Statement for Project File

The attached documents are **not part of the official record for Project PPR2628**. They have been included in the **project file for reference purposes only** and should not be considered as formal submissions or evidence within the project's official record.

Outlook

Request for Immediate Review - Significant Infrastructure & Environmental Concerns, Buc-ee's PPR2628

From Allison Hekter <hektera_8@hotmail.com>
Date Thu 10/15/2026 2:40 PM
To Meggan Herington <MegganHerington@elpasoco.com>
Cc PLNWEB <PLNWEB@elpasoco.com>; Kylie Bagley <KylieBagley@elpasoco.com>

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Mark Safe Report

El Paso County Digital, Strategy & Technology (DST)

Dear Ms. Herington and the El Paso County Planning and Community Development Department,

My name is Allison Lukovnikov and I'm writing to express my strong opposition to the proposed Buc-ee's travel center at County Line Road and I-25, near Monument and Palmer Lake.

I understand that your office receives a significant volume of correspondence, but I sincerely hope you will take a few moments to read my letter in its entirety.

As a Colorado Springs native whose family has called Colorado home for two generations, I have witnessed the consequences of our region's rapid growth: worsening traffic, strained infrastructure, disappearing open spaces, and the gradual loss of the landscapes that make Colorado unique.

I recognize that economic development is necessary, but **not every development belongs in every location.** A Buc-ee's is not an ordinary convenience store or neighborhood grocery

store. It is a massive, 24/7 regional destination with substantial implications for traffic, water resources, wildlife, and surrounding communities.

I urge the county to carefully consider the following concerns before granting approval.

1. Zoning Compliance and Legal Concerns

I am particularly troubled by the ongoing legal challenge involving the property's zoning classification.

My understanding is that the existing zoning does not permit gas stations as a designated use, yet the county has classified this development, with approximately 120 fueling positions, as a convenience store.

I urge the county to carefully consider the pending legal challenge and provide the public with a clear explanation of how this proposal complies with existing zoning requirements.

2. Traffic Congestion and Public Safety

According to the submitted traffic impact study, the proposed Buc-ee's is projected to generate approximately **22,150 vehicle trips daily.** This is an extraordinary volume for an area already experiencing significant growth along the I-25 corridor.

Compared with the Johnstown Buc-ee's, the Monument Hill proposal includes four additional fueling positions and **210** more parking spaces.

The proposed traffic signals, roundabout, and roadway modifications demonstrate the scale of the anticipated impacts. I am particularly concerned about congestion affecting Highway 105, surrounding neighborhoods, and emergency response times.

Who will bear the long-term financial responsibility for maintaining these roadway improvements? Local taxpayers should not inherit infrastructure costs created primarily by a private commercial development.

3. Groundwater and Long-Term Sustainability

Water is one of Colorado's most precious and limited resources. The proposed water supply plan estimates annual consumption of approximately **25.47 acre-feet**, drawn from the Denver and Arapahoe aquifers.

In a state where water conservation is essential, this level of groundwater consumption deserves scrutiny. Permitted withdrawals do not automatically establish long term sustainability, particularly when considering drought, neighboring water users, and continued regional growth.

4. Drainage, Stormwater, and Water Quality

The submitted plans propose approximately **477,500 cubic yards of fill**, significantly altering the property's natural topography.

Stormwater would drain toward Greenland Ranch Creek, with downstream wetlands potentially affected by increased runoff and pollutants associated with extensive vehicle traffic and fueling operations.

5. Wildlife, Lighting, and Colorado's Natural Landscape

The Palmer Divide is an important ecological landscape supporting elk, moose, mule deer, black bears, mountain lions, and other native wildlife. The HWA Wildlife Consulting assessment shows that the elk migration corridor is just **0.14 miles** north of the project boundary.

Colorado has invested considerable resources in wildlife protection and highway crossing infrastructure along I-25. The proposal reportedly includes removing approximately **4,663 feet of existing wildlife fencing** and replacing it with a modified system. Colorado Parks and Wildlife should be closely involved in evaluating these changes. Could this development compromise the effectiveness of infrastructure specifically designed to protect motorists and wildlife?

