

October 2, 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 September 25th comment letter for the Tailwaters Preliminary Plan Application which was submitted on January 15th, 2024. The table below outlines the timing of this Preliminary Plan Application to date:

| Action | Date |
|---|---------|
| Preliminary Plan Application Submitted | 1/15/24 |
| Application Accepted Letter | 3/1/24 |
| County Initial Comments | 6/7/24 |
| Tailwaters Response to Comments | 7/31/24 |
| County Follow up Comments | 9/10/24 |
| Tailwaters Response to Follow up Comments | 9/13/24 |
| County 2 nd Round of follow up Comments | 9/25/24 |
| Tailwaters Response to 2 nd Round of follow up | 10/3/24 |

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. We look forward to scheduling a hearing with Planning and the County Commissioners of this Preliminary Subdivision package in November as discussed.

Revised plans and studies (dates revised)

- Tailwaters Plat (All Sheets) (10/2/24)
- Tailwaters Parks and Open Space Plan (10/2/24)
- Typical Landscape Plans (10/1/24)
- Drainage and Engineering Reports (10/4/24)

Responses to Specific Comments from 9/25/24 Routt County Planning Letter:

1. Refer to comments from Public Works regarding Geotech Report. **See response to Public Work Comments attached with this letter.**
2. Refer to comments from Public Works regarding Drainage Report. **See response to Public Work Comments attached with this letter.**
4. All of the lots that you referenced in your response are higher in elevation than the county road. Some of them are up to 10' higher in elevation. This grade separation makes them more visible

than if they were lower in elevation than the road. Because of this, landscape screening is required. The area on the south side of CR 16 near the Fire Station was created in 1971 when landscape screening was not required. **Please see revised Typical Landscape (Sheet 3) which provides screening between CR 16 and any rear yards of the Project.**

9. Sidewalks don't exist in other developments in Stagecoach because the regulations in place at the time didn't require it. This development is required to have sidewalks, unless specifically waived by the Board of County Commissioners. Your response implies that pedestrians and cyclists will act as traffic calming measures. Traffic calming should be achieved using other methods as it is not appropriate to use humans as traffic calming measures. Sidewalks need to be shown on at least one side of the street. **As discussed, the Applicant would like to request this waiver from the BCC at the Preliminary Plan hearing with the BCC.**
10. Please provide examples of the playgrounds, fitness equipment, etc. that is proposed for the parks and where they will be located. **Please see revised Parks and Open Space Plan which provides examples and locations of playgrounds and equipment.**
12. Staff disagrees that the proposed open space also serves as park land. Per section 3.5.2 of the Subdivision Regulations, park lands are intended for active recreation. Most, if not all, of the open space is not able to be used for active recreation due to wildlife concerns (down by the creek), is steep land (in between the development pods located next to CR 18A and along Tailwaters Blvd.), or is so small it is unusable (area in between MF1 and CR 18A). None of these areas are able to provide active recreation opportunities. Also, a majority of the usable area in P5 is for the stormwater detention pond. If parks P2, P3, and P4 are placed in the right of way, this further reduces the amount of park land. If there is land within the commercial parcel that is to be devoted to parks, that needs to be shown now to ensure that the minimum land requirement is met. Your plan must be modified to provide at least 5.98 acres of land that is suitable for active recreation. **The following table along with the details provided in the revised Parks and Open Space Plan show how active recreation will be developed for the Project. No land within OS1 is being considered. The stormwater pond within P5 is a less than ¼ of that area, it is anticipated that the stormwater pond will be dry during the majority of the year (likely fill with water only during a few weeks during spring runoff) and some equipment may be placed within this area. The multi-use paths in P2-P4 will be used for walking, running and biking and will include linear parks features. These linear park features will also be included along the paths within portions of OS2. The core area is programmed to contain an amphitheater, park amenities, picknick areas and other land for active recreation. The following table shows how 5.98 acres is provided.**

| Active Park Area | | |
|------------------|---------------|--|
| Location | Acreage | Comments |
| P1 | 0.34 | Dedicated Park adjacent to multifamily housing |
| P2-P4 | 0.37 | Linear Park and active paths through project |
| P5 | 3.47 | Individual parks and paths though this area |
| Commercial Area | 0.7 | Dedicated outdoor recreation space in core |
| Portions of OS2 | 1.1 (minimum) | Paths, trails and linear park features |

