

June 26, 2018

Kari Parsons  
El Paso County Planning and Community Development Department  
Via EDARP

**Subject: The Retreat at TimberRidge Preliminary Plan - Review 1**

Dear Ms. Parsons:

This letter responds to your review letter dated May 17, 2018 regarding the subject application. Responses to comments in that letter are shown in **RED** below the original comment.

**EL PASO COUNTY PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT**

**Planning**

This preliminary plan application is being reviewed under the preliminary plan submittal requirements, the General Development Standards of Chapter 6, the Standards for Divisions of Land in Chapter 7, and the Standards for Subdivision in Chapter 8 of the Code. **Noted.**

1. Please see redlines in EDARP. Planning comments are depicted in green. Engineering comments are depicted in blue. The four (4) deviations have been signed, two (2) approved and two (2) denied, and uploaded under additional documents in EDARP. **Noted. Deviations that have been approved are noted on the Preliminary Plan cover sheet.**

**Engineering**

Planning and Community Development (PCD)-Engineering reviews plans and reports to ensure general conformance with El Paso County standards and criteria. The project engineer is responsible for compliance with all applicable criteria, including other governmental regulations. Notwithstanding anything depicted in the plans in words or graphic representation, all design and construction related to roads, storm drainage and erosion control shall conform to the standards and requirements of the most recent version of the relevant adopted El Paso County standards, including the Land Development Code (LDC), the Engineering Criteria Manual (ECM), the Drainage Criteria Manual (DCM), and the Drainage Criteria Manual Volume 2 (DCM2). Any deviations from regulations and standards must be requested, and approved by the ECM Administrator, in writing. Any modifications necessary to meet overlooked criteria after-the-fact will be entirely the developer's responsibility to rectify.

A written response to all comments and redlines is required for review of the re-submittal. Please arrange a meeting between the developer's team and County staff to review and discuss these comments and prepared revisions/responses prior to the next submittal. **Meeting was held May 21, 2018.**

Due to the extent of additional information required in the plans and reports, these comments are cursory in nature. More-detailed comments will be provided upon receipt of complete plans and reports and resolution of any major issues. **Noted.**

### General

1. Comments remaining from the TimberRidge PUD (PUD-17-003) include the following:
  - a. *Cul-de-sac design needs to meet ECM Section 2.3.8. Snow storage areas/easements need to be provided for cul-de-sacs and roads adjacent to or within adjacent property. Partially resolved; response references a letter from the adjoining property owner stating that easements will be provided. This will be further addressed at the Preliminary Plan and Final Plat stages. Provide documentation from the adjoining property owner(s) that all necessary offsite easements will be able to be obtained. Provide an exhibit showing general locations of all necessary offsite easements. **Turnaround areas are now on site.***
  - b. *Note: easements to other entities that overlap with future public road rights-of-way will need to be vacated/terminated at the time of platting of the rights-of-way. Documentation of separate vacation/termination documents will need to be provided showing no encumbrances on proposed rights-of-way at that time. Regarding the proposed Arroyo lane right-of-way, the existing access easement will need to be revised or extinguished in the area underlying the proposed ROW prior to County acceptance of the public improvements. **Noted.***
2. Note: Pre-development (early) grading has not been requested at this time; therefore, submittal of the associated GEC plans, SWMP report and permit applications have not been required. **Noted.**

### Preliminary Plan

1. Ensure that all checklist items are provided (reference planning comments and redlines).
2. Some of the legal description that was checked does not match the plan. Ensure that the entire boundary description and labels are correct. See redlines. **Revised.**
3. Ensure that all information will be legible on the printed version; much of the text is very small. Additional sheets may be necessary to allow for legibility without overwritten information. **Resubmittal includes additional sheets to address this issue.**
4. The term “floodway” is used to label the floodplain – please verify whether this is the entire floodplain; if so, relabel as “FEMA floodplain”; if not, show and label the entire floodplain as well. **Floodplain labeled as FEMA Floodplain.**
5. Provide a preliminary (not for construction) grading plan for reference. This plan does not require erosion control design or details, but should identify/highlight areas that will need erosion control at some point. (This is being asked for separately, rather than shown on the Preliminary Plan itself, so that the amount of information on the Preliminary Plan drawing does not become excessive.) **A preliminary grading plan has been added to the plan set.**
6. See Preliminary Plan redlines for additional comments. **Noted.**

### Transportation / Traffic Impact Study

1. See redline on Figure 1 (indicate phase for paving of Arroya Lane).
2. Regarding the five deviation requests:
  - a. ECM 2.2.7.B – Road Paving Policy: The request to construct Nature Refuge Road as a permanent gravel road has been denied. An alternative may be to phase paving and/or defer paving this road until Arroya Lane is constructed and

- paved; however, collateral or an escrow account for the paving improvements may still be required. **Noted.**
- b. ECM 2.2.7.B – Road Paving Policy: In conjunction with comment 2.a above, the request to construct a 50-foot paved apron on Nature Refuge Road at Arroya Lane has been denied. **Noted.**
  - c. ECM 2.3.8.A – The request to allow an interim cul-de-sac length in excess of 1,600 feet for Nature Refuge Road has been approved pending fire district concurrence. **Noted.**
  - d. ECM 2.2.5.B.1 – Access Criteria – Spacing: The request to allow an interim (shared) access from Vollmer Road to the two lots on the west side of Vollmer has been approved. This approval will require notation on the subdivision plat for these two lots that the access is interim, to be removed/relocated when the remainder parcel develops. **Noted.**
  - e. A deviation request for a temporary emergency access gravel road was not received. Provide with the next submittal if it is desired to have this addressed prior to the subdivision that triggers the need for the second access point. **Fire Department support has been provided; the deviation request will accompany the Final Plat.**

#### Preliminary Drainage Report (PDR) / Drainage Plans

**Note: These comments are cursory due to the number of revisions and additions required to the PDRs. Additional, more detailed comments will be provided on the complete submittal.** Per DCM1 Section 1.2.2 (and 4.3), “The purpose of a Preliminary Drainage Report (PDR) is to identify and propose specific solutions to drainage problems that would occur as a result of that portion of the development considered for platting. Detailed analysis of drainage basin hydrology and hydraulics is required. Alternative solutions to drainage problems shall be noted and the capacity of drainage facilities on and off-site shall be evaluated. Specific improvements, including open channels, storm sewers, grading, site stabilization, catch basins, culverts and other improvements will be located and sized to meet requirements of the initial and major drainage system.” In general, the reports submitted require a higher level of detail.