Furthermore, hundreds of proposed exterior lighting fixtures from a continuously operating travel center threaten the area's relatively dark skies, wildlife behavior, and the natural scenery that makes Monument Hill distinctive.

6. Historical and Cultural Significance

The Palmer Divide has a history extending thousands of years before modern development. The area has longstanding connections to Indigenous peoples, including the Ute, Arapaho, Cheyenne, Kiowa, and other tribes. Its geography also played an important role in early exploration, homesteading, regional transportation, and the development of Colorado's railroad network.

These landscapes are part of our regional identity. Appropriate cultural-resource and archaeological assessments, including tribal consultation, should precede extensive ground disturbance. Unlike the other Buc-ee's location that was built in an already growing commercial area in the Front Range plains, this location has a community rooted near the wooded foothills.

A Request to Protect the Palmer Divide

My opposition is not rooted in a resistance to all economic development. It comes from a belief that responsible growth requires thoughtful decisions about where large commercial developments belong and what communities may permanently lose in exchange.

I find it profoundly disappointing that future generations may come to associate Monument Hill more with a massive travel center and highway congestion than with its wildlife, mountain scenery, and Colorado history.

Before any approval, I urge El Paso County to require:

- Independent traffic and infrastructure analysis, including peak travel periods, winter conditions, emergency access, and long-term taxpayer costs.
- Comprehensive groundwater and stormwater evaluations addressing aquifer sustainability, downstream wetlands, and extreme weather.
- Wildlife and lighting assessments developed with Colorado Parks and Wildlife, including enforceable mitigation and long-term monitoring.

- Full transparency regarding zoning compliance and the pending legal challenge, along with appropriate historical and cultural-resource reviews.
- An assessment of public safety demands, including law enforcement, fire protection, and emergency medical services.

I urge El Paso County Planning and Community Development to withhold approval of the proposed Buc-ee's site development plan unless and until every applicable land-use, transportation, drainage, water, lighting, and environmental requirement has been demonstrably satisfied.

I further request that the county fully consider the cumulative impacts of this project, require independent technical review where appropriate, and make its findings and supporting documentation accessible to the public.

I, respectfully, request a written response addressing the concerns outlined in this letter and confirmation that my comments have been formally received and included in the public record.

Once this landscape is permanently altered, we cannot simply bring it back.

Thank you for your time and attention!

Sincerely,

Allison Lukovnikov, formally Hekter
719-466-0703

hektera_8@hotmail.com

Outlook

Fw: Buc-ee's (PPR2628) Final Drainage Report: Incorrect HSG Assumptions

From StormWater <StormWater@elpasoco.com>
Date Mon 10/19/2026 7:25 AM
To Daniel Torres <DanielTorres@elpasoco.com>; Gilbert LaForce <GilbertLaForce@elpasoco.com>
Cc Kylie Bagley <KylieBagley@elpasoco.com>; StormWater <StormWater@elpasoco.com>

Daniel and Gilbert,

We received the email below in our general stormwater inbox.

Thanks,

Erica Rylander
Stormwater Permit Specialist
Department of Public Works
2880 International Circle, Colorado Springs, CO 80910
Mobile: 719-330-1821
https://publicworks.elpasoco.com

Exciting News: El Paso County is combining the Engineering Criteria Manual and Drainage Criteria Manual into one streamlined document. We'd love your input—please complete the kickoff survey at http://www.elpasocountyecm.com by selecting the **Participate** tab.

From: Eric Hettler <enhettler@gmail.com>
Sent: Friday, October 16, 2026 12:39 PM
To: StormWater <StormWater@elpasoco.com>
Cc: Kylie Bagley <KylieBagley@elpasoco.com>
Subject: Buc-ee's (PPR2628) Final Drainage Report: Incorrect HSG Assumptions

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Mark Safe Report

El Paso County Digital, Strategy & Technology (DST)

Good afternoon,

I am attempting to review the Final Drainage Report for the proposed Buc-ee's site (PPR2628). However, I noticed a fundamental error in the assumptions that needs to be resolved before a proper review can be undertaken (apologies if you have already flagged the issues described below).

