TOWN OF MONUMENT
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PLANNING DEPARTMENT
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November 17, 2026

Meggan Herington, Executive Director
El Paso County Planning & Community Development Department
2880 International Circle, Suite 110,
Colorado Springs, CO 80910

SUBJECT: Town of Monument Comments Regarding the Pending Administrative Approval of the Buc-ees EPCO, LLC (ADM264) at the Southeast Corner of County Line and Beacon Lite Roads

Dear Director Herington,

The Town of Monument understands that the County has authorized administrative review of the proposed development at the southeast corner of County Line Road and Beacon Lite Road. In the interest of continued intergovernmental coordination and a thorough review process, the Town respectfully offers the following comments for the County's and applicant's consideration. These comments are intended to help identify and mitigate potential off-site impacts on the surrounding area and shared regional resources:

ENVIRONMENTAL IMPACTS - GROUNDWATER, STORMWATER, AND AIR QUALITY.
The Town encourages the administrative review to document and address reasonably anticipated direct, indirect, and cumulative environmental impacts, particularly those that could extend beyond the site and affect Monument or shared regional resources.

Groundwater and spill prevention should address:

- Existing groundwater conditions, depth, flow direction, and nearby wells or sensitive receptors
- Potential effects of underground or aboveground fuel storage systems, fueling operations, accidental releases, deicing materials, and other site activities
- Leak detection, secondary containment, spill prevention, inspection, reporting, and emergency-response procedures
- A response and remediation plan identifying responsible parties, agency notification requirements, and funding responsibility if contamination occurs

Stormwater management should address:

- Predevelopment and post-development runoff rates, volumes, flow paths, and water quality

- Permanent best management practices for hydrocarbons, sediment, trash, nutrients, and other pollutants associated with a high-volume fueling and commercial site
- Safe conveyance and detention during major storm events, including downstream capacity and erosion impacts
- Inspection, maintenance, and replacement responsibilities for private stormwater facilities
- Construction-phase erosion and sediment control, including stabilization and corrective-action procedures

Air-quality review should address construction dust, diesel exhaust, vehicle idling, fueling emissions, odors, and the effect of prolonged vehicle queuing. The applicant should identify enforceable mitigation measures, complaint-response procedures, and monitoring or corrective actions during construction and operation.

DARK SKY AND SITE LIGHTING.
The site-lighting plan should protect nighttime visibility and minimize glare, light trespass, and skyglow affecting nearby properties, motorists, and the Monument community. The County should require a complete photometric plan demonstrating compliance at all property lines and along adjacent roadways.

The plan should include:

- Fully shielded, downward-directed fixtures with appropriate cutoff characteristics
- The lowest practical mounting heights and illumination levels for safe operation
- Warm-color lighting where feasible and limitations on high-intensity blue-rich lighting
- Automatic dimming, timers, or operational controls during lower-activity periods, except where safety requires continuous lighting
- Controls for canopy, parking lot, building, sign, and landscape lighting, including digital displays
- Evaluation of glare and driver distraction at County Line Road, Beacon Lite Road, and the I-25 interchange
- A post-installation inspection and adjustment process to correct measurable spillover, glare, or noncompliance

WATER SUPPLY, DEMAND, AND SYSTEM RELIABILITY.

As part of the review, the Town requests documentation demonstrating that a legally and physically reliable water supply is available for the project and identifying measures to avoid or mitigate adverse effects on existing users, local groundwater resources, and planned municipal or regional water systems.

The water-supply analysis should identify:

- The proposed water provider and the legal source of supply
- Estimated average-day, maximum-day, peak-hour, irrigation, commercial, and fire-flow demands
- The basis for projected demand, including expected customer volume, food-service operations, cleaning, irrigation, and other high-use activities
- Available system capacity, storage, pressure, treatment, transmission, and redundancy
- Drought and emergency operating conditions and any required conservation measures
- Potential effects on groundwater levels, nearby wells, and existing water rights if groundwater is proposed
- Required off-site improvements, timing, funding, and long-term maintenance responsibility

The applicant should also identify how wastewater and fire-suppression demands will be served and confirm that utility construction, easements, or future expansion will not create unaddressed impacts within Monument.

TRAFFIC IMPACT.

