

From: [William Fales](#)
To: [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#); [Glenn Hartmann](#); [Philip Berry](#)
Subject: Spring Valley development
Date: Sunday, September 15, 2024 3:14:32 PM

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September 15, 2024

Dear Garfield County Commissioners,

The proposed Spring Valley development is too big for this rural area for many reasons:

The impact on the road from 577 houses.

These 6,000 acres provide critical habitat for deer, elk and all wildlife; as well as supporting food production, and a ranch that protects the ecosystem values of Spring Valley. Our ranching community is historically and culturally important, but also ecologically needed to support our declining deer and elk populations, raptors, and songbirds. When land is developed, non-urban bird species decline. Birds are important in the control of insects world-wide.

577 houses require water and the development of wells may adversely affect the neighbors' wells. Upscale developments are a problem across the mountain west, making it harder for middle class people to own houses as the tax basis rises and they can no longer afford to live in the area.

Please turn down this proposal.

Sincerely,

Marj Perry

Cold Mountain Ranch

Carbondale, CO

9/15/24

From: [Ginny Harrington](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#)
Cc: [Ginny Harrington](#); [Tom Harrington](#)
Subject: More info to support Denial of Proposed Spring Valley Ranch Development
Date: Sunday, September 15, 2024 8:13:43 PM
Attachments: [BCLT news VH article.pdf](#)

Some people who received this message don't often get email from ginny.a.harrington@gmail.com. [Learn why this is important](#)

Garfield County Administration & Commissioners
108 8th Street, Suite 101 Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

I received the following info from Erik Glenn of the Colorado Cattlemen's Agricultural Land Trust in February 2023 when opposing the proposal of a gravel pit in Montrose County on farm ground in rural Montrose County directly across from the 40 acres my mom and I own where mom and my brother live. This info is relevant in the Spring Valley Development Proposal as well as it explores the loss of farm and ranchlands and its impacts. It also allows some searching by state and county.

Erik states, The best source of data on the conversion subject (Ginny's Note: conversion of farm and ranchlands to commercial or residential development/subdivisions) is American Farmland Trusts Farms Under Threat report. (Ginny's Note: I included the report in the previous email sent to you. However, the info below expands on this and further pinpoints some state and county data.)

You can access the report here <https://farmland.org/project/farms-under-threat/>. It breaks down the data by state and county. (Ginny's note: I did not have the info handy on the interactive map when I sent you the previous email.) You can access the interactive map here: <http://development2040.farmland.org/>. In the map, click on Colorado and then click on the approximate location of Garfield. This map also provides a forecast for future loss. Here is the Colorado-specific info: <https://farmlandinfo.org/statistics/colorado-statistics/#FU> T; https://storage.googleapis.com/csp-fut2040.appspot.com/state-reports/FUT2040_CO.pdf.

(Ginny's note: Regarding the CSU Cost of goods and services I sent previously as an attachment-- Erik states--

In 2003 CSU Extension completed the attached report on the impact of rural residential development. Data is outdated but conclusions are still relevant.)

Here are more links I have found in my files regarding the importance of protecting ranchlands:

<http://www.farmland.org/programs/protection/default.asp><https://farmland.org/our-work/keeping-farmers-on-the-land/?mission-area=19>

<https://farmland.org/our-work/protecting-farmland/?mission-area=6>

I have also attached a newsletter from Black Canyon Land Trust in 2006 when I was working for them. I wrote an article about the importance of keeping ranchlands intact. I hope you will take time to read it.

I hope you will consider this information and VOTE NO ON THE PROPOSED SPRING VALLEY RANCH DEVELOPMENT!

