

Grandview Reserve SKP

Resubmittal comment responses – August 17, 2020

El Paso County Conservation District – 719-600-4706 – www.epccd.org

Conservation District #1

According to NRCS soils survey, the 8—Blakeland loamy sand, 1 to 9 percent slopes and the 83—Stapleton sandy loam, 3 to 8 percent slopes are poor for roads and streets and shallow excavations due to the following soil properties: unstable excavation wall and frost action. Due to the limitations on the above soils on the site, alternatives to mitigate the limitations of the soil will be required in your engineering design or construction techniques.

Response: Understood. Further geotechnical evaluation would be conducted to determine required fill or engineered fill for foundations and roadways.

Topsoil should be stripped to a depth of 6 inches and all stockpiles should have side slopes no steeper than 3:1 and seeded. All disturbed areas should be seeded and mulched with weed free hay mulch at 4,000 lbs. /acre. All disturbed areas should be reseeded between the planting dates of Nov. 1-April 30th. Grass seed should be drilled at a depth of ¼ to ½ inch deep and if broadcasted, double the rate. Please feel free to utilize the attached native shotgun mix that will work best on your gravelly foothill site.

Response: Noted.

The district recommends disturbed land be mulched or revegetated within 45 days of disturbance.

Response: Noted.

Vehicle tracking control stations need to be installed at all entrance and exit points on the site. The station should consist of a pad of 3 to 6-inch rock or a vehicle control pad/mat to strip mud from tires prior to vehicles leaving the construction site to prevent spreading of noxious weeds.

Response: Noted.

You have indicated using a phased grading approach, the district recommends limiting the area being graded to 15 acres or less and to seed with native grasses to minimize the land area disturbed. The development site is 765 acres.

Response: Noted.

Silt fences or other forms of erosion barriers need to be planned and installed as a temporary sediment control device used on construction sites to protect water quality.

Response: Noted.

The channels of many of the major streams are not stable and undergo substantial shifts in alignment during flood events. Upstream development increases the magnitude and frequency of local flooding. Floods that exceed the computed 100-year storm do regularly occur. The district does not support development proposals that are located in or near drainages or development that disturbs wetlands.

Response: Noted. Two jurisdictional wetlands exist on site and the master plan is respecting those wetlands within open space corridors. Based on the possibility that the drainages within this area may be unstable, the design will incorporate a geomorphic stabilization approach within the floodplain to take into consideration future adjacent and upstream development induced flows (low-flow and larger flooding events). This approach is being practiced by prominent Colorado stormwater districts to stabilize local drainages.

The El Paso County CD board strongly recommends that Low Impact Development (LID) techniques be implemented for economic and conservation benefits.

Response: Noted. LID will be considered within the planning areas upstream of the major drainages.

Conservation District #2

Shot Gun Mix

<u>Common Name</u>	<u>Recommended Cultivator</u>	<u>% of Seed Mix</u>	<u>Non Irrigated PLS Rate per acre</u>	
			Drill	Broadcast
Bluestem, Big Native	Kaw, Bison, Champ	20%	5.5	11
Grama, Blue Native	Lovington, Hachita, Alma	10%	1.5	3
Green Needlegrass Native	Lodom	10%	5	10
Wheatgrass, Western Native	Arriba, Barton	20%	8	16
Grama, Sideoats, Native	Vaughm, Butte, El Reno, Niner	10%	4.5	9
Switchgrass, Native	Blackwell, Greenville	10%	2	4
Prairie Sandreed, Native	Goshem, Pronghorn	10%	3.5	7
Yellow Indiangrass, Native	Cheyenne, Holt, Llano	10%	5	10

Response: Noted and applicant has no objection to utilizing this mix or a variation of this desired native mix.

Engineering Memo – Jeff Rice – 719-520-7877 - Planning and Community Development (PCD)-Engineering

The comments include unresolved previous comments and new comments resulting from the re-submittal in **bold**. All previous comments that have been resolved have been noted or deleted. 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.

General

1. **through 3 – resolved.**
4. Note: As shown on the sketch plan Staff supports adding the extension of Rex Road to the reimbursable Planned Improvements list in the County Road Fee program.

Response: Noted.

5. Note: Staff has no comments on the Preliminary Soil, Geology, Geologic Hazard and Wastewater Study, except that additional study will be required for road and drainage construction in accordance with ECM Appendix C, at the final plat stage.

Response: Noted.

Sketch Plan

1. **through 3 – resolved.**
4. See minor redlines. **Partially resolved; see updated minor redlines.**

Response: Noted and changes made to the Sketch Plan as requested.