Because the proposed development is located outside the Town of Monument, this review focuses on potential impacts to environmental quality, groundwater and stormwater resources, air quality, dark-sky conditions, water supply, area transportation facilities, emergency response operations, and public safety.

The Traffic Impact Study prepared by Kimley-Horn and dated June 15, 2026, estimates approximately 22,150 weekday vehicle trip ends. Of these trips, approximately 85 percent are assumed to be diverted from existing travel routes, primarily Interstate 25 (I-25). Although the study assigns approximately 10 percent of project-generated trips to south Beacon Lite Road, it does not evaluate downstream intersections within Monument, including the intersections of Beacon Lite Road and State Highway 105 (SH 105) and SH 105 and 2nd Street.

As a result, additional analysis would help clarify the potential operational, traffic, and safety effects of the proposed development on the Town's roadway network.

Based on this preliminary review, the Town respectfully requests that the following matters be considered through the County's development review process.

1. Beacon Lite Road and SH 105 Intersection

The existing unsignalized intersection of Beacon Lite Road and SH 105 is a primary concern. This intersection provides access to Town Hall and currently presents challenging left-turn movements because of existing traffic volumes and limited available gaps.

The Traffic Impact Study should be expanded to evaluate existing and projected intersection operations, including:

- Turning movements
- Intersection delay
- Vehicle queuing
- Sight distance
- Crash history
- Traffic signal warrants
- Potential safety and operational deficiencies

The Town recommends completing a traffic signal warrant analysis in accordance with the Manual on Uniform Traffic Control Devices (MUTCD) and identifying any improvements that may be appropriate to address demonstrated safety or operational deficiencies.

The evaluation should specifically consider the effects of Buc-ee's traffic on access to Town Hall and on emergency response movements. Any proposed improvements should be coordinated with the Colorado Department of Transportation (CDOT) and the Town.

2. SH 105 and 2nd Street Intersection

The Traffic Impact Study does not evaluate potential downstream impacts at the intersection of SH 105 and 2nd Street.

Supplemental analysis should identify the anticipated distribution of project traffic through this intersection and evaluate potential impacts on:

- Turning movements
- Intersection operations
- Vehicle queuing
- Traffic safety
- Adjacent roadway operations

If the applicant concludes that project-related impacts will be negligible, supporting analysis and documentation should be provided.

3. Project Trip Distribution

The Traffic Impact Study assumes that approximately 85 percent of project trips will be diverted from existing travel routes and assigns no diverted trips to south Beacon Lite Road.

These assumptions should be substantiated, particularly in consideration of local customers, employees, and potential alternate routing through Monument. The analysis should explain the basis for the assumed trip distribution and demonstrate that routing through Monument has been appropriately considered.

The proposed realignment of County Line Road and Beacon Lite Road should also be incorporated into the evaluation of future traffic distribution and roadway operations.

4. Seasonal and Weekend Traffic

Existing intersection traffic counts were collected on May 8, 2024, during weekday morning and afternoon peak periods. The study does not clearly document the application of seasonal adjustment factors or demonstrate that peak summer, weekend, and holiday travel conditions have been adequately evaluated.

Given the significant recreational and regional travel along I-25, supplemental analysis should address seasonal and weekend traffic conditions, including potential impacts to:

- Beacon Lite Road
- SH 105
- 2nd Street
- Adjacent intersections
- The surrounding Town roadway network

The analysis should identify whether traffic conditions during peak recreational, summer, weekend, and holiday periods could result in operational or safety concerns that are not reflected in the weekday traffic analysis.

5. I-25 Closures and Traffic Diversion

The Monument Hill area of I-25 experiences periodic closures associated with severe weather, crashes, and other incidents. During these events, traffic may be diverted onto SH 105 and surrounding local roadways, potentially creating substantial congestion within Monument.

The Traffic Impact Study does not address these conditions. A supplemental evaluation should consider the potential effects of I-25 closures on:

- Project access
- Traffic circulation
- Local roadway capacity
- Emergency response routes
- Access to Town Hall and other public facilities
- The intersections of Beacon Lite Road/SH 105 and SH 105/2nd Street

Coordination with CDOT, El Paso County, and Town emergency response agencies should be conducted to identify appropriate traffic management and emergency access measures for these conditions.

6. Emergency Response—Fire, EMS, and Law Enforcement

The Monument Fire District and Monument Police Department are among the closest first-response agencies to the proposed development. Although the site is located outside the Town limits, the development may generate additional demand for fire, emergency medical services, and law enforcement resources. It may also affect existing response routes and response times.