Sincerely,
Ginny Harrington
Concerned Rancher
Carbondale, CO

9/15/24

From: [Ginny Harrington](#)
To: [Glenn Hartmann](#); [Phillip Berry](#); [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#)
Cc: [Ginny Harrington](#); [Tom Harrington](#)
Subject: Letter, documents and links in OPPOSITION TO THE SPRING VALLEY RANCH DEVELOPMENT
Date: Sunday, September 15, 2024 5:16:29 PM
Attachments: [rick.knight.ranching.contributes.docx](#)
[Maestas et al \(2003\) Con Bio 17\(5\) 1425-1434.pdf](#)
[RanchersKeystoneSpecies.Rangeland.pdf](#)
[CSU.cost.of.community.services.study.pdf](#)
[AFT.cost.of.goods.Making.the.Case.Final.pdf](#)
[Cost of County Services - Colorado LUPR 03-03.pdf](#)

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Sept. 15, 2024

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

My husband and I are residents who reside in Garfield County. I am writing to the board of the Garfield County Commissioners office, with our strong opposition to the proposed development of the Spring Valley Ranch, located in Glenwood Springs.

I am sending these articles and links that support and defend my husband Tom and my opposition to the Spring Valley Ranch Proposed Development Plan in its entirety. These are articles speaking to the things ranchlands provide that disappear with development and the costs of such development to communities. Please place these in the record for OPPOSITION TO THE SPRING VALLEY RANCH PROPOSED DEVELOPMENT.

As ranchers, my husband and I have the lived experience of what ranching and livestock provide for our communities and the environment. We have lived and worked on ranches for the majority of our lives, at least 50 plus years.

My family roots to ranching in Colorado date back to 1868, in Gardner and the Wet Mountain Valley of Colorado. Then Montrose and Ouray County from 1879 on. Unfortunately, fate and circumstances through the years would be such, that my family does not have a ranch of our own since 1971, when I was a mere 8 years old. It was then that my grandfather passed and tax complications forced us off the family place, which was shortly planted with houses. My dad would support our family by working as a ranch hand, hard rock miner, welder and mechanic.

My mom and brother currently reside on 40 acres in the Spring Creek area of Montrose that my paternal great grandfather and great grandmother purchased around 1932. They are surrounded by a sheep ranch and some farm ground but there are developments that continue to encroach in the area. My brother is a ranch foreman for an absentee landowner in and around Montrose and Cimarron. Ranching is in our family blood. Tom's mom also resides in Montrose. We all lament the unchecked development and growing population that has changed the rural character of much of Western Colorado and threatens the farms and ranchlands.

My husband Tom has worked for ranches since he was 14. First working on a ranch for Gene Adams and daughter Denise that owned much of what would later be swallowed up by the Telluride Ski Area. After we were married in the fall of 1981, my husband first worked as a general ranch hand. First in Delta, then in Ridgway. A wealthy absentee landowner purchased this Ridgway Ranch in 1980 when death taxes would force the heirs of the previous rancher to sell the ranch. Her heirs were folks who had helped her over the years, as she had no blood relatives living.

Still on the ranch in Ridgway, in 1989 we made the decision to leave. So it was that about nine years out of high school with our seven-year-old daughter in tow, we went back to college. My husband and I realized we could not afford a ranch of our own and we knew we wanted to continue working on ranches and in agriculture. It was and is our life passion.

We believed getting a degree to help us be more equipped to handle the increasing challenges animal agriculture imposes would help us to be marketable as ranch managers. Therefore, we could live out our dream of working and raising our daughter on a ranch, and later see grandkids learn the value of ranching and agriculture and being stewards of the land, water, environment, wildlife and livestock.

Since receiving his Masters in Ranch Management and Animal Reproduction, in Dec. 1994, Tom has worked as a ranch manager. I received a BS in Agriculture business at the same time. We have lived and worked in WY, AZ, MT and our home state of CO. Living in Carbondale for the last 16 years.

I have worked in many capacities from accounts payable to producing seedstock/purebred sales catalogs and livestock records for the ranches we lived and worked on, worked for a land trust, the MT Dept of Ag, Director of the Ouray County Historical Society Museum and writing ranching history stories for the Ridgway Public Library. I now gladly and proudly work as a ranch wife who rides and cooks for the crew, runs errands and attends important meetings when others can't be spared.