13. The acreage of Lot 37-38 D is not accurate. The acreage of all of the lots needs to be double checked and corrected. **The acreage of Lot 37-38 has been corrected on the revised plat.**
14. There are several layers of mitigation that can be used to mitigate impacts to wildlife. They include creation of additional or improved habitat in the immediate area to compensate for any habitat losses resulting from the development, re-establishment of populations impacted by development, and offsite mitigation to compensate for impacted habitat. In instances where impacts to wildlife cannot be fully mitigated, compensatory offsets may be required, as determined by the County. The submitted plan seems to jump directly to compensatory offsets with no discussion of other alternatives. Additional information needs to be submitted detailing other measures that were considered to mitigate wildlife impacts as well as justification for why the plan proposed was selected. **This comment is inaccurate and does not reflect the actual measures provided to avoid and minimize impacts in the Wildlife Mitigation Plan. Only after prescribing those measures did the plan provide a mechanism to mitigate the direct and indirect impacts of the development that still remain after avoidance and minimization. The funds endowed with the real estate transfer fee can be used to accomplish precisely what the commenter suggested, i.e. "re-establishment of populations impacted by development and offsite mitigation to compensate for impacted habitat." However, these funds are not limited to only projects such as the two listed by the commenter. The funds can be used in any manner upon which the CPW and the Mitigation Trust Fund Board agree.**
15. CPW stated that groundwater monitoring is required to ensure that impacts on water quality are not seen in the shallow aquifers or alluvium through subsurface flow to Morrison Creek or Stagecoach Reservoir. This will need to be added back in to the Wildlife Mitigation Plan as well as the Water Quality Plan. In regards to landscape screening, please explain the 'grade separation' between the lots and the CR more. Perimeter fences are not allowed on individual lots. With that restriction, unless there is some type of vegetative screening, the contents of the backyards will be plainly visible. Some type of visual screening needs to be provided to mitigate these views. See the planting done between the houses and Highway 40 at Heritage Park. **We have requested a meeting with CPW to discuss the need for groundwater monitoring. The CPW comment does not even specify which constituents they have concerns about that could impact groundwater quality. Common sources of contaminants to the groundwater table include septic systems, direct disposal of hazardous waste into ground, landfills, spills or leakage from chemical material storage tanks or ponds, leakage from military and weapon manufacturing sites, agricultural pesticides and fertilizers, waste from active or abandoned mining facilities and petrochemical leakage from underground storage tanks. None of the uses described above are proposed for the Site, therefore it is not reasonable to assume development of the Site could lead to potential impacts to groundwater quality. Nutrients which could affect the health of Morrison Creek and Stagecoach Reservoir are transmitted almost exclusively through surface waters. The Applicant has previously submitted and committed to a surface water monitoring plan to prevent additional nutrient loading to area waterways.**

Response to Public Work Comments letter dated September 25, 2024

1. There are 5 outfall areas proposed along Little Morrison Creek (LMC). There is no description in the drainage report to address how these outfall areas will work to dissipate flows into LMC. According to the report and the grading plan, there are almost 3 basins that are proposed to drain into LMC with only roadside ditches and swales acting as BMPs. More robust and permanent BMPs along the creek are necessary to capture the increased runoff that will occur. **Each of the outfalls along LMC will be constructed with Low Impact Design (LID) Best Management Practices (BMPs) as shown in Appendix C of the Drainage Report. Specifically, Filter Strips and Terraced Filter Strips with enhanced plantings will be used to slow outflow from the basins and allow adsorption of water before passing through a rip rap collector ditch which will eventually flow into LMC. Final design and sizing of these BMPs will be provided with the Final Plan Submission – The drainage plan has been revised to note the location of these BMPs.**

2. Will the existing ditches along CR 18A be able to convey the proposed flows from Basin B2 and B3 downstream or north of the project? **Ditches along CR 18A will include Enhanced Grass Swales as shown in Appendix C of the Drainage Report. The Enhanced Grass Swale is significantly wider than a traditional swale with additional storage capacity. The addition of vegetation in this swale will allow additional flow adsorption during the growing season.**

3. Where/how does Basin B5 outfall off site? What BMP is being proposed to ensure sufficient water quality when storms run off of the commercial area? It is assumed that the commercial area will be mostly an impervious area with a significant parking area and commercial buildings. Will the existing culvert under 18A be able to accommodate the additional flows from the commercial area? **The Proposed Conditions Drainage Plan has been revised to reflect that the vast majority of stormwater from the commercial area will be conveyed to the east to the Basin 1. The current plan incorrectly indicates stormwater will go to B5. B5 will only collect minimal stormwater from a small portion of the grass area in the NW corner of the commercial area and CR 18A itself. Pre and post development flows to B5 and the existing culvert will remain consistent.**

4. In the report, it states that a 10% imperviousness was used to develop the existing flows for the site. That equates to just about 11 of the total 109 acre site is impervious. The only current development on the site are the county roads. These equate to about 2.5 acres. The imperviousness of the county roads should be reduced to 40% per the City of Steamboat Springs recommended impervious values. That same chart recommends that an undeveloped site use 2% imperviousness to develop historic flows. Why was 10% used instead of the recommended 2% when the site currently has no development on it? **The 10% impervious factor was used as it appears that the entire site was once used for agricultural purposes in the past which can reduce the permeability compared to that of undeveloped natural areas. Reducing from 10% to 2% will have a negligible effect on the predevelopment flows, we have re-analyzed the Site using a 2% assumption.**

5. In the geotech report it states that up to 15' cuts and fills can be retained. How will they be retained especially along CR 16? MSE, concrete retaining walls, tiered boulder walls? According to DT1, it only shows a 5' tall boulder wall. Any wall over 4' tall needs to be designed by an engineer.