The hydrology calculations in the report use soils classified as predominantly Hydrologic Soil Group B. While HSG B is consistent with the untouched native profiles, this site will require extensive regrading (the extent of the cut/fill is shown on Sheet 9 of their Grading and Erosion Control Plan). These areas generally need to be downgraded to an urban/disturbed classification of HSG C or D once they've been graded.

The majority of the cut areas are coming from Map Unit 69 (Peyton-Pring complex, 8 to 15 percent slopes). While the top layer is a sandy loam, the excavation cuts into the underlying sandy clay loam. Because they will be digging well below the initial foot of native loam and compacting that sandy clay loam, it seems more appropriate **to use HSG D as the soil classification for the final site plan**.

Using a more accurate HSG for the post-development landscape will significantly shift their flow volumes and rates. It is a piece that needs to be reconciled before the pond sizing and outlet hydraulics can be accurately evaluated.

On a related note, I am also wondering who handles the environmental evaluation for the stormwater impact on the downstream wetlands. While the report evaluates peak velocities--which will need to be revisited once the appropriate HSG is used--the massive increase in total runoff volume and the longer flow duration from the detention drawdown will likely cause severe channel erosion. Additionally, the thermal impacts of routing summer storm runoff from acres of hot asphalt straight into a wetland habitat seems like a major risk for those downstream systems.

Thank you for your time and consideration!

Eric

Outlook

Buc-ee's interchange request at I-25 and County Line Road in El Paso County

From Kathy Allen <kathyallenrm@gmail.com>
Date Tue 10/27/2026 4:54 PM
To Herman.Stockinger@state.co.us <Herman.Stockinger@state.co.us>
Cc Integritymatterscos@gmail.com <Integritymatterscos@gmail.com>; Kylie Bagley <KylieBagley@elpasoco.com>; Meggan Herington <MegganHerington@elpasoco.com>; Cory Applegate <CoryApplegate@elpasoco.com>; Lauren Nelson <LaurenNelson@elpasoco.com>; Holly Williams <HollyWilliams@elpasoco.com>; Bill Wysong <BillWysong@elpasoco.com>; Carrie Geitner <CarrieGeitner@elpasoco.com>; trilakespreservation@gmail.com <trilakespreservation@gmail.com>; governorpolis@state.co.us <governorpolis@state.co.us>; natasha_hutson@bennet.senate.gov <natasha_hutson@bennet.senate.gov>; jess_cohen@hickenlooper.senate.gov <jess_cohen@hickenlooper.senate.gov>; mark.baisley.senate@coleg.gov <mark.baisley.senate@coleg.gov>

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Mark Safe Report

El Paso County Digital, Strategy & Technology (DST)

I am writing to you as a long time El Paso County and Palmer Lake citizen. I have concerns about the planned changes at the intersection of I-25 and County Line Road to support a new Buc-ee's. I support a thorough, coordinated review by the state agencies involved with input from the public and local residents. I believe there are many factors that need to be considered and I request that any and all requirements, if approved, are paid for by Buc-ee's and monitored by the State.

I have followed this proposed development for more than 2 years and have continually voiced my opinion, both in writing and by speaking in public comment at meetings. I must say I am fatigued and frustrated at the lack of understanding from the El Paso County Commissioners when it comes to listening and respecting the needs of the community and the overall lasting impacts this type of development will have on our area. If we let this happen, it will forever change our area. I feel for

residents who are in the path of this monstrous, unnecessary mega store! I believe a zoning change should have been required and updated. This is currently being litigated in court.