We both also volunteer and serve on many community organizations including Holy Cross Cattlemen's Assoc., Carbondale Wild West Rodeo,

Roaring Fork Valley Coop and Colorado Cattlemen's Assoc. We work hard to ensure that the general- public understands the importance of ranchlands and to keep ranching sustainable and viable for future generations. Sometimes it is an uphill battle. Life's challenges and circumstances shape who we are and having seen and experienced the loss of ranches and ranchland and the impacts of such losses, we feel it is imperative that we speak up. By speaking up we hope we can save others from experiencing such losses and keep ranch and aglands intact. Tom is currently serving as the president for CCA for a one-year term from June 2024 to June 2025.

As a 5th generation native to the west slope of Colorado and 16 years living in Carbondale, I have seen the unchecked development eat up acre after acre of ranchland and it is time to stop the encroachment of development on ranch and rural lands. The proposed Spring Valley Ranch Development is simply wrong for our community. We are opposed to developing this land at all. We believe its highest and best use is for ranchland and wildlife habitat.

I share the ecosystem services directly below that ranchlands and ranchers provide. These values or attributes disappear when rural lands/ranch lands/working wildlands are developed for residential or commercial development. I am for private property rights; however, I believe our communities cannot withstand the further development of ranchlands without communities losing all that the ranchlands have provided, and have been valued for since homesteaders first entered the west slope of Colorado.

Ranchlands provide -- Open Space; Scenic Viewsheds; Necessary Wildlife Habitat-- Mammals, Birds, Fish; Wetlands; Wildlife Connectivity and Migration Corridors; Water Filtration; Fire Mitigation, Preserving Natural Plant Communities; Soil Erosion Reduction; Carbon Sequestration; Cultural & Historical Significance, Character of Rural Communities; Food & Fiber.

American Farmland Trusts Threat Report

Research reported in a July 18, 2022 article stating,

"If recent trends continue, 417,500 acres of Colorado's farmland and ranchland will be paved over, fragmented, or converted to uses that jeopardize agriculture by 2040. That represents an area more than four times larger than the city of Denver. In the worst-case scenario of *runaway sprawl*, Colorado could lose as much as 525,300 acres of farmland. 53% of the conversion will occur on Colorado's best land."

I have provided links and attached documents that speak to the importance of keeping ranchlands intact and the risks of rural development/exurban development and costs of said development of ranchlands. Or as Professor Emeritus Rick Knight of Colorado State University calls them, 'working wildlands.'

Rick Knight

Rick is a Professor Emeritus of wildlife conservation at CSU and is interested in the intersection of land use and land health in the American West. He is a five-time recipient of the students' choice for Outstanding Faculty Member in the Warner College of Natural Resources at CSU, and he sits on a number of boards, including the Colorado Cattlemen's Agricultural Land Trust, the Science Board of the Malpai Borderlands Group, the Land Conservation Assistance Network, and Rocky Mountain Land Library.

Here are two links, one is an article written by Rick Knight, PhD.

<https://www.hcn.org/wotr/a-message-to-environmentalists-from-a-wildlifebiologist/>

<https://farmland.org/new-report-smarter-land-use-planning-is-urgently-needed-to-safeguard-ag-land-in-arizona-colorado-new-mexico-and-nevada-amidst-historic-drought/#:~:text=In%20the%20worst-case%20scenario%20of%20runaway%20sprawl%2C%20Colorado,could%20save%20258%2C100%20acres%20of%20farmland%20and%20ranchland>

I hope you will consider my words and the words of others and my husband Tom and our plea to VOTE NO ON THE SPRING VALLEY RANCH DEVELOPMENT PROPOSAL.

Sincerely,

Ginny (and Tom) Harrington

Carbondale ranchers

9/16/24

From: [Ginny Harrington](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#)
Cc: [Tom Harrington](#)
Subject: Re: Letter, documents and links in OPPOSITION TO THE SPRING VALLEY RANCH DEVELOPMENT
Date: Monday, September 16, 2024 9:14:21 AM

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Garfield County Administration & Commissioners