MDDP

1. **Resolved.**
2. **Resolved.**
3. Provide discussion of drainage problems anticipated within and downstream of the development and their solutions. **Partially resolved; address proposed solutions to the potential issues from increased runoff volumes; will LID development designs/requirements be implemented? Because the DBPS has not been adopted and there is no fee system in place to fund downstream regional improvements would this developer propose other mitigation methods?**

Response: Additional language has been added this section within the report. Information to use LID practices has been added to the report to reduce runoff volumes and rates. At this time since there is no downstream regional improvements proposed fees for the current development to fund any unknown improvements is not expected. If and when the DBPS is completed, development following this work will need to abide by the DBPS.

4. Address all offsite upstream basins and include their flows through the site. **Partially resolved; see redlines.**

Response: Noted, redlines have been addressed. The map has been revised to show contours upgradient from the site.

5. **Resolved.**
6. Generally address interim and ultimate conditions where flows to and along Eastonville Road are potentially diverted (split flow) from intended/original locations until roadway drainage improvements (appropriate culvert sizes) are complete. It appears that upstream split flows will affect which channels receive the flow quantities previously assumed in the FEMA studies. **Partially resolved; see minor redlines. Future reports will need to reconcile diversions and flows used in previous studies.**

Response: Noted, redlines have been addressed.

7. **through 9 – resolved.**

10. Drainage plans:

- a. Provide plans showing the offsite basins and with an adequate level of detail for offsite sub-basins to refine the information provided in the DBPS and floodplain studies. **Unresolved; for MDDP basin level of detail, USGS StreamStats or basins drawn on topo maps would be adequate.**

Response: Offsite basin delineation has been added to the report by including pdf's of stream stats data.

- b. Show and label approximate locations of conceptual channel improvements and approximate channel cross-section on the developed drainage plan.

Response: Updated cross sections have been added to the MDDP.

11. See MDDP redlines for further revisions and clarification of these comments. **Partially resolved; see remaining/updated redlines.**

Response: Noted, redlines have been addressed.

Transportation / Traffic Impact Study

Note: These comments and the associated redlines are from the County's on-call consultant, with some Staff additions and edits. Some comments may be deferred to the subsequent TIS required for rezoning, depending on level of detail. For reference, a draft TIS checklist was previously provided, which has been updated with this review. (Some checklist items do not apply to a Master TIS.)

1. **through 9 – resolved.**
10. Address proposed pedestrian accommodations and connectivity, specifically regarding to school(s) and the regional park. **Unresolved (not found).**

Response: Discussion of pedestrian and bicycle accommodations can be found on pages 3 and 4 of the TIA

11. **Resolved.**
12. The proposed plan does not match the PEL intersection location of Rex Road/Highway 24. Additional discussion with CDOT is necessary to confirm approval of the exact location of the proposed Rex Road/Highway 24 intersection. **Provide details when available.**

Response: Comment Noted. LSC will copy EPC on items submitted to CDOT.

13. See TIS redlines for additional comments. **Partially resolved; see minor remaining redlines.**

Response: See LSC's responses in the redline PDF file.

Technical Report Comments

1. **through 21 – resolved.**

Nancy Prieve, Environmental Division, Community Services Department- 719-520-7845

The El Paso County Environmental Division has completed its review of the Grandview Reserve Sketch Plan SKP201. Our review consisted of the following items: wetlands, federal and state listed threatened or endangered species, general wildlife resources and noxious weeds.

1. Two jurisdictional wetlands have been identified on the property. A completed U.S. Army Corps of Engineers (USCOE) permit shall be provided to the Planning and Community Development Department prior to undertaking ground-disturbing activities in these jurisdictional 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.

Response: Understood. No revision was necessary as the Report already addresses this issue clearly and accurately.

2. The project will interfere with wildlife habitat including pronghorn range. In accordance with Colorado Parks and Wildlife guidelines, the applicant will prepare a fencing plan to avoid negative conflicts with pronghorn.

Response: Ecos revised Section 6.6 to acknowledge this request, noting our intention to discuss this with the county: “2. Ecos has recommended that the Project minimize the installation of fencing to avoid injury to wildlife. When fencing is needed, we have specified the use of wildlife friendly fences or the inclusion of specific wildlife crossings along fence lines. Pronghorn are of particular concern because they do not jump over fences and can be injured by barbed-wire fences. The El Paso County, Community Services Department, Environmental Division has requested that fencing be installed to “avoid negative conflicts with pronghorn”. Therefore, ecos will discuss this with the County and if deemed to be in the best interest of pronghorn protection, work with the Applicant to prepare a fencing plan in accordance with Colorado Parks and Wildlife guidelines.

