

July 31, 2024

Routt County Planning Department
136 6th St., Suite 200
Steamboat Springs, CO 804785

RE: Tailwaters at Stagecoach Prelim Subdivision Plan

Dear Alan,

Please find below, responses to your June 7th comment letter for the Tailwaters Preliminary Plan Application which was submitted on January 15th, 2024. The responses below, together with the revised plans and studies which have been uploaded to the County website, reflect any revisions necessary to address the items identified by Planning Staff and referral agencies. The most significant change has been the re-alignment of the Crest Court and where it intersects with CR 18A. The entrance to Crest Court was moved to the south and the road itself was relocated to the west of the multifamily units, which required several plans to be updated. All plans (listed below) have been uploaded to the County Planning website. We look forward to scheduling a hearing with Planning and the County Commissioners of this Preliminary Subdivision package in the very near future.

Revised plans and studies (dates revised)

- Tailwaters Plat (All Sheets) (7/30/24)
- Lotting Plan (7/24/24)
- Open Space Plan(7/24/24)
- Overall Landscape Plan(7/24/24)
- Substandards Land Plan(7/24/24)
- Tailwaters Design Guidelines(7/25/24)
- Stagecoach Geotech Rpt Final(7/24/24)
- TW Wildfire Mitigation Final(7/24/24)
- Tailwaters Engineering Plans (7/19/24)
- Tailwaters Preliminary Drainage Report (7/19/24)
- Tailwaters Water Calcs(7/22/24)
- Tailwaters Sewer Calcs(7/22/24)
- Draft Covenants (6/14/24)
- Stagecoach Water Quality Report (6/17/24)
- Tailwaters Wildlife Mitigation Plan (5/21/24)

Responses to Specific Comments from 6/7/24 Routt County Planning Letter:

1. The narrative states the commercial area is 4.11 acres. The drainage report is for 2.5 acres. Please revise the drainage report to reflect this.
 - a. ***The mislabel in the drainage report has been corrected to 4.11 acres.***
2. A trail connection from the northwest pod to the rest of the development must be provided.
 - a. ***A new Trail connection from the cul-de-sac on Parapet Dr proceeding south within the existing waterline easement is now shown on the Open Space Plan. It is expected that pedestrians will walk along Crest Ct or to the east of the multifamily units to provide access to the south and the commercial area. The project is planned to contain walkable streets where speed limits are at or below 20 MPH and residents are encouraged to walk along the side of the street. Along Tailwaters Blvd which will be the most high traffic area, a multiuse path is provided otherwise this has been designed as a walkable neighborhood.***
3. The Substandard Land map does not contain the 30%+ slopes in the northwest and northeast portion of the site shown on the existing conditions plan in the engineer drawing set. Please revise.
 - a. ***The engineering plan has been revised to remove the 30% slopes from the northwest and northeast portion of the site. These areas were originally shown as such due to a sensitivity setting that was set at too high a limit which was unrealistic.***
4. Geotech Report is labeled as 'DRAFT'. Please submit a final version.
 - a. ***The Draft label has been removed from the Geotechnical Report***
5. Page 7 of the Geotech Report states that "unretained cuts and fills of up to approximately 7 feet in height are anticipated for roadway development." Page CR16-2, station 6+00 (and in other areas of this roadway section), shows cuts of 15'. The report needs to be revised to account for this discrepancy. Need a more detailed grading plan to understand the height of these cuts and fills.
 - a. ***The Geotechnical report has been revised to address this, it should be noted that the cuts on at STA 6+00 on page CR16-2 are retained cuts, see Engineering sheet DT1, "Typ County Road 16 Slope Protection Detail". Additional plans detailing the grading in this area has been provided.***
6. Pit 4 experienced "practical rig failure" at approximately 5'. This means to me that they hit bedrock. With excavations of 15' in this area, a more detailed analysis will need to be provided.
 - a. ***In speaking with the Geotechnical Engineer and excavator we have confirmed that bedrock was not encountered at this location. What was encountered was the typical browns formation (consistent with our other sites in the area at Stagecoach) that can be excavated with no problems. On all test pits the Geotechnical Engineer typically stopped when they hit that browns formation as its more than adequate for support of structure. Additionally, Pit 4 was dug outside of the existing right of way at a surface elevation of approximately 7,340 with the bottom of the excavation at elevation 7,335 which would be well below the proposed finished grade at STA 5+00 (7,340) of the County Road in this location.***