108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

Please do not approve this extreme development proposal by Storied Development LLC. More golf courses using water that has been traditionally used to provide water for livestock and wildlife and grow forage is not the way to go. Replacing the ranchland and wildlife habitat and corridors of 6,000 acres with 577 homes and amenities of playgrounds for wealthy second homeowners doesn't sit right with this ranch girl. I have watched this type of story repeat itself over and over again in Western Colorado and specifically Garfield, Pitkin and Eagle County. We've got to stop catering to development and have serious conversations and take measures to preserve the things that make our community special and have drawn people to visit and live here. Do not destroy our community by continuing to approve developments like this proposal. "At Spring Valley, the development will include houses priced at \$5 million to \$6 million on 10-acre lots that sell for \$2 million. A private golf community with an 18-hole golf course, a nine-hole "short course," a clubhouse, a small, private ski hill on southwest-facing slopes and about 20 miles of trails with limited public access." (Aspen Daily News Feb. 23, 2024) https://www.aspendailynews.com/news/577-home-project-in-garfield-county-back-on-the-table/article_33863df4-d215-11ee-aa5a-e3c8a69422ba.html

The proposal and the representatives from Storied have spread half-truths or inaccuracies when talking about the proposal. Such as the following, "This is an extraordinary piece of property. It's not going to stay fallow," Enderle said. The property has not been fallow, and I don't consider planting houses a crop. A local ranch family has leased the property for 45 years contributing to the economy, raising local food and providing for wildlife. "(Colorado Parks and Wildlife) would just as soon it stays as it is," Enderle acknowledged. But since that is unlikely to happen, it is advising Storied Development on its plan to create 1,110 acres of "wildlife habitat reserves" that would be closed to humans during winters and spring reproduction." With all the human activity and fragmentation of the wildlife habitat I don't see this as a valid tradeoff for removing 6,000 acres from ranchlands and wildlife habitat and corridors.

"Ranches are critical to the Rocky Mountain region, serving as the West's water towers, food providers, land stewards and hubs of local economies and communities." July 2021 CSU Warner College of Natural Resources (stated) in launching a new ranch management and ecosystem stewardship new master's program.

An article in Wyoming Livestock Roundup on July 27, 2009 reports on work done by Rick Knight, CSU Professor of Wildlife Conservation, Department of Human Dimensions of Natural Resources, Warner College of Natural Resources.

Here is the link to that article. Rick Knight speaks to the costs of subdivisions and the loss of ranchlands and food production. <https://www.wyrl.net/2009/07/27/csus-knight-ranchers-provide-connection-between-food-and-open-space/>

According to Knight, the ecology of ranching comes into play when considering that ranching minimizes fragmentation and keeps the West open. "In the alternative land use, homes perforate the landscape, which is dissected by roads," he noted, adding that gives the same "natural heritage" of a Fort Collins, Colo. suburb. "Those areas support the same biodiversity – robins, magpies, garter snakes, skunks and raccoons – instead of mountain lions, bears and big game."

In a response to me, dated August 22, 2024, Professor Rick Knight states, "rural developments promote deficit spending, ecological decline, and cultural loss."

Please consider info and enter into record these articles/studies and the following links speaking to the case for conservation of and keeping ranchlands intact:

<https://farmlandinfo.org/publications/cost-of-community-services-studies-making-the-case-for-conservation/>

Other studies

<https://csuredi.org/authors/andrew-seidl/>

There are enough golf courses, hiking and biking trails, and housing developments catering to the second home owners and wealthy clientele. There is no going back to ranchland and wildlife habitat once land is fragmented, paved over and houses planted. I am pleading to the planning committee and Garfield County Commissioners and planning staff to keep the Spring Valley Ranch as ranchland and wildlife habitat for all citizens of and visitors to Garfield County to cherish for generations to come. Please don't play a role in taking more lands out of agricultural production and wildlife habitat. Keeping this 6,000 acres as ranchland and wildlife habitat would be an example of making a wise decision that future generations will truly appreciate for the contributions of ecosystem services and keeping ranchers on the land.

Respectfully Submitted,

Ginny Harrington

Rancher

Carbondale, CO

On Sun, Sep 15, 2024 at 5:13 PM Ginny Harrington <ginny.a.harrington@gmail.com> wrote:
Sept. 15, 2024

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communities cannot withstand the further development of ranchlands without communities losing all that the ranchlands have provided, and have been valued for since homesteaders first entered the west slope of Colorado.