Ecos’ recommendation is that fencing is not required to avoid impacts with pronghorn as they are a timid and non-confrontational species that avoids interaction with humans as a regular course of their survival. The County Environmental Divisions references fencing be installed, “In accordance with Colorado Parks and Wildlife guidelines...”, however pursuant to the CPW publication *Fencing with Wildlife in Mind* CPW does NOT advocate for the use of fences; rather they try to rationalize that fencing may not be required at all, and only provides guidelines for the portion of the public that feels they need fences for other reasons such as privacy and security.

The CPW guidance publication *Fencing with Wildlife in Mind* correctly states on page 5 in the section titled Do You Really Need a Fence? That, “...the best fence for wildlife is no fence at all...In some cases, though, there are good alternatives to fences. People, especially those new to mountain and foothill communities, tend to put up fencing along their property lines. If the property contains important habitat and the fence excludes wildlife, the animals lose food, water, resting areas, and travel corridors.” and “There are many creative ways to define boundaries, discourage trespass, or maintain privacy. A line of trees, shrubs, and other vegetation can be used to mark a boundary, screen for privacy, beautify your landscape, and provide additional food and cover for wildlife. The areas that wildlife choose as travel corridors are often the same places that you would want to preserve in a natural state to retain the scenic amenities and aesthetic value of your property. You could also consider marking property boundaries with signs, flexible fiberglass or plastic boundary posts, or fence posts spaced at intervals without cross-wires. If you only fence the portions of your property that you need to protect, you’ll be saving time, money, and wildlife.”

Furthermore, in the section titled *Considerations for Fence Design* CPW states, “If a fence is needed, please consider fence placement and designs that minimize the impact on wildlife.” And “Wherever possible, design your fence to provide wildlife free travel to important habitats and corridors, as well as access to water. Wetlands and riparian habitats are especially important for all wildlife.” Please refer to the CPW manual at:

<https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf>

3. The project will interfere with wildlife habitat including potentially nesting migratory birds. The applicant will perform two surveys for migratory birds and their nests approximately one to two months prior to one week prior to construction. The take of migratory birds and their nests will be avoided. The applicant is hereby on notice that the U.S. Fish and Wildlife Service has regulatory jurisdiction over migratory birds. 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 Migratory Bird Treaty Act.

Response: Understood

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.

Response: Ecos has revised Section 7.3 to specify that 2 surveys will be performed prior to construction pursuant to the wording recommended by the County, which is in line with our typical recommendations. However, as Wildlife Biologists we tend to wait until the Construction Start Date is finalized, then set date for the first survey based on seasonal conditions that make nest identification most effective rather than stating "...approximately one to two months prior to construction..." such that the field surveyor may have maximum opportunity to identify all potential nests. The second survey is always set one week or less prior to construction to ensure no new nest have been established. We also formulate site-specific migratory bird/raptor impact avoidance recommendations by discussing the proposed Construction Start Date with the Applicant well in advance to recommend the best start date and work timeframe to avoid and/or minimize migratory bird/raptor impact. At this phase of the Project it was not yet appropriate to insert this specific language, but ecos intends to work with the Applicant as outlined above.

Natural Features Report Comment

Please attach response comments for the Natural Features to the report and upload so the item is easily found when referred to in the staff report by viewing the Natural features and Riparian report in EDARP.

Response: Noted and completed.

8/3/2020 – Northern EPC Coalition of Community Organizations Inc. (NEPCO)

1. Please see our original comments of April 29, 2020 on this application. They remain valid.

Response: Noted.

2. In addition, we recommend that the El Paso County Planners and the Board of County Commissioners place a moratorium on rezoning and other land use applications resulting in increased densities over what is allowed under current zoning, until a public hearing or other transparent plan is made available to the citizens of El Paso County in order for us to understand your apparent unspoken plans for future additional populations growth in El Paso County. Allowing increased densities over current zoning is not a property right – it is a political decision. El Paso County citizens should have a voice in any big picture decision which significantly affects all aspects of our way of life in Front Range communities.

Response: Noted.

7/20/2020 – RBD Floodplain

1. Portions of this property are located within a designated FEMA floodplain as determined by the FEMA National Flood Insurance Program, flood insurance map #08041C0556G and 08041C0552G with an effective date December 7, 2018. Existing floodplain boundaries may be revised and/or the base flood elevation (BFE) may be modified. Coordination with FEMA will be completed to establish revised flood plain limits and BFE, if the submittal and review of the floodplain revision occurs independently of this sketch plan and shall be approved prior to the platting of any lots currently located within floodplain boundaries.