How will the other 10' be retained and allow for roadway maintenance to occur? **Although the Geotech report says up to 15' can be retained, that level of cut is not required for this project. Currently we are only anticipating 5' retaining walls along CR 16, above that reinforced vegetation slopes at 2:1 or 3:1 will be used to match back into existing grades.**

6. The geotech report states that bedrock was encountered. You have stated that this is not correct. The statements in the report and your response causes confusion. Please revise the report to include the information in your response so that it is clear what was encountered at pit 4 and the associated properties of that formation. **The Geotech Report states that sandstone bedrock of the Browns Park formation was encountered in some test pits. The material is technically bedrock (common to much of the Stagecoach area) which is soft enough to be excavated with larger excavation equipment. The report as written is accurate.**

7. You have stated that the cuts at STA 6+00 are retained cuts and to reference the "Typ County Road 16 Slope Protection Detail" on page CR16-2. This detail starts at 7+50 and does not include 6+00. Please revise. **The detail is correct indicating the approximate start of slope protection, we could not locate a reference to STA 6+00 in the submittal.**

8. CR 18A/ 16 intersection grading needs to be lower than proposed road to facilitated snow storage and reduce drifting. **All slopes adjacent to the intersection have been revised to be lower than proposed road to facilitate snow storage.**

9. Blow off hydrant at 18A/ 16 needs to be located so as not to inhibit snow removal. **The blow off hydrant has been moved to the NE corner of this intersection to allow for additional snow storage.**

10. ROW for CR 16 needs adjusted at the southern end of the property, specifically the portion accessing parcel ID 961053002 which shall remain county ROW. **A ROW along the existing CR 16, to allow access to the referenced parcel, has been added to the Plat.**

11. Fraysher Ln access must meet county standards. Please include more detail on plans at that intersection. **No significant changes to the grade at Fraysher Lane are proposed, it should be noted that the existing grade of Fraysher Lane appears to be over 8% which is a preexisting condition at this location.**

12. Private Drives may not be paved within CR 16 ROW per county access standards. **Any paving within the CR 16 or CR 18A ROW has been removed from the plans.**

13. Emergency access gates at private drives must be located at least 1.5 times the length of the longest vehicle that will use the access in order to meet county standards. **The emergency access gates have been relocated to allow 1.5 the vehicle length for vehicle storage before the gate off of CR 16.**

14. There was a Traffic Impact Study performed by Tailwaters that indicated that current county roads can accommodate new traffic that will be generated from the Tailwaters site. That will work in the current state of the county roads with no other development taking place in the area. When Routt County analyzed the Stagecoach roadway system as a whole (current platted lots and other

developments), Tailwaters at full buildout will account for 29% of the increased week day daily trips on CR 14. It will account for 32% of increased AM Peak hour trips. The development will add 85 new peak hour trips to the existing 129 northbound peak hour trips to the intersection of CR 14 and 16. Developer shall enter into a development agreement with Routt County to determine the effects to the LOS of CR 14 and CR 16 and the costs associated with mitigating those affects. **We have performed an initial review of the County Traffic report and have significant questions as shown below. Our Traffic Consultant, Fox Tuttle Transportation Group will provide a formal memo that more fully documents our concerns.**

- **Fox Tuttle Weekday Daily increase of 2266 vs 4788 used by the County**
- **Fox Tuttle AM Peak of 172 vs 370 used by County**
- **Fox Tuttle PM Peak of 219 vs 349 used by County**
- **Fox Tuttle conclusion that no LOS improvements would be required on CR 14**
- **The County's use of "internal capture" and corresponding percentages for each project**
 - **why is Stagecoach's only 5% and the Mountain Resort at 32%?**
- **The County's assessment of trip generation for each project –**
 - **the Landaulet project has 79 homes and generates 550 weekday daily trips (or 7 trips per unit),**
 - **Tailwaters has 200 homes and generates 4778 weekday daily trips or 24 trips per unit – why are none of the Tailwaters home classified as "Recreation Homes"**
 - **Background development of projected new homes is 663 which generates 5002 trips or 7.5 trips per unit,**
 - **Mountain Resort 747 homes generates 8480 trips or 11 trips per unit?**
 - **For some reason the Tailwaters project generates 3 times the number of trips per unit as the other projects.**
- **Has any assessment of workforce traffic (assume the resort will require hundreds if not thousands of workers each day) been assigned to the Mountain Resort project? Why not?**
 - **Similarly, since a significant portion of the Tailwaters project will be obtainable workforce housing, and it is very likely that a significant portion of population from Tailwaters may work at the resort, shouldn't a higher internal capture percentage be used for the Tailwaters project?**