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Rick Knight

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<https://farmland.org/new-report-smarter-land-use-planning-is-urgently-needed-to-safeguard-ag-land-in-arizona-colorado-new-mexico-and-nevada-amidst-historic-drought/#:~:text=In%20the%20worst-case%20scenario%20of%20runaway%20sprawl%2C%20Colorado,could%20save%20258%2C100%20acres%20of%20farmland%20and%20ranchland>

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Sincerely,

Ginny (and Tom) Harrington

Carbondale ranchers

Garfield County Administration & Commissioners

108 8th Street, Suite 101 Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners, I am a resident who resides in Mesa County in the DeBeque area. We have lived there, raised our kids, and farmed for over 30 years. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs. I believe that the proposed development will have detrimental effects on our community. Some of concerns are summarized below:

Growth always comes with a cost that often isn't fully understood or considered when town planners approve a large development on a farm/ranch property. In western Colorado farms and ranches contribute to our food supply, create and maintain habitat for wildlife, manage soil health and prevent sediment runoff, and add to the carbon sequestration cycle.

The people associated with Colorado working farms and ranches are vital members of our communities. They raise kids, coach sports, become 4h leaders, and are on school boards and ditch boards. This is more the norm than the exception.

Subdivision and big developments always need more infrastructure add-ons and financial support down the road, examples are municipal water and sewer expansions, bigger and more roads and traffic lights. All this causes taxes to increase for the citizens that already live on the western slope.

Adding the additional 577 housing units, as well as 2 golf courses, a general store, a fire station, and a South facing skiing and sledding hill that the developers are proposing, would significantly affect these precious all the overtaxed sources in the area.

I encourage the decision makers n Garfield County to vote No on approving this development,

Don & Diana Metzler

2045 45 ½ Road

DeBeque, CO 81630

970 260-7556

Garfield County Administration & Commissioners

108 8th Street, Suite 101

Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

I am a resident of Garfield County. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs. I believe that the proposed development will have several detrimental effects on our community. Some of my concerns are summarized below:

WATER: Water is one of my utmost concerns. This proposed development would have a catastrophic effect on the water source that is currently under consideration. Our region has been in a drought for more than 15 years, affecting the entire Colorado River water system with unpredictable winter months depleting the local and regional water supply. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife. The two years that Spring Valley Ranch was filling up their reservoir, the quality and quantity spring I rely on was significantly affected. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible. Adding the additional 577 housing units, as well as 2 golf courses, a general store, a fire station, and a South facing skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources. They propose to use in excess of 1 million gallons per day equal to approximately 3 acre-feet (about 3 football fields 1 foot deep).

FIRE: There is an alarming number of safety concerns if there were to be another wildfire in the area today. In the event of a nearby fire roads will become blocked, making it difficult for residents to get out safely, not to mention the first responders ability to safely access the area. Having these additional structures so close to each other would increase the chances of fire, and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 3 accessible emergency routes, one of which (Red Canyon) is very dangerous.

TRAFFIC: The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would become unmanageable, and would affect County Roads 114, 115, 119, 110, and all of the different road routes that go through Cattle Creek, towards Missouri Heights, Cottonwood Pass and Eagle. The road usage increase would create more auto accidents, dust, pollution, wildlife collisions and noise. There would be a significant increase in traffic that would also affect Highway 82, which is already a daily NASCAR race with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

WILDLIFE: The wildlife in the area has changed over the years but has been returning to the area since the Grizzly Creek Fire. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area. There are a significant number of deer that call Spring Valley and the surrounding areas home, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding. This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding forcing them to move to another area that will not be able to accommodate their needs to survive. Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well.

This development will not benefit the community or the county and is just not something this area can endure. It will take away from local businesses and the small town mountain charm we have. It is inconsistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural as we can and not let more of the entitled few overrun this beautiful area that we call home.