1. See PDR redlines. **PDR redlines have been addressed.**
2. There are many references to adjoining property as “open space”; please clarify what the uses of the overall properties are (typically rural residential?). (north report). **Text modified to address comment.**
3. Address the 4-Step process described in ECM Section 1.7.2.A and how these steps are being provided for on this site (north and south). **Additional text on 4-step process added. (North)**
4. Provide discussion of maintenance access and aspects of the preliminary design. Show access roads for ponds and channels on the drainage plans. **Comment addressed in report text.**
5. (South report): An overall hydrologic model (HEC-HMS and/or excerpts from the most recent DBPS or other study addressing ultimate developed conditions) and hydraulic model (HEC-RAS) are required to address overall basin-wide pre- and post-development Sand Creek channel flows and hydraulic channel conditions. The FEMA (existing) flows are higher (~2,600 cfs vs ~2,200 cfs in DBPS) in this reach. Address this in the PDR, as well as the following: **Reference to the DBPS recommendations through this Reach were included with the previous report. Additional discussion in the report has been added regarding FEMA flows vs. DBPS flows.**

- a. Address floodplain/channel hydrology and hydraulics for the existing (FEMA) and anticipated fully developed basin detained conditions, and fully developed “emergency conditions” undetained flow analysis. Address specifically how re-routing of flows to specific outfalls on the Sand Creek channel will affect the overall channel flows, velocities, volumes and depths. (This is anticipated to be minor, but will a LOMR be required?) Ensure that proposed building areas are outside of the emergency scenario 100-year flood (DCM Update Section 12.0). **All this detailed design information provided with FDR and Final Plat.**
  - b. Address channel velocities, in the range of 8 to 11 fps per the FEMA study, above the 7 fps recommended in the DBPS, and any stabilization necessary above that called for in the DBPS. **Additional text added to report addressing these issues.**
  - c. Address existing interim conditions where flows along Vollmer Road are diverted from intended locations until DBPS improvements are complete (see drainage plan redlines). **These historic off-site pass-thru flows currently reach Sand Creek, just a little further down the Reach and only total less than 2% of historic flows within this Reach. Thus, there will be no significant impact to the existing creek prior to improvements. This text added to report.**
  - d. The report states that specific channel improvements have not been determined with this report. Details, including preliminary design, sizing, and modeling (to verify depths and velocities) are required, including the offsite area in Sterling Ranch adjacent to the west side of the south portion of Timber Ridge (proposed Tract G). The entire reach through and adjacent to this development needs to be addressed in this report so that final drainage reports at the final plat stage have a comprehensive plan for improvements. **Preliminary Design is based on the DBPS recommendations and concept designs also included in this report. Final design plans will be presented at Final Plat stage.**
  - e. Regarding all of the above, coordination with Sterling Ranch design and modeling is necessary. It may be advantageous to address these issues, especially where the channel overlaps both developments, in the overall Sterling Ranch MDDP, which is a larger project already considering these issues to the south, and may possibly be pending submittal. **Coordinating with Sterling Ranch Engineer to address in their MDDP.**
6. Regarding offsite flows:
- a. As noted in the MDDP review comments, the method of accommodating offsite flows from the east needs to be addressed in the PDR. The drainage plan (south) appears to show offsite construction of storm drain stubs to the east. Label all necessary easements (onsite and offsite) and provide preliminary grading and capture/conveyance details along the east property line. **Proposed drainage easement notes have been added to the drainage maps.**
  - b. Provide headwater calculations for the culverts crossing Vollmer Road and those capturing flows from the east of the property. Show any necessary ponding easements for those on the east side. **Now included.**
7. Appendices/calculations:
- a. Provide DCM Update Table 6-6 listing Rational C values for reference (both reports). **Table added to reports.**
8. Drainage plans: **Comments addressed in plans.**
- a. Ensure that all information will be legible on the printed version; much of the text is very small. Additional sheets may be necessary to allow for legibility without overwritten information.

- b. Provide proposed roadway cross-sections or call out curb and gutter/ditch types on the Developed Condition plans. **Plans already label areas as “Rural Res.” Or Urban Res. With cross sections shown on PP.**
  - c. The location of Alternate Pond B does not look like it would capture all road runoff. Please clarify on drainage and preliminary grading plans. **Now labeled as alternate/additional facility to be determined at Final Plat.**
  - d. See drainage plan redlines for additional comments.
9. Note: per the PDR, individual lot sediment control BMPs will be required for Lots 11 and 12 west of Vollmer Road. This should be noted on the Preliminary Plan. **Note added to PP.**
10. Note: Detention basin calculations were not reviewed in detail. See redline comment on potential reimbursements; if all design storms (2- to 100-year) are not detained to historic rates the ponds may not be partially deductible from drainage fees. Further design adjustments may be necessary with the Final Drainage Report. **We acknowledge that further design will be required with Final Plat and Final Drainage Report.**
11. Note: A wetlands mitigation map will be required showing the proposed/required locations of mitigation (replacement areas). If this is not provided with the Preliminary Plan, notes will be required on the Preliminary Plan regarding the timing and responsibilities for the report and associated mitigation. **Provided at Final Plat. Note added to Preliminary Plan.**
12. A deviation request from ECM Section I.7.1.B will be required addressing all urban lot and road areas not provided with WQCV.
  - a. It appears that minor grading adjustments (roadside ditches) might be possible to accommodate drainage of the road areas to the detention basins. **Adjustments made to ditches to capture all roadways.**
  - b. If a deviation is requested for any urban lots, address roof drains being required to drain to the front yards. **Addressed at Final Plat stage.**
  - c. Any urban lot areas draining directly offsite may require an easement or other documentation from the adjoining owner(s) that the proposed developed condition is acceptable. **Noted.**

**There were also some questions/comments in the PDR that aren't directly answered by the report revisions. Responses to those items are shown below.**

- **Page 4, 2<sup>nd</sup> paragraph – Q: rural residential? X2, A: Yes to both.**
- **Page 7, 4<sup>th</sup> paragraph – Q: HOA or district? A: District.**
- **Existing Drainage Plan – Q: What is this line? A: It is the boundary of a surface feature in CAD, which shouldn't have been shown.**
- **Proposed Drainage Plan – Q: What is this line? A: It is the boundary of a surface feature in CAD, which shouldn't have been shown.**
- **Proposed Drainage Plan – Q: From the contours it appears that this flow crosses Arroya Lane. Is there a culvert? A: Flow does cross Arroya Lane after ponding at least 2 feet. Looks like some flow may also go west along Arroya Lane after ponding (couldn't be sure since everything was dry). There is no culvert there, just a cattle guard. We aren't rerouting this flow as it's outside the development**
- **Proposed Drainage Plan – C: Stabilized spillway outfall needs to be entirely within the property. R: It is (shown ending at the property line).**