The submitted Wildfire Hazard and Mitigation Report addresses on-site emergency access but does not specifically evaluate off-site emergency response impacts or potential effects on law enforcement operations.

Coordination with the Monument Fire District, Monument Police Department, and applicable County agencies should address:

- Anticipated fire, EMS, and law enforcement response demands
- Primary response jurisdiction
- Mutual-aid considerations

- Emergency access routes
- Potential response delays caused by increased traffic
- Response conditions during I-25 closures or other major incidents
- Communication and coordination procedures

The Town requests that the applicant identify any additional response measures, improvements, staffing needs, or funding responsibilities that may be associated with project-related impacts.

7. Grand Opening and Initial Operations Traffic Management

The grand opening and initial operating period are anticipated to generate traffic volumes substantially greater than typical ongoing operations. The Traffic Impact Study does not include a specific grand-opening traffic forecast or traffic management plan.

The March 2024 opening of the Buc-ee's facility in Johnstown, Colorado, provides relevant experience regarding potential traffic impacts. Reported issues included:

- March 18, 2024—Parking capacity exceeded: Nearly 600 parking spaces reportedly filled within hours of opening, resulting in overflow parking along nearby roads. (BizWest)
- March 18, 2024—Traffic overflow: Opening-day traffic reportedly spilled onto surrounding streets and neighboring business parking lots. (KUNC)
- March 18, 2024—Illegal roadside parking: Vehicles reportedly parked along Nugget Road and in nearby residential areas, creating traffic management and enforcement concerns. (Denver Gazette)
- December 5, 2024—Traffic congestion: Residents reported significant traffic backups near the facility. Johnstown officials acknowledged initial traffic concerns but indicated that the roadway network accommodated the additional traffic. (KRDO)
- February 4, 2025—Continued congestion concerns: A nearby resident reported recurring traffic backups, although conditions had improved since opening. The Johnstown Town Manager indicated that, to his knowledge, no post-opening traffic study had been conducted. (KKTV)

A Grand Opening and Initial Operations Traffic Management Plan is recommended before the facility opens. The plan should incorporate available operational data and lessons learned from the Johnstown facility and should separately address passenger vehicles, commercial trucks, any temporary truck weigh-station or inspection activity, and the following operational issues:

- Anticipated opening-day and initial-operating-period traffic volumes

- Vehicle queuing and overflow parking
- Temporary traffic control

Temporary truck weigh-station or inspection operations, including location, queue storage, hours, staffing, and procedures to prevent backup onto public roads

A plan for commercial-truck routing, staging, enforcement, and overflow management during the opening period

Coordination with the Colorado State Patrol, CDOT, El Paso County, and local law-enforcement agencies regarding any truck inspection or weigh-station activity

- Access management
- Law enforcement and traffic control staffing
- Emergency vehicle access
- Pedestrian and bicycle safety
- Communication with surrounding jurisdictions
- Monitoring procedures
- Contingency procedures for excessive congestion
- Traffic management during I-25 closures or other major incidents

The plan should be developed in coordination with El Paso County, CDOT, the Monument Fire District, the Monument Police Department, and the Town, as applicable.

The applicant should clearly identify responsibility for plan implementation, monitoring, staffing, and associated costs. The plan should also ensure that the Town is not responsible for absorbing traffic management or law enforcement costs associated with a development located outside its jurisdiction.

8. Beacon Lite Road Improvements

The submitted plans identify improvements to Beacon Lite Road extending south from County Line Road to the project limits. Clarification should be provided regarding the southern termination of these improvements and any potential impacts to the existing roadway corridor extending into Monument.

The applicant should identify:

- The limits of the proposed Beacon Lite Road improvements
- The proposed roadway cross-section
- The anticipated transition to the existing roadway
- Temporary and permanent traffic control measures

- Potential impacts to roadway capacity and safety within Monument
- The relationship between the proposed improvements and any future County Line Road or Beacon Lite Road realignment

Any improvements that could affect Town roadways or traffic operations should be coordinated with the Town before construction begins.

9. Wildfire Evacuation and Emergency Access

The Wildfire Hazard Evaluation Report dated September 2026 identifies elevated wildfire hazards along Beacon Lite Road and recommends roadway widths sufficient to accommodate simultaneous emergency access and evacuation.