While I am not an expert by any means about traffic, road construction or safety, I can tell you that this intersection was never intended for the volume of traffic that a Buc-ee's would bring. If built in this location, one study says it would add approximately 22.150 daily trips to the already busy interstate corridor. The project sits at the highest point along the front range at 7500'. The projected traffic numbers are staggering! Imagine what it would be like in a major Monument Hill snow storm or during the annual summer Renaissance Festival in nearby Larkspur. On these days it is already backed up and treacherous! Anyone who lives here knows and understands why this project deserves serious scrutiny. Can the proposed interchange improvements safely accommodate the projected traffic? As a local resident who uses this interchange frequently I can tell you that it seems impossible to me to see any way the existing space could possibly be upgraded to handle this amount of traffic! Palmer Ridge High School is nearby on the east side of I-25 and many parents, students, school buses and team vehicles use County Line Road and Monument Hill Road (frontage road) on the east side of I-25 at this intersection. This could not & should not be used as a secondary access point due to the sharp curve and hilly terrain. There have been fatal traffic accidents on that sharp curve. Young drivers and school buses would have to navigate the traffic at this intersection daily. Our nearby "back roads" are not equipped to handle a lot of traffic. Beacon Lite Road is mainly residential traffic and it also serves a church. The high volume of added traffic and impacts that Buc-ee's brings along a major interstate highway has been well documented. Some cities across the country have imposed so many requirements on this mega store that Buc-ee's request to build has been withdrawn due to traffic impacts. Boise, Idaho, for example, read about it here: https://boisedev.com/news/2026/07/23/buc-ees-out-for-busy-meridian-interchange-but-not-giving-up-on-treasure-valley/.

As a Palmer Lake resident I am also concerned about evacuation planning. Palmer Lake has the railroad going right through it and there is currently no way for traffic to get through when a train comes by. In an emergency evacuation it could mean the difference between life and death. The railroad crossing should be upgraded with a bridge for the trains to go OVER the roadway to ensure there is no blockage of the flow of traffic. Buc-ee's should pay for it BEFORE they are allowed to begin construction. What about bikes and walkers going to and from the El Paso County Park and Palmer Lake each day? The number of recreational users has grown immensely over the past 5 years. If the train is blocking traffic at the corner of Spruce Mtn Road and County Line Road, there are only two ways out; on Highway 105 towards Monument or Spruce Mountain Road on the north towards Larkspur. For the number of residents and businesses that would need to evacuate, this is not enough. Much thought and planning should be done in advance.

The new 15 million dollar wildlife bridge across I-25 is just a mile north of the proposed Buc-ee's location. I am thrilled that it has been built and safely allows the migration of many large animals through the open space in Douglas County. We are so fortunate to live here and share our space with our 4 legged friends. It is baffling to me why we would spend that kind of money protecting our wildlife from the busy interstate and then turn around and allow this type of development. I would think our government officials would have better judgement than that! I hope the various departments are in communication.

Please consider denying this development to be built here! A smaller type of commercial project that doesn't draw travelers and destination visitors and affect the safety of residents, our natural resources and wildlife should be considered for this location.

Please distribute my email to all concerned and include it in the meeting record. If you have any questions or concerns you can reach me at 719-661-9863 or kathyallenrm@gmail.com. Thank you for your time and commitment.

Kathy Allen
560 Fort Collins Drive
Palmer Lake, CO 80133

--



Kathy Allen
719-661-9863

Outlook

CDOT

From steve draper <ssdraper@mac.com>
Date Wed 11/4/2026 10:34 AM
To Kylie Bagley <KylieBagley@elpasoco.com>
Cc PLNWEB <PLNWEB@elpasoco.com>

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Sorry Kylie - one more - just a forward for you to CDOT region 2 . . .

Please add this supplemental comment to the PPR2628 (Buc-ee's) file and forward it to the CDOT Region 2 reviewers, as you kindly did with my October 29 comment....