Response: Noted.

2. No structures or solid fences are permitted within the designated floodplain area.

Response: Noted.

8/5/2020 – Traffic Review Consultant

Comments on the applicants revised Traffic Impact Study have been uploaded to Bluebeam Revu. Our comments also consider the applicant's response to comments memo.

Response: Noted and report modified as needed.

Woodmen Hills Metropolitan District – Jerry Jacobson – GM

Is Grandview Reserve Metro District to build the infrastructure and then connect to Woodmen Hills (typical) please state?

Response: The Grandview Reserve Metro District intends to build lift station(s) and forcemain for collection of the wastewater and delivery to WHMD for treatment.

What about school and church site data?

Response: Final calculations will involve the uses by proposed church and school areas.

JDS Hyrdro – Water Resources-Wastewater report

Please provide the discussion in the text the Code references. In text refer to what appendix provides the map or data. More splices of Code following pages. I have discussed the water report req. with Craig and Nina ad Craig has stated the reports need to address the Code and the LOI needs to address the water master plan. (He has stated that the Water Master Plan is our most important and relevant planning guide in terms of master plan compliance).

Response: Understood

Under table of contents, 2.0 Projected Water Demands, this is a sketch plan and it will be phased per the letter of intent and there are multiple land uses not addressed in report...

Response: The report has been updated to address

Under Appendices, update list of pages and titles of documents n appendix please for example: state water summary form, waste water letter, water letter, etc...

Response: Updated

2.0 Projected Water Demands, address supply demand for 10 acre school site and church please and update SFE's in Table #1

Response: Addressed and updated

3.1 Source of Supply, how is the water to be delivered? Is Grandview to build infrastructure and deliver or is 4 way ranch building infrastructure and delivering? Is there proposed to be an IGA between the two for water?

Response: Grandview will build raw water infrastructure and deliver to 4-way Ranch for treatment. 4-way Ranch will then provide treated water for delivery in the Grandview build distribution system. An agreement will be drafted

3.2 Water Treatment, too vague

Response: More detail has been provided

3.4 Distribution & Transmission Lines, how is the water to be delivered? Is Grandview to build infrastructure and deliver or is woodmen hills building infrastructure and delivering? Is there proposed to be an IGA between the two for water

Response: The Grandview Reserve Metro District intends to build lift station(s) and forcemain for collection of the wastewater and delivery to WHMD for treatment. An agreement will be drafted

3.5 Water Quality, code requirement for wastewater report

Response: Updated

4.1 Projected Wastewater Loads, Table 2, SFE's – is it for church and school?

Response: Report updated to clarify

4 Way Ranch Metro District – April 22, 2020 – Peter Martz

Is Grandview Reserve Metro District to build the infrastructure and then connect to 4 way Ranch? Is an IGA anticipated? please state

Response: Grandview will be connecting into 4-way Ranch and an agreement is anticipated

What about church and school?

Response: Inclusion of the school and church is anticipated

LOI Comments

Page #6 – Utilities

Is Grandview Metro District no 1,2,3 supplying water via and IGA with ? x or is there an anticipated IGA between the proposed district and Woodmen Hills?

Response: LOI revised as needed to answer question.

Page #7 - Grandview Reserve Metropolitan District No. 1

Anticipated to be XXX districts. Why is 4 Way Ranch serving this development if this development is just petitioned out of 4 Way Ranch Metro. Provide letters from each district that they will be able to serve water and waste water needs and the water resource report should also address future needs and demands of the districts capabilities.

Response: LOI and Water Resources & Wastewater Report modified to address comment.

Page #19 – El Paso County Parks Master Plan

Add analysis page 30 of the training PowerPoint I sent

Response: LOI revised as requested.

Page #22 – #5

Size? Did the District comment they agree to location in EDARP?

Response: The District did agree to the general location of the school site through face to face meetings. Comment was not provided on EDARP.

Verify with Pat H that the District is only asking for those services and not water/wastewater via IGA

Response: Noted, further discussion may be needed.

Page #23 – Wetland Habitat and Waters of the U.S.

2 non jurisdictional that are staying or going? 2 jurisdictional that are staying open space or going or being relocated? tell the reader the PC and BOCC will not look to a report.