## COLORADO STATE FOREST SERVICE

The Colorado State Forest Service recommends that all forested acres be mitigated to reduce the risk of wildfire and that defensible space be created for each dwelling using the standards in ***“Protecting Your Home From Wildfire: Creating Wildfire-Defensible Zones” FIRE 2012-1*** located on the Colorado State Forest Service website. **Noted.**

[http://csfs.colostate.edu/pdfs/FIRE2012\\_1\\_DspaceQuickGuide.pdf](http://csfs.colostate.edu/pdfs/FIRE2012_1_DspaceQuickGuide.pdf)

In addition, I recommend that all wildfire mitigation be completed before or during dwelling construction. **Noted.**

Please feel free to contact me if I can be of any further assistance.

Respectfully,

Larry Long C.F.  
Supervisory Forester  
719/687-2921  
[larry.long@colostate.edu](mailto:larry.long@colostate.edu)

## FALCON FIRE PROTECTION DISTRICT

This project is within the boundaries of the Black Forest Fire District. As such no review was completed by the Falcon Fire District. **Noted.**

## ELPASO COUNTY HEALTH DEPARTMENT

Please accept the following revised comments from El Paso County Public Health (EPCPH) regarding the project referenced above: **Noted.**

- The proposed 263 acre 212 residential lot development will be served water and wastewater services from a couple area metropolitan districts that will be referenced later in this report. There are also 41 residential lots of 2.5 acres+ planned that will utilize individual private wells and onsite wastewater treatment systems (OWTS) as their source of water and wastewater service. **Noted.**
- There is a not a finding for sufficiency in terms of water quality for drinking water for the portion of the project with 2.5+ acre lots due to the lack of a water quality sample being submitted for review. **Noted.**
- The remaining lots in the project will have water obtained from an approved Colorado Department of Public Health and Environment, Water Quality Control Division, regulated public water system from which there is a finding of water quality sufficiency. The proposed Retreat @ TimberRidge Metropolitan District will obtain community water service through Sterling Ranch Metropolitan District No. 1. Sterling Ranch Metropolitan District No. 1 has written a letter of intent to provide water to the lots less than 2.5 acres in area. **Noted.**

- Sterling Ranch Metropolitan District No. 1 has agreed to provide wastewater service through the Retreat @ TimberRidge Metropolitan District once the district is formed. A letter verifying the wastewater treatment facility used by Sterling Ranch Metropolitan District No. 1 has sufficient treatment capacity for this development project is requested for review by El Paso County Public Health. **Noted.**
- The Entech Engineering, Inc., Soil, Geology and Geologic Hazard Study dated 12April2017, and revised 01Dec2017, for the 41, 2.5 acre+ lots was reviewed for the determination of suitability of the site for onsite wastewater treatment systems (OWTS) installations. The number of soil test pits (6) for the planned 41 lots proposed to use onsite wastewater treatment systems (OWTS) is less than the requirement of the current Land Development Code. The number of soil tests must be 20% or more of the total number of lots with OWTS's planned. Nine soil test pits minimum are required. Until this requirement is satisfied, OWTS installations for wastewater service cannot be approved. **The testing for the required number of lots was submitted directly to Mr. McCarthy.**
- Note: The 6 soil test pits within the report did indicate that shallow ground water was not encountered. However, the report did show that a majority of the soil in the area does have a fluctuating level of bedrock known as the Dawson Formation. This formation is common throughout the northeastern portion of El Paso County, and OWTS installations are possible with proper design engineering. **Noted.**
- Radon resistant construction building techniques/practices are encouraged to be used in this area. The EPA has determined that Colorado, and the El Paso County area, have potentially higher radon levels than other areas of the country. **Noted.**
- Earthmoving activity in excess of one acre, but less than twenty-five acres, will require a Construction Activity Permit from El Paso County Public Health. Go to <http://www.elpasocountyhealth.org/service/air-quality> for more information. If the earthmoving activity is in excess of twenty-five acres at one time, then a Construction Activity Permit is required from Colorado Department of Public Health and Environment, Air Pollution Control Division. **Noted.**
- The storm water detention ponds to be built as storm water quality protection measures will be maintained by the Retreat @ TimberRidge Metropolitan District once formed. The district is encouraged to include mosquito control as part of its maintenance responsibilities. Detention ponds that are not properly maintained provide mosquito breeding habitat and increase the risk of the general public to West Nile Virus. **Noted.**

Mike McCarthy, R.E.H.S.  
 El Paso County Public Health  
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 719-575-8602  
 30Apr2018

## ELPASO COUNTY CONSERVATION DISTRICT

The El Paso County Conservation District board of supervisors have no comments at this time.

## 911 AUTHORITY –ELPASO/TELLER COUNTY

Hello Comments for 911 as follows:

All street names have been previously approved. Several corrections to suffixes are requested. The small segment of Owl Perch Loop at the southern end should have a unique road name where it takes the 90 degree turn (from lots 153 – 156) Nature Refuge Road – Acceptable - Due to continuity, suffix should be Court, Place, Way, Terrace, Lane, Loop, Trail, or Path Hawks Hill Court – Acceptable - Due to continuity, suffix should be Street or Drive Aspen Valley Road – Acceptable – Previously reserved as “Parkway,” but “Road” better conforms to code. Falcon Nest Court – Acceptable Antelope Ravine Drive – Acceptable - Previously reserved as "Avenue," but "Drive" better conforms to code. Elk Antler Lane – Acceptable - Due to continuity, suffix should be Street or Drive Bison Valley Trail – Acceptable - Due to continuity, suffix should be Street or Drive Rabbit Tail Place – Acceptable Owl Perch Loop – Acceptable - Due to continuity, suffix should be Street or Drive **Street name suffixes have been changed as requested.**

Thank you Justin

## MOUNTAIN VIEW ELECTRIC ASSOCIATION, INC

This area is within MVEA certificated service area. MVEA will serve this area according to our extension policy. Connection requirements may include provisions for necessary line extensions and or other system improvements, and payment of all fees under MVEA line extension policy. Information concerning these requirements can be obtained by contacting the Engineering Department of MVEA. **Noted.**

