



COLORADO

Parks and Wildlife

Department of Natural Resources

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March 22, 2023

RE: Application PL20230003; Stagecoach Mountain Ranch Development Administrative Review

Dear Mr. Goldich,

Thank you for consulting Colorado Parks & Wildlife (CPW) on the proposed Stagecoach Mountain Ranch Development. CPW's statutory mission is to perpetuate wildlife resources of the State, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW encourages Stagecoach Mountain Ranch and Routt County to afford the highest protection for Colorado's wildlife species and habitats.

The Stagecoach Mountain Ranch Master Plan proposes development on approximately 6,620 acres of privately owned property in Stagecoach. The private recreation-based residential community proposes 800 residential properties comprised of 50 - 100 large tract lots, 200 - 400 single-family lots, and multi-family properties such as townhomes, condominiums, and workforce housing. The proposed layout shows 80% of the residential development on the mountain property and 20% on the lakefront golf property. Amenities also include commercial centers, private clubs, recreational trails, parks, and upgrades to roads and infrastructure. In addition to Stagecoach Mountain Ranch residential development, a Nordic ski area, downhill ski area, golf course, fitness center, and extensive non-motorized trail network would also offer extensive recreational opportunities. Residents would also be presented with boating, angling, agricultural interactions, and shooting sports opportunities.

The mountain property will have a ski base area, which includes on-mountain ski lodges, cabins, maintenance facilities, and storage facilities. In addition, the mountain property will also maintain agricultural operations on a large portion of the property. The golf course property includes a clubhouse, activity center, maintenance facilities, and storage areas for the golf course and lake activities. A commercial center planned near the existing residential development in the north (lake) end of the Stagecoach community will have retail and office space, outdoor and indoor community gathering areas, public recreational trails, and parks. Non-motorized public recreational trails will provide public access to 720 acres of Bureau of



Land Management (BLM) land that currently does not have public access. This parcel is approximately 1/4 mile west of the Stagecoach Townhomes and the Meadowgreen area. Trails will connect to the existing trail system through the Neighborhoods at Youngs Peak and the State Park trail around Stagecoach Reservoir.

CPW Area Staff and State Park Staff have compiled the following concerns and comments to avoid and minimize impacts on Stagecoach State Park, Stagecoach Reservoir, and wildlife resources that may result from the development of Stagecoach Mountain Ranch. Standardized, statewide wildlife recommendations have been developed by CPW for utilization by regulatory entities when reviewing and approving various land use proposals under their jurisdiction. This suite of species and seasonal habitats are collectively referred to as CPW's High Priority Habitats (HPH) and contain areas for which CPW has sound spatial data and science-based recommendations to avoid, minimize, and mitigate adverse impacts resulting from anthropogenic disturbances. CPW requests that Routt County and the project proponent incorporate these recommendations into the proposal. CPW prefers to work proactively with project proponents to avoid impacts on wildlife. When avoidance of impacts from development is not possible, we recommend minimization measures such as best management practices to reduce the unavoidable impacts. Minimization of impacts on wildlife resources requires mitigation efforts to offset development impacts. If the Stagecoach Mountain Ranch cannot be altered to avoid impacts on wildlife, minimization and mitigation discussions should be required by Routt County.

State Park Management

Stagecoach State Park (Park) is a public resource that offers a quiet stage for recreational activities in the Yampa Valley of southern Routt County. To maintain this atmosphere, CPW carefully manages lake and campground use to avoid safety issues associated with increased numbers of boats on the reservoir. Stagecoach Reservoir limits the number of boats operating at any given time. With current Park usage, the reservoir reaches boating capacity every weekend during the summer. The Park also operates a marina that offers boat rentals and supplies to the public. CPW has safety concerns about increased boating use and is concerned about direct competition from boating facilities proposed by Stagecoach Mountain Ranch. Multi-use trails at Stagecoach State Park offer the opportunity to recreate in and around the reservoir and are popular with bikers, hikers, and equestrians all summer. Increased trail use and proximity to the golf course create safety and congestion concerns for residents and Park visitors. Balancing Park users with Stagecoach Mountain Ranch constituents will require careful adaptive management and coordination with CPW to provide opportunities for residents, guests, and public visitors to Stagecoach Reservoir and the surrounding area to avoid a negative impact on the State Park visitors.