The County's own review of the applicant's Traffic Impact Study states that CDOT's Policy Directive 1601 approval is required before the site plan can be approved. The study should be strengthened before CDOT relies on it for the I-25 / County Line Road interchange (Kimley-Horn, June 15, 2026):

1. **Weekends are not analyzed.** The study's own data from 15 Buc-ee's sites shows average weekend traffic about **29% higher** than weekdays (22,509 vs. 17,433 daily trips), but the analysis uses weekday traffic only.
2. Inputs appear generic and **do not reconcile. The trip table is labeled "Oak Grove Trips" and assumes a freeway volume of 75,000 vehicles a day. It is unclear whether an actual Exit 163 count was used**. The model assumes only 2% heavy vehicles at a site with 120 fueling positions, fuel tanker deliveries, and diesel customers. County reviewers have also noted that the study shows about **9,300** daily trips on the first site entrance segment of Beacon Lite Road, although the site is projected to generate about **22,000.**
3. Independent engineering review in the County record raises serious interchange concerns. **The Galloway traffic review (June 12, 2025, Exhibit A to the Brownstein letter of August 24, 2026, in APP261)** found that:

- the ramp intersections are less than 400 feet apart, and queues may spill between them;
- the bridge fence obstructs sight distance from both off-ramps, so right turns on red would likely be prohibited;

- in its simulation, northbound off-ramp queues periodically reach the gore point, and about 705 feet of additional deceleration length would be needed to protect I-25;
- neither study provided I-25 volumes, so no merge analysis was possible.

4. **Winter conditions and closures**. Exit 163 is at the top of Monument Hill, where snow, ice, and I-25 closures are recurring. When I-25 slows or closes, stranded traffic exits here, and a major travel center would draw more.
5. Beacon Lite access. The County describes Beacon Lite as a rural collector, but County reviewers have written that this segment will function like an arterial, so the two Buc-ee's accesses, about **570 feet apart, should be judged against arterial spacing**. The County Line right-out also requires an access spacing deviation, and County reviewers have asked for CDOT's approval of it.
6. Retaining wall and fill next to I-25. The site plan shows a retaining wall about 1,300 feet long and up to about 36 feet high along the I-25 right-of-way, with up to 31 feet of fill on site (Terracon geotechnical report 23245069, revised October 8, 2026). **The wall's own geotechnical report (Terracon 23245069B) is not in the County file.** Meanwhile, material from the Beacon Lite stockpile (CDR261) has been placed and leveled on the property, and the **geotechnical report does not address it.** The County has also confirmed there are generally no compaction requirements for early grading or stockpiling, so fill on this site **cannot be assumed to be engineered**. I ask that CDOT review the wall design and its geotechnical report, and confirm that any fill supporting the wall or near CDOT right-of-way is engineered, tested, and certified, before access or permits are approved.

I respectfully request that CDOT require, as part of the Policy Directive 1601 submittal:
a. weekend, holiday, and winter-condition analysis;
b. a microsimulation of both ramp intersections, County Line Road, and the Beacon Lite accesses together;
c. an I-25 merge and diverge analysis using actual I-25 counts;
d. a sensitivity test with traffic 25-50% above the forecast;
e. actual traffic counts from existing interstate Buc-ee's stores, including Johnstown, Colorado;
f. review of the I-25 retaining wall, its geotechnical report, and the fill supporting it;
g. confirmation of whether CDOT will require escrow or a proportional share for the future signal from this development, as the Monument Ridge East study indicated CDOT required.

I have requested CDOT crash data for this interchange and will provide a summary when received.

Thank you,
Steve Draper
Colorado Estates, Monument

Outlook

Re: Subject: PPR2628 – my Oct 29 comment

From steve draper <ssdraper@mac.com>
Date Wed 11/4/2026 10:18 AM
To Kylie Bagley <KylieBagley@elpasoco.com>

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GM Kylie - one quick follow up question for my file .

The County's review comments on the Traffic Impact Study say the County will require CDOT's Policy Directive 1601 approval before the site plan can be approved. Will the County approve the site plan, or issue any grading or building permits, before the Transportation Commission completes the 1601 review?