Due to the density of this development and developments in the vicinity, MVEA has indicate in earlier communication that connection requirements will include provisions for construction of a new transmission line and a substation. **Noted.**

MVEA requests a ten (10) foot front, rear and side lot line utility easement on lots one (1) acre and larger. Residential lots less than one (1) acre MVEA request a ten (10) foot front and rear lot line utility easements along with five (5) foot each side lot line utility easement. MVEA also request a twenty (20) foot exterior subdivision utility easement. **Noted.**

If open space, drainage and landscape tracts are designed in this subdivision MVEA requests these areas be listed to include utilities. Additional easements may be required once a review of civil drawings with grading and erosion plan is provided to MVEA. **Noted.**

MVEA has existing facilities near this parcel of land. If there is any removal or relocation of facilities it will be at the expense of the applicant. **Noted.**

Mountain View will require that the owner or developer of this project coordinate with it and the El Paso County concerning the location of any roads or other public improvements that it constructs, including any offsite modifications to existing roads or other public improvements, in order that arrangements can be made, in advance of entering into any construction contracts affecting such facilities, to complete any necessary relocation of Mountain View facilities prior to construction of said improvements, all in accordance with Colorado law and Mountain View's published policies and Bylaws. Mountain View will not proceed to relocate any facilities until

after such coordination is complete and Mountain View has been paid those relocation costs that are properly owned it under its published policies and Bylaws and Colorado law. If additional information is required, please contact our office at (719) 495-2283. **Noted.**

Sincerely,

Cathy Hansen-Lee  
Engineering Administrative Assistant

## **PIKES PEAK REGIONAL BUILDING DEPARTMENT**

Regarding a request for approval of a preliminary plan for Retreat at TimberRidge, Enumerations has the following comments: 1. The road names for this development have been approved, but the suffixes need to be updated per the comments from Justin Annan at El Paso/Teller 911. **Revised.** 2. Please provide a large format copy of the entire development for addressing. We would prefer to address the entire development at one time rather than as each phase is developed in order to ensure consistency throughout the development. Indicate with (XXXX) the locations of all lots and tracts which will require an address. **Noted.** 3. Enumerations will have more comments as each phase is submitted for approval of the final plat. **Noted.** Floodplain has the following comments: 1. By placing the floodplain areas of this development into Tracts F and G, it appears that Section 313 of the Regional Building Code has been complied with. Contact Floodplain Administrator Keith Curtis ([keith@pprbd.org](mailto:keith@pprbd.org), 719-327-2898) with any questions or concerns regarding compliance with floodplain code. **Noted.**

Brent Johnson Enumerations Plans Examiner  
Pikes Peak Regional Building Department  
O: 719-327-2888 E: [brent@pprbd.org](mailto:brent@pprbd.org)

## **ELPASO COUNTY ENVIRONMENTAL SERVICES**

The El Paso County Environmental Division has completed its review of the Retreat at Timber Ridge Preliminary Plan – SP182. Our review consisted of the following items: wetlands, federal and state listed threatened or endangered species, general wildlife resources and noxious weeds.

1. Potentially jurisdictional aquatic features have been identified on the site and the U.S. Army Corps of Engineers (USCOE) letter dated July 20, 2017 indicates that a permit may be required for the project. The project proponent has indicated that the USACOE permit will be addressed at the platting stage of the development which is acceptable. A completed permit shall be provided to the Planning and Community Development Department prior to project commencement if ground-disturbing activities will occur in wetland areas. The applicant is hereby on notice that the USCOE has regulatory jurisdiction over wetlands. It is the applicant's responsibility, and not El Paso County's, to ensure compliance with all applicable laws and regulations, including, but not limited to, the Clean Water Act. **Noted.**
2. The letter dated May 15, 2017 from the U.S. Fish and Wildlife Service (USFWS) indicates that it is unlikely the project will result in the take of listed species but that it may have minor adverse impacts to listed species that may occur in or near the project area. The USFWS provides a series of conservation recommendations which we strongly recommend be incorporated/followed during the pre-construction,

implementation and post-construction phases of the project. The applicant is hereby on notice that the USFWS has regulatory jurisdiction over threatened and endangered species and migratory birds, respectively. It is the applicant's responsibility, and not El Paso County's, to ensure compliance with all applicable laws and regulations, including but not limited to, the Endangered Species Act and the Migratory Bird Treaty Act. **Noted.**

3. The letter dated May 4, 2017 from Colorado Parks and Wildlife provides numerous Best Management Practices (BMPs) and recommendations related to wildlife/natural areas on the property. We strongly recommend that these BMPs and recommendations be incorporated/followed during the pre-construction, implementation and post-construction phases of the project. Additionally, the project proponent has indicated that wildlife protection measures will be addressed through covenants. **Noted.**
4. The Noxious Weed Management Plan (Plan) dated July 7, 2017 provides a basic plan for addressing noxious weeds on the property. This Plan should also include more specific information regarding the species and infestation locations present on the property. It is the applicant's responsibility, and not El Paso County's, to ensure compliance with all applicable laws and regulations, including but not limited to the Colorado Noxious Weed Act and the El Paso County Weed Management Plan. **Noted.**
5. In the report dated December 5, 2017, Core Consultants provides several recommendations regarding addressing natural resources issue including performing raptor nest and breeding bird surveys prior to the start of construction, performing noxious weed surveys and treatments prior to undertaking ground disturbing activities, orienting drainage crossings to avoid impacts to riparian habitat and performing surveys for fox dens prior to ground disturbances. Following these recommendations is suggested in order to insure compliance with applicable laws and regulations. **Noted.**

It is strongly recommended that the applicant obtain the necessary approvals from all federal, state and county agencies as a part of their planning process. **Noted.**

We appreciate the opportunity to comment on this project. If you have any questions or concerns, please contact me at (719) 520-7845.

## **NORTHERN EPC COALITION OF COMMUNITY ORGANIZATIONS, INC (NEPCO)**

NEPCO is providing the collective input from its membership that includes 8,600 homeowners, 41 HOAs and 18,000 registered voters within and around the Tri-Lakes area. The purpose of NEPCO, a volunteer coalition of Homeowner Associations in northern El Paso County, is to promote a community environment in which a high quality of life can be sustained for constituent associations, their members, and families in northern El Paso County. We collectively address growth and land use issues with El Paso County Planners and the Town of Monument, as well as addressing HOA issues of common interest among the members. NEPCO achieves this by taking necessary steps to protect the property rights of the members, encouraging the beautification and planned development and maintenance of northern El Paso County.