As Park use increases, traffic to and from the Park will also increase, creating a need for improved access on CR14, CR16, and all access points leading into the Park facilities for safer ingress and egress. CPW also expects to see an increase in non-compliance with State Park Regulations with the proposed Stagecoach Mountain Ranch such as off-leash dogs, illegal

access, and overcrowding requiring additional staff and resources to address. CPW requests a cooperative management plan addressing these challenges to maintain the Park's high standards of customer service and safety for both Stagecoach Mountain Ranch residents and Park visitors. This plan should address the approach and costs of maintenance, customer service, law enforcement, and proactive education components.

CPW manages Stagecoach Reservoir and the Yampa River as a sport fishery with specific management plans in cooperation with the Upper Yampa Water Conservancy District (UYWCD) and Colorado Division of Water Resources to induce a disadvantage to invasive fish species in the reservoir that compete with and prey on more desirable sportfish. Coordination and facilitation of continuing that operation will benefit the residents, guests, and State Park visitors by maintaining the quality of the fisheries at the reservoir.

Water & Fishery Management

Stagecoach Reservoir is managed as a Sportfish Management Water following CPW's HPH recommendations (2019) that no ground-disturbing activity (NGD) occurs year-round within 300 feet of the ordinary high water (OHW). A development of this magnitude expects to have implications for Stagecoach Reservoir from stormwater discharges and runoff, an increase in sediment input, nutrient loading from biological and chemical applications, and a multiplication of wastewater treatment demands. To protect the sport fishery and water quality, CPW recommends the following best management practices be put into place to avoid and minimize impacts:

- Avoid any development within 300 feet of the ordinary high water mark of Stagecoach Reservoir, the Yampa River, and any other water bodies.
- Install multiple groundwater monitoring wells within the buffer zone between any water body, permanent or ephemeral, before construction to gather baseline data and provide continuous monitoring.
- Incorporate plans that protect wetland and riparian habitats from construction impacts and damage from visitors.
- Protect the landscape from erosion by implementing a stormwater management plan to minimize erosion and runoff from impervious surfaces carrying sediment, nutrients, and chemicals.
- Implement a nutrient removal system incorporated into the stormwater management plan that minimizes fertilizers, pet waste, etc., from washing off parcels during storms or snow melt into the river and reservoir.
- Allow for snow storage areas incorporating drains that properly remove trash, debris, nutrients, and salts as it melts.
- Analyze the adequacy of the wastewater treatment facility for this development and its fluctuations in visitors. The wastewater treatment facility should include tertiary treatment to remove nutrients before discharge into the environment.

Wildlife

Stagecoach Mountain Ranch proposed to occupy areas within High Priority Habitats, for which CPW has sound, spatial data, and scientifically-backed recommendations. Columbian sharp-

tailed grouse (CSTG) consistently utilize three lek sites and associated production areas and winter range within the proposed golf property and around the reservoir that will be impacted or displaced by Stagecoach Mountain Ranch. CPW recommends redesigning the development to avoid development within 0.6 miles of active lek sites, and implementing seasonal closures from March 15th to July 30th within the production area or 1.25 miles of a lek, whichever is greater, and in the winter from November 15th to March 15th to protect winter range.