7. The grading to the east of Lots 130-132 falls within the 50' waterbody setback. It is suggested that no grading occur within this setback. If this remains, a waterbody setback permit will be required. Please indicate how you intend to proceed.
 - a. ***The applicant is proposing to apply for a waterbody setback permit for this area to temporarily regrade and revegetate this location, alternatively a small retaining wall could be installed here but we feel limited grading in this area would be more practical. In any event a setback permit will be required to fix the existing inadequate crossing of the creek and CR 16 at the southern end of the property as required by Road and Bridge.***
8. I am unable to locate exactly the work to be done on page CR16-7. The driveway shown coming off of CR 16 is labeled "Barr Trail." This road name does not exist. Please revise.
 - a. ***This road has different names based on what mapping service you use, the more typical name for this road is Fraysher Ln, just east of the CR 16 / CR 18A intersection.***
9. Lots along the eastern edge that contain slopes greater than 30% must be reconfigured so that they do not contain slopes greater than 30%.
 - a. ***While some portions of these affected lots do capture areas of slope exceeding 30% within the parcel boundary, those areas are not proposed for structural development. Residential structures within this neighborhood pod would be sited towards the front of the lots proximate to the road. Careful review of each lot has determined that planned product types can be constructed within the defined lot boundaries, including required setbacks, while avoiding slopes greater than 30%.***
10. Drawings for the extension of the water main from Snowbird Trail were unable to be located. Please state where these are located or submit these drawings.
 - a. ***Please see revised engineering drawings that show the extension of the waterline from Snowbird Trail.***
11. What is the difference between Parcels A and B; Outlots 1, 2, and 3; and Parks 1, 2, 3, & 4?
 - a. ***Parcels A and B, as well as Outlots 1 and 3, are open space areas that are intended to remain in their naturalized conditions. Outlot 2 corresponds to Park P5, as indicated in the 'Parks and Open Space Plan'. Parks 2, 3, 4 and 5 are disjointed components of a linear park system that will host a multi-use path and activated by a variety of active and passive amenities. Park 1 is common green area within the walkable neighborhood that will also host passive and active amenities.***
12. According to the plat, the multi-family and commercial areas are not being subdivided. Will these be subdivided at a later date after construction? Please indicate how many multi-family and commercial units will be located on these various lots.
 - a. ***Both the multi-family and the commercial areas may be subdivided at a future date when final building plans are determined. MF lot one will contain 16 units, MF lot two will contain 4 units, and MF lot three will contain 20 units. It is anticipated that the commercial lot will contain four to six commercial units and up to six residential (mixed use, residential over commercial) units.***

13. Please provide a legal description of the commercial area so that this land can be rezoned to commercial.

a. **See legal description of the commercial area below:**

Legal description of parcel of land located in SW ¼ SW ¼, Lot 8 Section 5 Township 3 North, Range 84 West, of the 6th P.M., County of Routt, State of Colorado and more particularly described as follows:

Beginning at the northwest corner of the right of way of Tailwaters Blvd. and Routt County Rd 18A thence the following five courses along the western edge of CR 18A

1. **N 1°33'12" W a distance of 52.51 feet;**
2. **78.42 feet along the arc of a non tangent curve to the left having a radius of 330.00 feet;**
3. **N 14°55'56" W a distance of 141.96 feet;**
4. **N 1°27'31" W a distance of 206.27 feet;**
5. **N 1°05'09" W a distance of 79.73 feet;**

Thence the following four courses along the southern edge of Crest Ct.