**NEPCO's comments related to densities in The Retreat at Timber Ridge. Densities shown on the Preliminary Plan have been approved by the Board of County Commissioners and recorded on the PUD Plan.**

1. NEPCO has serious concerns about development of this size residing in “rural” El Paso County. Assuming a density of .806 homes per acre on 263 acres, and again assuming 4 persons per household, that yields a population of approximately 850. This development will reside just north of the Sterling Ranch Development that plans to have 5,500 residential units (4 members per household = 22,000 residents) as well as 56 ac of commercial space. The combination of these two developments will put incredible pressure on the infrastructure supporting this area including roads, water and sewer systems. The potential rezoning of these tracts of land will authorize a planned 212 homes versus 53 homes under the current RR-5 zoning, a four-fold increase.
2. NEPCO has concerns about the probability of the transitions happening as described in the Introduction in the Letter of Intent. A Title search reveals that all the land transaction occurred on the same day, 11/15/2016, both to and from Arroya Investments LLC. A review of the Arroya Investments LLC finds that the land transactions on that day were between the various partners of the LLC and did not involve outside parties. That begs the question about why all this property is not part of the PUD unless it is useful to infer that the other land will provide the density transition to RR-5 that this PUD does not. The future is whatever the future is; needs change and the current “transition land” becomes the new higher density development land to the north of the current PUD.

**NEPCO’s comments related to water supplies in The Retreat at Timber Ridge. Water findings if quality, quantity, and dependability are made at the Final Plat stage of review.**

1. NEPCO has continuing concerns about a new Metropolitan District, effectively an administrative agency/pass through organization proposing water from a rapidly declining source.
2. The Metropolitan District has not been approved even though the BoCC approved the PUD and the BoCC Approval Letter, dated March 27, 2018, does not list approval and establishment of the Metro District as a Condition of Approval. The process seems out of order, the PUD approval now becomes a forcing function rather than weighing the Metro District on its merits.
  - a. The Retreat at Timber Ridge Metro District plans to purchase water from the Sterling Ranch Metro District who purchases water from Woodman Hills Metro District which has 15 wells in the Denver Basin Aquifers and 2 wells in the Upper Black Squirrel Alluvial (shallow) Aquifer-i.e. no renewable sources. <http://schoolerandassociates.com/wp-content/uploads/2016/12/SterlingRanch-MetroDist-Nos-1-3-2010-ServicePlan.pdf> (page 12). Metro Districts are a reality in rural developments, but they are inherently inefficient, and we are witnessing more of these “administrative” Districts that exist only as pass-through entities, adding a layer of administration but few additional services.
    - i. Under the El Paso County Policy Plan, 10.2.3 and 10.2.4, the goal is to maximize water supply options and economies through the pooling of resources and to encourage the linking of systems among water providers to provide the highest assurance of available service.
      1. The intent of this Policy Plan is to encourage interconnectivity thereby providing backup capability in cases of emergencies, not

routine operations. A single failure here is detrimental to a few thousand homes since they all rely on the same source.

2. What, if any, will the impact of Colorado Springs Utilities move to become a regional water provider have on this PUD?
  - ii. The Retreat at Timber Ridge development creates a whole new Metropolitan district to provide services and then states that these requirements are *“met by the proposed IGA between Sterling Ranch Metropolitan District and the proposed Retreat at Timber Ridge Metropolitan District.”*
- b. Woodman Hills Metro District has 7 existing Intergovernmental Agreements (IGAs) with other Districts. The ***Pikes Peak Regional Water Authority Area 3 Preliminary Engineering Report***, publicly released this past summer, sounds the alarm about relying on non-renewable water sources and yet we have another pair of developments stating that there is sufficient water for 20,000 plus new residents depending on the underlying aquifers (though some of the water is pumped from wells considerably outside their service area along County Line Road). USE RENEWABLE WATER.
  - i. The Executive Summary of the ***Area 3 Preliminary Engineering Report*** states *“Area 3 is the northern project area, and its entities rely heavily on Denver Basin groundwater supplies. Due to declining well pressures, this study assumed that by the year 2035, Denver Basin wells in the area will only be able to economically pump 35% of their current production. And by 2050, Denver Basin water will no longer be economically feasible to pump.”* (page ES-1)
  - ii. Further it states; *“To supply the Area 3 participants with needed renewable water by the year 2050, the projected future demand of 8,592 acre-feet per year (AFY) minus the current renewable supplies of 209 AFY, equals a deficit of 8,383 AFY of water that needs to be acquired for Area 3.”* (page ES-1)
  - iii. The Area 3 Report is referring to the same diminishing, non-renewable water sources the Developer is requesting approval for in this development proposal.
  - iv. According to the Neighborhood Meeting Summary, the water provided by the water district(s) *“will come from the deep aquifers: Arapahoe and Laramie-Fox Hills.”* This represents thousands of new homes relying on a diminishing source of water that could become unaffordable within 15 years, let alone the 300-year requirement levied by El Paso County.
- c. Will there be a requirement that those homes in The Retreat at Timber Ridge that are not connected to the water district (large lots), mine their water from these same deeper aquifers? Or are they allowed to pull water from the Dawson or Denver aquifers?

**Transportation/Access Concerns remain. Transportation and traffic issues have been addressed in the Traffic Study submitted with the application.**