Response: The two non-jurisdictional wetlands are not anticipated to stay. The two jurisdictional wetlands are staying and being preserved within open space corridors with the exception of minor impacts at utility/roadway crossings.

Page #24 – #10

The mineral extraction and aggregate resource on-site have not been identified- check with Entech to determine what they are and if they are valuable to mine.

Response: Please refer to the Preliminary Soil, Geology, Geologic Hazard, and Wastewater Study, Grandview Reserve, dated January 15, 2019. Section 8.0 Economic Mineral Resources, page 13 addresses this comment

Recommend stating something about LID (see MDDP comments).

Response: LID addressed within the MDDP comment and within the Water Master Plan comments

MDDP Redlines

Page #12 - Add a statement that the Preliminary Drainage Reports will need to better reconcile any differences

Response: Statement has been added to the report.

Page #16 – Step 4 - will be... with subsequent land use approvals... prior to construction

Response: Verbiage revised to reflect redline.

Page #18 - add footnote that this value will be refined with Preliminary and Final Drainage Reports

Response: Footnote added.

Page #22 – (1) DR1

Please move pdf sheets 22-33 (drainage plans) to the end of the pdf.

Response: Drainage plans have been moved to end of the pdf.

Label the entire contributing basins including acreage and CN values. Provide a separate exhibit if necessary.

Response: Streamstats information has been added to the MDDP via separate exhibits.

Label existing and proposed culverts/bridges under Eastonville Road, Rex Road and Highway 24.

Response: Existing and proposed culverts/bridges added to drainage plan.

Page #33 – (1) EX1

Label the entire contributing basins - **Basin Areas Added**

704 should include upstream basin - **Upstream basin Included**

595 CFS – **This outfall value is 523.77 cfs**

808 not in model? – **Link removed from exhibit**

221 CFS? / 217 CFS – **Please clarify comment. Link 600 has ~ 158 cfs in it for the 100 year event. It is shown as link 42 in the SWMM pdf but has now been updated.**

Label existing culverts/bridges under Eastonville Road and Highway 24. – **Labels added**

Please provide design point, link, and basin summary tables. – **Table Added**

154 CFS - **Correct**

164 CFS/280 CFS – **Outfall 2 is 317.41 cfs for 100 year and 26.96 for the 5 year for the predevelopment condition.**

13 CFS/413 CFS – **Outfall 1 is 13.03 cfs for the 5 year and 66.8 for the 100 year.**

Response: Additional redlines have been addressed. Please note some of the values inserted as redlines are incorrect. Please refer to the table now on this sheet along with the above responses for the flow rates.

TIS Redlines

Page #3 – Site Plan

Trip Gen sections mentions a Private K - 8 school (elementary-middle school).

Response: The future use of the school site is unknown. The text has been revised to identify the parcel as a "school site"

Page #8 – (labeled page 7 on document)

Area around Grandview Reserve(?)

Response: Area south of Grandview Reserve

Are all these developments northeast of Eastonville/Stapleton?

Response: This section of the text has been updated to include the existing currently proposed Waterbury subdivisions in the bulleted

2040 Background Traffic - Please state resulting PEL growth factor/rate for US 24 used in the study.

Response: The report has been updated to address this comment. The 2040 traffic volumes shown in the PEL were based on the PPACG traffic demand model. The projected volume on US 24 adjacent to the site was shown to increase from 9,500 vehicles per day to 23,000 vehicles per day. This represents a 20 year growth rate of about 4.5 percent per year.

Page #9 – (labeled page 8 on document)

Trip Generation - Type of school is changed from Public to Private in this update. ITE Trip Gen rates should be preferred but since MSTA rates are higher (AM), they are ok to use.

Response: The trip generation assumptions were requested by and approved by County staff (Jeff Rice) prior to updating the TIA

Page #11 – (labeled page 10 on document)

Projected Levels of Service

0.95

Response: Updated

Synchro reports use 2% for US 24 under all scenarios in the Appendix

Response: This section has been struck from the updated report. As discussed in the response to comments with the prior submittal:

"The CDOT heavy-vehicle data is based on the daily traffic volumes. The percentage of heavy vehicles during the peak hour is likely lower than during the off-peak times and will likely to continue to decrease as the large number of residential uses currently planned in the region are developed. LSC used the Synchro default of 2 percent trucks for all movements."

Page #13 – (labeled page 12 on document)

Queuing Analysis - Queuing analysis should look at both AM and PM peaks. Analyze queuing at main site related intersections. At a minimum, recommend intersections #1, 6, 8 and 9.

Response: The requested additional queuing analysis has been included in the updated report