Elk utilize high elevations of the mountain property during the early summer months for production. CPW recommends implementing seasonal closures with no permitted or authorized human activities from May 15th to June 30th to protect resources and reduce stress on calving elk. Lower elevations of the mountain property provide refuge for elk during severe winters and concentrate herds during winter months to areas with available forage. CPW recommends seasonal closures during the winter to avoid human activities from December 1st to April 30th. If avoiding these HPHs is unachievable by redesigning the development, CPW will work with project proponents to minimize or mitigate those impacts in further conversations and plan development.

Human-Wildlife Conflicts

Some Colorado wildlife species often adapt to mountain-urban environments like Stagecoach Mountain Ranch, with black bears, moose, and mountain lions posing the biggest concerns for this area. Other wildlife species such as coyotes, foxes, raccoons, and skunks, are also found in the area and can be considered a nuisance by residents. CPW recommends establishing expectations and protocols as part of normalized life and operations at Stagecoach Mountain Ranch by incorporating these best management practices to reduce or prevent unnecessary conflicts between people, pets, and wildlife.

- All outdoor garbage should be secured in IGBC-certified bear-resistant canisters, if possible, or stored in a structure that prevents black bear access. Trash should not be outside unsecured or in bags or standard canisters.
- No compost piles should be allowed on the property.
- Landscaping should not include fruit-bearing trees.
- Landscaping fabrics or erosion control materials should be constructed of natural materials and pose a low risk of entrapment or damage by wildlife.
- Prohibit backyard poultry, waterfowl, or beehives and the use of bird feeders.
- Prohibit placement of pet food outside.
- Avoid installing fencing, except in designated dog parks, which could prohibit wildlife passage. Where fencing is necessary, adhere to guidelines within CPW's Fencing with Wildlife in Mind Document.
- CPW strongly advises that dog runs be near units that allow pets to encourage use. A lack of fenced dog runs can lead to wildlife harassment by dogs, and improper fences in residential areas can entangle wildlife.
- Dogs should be leashed and under control unless in a fenced dog park. Roaming domestic animals can engage with wildlife, leading to potential injuries and mortalities. Dogs and cats can chase, harass, and kill wildlife, including fawns, calves, small mammals, and songbirds.
- Outdoor cooking appliances should be cleaned and stored in a protected area.

- Lighting should be capped from above to help reduce night-sky light pollution, which inhibits nocturnal wildlife behavior.
- The HOA should prohibit wildlife feeding via salt blocks or other methods. Except for bird feeders, any type of feeding, baiting, salting, or other means of attracting wildlife is illegal. CPW may cite both homeowners and tenants for violations.
- Garage doors should remain closed when residents are not outside and in the immediate vicinity to prevent bears from entering and obtaining stored food rewards, such as freezer food, pet food, and trash.
- Raptors and other migratory birds are protected from take, harassment, and nest disruption at the state and federal levels. CPW recommends that a nest survey be performed in each project area (half-mile radius) no later than two weeks before initiating construction for each project to identify potential raptor and songbird nests, raptor perching and foraging areas, and winter roosting areas.
- The homeowners and tenants should be individually responsible for abiding by all wildlife conflict mitigation measures adopted by the county and project.

For additional resources to reduce human-wildlife conflicts and minimize impacts on wildlife, please visit CPW's Living with Wildlife publication.

Vegetation

CPW recommends developing a comprehensive weed management plan, incorporating wildlife-friendly vegetation and landscaping while controlling the spread of noxious weeds within the Stagecoach Mountain Ranch development. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them. CPW requests a review of all seed mixes, excluding the golf course, to be utilized on the properties to minimize the use of seed species detrimental to wildlife and native habitats.

CPW appreciates being contacted early and often for input on the impacts that Stagecoach Mountain Ranch could impose on the wildlife and wildlife habitat in the area. This comment letter identifies concerns for both Stagecoach State Park and wildlife in the area. CPW looks forward to actively participating in a planning process and developing cooperative management plans that address these concerns. Contact CPW staff to discuss these wildlife issues further and facilitate measures to avoid, minimize, and mitigate impacts on wildlife.

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Sincerely,



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