1. The **Traffic Impact Study** has been improved over the previous iteration in that it now includes the additional traffic that will be generated by the Sterling Ranch Development, Phase 1 in the 2020 background traffic.
2. The proposed road system has inadequacies related to supporting the number of new residents. **Good subdivision design requires providing connections to adjacent unplatted land.**
  - a. **Arroya Lane** terminates in a dead end
  - b. **Aspen Valley Road** terminates in a dead-end
  - c. **Elk Antler Lane** terminates in a dead-end
  - d. **Bison Valley Trail** terminates in a dead-end
  - e. The discussion about **Briargate Parkway** connecting Black Forest Road and Volmer Road is premature. Though the project is listed on the 2040 Major Transportation Corridor Plan (2040 MTCP) the project is not funded in the current **Pikes Peak Rural Transportation Authority A List Capital projects**. That means no funding for construction until after 2024. There will be funding for the **Stapleton Drive/Briargate Parkway Corridor Study** before 2024.
3. These roads rely on the Sterling Ranch development for connectivity-an event not under the control of this Developer. **Volmer Road** is the only route either into or out of this development to locations not in the development.
4. The road network summary on page 2 states that Volmer Road “has a posted speed limit of 45 miles per hour (mph).” On page three in the paragraph titled “SIGHT DISTANCE” it states that “The Analysis is based on a design speed of 40 miles per hour.” The analysis is not based on currently posted speed limits.
5. In the Trip Generation paragraph on page 4 the analysis states that they anticipate during morning peak hour, which generally occurs for one hour between 6:30 and 8:30 a.m., they predict 39 vehicles will enter and 118 vehicles will exit the site. NEPCO understands that this is based on research at a national level but questions its applicability to this development. Assuming only 118 vehicles will depart 220 homes in the morning discounts buses, teenagers going to school, potentially both parents working etc. Further, assuming some of the 39 vehicles entering are returning vehicles that left as part of the 118, means some homes will generate no traffic. Other traffic reports/analysis we have seen indicates that the average American home generates nine trips per day.
6. A critically important document in the Traffic Impact Study is **Table 3, Roadway Improvements, Retreat at Timber Ridge**. This is a future looking compilation of the requirements to adequately address traffic generated by this development and the Sterling Ranch development and stipulates what is needed, why it is needed, how it should be accomplished and who should pay for improvements.

7. Only transportation planners would call a Level of Service D, “satisfactory” on day 1 of a new development

### NEPCO’s general comments related to The Retreat at Timber Ridge

1. The planting of pines on the berms is a laudable idea to shield the residents from traffic along Volmer Road.
2. Who will be maintaining the trails in this development? The **Cover Sheet Tract Table** states that for **Tract F**, there will be 17.794 ac of Regional and Local trails. On page 4 of the **Letter of Intent**, it states that the proposed major trails will be constructed by the developer, placed in an easement, and maintained by El Paso County. Page 10 states much the same. According to the **Maintenance Agreement**,
  - a. *“El Paso County will own and maintain the multi-use trail easement, and will own and maintain the open space parks should dedication be accepted.*
  - b. *A Metropolitan District will own and maintain the open space, drainage and water quality facilities, common areas, trails, landscape areas and buffer tracts.”*
  - c. The **Letter of Intent**, page 11, Policy 2.3 states that, “Parkland will be owned and maintained by a Metropolitan District.” Which is correct the **Maintenance Agreement** or the **Letter of Intent**?
  - d. What is the distinction between “multi-use trail” and “trails” above?
3. A cursory check of County ownership records indicates that most of the land adjacent to this proposed PUD development, is owned by Partners in the development proposal and as such lessens the import of their letters of support for the development.
4. A letter from owners of the neighboring 35-acre parcel while generally supportive references the addition of fire hydrants at least in the periphery of this development. However, the **Wildland Fire & Hazard Mitigation Plan** states that *“At present, there is no readily available water supply for ground suppression fire resources. The local fire protection districts will need to haul water into the site during a fire. The subdivision will be supplied with water by the Sterling Metropolitan District in the future.”* We can find no references to, or guarantees of, future fire hydrants in other documents.
  - a. Excerpt from the **Wildland Fire & Hazard Mitigation Plan**:  
*“At the present time, the Black Forest Fire/Rescue Fire Protection District has the following resources:*
    - 1 – Type 1 Engines: 500 gallons’ total
    - 4 – Type 3 Engines: 1,750 gallons’ total
    - 3 – Water Haulers - 6,000 gallons’ total

*There are two full-time staff members at Station 1 whose primary responsibility is medical emergencies. **The primary resource for fire suppression is volunteer firefighters and has a wide range of response time and availability.”** [emphasis added]*
  - b. The fact that fire suppression is the primary responsibility of volunteers, means that any fire, wildland, grass or structure, will require a mutual aid assist from other fire districts even after fire hydrants are available in the development.

- c. Additionally, the Black Forest Volunteer Fire Department listed three specific needs for new vehicles in their comments; a new ambulance, a new fire truck and a new brush truck. They have specific concerns about supporting a new neighborhood with their existing inventory of vehicles.
5. The **Detail Plans, Signs & Lighting** is deferred to Final Plat.
  - a. Will dark-sky compliant lighting be used/required in this development?

**NEPCO's final comments:**

1. It was surreal to see that the Planning Commission voted 7-0 to reject the proposed development and the BoCC approved the same development. As more than a casual observer of this process, NEPCO recommends a change in procedure that would require any developer that is unanimously rejected by the Planning Commission be required to pass through the Planning Commission process a second time after they have adequately addressed the Planning Commission concerns and received at least a majority approval vote by the same Commission. Only after that process should the development move toward a review by the BoCC. The current approach results in an unacceptable perception by the public that the subject matter experts on the Planning Commission objected but the elected officials accepted the proposal.
2. NEPCO has significant concerns about large residential developments in unincorporated El Paso County. Especially developments that rely on non-renewable water sources. Urban densities and large developments, measured in thousands of people, should be supported by urban (renewable) water and sewer systems. When the water runs out the residents will be paying large sums to connect the Colorado Springs Utilities-no one likes that kind of surprise. The Developer will have no defense, they were warned before they turned the first shovel of dirt that the water would run out within a generation. The Cherokee Water Pipeline draws water from the same aquifers that everyone else does, just a bit farther north. Water moves around, and the high ground will typically run out first, such as the north El Paso County line where this water originates from.
3. Further, if El Paso County is to say that it 'plans' for future development, then its 'plans' should have some specific limits. If for water the limit is 300-year supply, then a development 'plan' that clearly does not have a 300-year supply should be rejected outright. Voters don't want their existing homes left waterless-for the temporary benefit of people who don't even live here yet-after current County staff have retired. Voters/taxpayers want defensible, compliant decisions now.
4. High-density residential developments stress "rural" transportation infrastructure. The land was designated RR-5 as a reasonable density given the capabilities of rural Colorado land to support residential uses. Transitioning from 1 home per 5 ac to 1 home per .8 acres (thanks to some larger lots in Phase 1 that skew the ratio upward) is beyond what the land or the transportation infrastructure can support.
5. Colorado Springs Utilities has been exploring the selling of renewable Southern Delivery System water to "bedroom communities" for the last year. The Colorado Springs Utilities Policy Advisory Committee formed a draft recommendation to the Colorado Springs Utilities Board and the City Council that the City would sell water to bedroom communities at a lower cost (-26%) than they have been in the past. This is a much better solution for urban density "rural" communities.

