.

One comment described education needs throughout Summit County and the surrounding area as a community of interest. Another comment asked that the commissions keep Summit County separate from Routt and Eagle Counties in state legislative districts, arguing that those counties have both agricultural and tourism economies, while Summit County’s economy is primarily tourism. One comment cited the Lake County Link that connects Summit and Lake Counties as a community of interest. One comment said that public safety is a public policy concern for the Town of Heeney, and argued that this town shares a community of interest with the area of Summit County north of Silverthorne but south of Grand County.

**Teller County.** One comment felt that Teller County has different policy concerns than El Paso County, even though Teller County residents use many El Paso County services. This comment cited healthy watersheds and rural public utility needs as policy concerns. Another comment from Woodland Park described Teller County as a rural mountain and mining community with more in common with the Western Slope than the Front Range. One comment described the Four Mile area, which spans Fremont, Park, and Teller Counties. This comment explained that people in this area regularly shop, worship, and congregate in all three counties, as well as traveling to Colorado Springs for services as necessary.



**Washington County.** One comment listed farming, ranching, and oil and gas development as communities of interest for Washington County. An additional comment regarding Washington County are located under “Eastern Plains” above.

**Weld County.** The commission received a number of comments from Weld County. Most of the comments distinguished the rural eastern part of the county and the more urban areas of Greeley and the Interstate 25 corridor. Some, however, argued that it was important for the Independent Congressional Redistricting Commission to keep Weld County whole in a congressional district.

Regarding Greeley, many comments noted that the city of Greeley is less like the rest of rural Weld County and that the commissions should consider Greeley as an urban center. The commissions also received comments about Greeley’s diverse ethnic makeup with many immigrants and refugees, as well as its rapid growth. Some comments noted that Greeley and Evans share School District 6 and are similar communities that should not be separated. One comment suggested that Greeley has a lot in common with Fort Collins, noting the presence of major state universities and shared water and infrastructure concerns. Some comments noted the growing Latino population in Greeley and suggested grouping it with cities in the northern Denver Metro area like Brighton, Commerce City, and Northglenn, as well as Longmont, to create a district with a large Latino population.

For state legislative districts, a Greeley city councilmember wrote about the differences between west and east Greeley, stating that east Greeley, along with Evans and Garden City, has older homes, more multifamily zoning, and more diverse and smaller businesses. This comment also noted ties to the University of Northern Colorado and the shared Greeley-Evans School District 6, and it described west Greeley as more suburban. Another comment suggested that the commissions should combine west Greeley (from 23<sup>rd</sup> Avenue) and part of south Greeley with areas west to Johnstown and Milliken, where continued residential growth is expected.

A number of comments addressed southern Weld County and the Interstate 25 corridor. Some comments suggested the Independent Congressional Redistricting Commission should include cities in Boulder, Larimer, and Weld Counties along the Interstate 25 corridor in a single congressional district. These comments note shared services and resources, such as health care, fire districts, entertainment and shopping, and transportation. One comment discussed the need to address aging oil and gas facilities in this area. Others discussed the high growth in the area and the need to address regional concerns resulting from this growth, including water and air quality, infrastructure, and broadband connectivity.

One comment discussed the city of Erie, which is split between Boulder and Weld Counties. This comment noted that cities along the northern Interstate 25 corridor share services such as schools and health-care systems that cross county lines. Another comment said oil and gas extraction (fracking) near homes is a policy concern in Erie.

One comment suggested the Independent Congressional Redistricting Commission should locate Frederick in a congressional district with Denver’s northern suburbs, such as Broomfield, and possibly Boulder and Longmont. The commenter said that Frederick should be included in a more suburban district, rather than a rural district, because of economic, social, and educational ties. Another comment characterized Dacono as more of an urban or suburban area with more in common with Erie, Firestone, Frederick, and Longmont, rather than the rural portions of eastern Weld County where there is more oil and gas development.

One comment identified Fort Lupton as an area that has more in common with metro Denver than with the rest of Weld County, noting people in Fort Lupton travel to the Denver area for shopping, jobs, and activities.

A comment from Johnstown discussed wind energy connections between the Eastern Plains communities where there are turbines and the operations in Castle Rock, Pueblo, and Windsor where wind energy components are produced.

One comment suggested that the commissions should divide Weld County to the east and west of Highway 85. This comment noted that Weld County cities like Evans, Firestone, Frederick, and Greeley share many services with eastern Larimer and Boulder Counties, while eastern Weld County is characterized by farming, ranching, and the oil and gas industries.

Some comments about Weld County focused on water. One noted the Home Supply Ditch Company's service area, including some of Weld County between Berthoud and Loveland, as a community of interest. Another identified the South Platte and Cache La Poudre Rivers, as well as the Poudre Ponds, as important geographic features in Weld County. One comment suggested that a congressional district could follow Weld County watersheds to the east.

Regarding legislative districts, some comments provided specific suggestions for dividing Weld County. One noted that the county could have two fully contained state senate districts, and four almost wholly contained state house districts if Weld County merged with Logan or Morgan Counties. The comment suggested creating a district in southwestern Weld County because of population increases and their like communities. Two state house districts would then be comprised of Evans, Greeley, Johnstown, Milliken, and Windsor.

One commenter discussed the High Plains Library District, which includes most of Weld County and portions of Adams and Boulder Counties. This comment recommended the following state house districts, noting that they might cross counties but would have much in common with each other:

- East Greeley and Evans;
- Severance, west Greeley, and Windsor;
- Berthoud, Johnstown, and Milliken;
- Carbon Valley (Dacono, Firestone, Fort Lupton, and Frederick);
- Erie, Longmont, and Mead;
- Ault, Eaton, Nunn, Pierce, the rest of northeast Weld County, and all of Morgan County; and
- The Interstate 76 corridor (Hudson, Keenesburg, and Lochbuie).

Another comment characterized similar regions of Weld County:

- Northern and eastern rural parts of Weld County;
- The Interstate 76 corridor (Hudson and Lochbuie);
- Southwest Weld County/Carbon Valley (Erie, Firestone, Frederick, and east Longmont);
- Berthoud, Johnstown, and Milliken;
- Severance, Timnath, and Windsor;
- East Greeley; and
- West Greeley.

This comment also noted that several of these groupings extend over county lines, and suggested that the municipal and regional interests be prioritized rather than the counties.

Additional comments about Weld County are located under the Adams and Larimer Counties sections.

**Yuma County.** One comment said that rural areas, such as Yuma County, need full representation since this area's economy is driven by agriculture production and energy.