Thanks . Steve

> On Nov 2, 2026, at 2:53 PM, steve draper <ssdraper@mac.com> wrote:
>
> Thanks Kylie !!
>
> Sent from my iPhone
>
> > On Nov 2, 2026, at 2:01 PM, Kylie Bagley <kyliebagley@elpasoco.com> wrote:
> >
> > Steve,
> >
> > We are working on uploading comments to EDARP, I appreciate your patience. I have forwarded your email to CDOT.
> >
> > Thank you,

<Outlook-El Paso Co.png>

Kylie Bagley
Principal Planner
Planning and Community Development
719.520.6323
www.elpasoco.com

From: steve draper <ssdraper@mac.com>
Sent: Monday, November 2, 2026 12:23 PM
To: Kylie Bagley <KylieBagley@elpasoco.com>
Subject: Subject: PPR2628 – my Oct 29 comment

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Hey Kylie :

My October 29 public comment on PPR2628 (Buc-ee's), sent to plnweb@elpasoco.com, doesn't appear in the EDARP file yet. A copy below is attached. Could you please add it to the file and confirm it was provided to the CDOT reviewers? Thanks !!

Please also forward this comment to the CDOT Region 2 reviewers on this project (Teresa Guagliardo, Michelle Regalado, Kimberly Blanchard, Adam Lancaster).

Ms. Bagley and CDOT reviewers,

As you know, the I-25 / County Line Road interchange has been elevated to a Policy Directive 1601 review before the full Colorado Transportation Commission, which will independently examine its capacity, safety, environmental impacts and funding. Given that, I submit the following public comment for the PPR2628 record. It is based entirely on the applicant's own submittals.

1. The ramps would carry about 22,000 Buc-ee's trips a day, not 3,300. The applicant's Traffic Impact Study (Kimley-Horn, June 15, 2026) projects about 22,150 daily weekday trips, then counts only 3,322 as "net new" by treating the rest as drivers already on I-25. Those drivers still exit and

re-enter at the County Line Road ramps. The interchange must be evaluated for the full volume, plus fuel tankers and heavy trucks.

2. The applicant proposes to reuse the existing bridge with signals only. The study's 2028 recommendation is to "utilize the existing bridge deck (approximately 72 feet)" with traffic signals and restriping. Colorado's existing Buc-ee's in Johnstown sits next to a new, high-capacity diverging diamond interchange. The FHWA memo in the record already rejected a roundabout interchange here and noted steep grades for a diverging diamond. CDOT should determine whether this bridge can safely carry the projected traffic before any access is approved.
3. No CDOT access permit has been issued. The CDOT plan sheets are a 60% submittal labeled "Access Permit #XXXXXX."
4. Who pays is unresolved. The draft Development Agreement bonds about $5.6 million for County portions of Beacon Lite and County Line Roads only. It includes nothing for the interchange, ramps or bridge. The interchange work is presented as an El Paso County project, prepared for Buc-ee's.
5. The project's own plans depend on the interchange. The site plan states that "offsite CDOT improvements" are shown for reference only. The site cannot function without them.

I respectfully request that:

a. CDOT evaluate the bridge and ramps for the full ~22,000 daily trips plus truck traffic, not the 3,322 "net new" figure;
b. since the Transportation Commission will review the interchange in any case, the site development plan not be approved, or be expressly conditioned, until CDOT approves the access and the Policy Directive 1601 review is complete;
c. the County disclose who will pay for the interchange, ramps, bridge, and any Beacon Lite right-of-way the County is acquiring; and
d. this comment be placed in the PPR2628 file and provided to CDOT for its review.

Thank you

Steve Draper

Colorado Estates

Outlook

Subject: PPR2628 – my Oct 29 comment

From steve draper <ssdraper@mac.com>
Date Mon 11/2/2026 12:24 PM
To Kylie Bagley <KylieBagley@elpasoco.com>

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2. The applicant proposes to reuse the existing bridge with signals only. The study's 2028 recommendation is to "utilize the existing bridge deck (approximately 72 feet)" with traffic signals and restriping. Colorado's existing Buc-ee's in Johnstown sits next to a new, high-

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b. since the Transportation Commission will review the interchange in any case, the site development plan not be approved, or be expressly conditioned, until CDOT approves the access and the Policy Directive 1601 review is complete;
c. the County disclose who will pay for the interchange, ramps, bridge, and any Beacon Lite right-of-way the County is acquiring; and
d. this comment be placed in the PPR2628 file and provided to CDOT for its review.

Thank you

Steve Draper

Colorado Estates