Thank you for the opportunity afforded NEPCO to engage in this process to work with the El Paso County to ensure we have planned, responsible growth.

Thomas M. Vierzba  
Vice President,  
Chairman,  
NEPCO Transportation and Land Use Committee

Larry Oliver  
NEPCO President, NEPCO

## **COLORADO GEOLOGICAL SURVEY**

5/10/2018: Sheet 2 of the preliminary plan (N.E.S., 4/11/2018) shows an "Existing Geologic Hazard Legend," but hazards are only identified within proposed lots 1 through 12. If the current preliminary plan application is for all 203 proposed Retreat at Timber Ridge lots, then the mapped hazards as shown on Figure 7 of Entech's 12/1/2017 revised Soil, Geology, Geologic Hazard, and Wastewater Study, and the areas of observed shallow groundwater identified in Entech's test pits 3 and 5 (proposed lots 18-23) and boring 2 (lots 77-78, at a minimum) need to be clearly identified. **Geologic conditions have been identified on a separate sheet for clarity. Reference has been made to the Entech reports for all lots within the Preliminary Plan.**

## **PARKS ADVISORY BOARD**

Request by N.E.S, Inc, on behalf of Arroya Investments, LLC, Robert Scott General Contractors, and Jacob Decoto for approval of the Retreat at TimberRidge Preliminary Plan, consisting of 205 residential lots on 234.05 acres. Minimum lot sizes vary from 15,619 square feet in the southern portion of the property to 2.5 acres on the northern end near Arroyo Lane. The property is located along Vollmer Road, at the intersection of Arroyo Lane. The project is located within the bounds of the Black Forest Preservation Plan.

The 2013 El Paso County Parks Master Plan shows two proposed regional trail connections and one proposed bicycle route impacted by the project. The proposed Sand Creek Primary Regional Trail alignment traverses the central portion of the property, along Sand Creek, while the Arroyo Lane Primary Regional Trail traverses east-west across the property, along Arroyo Lane. Furthermore, the proposed Vollmer Road Bicycle Route runs north/south adjacent to the western property boundary. The far northern edge of the property is located just outside of the Black Forest South Candidate Open Space.

The original PUD Development Plan, endorsed by the Park Advisory Board in May 2017, showed a 3.6 acre neighborhood park in addition to the Arroyo Lane and Sand Creek Primary Regional Trail corridors. Furthermore, both trail corridors conformed to the El Paso County Parks Master Plan, Trails Master Plan. The original PUD Development Plan also showed 69.12 acres of open space, or 23.6% of the total project area, dedicated to open space, regional trails, water detention, landscaping, and the neighborhood park. This plan far exceeded the required 10% dedicated open space requirement for PUD Development Plans.

Since the time at which the original PUD Development Plan was endorsed, the applicant met with members of the Black Forest Land Use Committee and made significant changes to the PUD Development Plan. As a result of those meetings, the applicant reduced the number of residential lots from 482 to 212, and revised the overall street layout. That revised PUD Development Plan did not include the original 3.6 acre neighborhood park or the 30.23 acre

Tract B open space located north of Arroyo Road, thus reducing significantly the amount of open space available for recreational uses from 23.6% to 9.1%. The loss of Tract B also removed a proposed alignment of the Sand Creek Primary Regional Trail north of Arroyo Lane.

The revised PUD Development Plan was endorsed by the Park Advisory Board in January 2018 with the following recommendations:

“Recommend to the Planning Commission and Board of County Commissioners that approval of the Retreat at TimberRidge PUD Rezone/Development Plan include the following conditions, to be implemented on all forthcoming preliminary plans and final plats: (1) provide to El Paso County 25-foot public trail easements along the Sand Creek Drainage and Arroyo Lane that allow for public access, as well as construction and maintenance by El Paso County of primary regional trails, and these easements shall be shown on forthcoming preliminary plans and final plats, and the aforementioned easements shall be dedicated to El Paso County on forthcoming final plats; (2) reestablish the neighborhood park in order to not only meet the recreational needs of residents, but also to increase the open space acreage to at least 10%, thus meeting the PUD Development Plan open space requirement as dictated in the El Paso County Land Development Code; and (3) require fees in lieu of land dedication for regional park purposes. The amount of \$91,160 was calculated for informational purposes and is based upon the preliminary lot layout and will be adjusted as preliminary plans and final plats are submitted.”

In February 2018, the applicant responded to County review comments, and three new open space tracts were added which brought the open space percentage to 11.8%. These tracts included landscape areas and trail corridors along Arroyo Lane, as well as slight modifications to other existing open space tracts. This modified PUD Development Plan was presented to the El Paso County Planning Commission on March 6, 2018, where it was unanimously denied with a vote of 7-0, and subsequently forwarded to the Board of County Commissioner, who approved it on March 27, 2018. While the approved PUD Development Plan met the 10% open space requirement, it did not address the reestablishment of the neighborhood park.

The current Preliminary Plan shows 25-foot trail buffers along Sand Creek and Arroyo Lane. Parks staff recommends that all forthcoming final plats show 25-foot trail easements along the Sand Creek drainage, as well as the 25-foot trail easement along Arroyo Lane, and shall dedicate these 25-foot wide regional trail easements to the County for the County's construction and maintenance of public multi-use trails on forthcoming final plats. Staff also recommends that the developer reestablish a neighborhood park in order to meet the recreational needs of residents, especially those living in the higher density area east of Sand Creek. The applicant could apply for an Urban Park Grant to help facilitate the construction of the neighborhood park.

Recommended Motion:

Recommend to the Planning Commission and Board of County Commissioners that approval of the Retreat at TimberRidge Preliminary Plan include the following conditions: (1) provide to El Paso County 25-foot public trail easements along the Sand Creek Drainage and Arroyo Lane that allow for public access, as well as construction and maintenance by El Paso County of primary regional trails, and these easements shall be shown on and dedicated to El Paso County on forthcoming final plats; (2) strongly recommends and encourages the reestablishment of the neighborhood park in order to meet the recreational needs of residents; and (3) fees in lieu of land dedication for regional park purposes in the amount of \$88,150 will be required at time of the recording of the Final Plat. **Noted.**

## BLACK FOREST LAND USE COMMITTEE

The Black Forest Land Use Committee is OPPOSED to the preliminary plan application for the Retreat at Timber Ridge and recommends denial of the request. **BFLUC issues are being reviewed by legal actions. No response can be made.**

At the Planning Commission meeting on March 6th, the commissioners denied the PUD and preliminary plan request 7-0 on the basis of density that was too high and density that did not provide adequate transitions. They also expressed support for the Black Forest Preservation Plan. Here are a few of the commissioner comments:

- Mr. Gioia - "...from what I am seeing of the Master Plan, it doesn't fit that (plan)....Less than 1/3 of an acre up to 1 acre does not seem to be appropriate."

