



March 17, 2023

Kristy Winser
Routt County Planning Department
136 6th Street, Suite 200
Steamboat Springs, CO 80487

RE: Stagecoach Mountain Ranch Project

Dear Routt County Planning Department:

Thank you for the opportunity to comment on the proposed Stagecoach Mountain Ranch Project. The proposed project is adjacent to Upper Yampa Water Conservancy District (UYWCD) property, Stagecoach Reservoir, and Stagecoach State Park and is of great interest to the UYWCD. As a neighboring property owner and water supply provider, the UYWCD does have concerns about the potential effects Stagecoach Mountain Ranch may have on the surrounding area and the water resources of the Upper Yampa River Basin. Beyond the UYWCD's comments below, the UYWCD requests that the Routt County Planning Department request a public presentation by the project proponents to allow for early public engagement in the planning process for this project.

Given the proximity of the proposed activities to UYWCD property and operations, the UYWCD will seek to ensure that any project development activities comply with all local, county, state, and federal regulatory programs applicable, including but not limited to Routt County Planning, United States Army Corps of Engineers (USACE), United States Fish and Wildlife Service (USFWS), Colorado Department of Public Health and Environment (CDPHE), Federal Energy Regulatory Commission (FERC), United States Forest Service (USFS), Bureau of Land Management (BLM), Environmental Protection Agency (EPA), and Colorado Division of Parks and Wildlife (CPW). To clarify and organize some of the UYWCD's initial concerns about the proposed project, we have responded to specific sections included in the *Narrative for Stagecoach Mountain Ranch Project* (February 1, 2023) that is included in the project application materials:

Section 1: Introduction

The inclusion of up to 800 residential properties associated with the full project development raises concerns by the UYWCD about multiple impacts to existing infrastructure adjacent and leading to the proposed project areas. Upgrades to roads and civil infrastructure necessary for the addition of 800 new residential units in the Stagecoach area need to be quantified and explicitly defined by a third-party technical analysis in future submittals.

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Additionally, the real impacts to areas adjacent and/or in close proximity to the proposed project may not be known for several years after development activities are completed. Routt County could consider the requirement of a long-term development impact fund to be used for the purpose of mitigating the continued effects of the proposed project. This financial mechanism could be tied to the revenues of the proposed project realized over time and not a one-time, lump sum payment.

Section 2: Stagecoach Mountain Ranch: A Low Impact, Low Density, High Quality, High Tax Paying Community

The proposed community design will need to consider the impacts of development during all phases of the project lifespan, including construction. The UYWCD has concerns about the construction phase and long-term potential effects on water quality, weed management, and roadways the proposed activities may have.

All references to and/or demarcations of the site of the proposed golf development as the “Golf Course/Marina property” in the Stagecoach Community Plan should be deleted. This nomenclature is outdated. The identified property does not possess any rights of ownership that include rights and/or options to develop or construct a marina on Stagecoach Reservoir. Therefore, the UYWCD requests that the property/area should be renamed so as not to carry any connotation of unauthorized construction of a marina.

The proposed development of 390 acres adjacent to Stagecoach Reservoir as a golf course will have an impact on the water quality of Stagecoach Reservoir. All non-point source run-off and organized discharge from the proposed development into Stagecoach Reservoir will need to be monitored on a predetermined schedule to comply with EPA, CDPHE, and Routt County water quality standards. Any degradation of the water quality of Stagecoach Reservoir resulting from the proposed development activities will not be acceptable. The UYWCD is willing to work with the project proponents, EPA, CDPHE, and Routt County in a stakeholder role to establish a water quality management program for Stagecoach Mountain Ranch. The current Routt County water body setback requirements should be reviewed for the potential for expansion for the golf course component of the proposed project.

The project owners, present and future, are to be responsible for all point and non-point source water quality degradation resulting from the full development of the project as presented, including the water quality of Stagecoach Reservoir as determined by all current and future regulatory agency standards.

Section 3: Residential Development

The UYWCD requests that the project proponents provide the UYWCD with a CDPHE accepted technical analysis that the newly renovated Morrison Creek Metropolitan Water and Sanitation District’s (MCMWSD) facilities that discharge directly into Stagecoach Reservoir will continue



to comply with all Routt County, CDPHE and Federal wastewater requirements at the wastewater capacity envisioned with the full development of the proposed project (+800 residential units and commercial development). The UYWCD encourages Routt County to solicit comments from MCMWSD about the proposed project and that any comments from MCMWSD be made public.

The project owners, present and future, are to be responsible for all point and non-point source water quality degradation resulting from the full development of the project as presented, including the water quality of Stagecoach Reservoir as determined by all current and future regulatory agency standards.

Section 4: Recreational Amenities

Boating and watercraft access to Stagecoach Reservoir will only be allowed through existing Stagecoach State Park boat ramps and/or existing access points for personal watercraft included in current CPW State Park management activities. All other access to UYWCD property shall remain as existing unless otherwise agreed to by UYWCD.

There are no current authorizations and/or agreements to construct an additional marina on Stagecoach Reservoir.

Section 8: Water

The UYWCD appreciates that the project proponents have a stated intent to utilize existing water supplies in close proximity to the proposed project properties as a source for any additional water supply required. There currently are no water storage contracts in UYWCD storage facilities associated with the proposed project uses. It would be helpful for the project proponents to quantify and report all additional water supply use that will be necessary for the fully developed proposed project. The UYWCD requests that the project proponents consider stringent restrictions on irrigation of lawns and/or landscaping for all components of the proposed project.

Any contractor's use or reuse of contracted UYWCD Water shall in all instances be in accordance with the terms of a water supply contract, the permits and decrees of UYWCD's water rights, UYWCD's adopted policies and procedures, as they may change from time to time, and in accordance with applicable law and all decrees related to the contracted water.

The project owners, present and future, are to be responsible for all point and non-point source water quality degradation resulting from the full development of the project as presented, including the water quality of Stagecoach Reservoir as determined by all current and future regulatory agency standards.



Section 9: MCMWSD

The UYWCD believes that documentation of formal consultation with MCMWSD and an analysis of the impacts the full development of the proposed project will have on the MCMWSD and Stagecoach Reservoir are requirements of any future project development applications submitted to Routt County.

Please see comments on Section 3 above.

Thank you for the opportunity to comment on the proposed Stagecoach Mountain Ranch Project. The UYWCD is interested in engaging with the Routt County Planning Department for any future activities on this matter. Please feel free to contact us with any questions you may have about the contents of this letter and/or UYWCD operations in the Stagecoach area.

Sincerely,
On Behalf of the UYWCD Board of Directors

A handwritten signature in black ink, appearing to read "Andy Rossi", with a small flourish at the end.

Andy Rossi
General Manager
Upper Yampa Water Conservancy District

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