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Twentymile Coal, LLC

29515 Routt County Road # 27  
Oak Creek, Colorado 80467  
(970) 879-2718

March 20, 2025

Michael Fitz  
Planner II  
Routt County Planning Dept  
136 6<sup>th</sup> St. Suite 200  
Steamboat Springs, CO 80487

**RE: Peabody Temporary Housing SUP Renewal Application, Variance Request, V2.**

Dear Mr. Fitz,

Peabody has submitted an application to request renewal of the current Temporary Housing SUP (PL-20220085). With this application Peabody is requesting a variance to grant an additional 3 year term based on the following information:

1. The Variance will not injure or adversely impact legal conforming uses of adjacent property, or the applicant has accurately assessed the impacts of the proposed Variance and has agreed to adequately mitigate those impacts.
  - a. The location of the existing temporary housing facility does not impact the adjacent properties. There has been minimal impact to both the public and the environment with our current location. Peabody has insured the facility remains in preeminent condition and is maintained to the best of our ability. The site remains clean and orderly at all times. From the public eye this location is very discreet. The location can only be seen from the immediate driveway area on County Road 51B. The area is already industrialized and well suited for this establishment.
2. The Variance furthers the intent of the Master Plan and applicable Sub-Area Plans.
  - a. The location of the current temporary housing facility is surrounded by Agriculture/ rangeland and industrial zonings. This location does not hinder future development or preservation. The location is within the Hayden 3-mile plan but resides with in the powerline corridor where development will be limited.

The Master Plan addresses the need for efficient, affordable, and effective transportation to reduce congestion on Highway 40. The majority of the Twentymile workforce commutes from either Craig or Hayden. As everyone is aware the hazards of Highway 40 continue to increase as the number of commuters continue to increase. By keeping our Temporary housing facility at its current location, we will eliminate as many as 48 roundtrip commuters from Highway 40 every day. Although this may not seem like much of a dent in the overall commuter number, for Peabody, when accounting for the bi-

weekly shift rotations, it is 96 employees that will have a safer commute, making up 1/3<sup>rd</sup> of our workforce.

Peabody's goal is to hire local or hire with the intent that the workers will eventually relocate to the valley permanently. Since January 1<sup>st</sup> of 2023 Twentymile has hired 650 employees and contract workers. Since January 1<sup>st</sup> of 2023 our workforce numbers have only increase by 24 people. Our intense turnover rate elevates concern for any permanent consolidated housing development. Nearly 20 employees that were originally provided housing through our temporary housing facility have permanently relocated and brought their families to the valley in which they have obtained permanent housing. Many of our occupants of the current Temporary Housing Facility travel from 6+ hours away with some coming from 20+ hours away. They fly in and out of the Hayden Airport every 7 days making the location of the current facility even more beneficial. Although we are only a few miles from Hayden our employees have had no complaints about the vicinity of the Facility to services found with in the Town limits of Hayden. Our crews generally work 12+ hour shifts are really only in need of a place to relax and sleep before the start of their next shift. At the end of their rotation of days they leave the valley to go home.

Although we find our employees to be respectful, quiet, and law abiding citizens and have had no complaints from the public for our workforce, recent public interactions have shown that the public is not always in support of the development of housing for transient workers within or near the communities. Many communities have the opinion that transient workers bring crime and mischief to the area. This interaction more proves that the location of our current facility could not be more perfect; out of sight, out of mind.

3. The Variance application meets the criteria of either special circumstance, or practical difficulty, or the application presents an acceptable alternative, as further defined below.
  - a. Special Circumstances. The special circumstances of the property make the strict application of the standard an unnecessary hardship to the applicant, and the special circumstances are not the result of actions of the property owner or applicant.
    - i. Peabody continues to research a more permanent housing option for its employees. Peabody has been hesitant to pursue permanent housing establishments. The coal market continues to be volatile and because of this we continue to keep our mine planning forecasted only three years at a time. The current location is practical for everyone involved. It works well for our employees and allows our operations to have sufficient workers to continue to operate. Its vicinity to the Twentymile Mine, Hayden Airport, and the Town of Hayden offer a perfect location for our out-of-town workforce. All though we have researched permanent housing options we find that our most practical approach has been to encourage the current occupants to relocate to the valley on

a permanent basis and seek permanent housing on their own. In some instances, depending on the employment opportunity, Peabody has offered relocation packages to help fund expenses of permanently moving to the valley to offset the high expenses of living that we are seeing in the area. Since we truly have a rotating door of employees this scenario of housing is the best approach for Peabody. With the uncertainty of the coal market and large construction windows estimated for completion of housing developments Peabody does not support taking the risk of a permanent development of housing benefiting Routt County more than Peabody.

- b. Practical Difficulty. The proposed Variance is of a technical nature and is required to compensate for some practical difficulty or unusual feature of the site or the proposed development that is not shared by landowners in general.
- c. Acceptable Alternative. The proposal provides at least one of the following acceptable alternatives to the standard:
  - i. The alternative achieves a result that is equal to or better than the Code standard to which a variance is being sought; or
  - ii. The purpose and intent of the Code standard will not be achieved by strict application of the standard in the particular circumstance; or
  - iii. The application of other Code standards, purposes, or intents will be improved by varying the standard.

We look forward to continuing to work with Routt County on the renewal of this permit. Our Temporary Housing facility is critical to keeping our operation running. We believe that the renewal of this permit is worthy of a variance of the UDC being granted. This establishment will have no adverse impacts, it exists in an area that is not ideal for any other development and is financially justifiable to the operator.

Sincerely,



Miranda Kawcak  
Environmental Manager  
Peabody, Colorado Operations.

CC': Nick Aromando  
Pat Sollars