Thank you for your time,

Steve Willcut

From: [Brooke Winschell](#)
To: [Philip Berry](#)
Subject: FW: Garfield County website inquiry - Community Development
Date: Monday, September 16, 2024 3:42:18 PM
Attachments: [image001.png](#)

Here is another one.

Thanks,

Brooke A. Winschell



Community Development Administrative Specialist
Community Development Department

bwinschell@garfield-county.com

Direct 970-945-1377 Ext. 4212

T: 970-945-8212 | F: 970-384-3470

108 8th St, Suite 401 | Glenwood Springs, CO 81601

From: noreply@formstack.com <noreply@formstack.com>
Sent: Monday, September 16, 2024 3:38 PM
To: Glenn Hartmann <ghartmann@garfield-county.com>; Brooke Winschell <bwinschell@garfield-county.com>
Subject: Garfield County website inquiry - Community Development



Subject: Please don't approve the Spring Valley Ranch proposal

Name: Jackie Warncke

Email: jackieoh@gmail.com

Phone Number: (301) 602-9579

Message: My name is Jacqueline Warncke, my husband and I resides at 230 Meadow Wood Rd and are property owners at 3504 Elk Springs Drive. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

I believe that the proposed development will have detrimental effects on our

community. Some of my concerns are summarized below:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife.

Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible.

Adding the additional 577 housing units, as well as a 200-acre golf course, a general store, a fire station, and a possible skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 2 accessible emergency routes, without any additional traffic.

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and

breeding.

This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

Given that we have not yet started to build, this issue gives us great pause and we are considering selling our property in Elk Springs pending the outcome of the proposed development. All the things that drew us to the area (the wildlife, the fire safety in place in Elk Springs and the water availability) are now things we find are being threatened and cause great risk to our dream home. Please don't forsake all of us who own in the area for out-of-town developers who do not have a vested interest in our community.

September 16, 2024

Garfield County Administration & Commissioners

108 8th Street, Suite 101

Glenwood Springs, CO 81601

Dear Garfield County Commissioners,

My name is Ted Benge, I am a resident of Garfield County, with address at 403 S 2nd St, Carbondale, CO 81623. I am a Carbondale native, a hunter who relies on wild game meat, an outfitter whose livelihood depends upon the protection of natural beauty and robust wildlife herds, a young community member with a long-term vision, and a voter. I am writing to urge the board of the Garfield County Commissioners office to oppose the Spring Valley Ranch PUD Amendment.

The soul of our county character is rooted in nature and open space, and our community is dependent upon careful long-term planning to maintain livability. The primary concerns of many of our citizens, your constituents, are threats to wildlife and open space, and a severe lack of affordable housing. The proposed development, which would affect nearly 6,000 acres of pristine wildlife habitat and include two golf courses, and private (south-facing) ski resort, and vast amenities, fails to address either concern and is inconsistent with the housing, open space and agricultural visions outlined in the Garfield County Comprehensive Plan 2030.

Are we willing to sacrifice one of the most important contiguous habitat parcels remaining in the Valley for another luxury second home development? Is the transfer tax worth the loss of open space and increased strain on infrastructure?

We must accept trade-offs as our region continues to grow. There will be times when development is sensible in rural locations to provide efficient affordable housing. The SVR PUD amendment, if approved, would fail on all fronts.

Our area is renowned for its natural beauty and abundant wildlife. Many of us residents struggle through the challenging local economic dynamics for the opportunity to live a life close to nature. Our mountains would feel vacant and dead without the wild creatures whose presence not only helps to drive a booming local recreation and hunting economy, but whose existence has inherent value separate from what humans extract or enjoy.

Wildlife in our region is under unprecedented pressure, and, if approved, the Spring Valley Ranch development would irreversibly destroy critical elk winter habitat and calving grounds, deer winter habitat, and habitat crucial to the survival of thousands of other species. While the developers assert that their plan includes wildlife refuge areas and maintains open space, the refuge habitat will be highly fragmented and unviable, and their open space calculation includes golf course acreage.