1. **S 89°15'39" E a distance of 64.77 feet;**
2. **41.13 feet along the arc of a non tangent curve to the left having a radius of 122.07 feet;**
3. **S 61°37'24" E a distance of 202.98 feet;**
4. **N 28°24'29" E a distance of 36.00 feet;**

Thence S 61°37'24" E a distance of 226.71 feet along the northeastern edge of commercial area 1;

Thence the following six courses along the northern edge of Tailwaters Blvd

1. **57.43 feet along the arc of a non tangent curve to the right having a radius of 190.09 feet;**
2. **S 28°32'44" W a distance of 107.30 feet;**
3. **90.02 feet along the arc of a non tangent curve to the right having a radius of 170.01 feet;**
4. **S 58°52'38" W a distance of 242.82 feet;**
5. **48.00 feet along the arc of a non tangent curve to the right having a radius of 97.00 feet;**
6. **S 87°27'40" W a distance of 65.45 feet to the point of beginning, containing 4.04 acres more or less.**

14. Please indicate whether sidewalks will be provided or not? If not, a formal request to not provide them needs to be made.

a. **As previously stated, the project is planned to contain walkable streets where speed limits are below 20 MPH and residents are encouraged to walk along the side of the street. Along Tailwaters Blvd which will be the most high traffic area, a**

multiuse path is provided. With the significant amount of hiking and biking paths in addition to the walkable streets, the Project has been designed as a walkable neighborhood. Through this response we are making a formal request not to provide sidewalks on all roads within Project.

15. Loading and unloading space in commercial area was not identified. Please identify these areas.
 - a. ***Under the current plan, commercial loading and unloading would occur within the larger parking lot area, as well as along the Emergency Access road that leaves the commercial zone and connects to Crest Ct to the north. Distribution would occur across the planned network of sidewalks and plaza areas. More formalized loading areas will be designated when subdivision plans for the Commercial lots are submitted.***
16. The water quality report is labeled as 'Draft'. Please revise and finalize.
 - a. ***The Draft label has been removed from the water quality report.***
17. Statements made in the water quality report do not line up with the submitted plans. The last sentence of paragraph 3 of Section 3.2 states, "No work within 100 feet of the Creek is anticipated." The grading plan shows that grading will take place within 100' of the creek. Also, individual lot development will take place within 100' of the creek. Please revise this report to take this into account.
 - a. ***The water quality report should have used the County mandated 50' setback (not 100') when making the above referenced statement. This has been updated in the report to note that residential lot development within 50 feet of the creek is not being proposed. As previously noted, the developer will be requesting a permit to allow stormwater outfalls and minor regrading within this 50' buffer in select areas.***
18. The water quality report indicates what measures will be taken if elevated phosphorous levels are found but it does not mention what will happen if elevated nitrogen levels are found. Please provide additional detail on this.
 - a. ***If high nitrogen levels are found, the Applicant will complete additional testing to determine where elevated nitrogen laden runoff is coming from. The applicant will then detain any stormwater from this area to prevent elevated nitrogen runoff from entering Morrison Creek. This will continue until nitrogen levels reduce to acceptable levels. This has been updated in the report.***
19. See comments from Upper Yampa Water Conservancy District.
 - a. ***The comments from UYWC have been addressed see below.***
20. The Wildfire Mitigation Plan states, "Tailwaters will treat all surface fuels within an approximate 150-foot-wide setback zone surrounding the disturbed perimeter". This indicates that all of the vegetation along Little Morrison Creek within this buffer will be removed. Please provide more information on what means.
 - a. ***The 150-ft setback zone would extend from the limits of disturbance that occurs from construction of neighborhood roads, not lot boundaries. In addition, the treatment planned for these areas involves mowing all surface vegetation to a height of approximately 4 inches where accessible by mechanical equipment. Because the slopes surrounding Little Morrison Creek are too steep to***

accommodate mechanized equipment, these areas would be subject to vegetative thinning using hand tools, leaving adequate surface vegetation and roots in place to prevent sediment transportation from these slopes to the creek. In addition, the wildfire mitigation plan includes selective thinning of willows within the riparian corridor to reduce wildfire hazards. The intent of these efforts are to reduce fire hazards within this zone in a manner that minimizes intrusions into the riparian corridor, as well as minimize vegetation thinning to the extent practicable.