However, the report does not evaluate the potential use of Beacon Lite Road as an evacuation route for surrounding residential areas or the effects of project-generated traffic on evacuation operations.

The applicant should coordinate with the Monument Fire District, Monument Police Department, and applicable County emergency management agencies to determine whether Beacon Lite Road serves as, or could serve as, an evacuation route.

If Beacon Lite Road is identified as an existing or potential evacuation route, the applicant should evaluate the potential effects of the proposed development on:

- Evacuation capacity
- Emergency vehicle access
- Traffic control
- Contraflow or other emergency traffic operations
- Access for surrounding neighborhoods
- Traffic management during wildfire or other emergency events

Any recommended improvements or operational measures should be identified and coordinated before final project approval.

10. Construction Traffic and Haul Routes

The applicant should identify whether construction-related hauling associated with the proposed development will use roadways within the Town of Monument.

If Town roadways are proposed for construction hauling or other project-related construction traffic, the applicant should provide:

- Proposed haul routes
- Anticipated truck volumes

- Vehicle types and sizes
- Expected construction duration
- Construction schedules
- Temporary traffic control measures
- Measures to protect roadway infrastructure
- Measures to maintain traffic and pedestrian safety
- Procedures for addressing roadway damage or unusual maintenance needs

Construction hauling that utilizes Town roadways would be expected to comply with applicable Town truck-route and weight restrictions, including Monument Municipal Code Chapter 8-3, as well as applicable permitting requirements established by the Town's adopted Roadway and Pavement Design Criteria.

The applicant should coordinate proposed hauling activities with the Town before commencing operations that could affect Town roadways.

SUMMARY AND RECOMMENDATION.

The Town's principal observation is that the Traffic Impact Study focuses primarily on the immediate project vicinity and the I-25 interchange and would benefit from additional evaluation of potential impacts on Monument's roadway network, emergency response operations, and public safety.

Of particular importance are:

- Dark-sky protection, glare, light trespass, and post-installation lighting verification
- Water-supply demand, reliability, fire flow, and effects on shared water resources
- Potential groundwater, stormwater, spill-prevention, and air-quality impacts
    - The existing unsignalized Beacon Lite Road and SH 105 intersection
    - Potential traffic diversion during I-25 closures
    - Seasonal, weekend, and holiday traffic demands
    - Potential impacts to SH 105 and 2nd Street
    - Wildfire evacuation and emergency access
    - The substantial traffic volumes anticipated during the grand opening and initial operating period
    - Construction traffic and potential impacts to Town roadways

To support a complete review, the Town respectfully requests that the County consider obtaining the following from the applicant:

1. A water-supply and demand analysis documenting legal supply, system capacity, fire flow, drought reliability, utility improvements, and effects on groundwater and existing users.
2. A photometric and exterior-lighting plan addressing dark-sky principles, glare, light trespass, fixture controls, and post-installation verification.
3. A comprehensive environmental analysis addressing groundwater protection, stormwater quantity and quality, spill prevention, construction dust, idling, and operational air-quality impacts.
4. Supplemental traffic analyses addressing the Beacon Lite Road/SH 105 and SH 105/2nd Street intersections.
5. Substantiation of the proposed project trip distribution, including potential routing through Monument.
6. Supplemental evaluation of seasonal, weekend, holiday, and I-25 closure conditions.
7. A Grand Opening and Initial Operations Traffic Management Plan.
8. An evaluation of wildfire evacuation and emergency access conditions.
9. Detailed construction haul routes and traffic control measures.
10. Coordination with the Monument Fire District, Monument Police Department, CDOT, El Paso County, and the Town.
11. A coordinated emergency-response plan addressing fire, EMS, law enforcement, mutual aid, wildfire evacuation, I-25 closures, communications, staffing, equipment, and funding responsibilities.
12. A clear identification of responsibility for implementing and funding traffic management, emergency response, roadway improvements, and public safety measures necessitated by the development.

The Town respectfully requests that these items be considered and, where appropriate, addressed before final project approval or before activities begin that could materially affect environmental resources, water supply, dark-sky conditions, Town transportation facilities, emergency response operations, or public safety.

Please contact me directly if you have any questions.

Sincerely,

TOWN OF MONUMENT

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