It is undeniable that this development would be devastating to local wildlife and confirm the growing local suspicion that new governance values development above all else. The CPW has refused to sign off on the SPR PUD proposal, and has outlined at length the cumulative impacts of increased human presence, habitat fragmentation, and the outright destruction of our natural heritage. I need not rehash all CPW's findings here, but stress that my observations over a lifetime spent in the mountains confirm intense stress, declining herds and changing migration patterns. I foresee a bleak outlook for wildlife unless we make actions today to protect habitat into perpetuity.

The proposed development would permanently destroy habitat to create a luxury second home compound built around a golfing lifestyle. Is this tradeoff in the best long-term interest of your constituents, who value nature and who are already faced with a lack of affordable housing, growing strain on our infrastructure?

Thank you for your consideration.

Best Regards,

Ted Benge

From: [Janna Six](#)
To: [Philip Berry](#); [Glenn Hartmann](#)
Subject: Comments Re: Spring Valley Ranch PUD Amendments
Date: Tuesday, September 17, 2024 10:40:12 AM

Some people who received this message don't often get email from jannasix@gmail.com. [Learn why this is important](#)

Dear Glenn and Phillip,

Please accept and share my comments (below) to Garfield County Planning Commission and County Commissioners regarding the Spring Valley Ranch PUD Amendments (File PUAA-05-23-8967).

As a full and now a part time Garfield County resident since 1988, I've watched residents and businesses move into the area. Development is creeping onto agricultural lands and open space. Where should the County draw the line in "preserving the rural character" and "protecting wildlife corridors, natural habitats, important viewsheds and other critical open space" (from the Garfield County Comprehensive Plan of 2030).

Does the Spring Valley Ranch PUD Amendment cross the line of acceptable development? Is it proposing Smart Growth for Garfield County or a Jackpot for Developers?

Smart Growth ([Environmental Protection Agency's Smart Growth Self-Assessment for Rural Communities](#)). These goals help prioritize strategies and identify low-hanging fruit that can move a community closer to its economic, social, and environmental goals.

- Revitalize Town Centers
- Strengthen the Local Economy
- Engage and Connect Community Members
- Improve Health and Promote Active Living
- Protect Natural Habitats and Ecosystems
- Support Productive Agriculture for a Variety of Markets
- Meet Housing Needs for Different Ages and Incomes
- Preserve Historic and Cultural Resources
- Provide Transportation Choices
- Invest in Efficient Public Infrastructure Systems and Operations
- Use Energy Efficiently and Provide Renewable Energy

The Spring Valley Ranch PUD Amendment accomplishes none of these Smart Growth goals. The proposed 75 affordable housing units will be just enough to house workers needed to maintain the subdivision and will not be a net benefit to the community.

Jackpot for Developers looking for a large financial return with the least amount of effort, time, cost.

- Being allowed to resurrect a 16+year old PUD, that was approved under a different scenario of the future of the County and different leadership
-

Claiming that there is enough water for 577 homes, 2 golf courses, and a ski hill without detrimentally impacting any other water users downstream – while independent engineering studies question many of the points in the hydrogeology studies completed by the developer

- Adding a large stock of unaffordable housing, which is more profitable to developers
- Destroying essential wildlife habitat and open space for the sake of profits and private landowners' pleasure
- Scarring a majestic, natural viewshed, second only to Mount Sopris in the County
- Increasing traffic congestion and accidents on Highway 82 and County Road 114, shutting down roads critical to operations at Colorado Mountain College and cities along the highway
- Not contributing enough infrastructure or paying enough development fees for this residential growth to pay its own way.
- Having the County shackled to the long term financial burden and responsibility for infrastructure for a distant suburb – from roads to police protection to waste treatment
- Phased development over 25 years for which the Master Developers will not be held accountable
- Stealing the rural character of Spring Valley from neighboring land owners, ranchers and recreationists
- Once infrastructure is built for Spring Valley Ranch, other developers will be attracted to the region.

The Garfield County communities I want to see in the future are resilient. They have “the ability to rebound, positively adapt to, or thrive amidst changing conditions or challenges - including human-caused and natural disasters, and to maintain quality of life, healthy growth, durable systems, economic vitality and conservation of resources for present and future generations.” The Colorado Disaster Emergency Act in 2018 (HB 18-1394).