21. Please provide design guidelines referenced in the covenants to ensure items listed in the Wildfire Mitigation Plan are included. The items listed in the Landscaping and Home, Lawn, and Defensible Maintenance sections need to be included in the design guidelines.
 - a. ***The items outlined above had been incorporated into Draft Design guidelines.***
22. See comments from the Routt County Weed Department.
 - a. ***See Weed Department Response below.***
23. Please provide cut and fill calculations. If soil is to be trucked off site, please provide amounts.
 - a. ***Cut and fill calculations are provided on sheet N2 of the Engineering Plans.***
24. Landscape plans were submitted for individual lot development, however these don't provide adequate screening from major access roads. Please revise to provide adequate screening to preserve privacy and mitigate visual impacts to surrounding areas.
 - a. ***We presume that "major access road" references County Road 16. The proximity of the proposed Tailwaters community to existing County Road 16 poses significant challenges to provide effective screening to travelers along that route due to natural and post-construction slopes and the density of the planned community lots. While we have studied opportunities for implementing additional screening, it is our opinion that additional vegetation screening is not a viable option due to terrain constraints of this area. To that end, we have purposely created a grade separation between lots and residential structures and travelers along County Road 16. While the grade separation does not necessarily reduce visual impacts, it does serve to preserve privacy.***

In developing these plans, we attempted to strike a balance between maintaining the naturalized conditions of the site, which is natively open rangeland comprised primarily of grasses, forbs and shrubs, and importing taller vegetation components for screening and aesthetics. In addition, due to the density of the residential product within the planned neighborhoods, we were also considerate of importing vegetation onto residential parcels that seem to conflict with Firewise recommendations for defensible spacing from structures.

25. The SS snow storage standards for commercial areas require 1 square foot of storage for every 2 square feet of paved area which is a 50% requirement. Your narrative indicates that you have provided 20%, well under the required area. Please revise.
 - a. ***The reference to 20% snowstorage was for roads only and not the commercial area. There are currently 49,386 sq. ft. of pavement within the commercial district***

as shown in the current plan. The snow storage plan accommodates an area of 25,170 sq. ft., thereby meeting the 50% requirement.

26. Pavement is only 20' on the below listed roads. Standards require 22'. Please revise.

- a. Confluence Blvd.
- b. Spillway Ave.
- c. Parapet Dr.
- d. Crest Ct.
- e. Eddy Circle

i. All pavement has been revised to 22', we would recommend the County revisit these standards in the future as it has been shown that low volume roads in walkable areas do not require excessive pavement widths which can lead to excessive vehicle speeds, increased runoff and pollutant load, and excessive heat adsorption in these areas.

27. Covenants:

- a. 35.5.7 – references the Town of Minturn
- b. 15.2.1 – references the “Tailwaters PUD”. This is not a PUD.
- c. 16.4.1 - references “Game Creek Trail” This is not a named road in this development.
- d. Water quality plan states that the covenants will discourage manicured lawns. Where is this stated in the covenants?
 - i. The covenants have been revised to remove the inadvertent references and include the discouragement of manicured lawns as reflected in the typical landscaping plans, as now referenced in Section 5.2 of the Covenants.***

Public Works Review (Reviewed By: Zach Schaffner)

1. See letter dated June 7, 2024 and drawings.

The majority of the comments referred to incorrect right of way locations which were mistakenly included on the engineering drawings, this has been revised and resubmitted. The below is offered in response to specific comments on the sheets indicated, if we have not directly addressed a comment here they have been addressed through updates to the engineering plans:

- **Sheet PR-MD1**
 - ***Adequate site distances for the intersection with CR 18A and Parapet Drive were verified in the field by Emerald Mountain Survey.***
 - ***The intersection of CR 18A and Crest Ct was not sufficient, Crest Ct has been moved to the south and re-aligned to provide adequate site distance at this intersection.***
- **Sheet PR-MD2**
 - ***the area adjacent to the CR 16 / 18A intersection has been re-graded to allow for snow removal.***
 - ***The ROW along CR 16 has been adjusted to allow for snow storage.***
 - ***In order to re-align and improve grades as CR 16 leaves the Site to the south, grading is required outside of the limits of the Site. Grading would only occur within the 60' County ROW by the developer when road re-***

alignment occurs. If grading is not allowed outside of the limits of the of the Site, than the proposed road improvements are not possible.