- Mr. Mastin - "I think the transition is too small."

- Mr. Risley - "...I see an issue with the density as well....I don't believe there is compatibility with the land uses proposed."

- Mr. Curry - "The Black Forest Preservation Plan envisioned 1 acre to 5 acre lots. Sterling Ranch did change the nature of the area, but not that much."

- Ms. Lucia-Treese - "When folks move to the Black Forest they move there for quality of life. The abrupt transition does not show compatibility."

- Mr. Egbert - "In this case I feel like we need to defer to the sensibilities of the Black Forest residents."

1. The Retreat at Timber Ridge is in the Southern Transitional Area in the Preservation Plan. On page 95 of the Black Forest Preservation Plan, under item "10. Southern Transitional Area," it says, "A key element in this unit is a low density residential buffer area. This buffer would originate along a line one quarter mile north of a major corridor if such a roadway is constructed and if it is located within two miles of Woodmen Road. Overall densities are expected to decrease rapidly from approved densities at the line to one dwelling per five acres at the Timbered Area Edge."

The "major corridor" within two miles of Woodmen Road would be an extension of Stapleton Road, the alignment of which has not yet been finalized. Assuming a straight east-west alignment of Stapleton Road, one quarter mile north of the Stapleton extension would be the southern border of the Retreat at Timber Ridge. The "approved densities" at this southern border remain RR-5 and the urban lots to the north of this line are certainly not densities that are "decreasing rapidly" toward the timbered edge. The Preservation Plan expected urban densities to be south of this line, not north.

The surrounding densities of existing homes adjacent to the Retreat are 5-acre and larger lots on both sides. Therefore the proposed densities for The Retreat are significantly higher than the existing densities.

2. The Retreat proposes to use groundwater from wells on Sterling Ranch. Using groundwater for an urban development such as this will result in water usages far exceeding normal for groundwater wells and usages that are not sustainable over time. Compare properties with 2.5 acres and one private well to a density of 7 lots per 2.5 acres at The Retreat and the results are a seven-fold increase in water usage. In addition, homes on smaller urban-sized lots will have lawns compared to 2.5 acre lots where few have lawns, resulting in 8-12 times as much water use for these urban lots at the Retreat. Water shortages in Woodmoor in Monument and Donala in Gleneagle have shown that residential lots using groundwater are not sustainable over the long run. County officials must face the reality that groundwater will not be

available in the long term for urban-sized developments and must take steps to restrict developments like this to conserve water resources.

3. At the PUD rezoning hearing, the applicant stated that this development will “protect” Dawson water by drawing water from the Arapahoe aquifer. While this statement may be true for the short term, in the longer term this development (and Sterling Ranch) will take much more Dawson water than if the lots were each 2.5 acres or larger. Sterling Ranch has committed to provide water for the Retreat through a metro district. Sterling Ranch has been granted water rights to extract approximately 590 AF/yr of Dawson water with more water granted from the other three aquifers. While Arapahoe water will be used in the beginning, the water decree granted to Sterling Ranch will be using water from all the aquifers and result in much larger water use than 2.5-acre lots. Thus the use of a metro district will result in much more Dawson water being extracted than if the Preservation Plan were followed.

Consider this comparison: (I am combining Sterling Ranch and the Retreat because they will both be using water from the Sterling Ranch Metro District.) Sterling Ranch is planning 5225 homes on 1400 acres. The urban area of the Retreat has 153 homes on about 100 acres. Combine those and you have 5378 homes on 1500 acres, all using groundwater for homes and lawns. Normal water use for a private well in the Black Forest is about 0.4 AF/yr and for an urban lot with a lawn and landscaping the water use jumps to about 0.6 AF/yr. If the 1500 acres had 2.5-acre lots, they would have 600 lots and use about 240 AF/yr. The 5378 homes on the same 1500 acres would use about 3200 AF/yr. That is 13 times as much water use as 2.5-acre lots on the same 1500 acres. In both developments, Dawson water will be used to maximum allowed by the state. Under the current scenario, all of the water for both Sterling Ranch and the urban lots in the Retreat will come from non-renewable groundwater. This is not sustainable for the long term.

STATING THAT WATER IS BEING PROTECTED IN THE RETREAT AT TIMBERRIDGE IS TOTALLY INCORRECT. WATER IS ACTUALLY BEING EXPLOITED.

4. This development violates the spirit of a PUD. A PUD should maintain much the same density as the existing zoning and not change from 2.5-acre lots to urban densities. About 20 PUD developments have been established in the Black Forest and almost all of them remained within the basic 5-acre zoning that was originally established. A PUD is designed to provide flexibility in lot sizes because of terrain, open space, drainages and other factors. It is not intended to radically change the character of an area and result in what amounts to spot zoning. The Retreat leaps from 2.5-acre lots to 1/3 acre lots.

5. The PUD regulations state that a PUD “must generally conform to the Master Plan and small area plans.” This PUD regulation is directive and not advisory. This proposal is a major departure from the Black Forest Preservation Plan.

6. This proposal violates the rights and expectations of people who purchased property in this area who anticipated that the area would remain rural and open with larger lots. The Retreat nullifies the protection they expected from RR-5 zoning. The resultant destruction of natural grassland along with traffic increase and noise is not consistent with the rural, residential flavor of the Black Forest.

Approval of this preliminary plan application would set a precedent for additional urban incursion into the Black Forest area. Given the violations of the Preservation Plan and the PUD regulations, the Black Forest Land Use Committee strongly urges DENIAL of this preliminary plan application.

Revised Plans and documents have been uploaded to the County EDARP site. Please contact our office if you have further comments or questions.

Sincerely,  
**N.E.S. Inc.**

A handwritten signature in black ink that reads "John A. Maynard". The signature is written in a cursive style with a large, prominent initial "J".

John Maynard  
Planning Director