- **Sheet CR16-1**
 - *the ROW has been adjusted along the west site of CR16*
- **Sheet CR16-2 & CR 16-3**
 - *the ROW has been adjusted along CR16 to provide a minimum of 60' throughout.*
 - *Controlled access (Gates) is now shown on the roads at STA 6+50 and STA 9+50.*
 - *Pavement has been removed between STA 10+50 – 12+00*
- **Sheet CR16-7**
 - *Detailed grading plans at Fraysher Ln (not Barr Trail) have been provided.*
- **Plat Sheet 4 of 7**
 - *Crow Trail ROW is offset because the Crow Trail roadway was not constructed within the centerline of the ROW.*
- **Plat Sheet 7 of 7**
 - *The 60' ROW is shown on the plan and will remain, the additional easement proposed is to ensure access to the abutting property due to the realignment of CR 16 in this area.*

Routt County Weed Review (Reviewed By: Tiffany Carlson)

1. See email dated January 17, 2024.

We have responded to all comments from the Weed Review, one comment requested an baseline inventory of existing invasive species, that inventory is currently being conducted throughout the summer of 2024 due to the varying germination dates of different species.

Fire Review (Reviewed By: Bob Reilly)

1. Plans currently call for the use of Bollards. Bollards need to be replaced with emergency access gates with the proper KnoxBox control access. I have talked with the developer and they agree.

All bollards have been replaced with emergency access gates as requested.

2. OCFPD has adopted the Routt County Road Standards (2016) as well as 2009 IFC. Per RC the road with would need to be at least 22'. As I read the 2009 IFC, road with for the common roads would need to 26'. In our discussions with the Tailwaters group, there was to be NO parking on the roads. We would like to see the shoulders paved as well.

Roads have been increased to 22' width as requested. There will be no parking on the roads, this has been added to the Draft covenants. We strongly disagree with the request to pave the shoulders of the roads, a 22' road width in low density residential neighborhoods is more than adequate for the passage of emergency vehicles. There are countless studies that show the many benefits of narrow neighborhood roads in residential neighborhoods. Wider roads, with excessive pavement directly correlate to increased speed by drivers on these roads making it more dangerous for pedestrian

and other users. Additional pavement increases heat absorption and warming in neighborhoods. Additional pavement results in higher amounts of runoff and increased runoff rates which can lead excessive erosion and increase pollutant loading. For the reasons outlined above and many others we request that pavement widths on neighborhood roads are limited to 22 feet or less.

CPW Review (Reviewed By: Molly West)

1. We still need to reach an agreement with CPW. We are in the process of getting a response and setting up a meeting with the consultants.

We had a zoom meeting with CPW and State Park staff on 6/14/2024, it appears that we have agreed upon a mitigation plan for the project. CPW will follow up with Routt County Directly.

Upper Yampa Water Conservancy District Review (Reviewed By: Andy Rossi)

1. See email dated May 22, 2024. – ***Please note that the Water Quality report completed for the development of the Tailwaters project is not intended to be an exhaustive scientific analysis of water quality within Stagecoach reservoir. The intention of the report was to demonstrate that the development of the Tailwaters Site will not have a measurable effect on the nutrient loading to Stagecoach Reservoir which seems to be apparent.***

- a. ***Comment 1 – All data for the Upper Yampa River was taken from USGS website, (<https://waterdata.usgs.gov/monitoring-location/09237450>) the commenter is correct regarding Table 4 and the Yampa River mean annual flow data, for flows and nutrient loading. Unfortunately, an incorrect conversion factor (from CFS to MGD) was used in the report – this has been corrected. The mean annual flow collected was approximately 68.48 cfs. This flow data set is from USGS data from 1996-2022, only for the most recent 10-year period is consistent monthly data available. In years prior to 2012 there were times (typically winter months) when data was not available on the USGS website. The number of years used greatly influences the average flow rates recorded within the river. The same USGS site was used for nutrient loading data, for this dataset only the years from 2012-2023 were analyzed for this report as consistent testing before this time period was not available. As the commenter indicates since the flows in the Yampa are orders of magnitude***

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Mean
40.89	31.31	63.59	115.23	108.51	113.68	98.64	66.48	47.41	44.25	50.86	40.90	68.48

higher than any other tributary to the reservoir, these changes will have no effect on the conclusions of the report. The table above shows monthly mean flows that were used within the report between 1996-2022.

- b. ***Comment 2 - The report has been updated to indicate the details of post construction monitoring, the developer will provide copies of the quarterly reports to both UYWCD and the County.***

- c. Comment 3 - At no point during the drafting or release of the report was there any intention of participation with or sign off from, the Morrison Creek Metropolitan District. The Applicant has no control over what MCWSD is able to provide regarding the Applicants Water Quality Report.***