Section Six of Garfield County's own Comprehensive Development Plan promotes the continuation and expansion of agricultural uses; preserve a significant rural character in the county; and preserve scenic and visual corridors in the county.

Please draw the line on development by rejecting the Spring Valley Ranch PUD Amendment.

Thank you.

Janna Six

1044 Highway 325, Rifle, CO 81650

303-530-2222

jannasix@gmail.com

From: [Phil Armstrong](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#)
Subject: Letter of Opposition to Spring Valley Ranch
Date: Wednesday, September 18, 2024 2:29:16 PM

Some people who received this message don't often get email from laminarenergy@gmail.com. [Learn why this is important](#)

Dear Garfield County Commissioners,

I live in Garfield County, at 80 Oak Run Rd, in Carbondale. I work here, live here, hunt here, raise a family here, and care about the future of our County like each of you do. The Spring Valley Ranch development is NOT what we need here in Garfield County. It is not a part of our rural and mostly working class character. The negatives that come with this development far outweigh the economic benefits. We do not need this. Please do what you can to oppose this development.

If you do not oppose and try to restrict this development, I will not be voting for you in the future.

Phil Armstrong
Garfield County Resident

From: [Tyler Stableford](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Mike Samson](#); [John Martin](#); [Tom Jankovsky](#)
Subject: Comments for Spring Valley Ranch development meeting
Date: Wednesday, September 18, 2024 12:02:53 PM

Some people who received this message don't often get email from tylerstableford@gmail.com. [Learn why this is important](#)

Hi Garfield County friends,

I hope you are doing well. Thank you for your work serving our great community here!

My name is Tyler Stableford, I am a Garfield County resident living at 1399 Rock Court in Carbondale, Colorado and I have been a resident of Garfield County for 27 years.

I am writing to encourage the Garfield County Commissioners to reject the Spring Valley Ranch PUD Amendment.

The essence of our county's identity is deeply tied to its natural landscapes and open spaces. Preserving our quality of life relies on thoughtful, long-term planning. Many of your constituents share concerns about the threats to our wildlife and open areas, as well as the severe shortage of affordable housing. The proposed development, which would impact nearly 6,000 acres of untouched wildlife habitat and include two golf courses, a private ski resort, and extensive amenities, does not address these key issues. In fact, it contradicts the goals laid out in the Garfield County Comprehensive Plan 2030 regarding housing, open space, and agriculture.

It is clear to me that the potential revenue from a transfer tax is not worth the loss of open space and the additional burden on our county's infrastructure.

As our region grows, we need to weigh development decisions carefully. There may be instances where rural development may be necessary to provide affordable housing. However, the Spring Valley Ranch PUD amendment would fail in this regard.

Our community is known for its stunning natural beauty and abundant wildlife. Many residents endure the local economic challenges for the privilege of living close to nature. The absence of wildlife would strip our mountains of life and vitality. These animals not only support our local recreation and hunting industries, but their presence also holds intrinsic value, independent of human use.

Wildlife in our region is already facing immense pressures, and the proposed Spring Valley Ranch development would irreversibly damage key elk wintering areas, calving grounds, and deer habitat, along with vital ecosystems that support countless other species. Although the developers claim they will preserve wildlife areas and open space, their plans involve fragmented and unviable habitats, with golf courses misleadingly included in their open space calculations.

It's clear this development would have devastating consequences for our local wildlife, reinforcing the growing concern that our governance prioritizes development over preservation. Colorado Parks and Wildlife (CPW) has refused to endorse the PUD proposal, citing the harmful cumulative effects of increased human activity, habitat fragmentation, and

destruction of our natural heritage. My own lifetime spent in these mountains echoes CPW's findings: wildlife populations are under significant stress, herds are declining, and migration patterns are shifting. Without decisive action now, the future for our wildlife looks grim. (And to be clear, as a hunter, I believe CPW has grossly mismanaged hunting in our region and has overseen a wholesale slaughter of our elk herds on their watch. I am communicating with them as well.)

This development would destroy critical habitats to create a luxury enclave focused on a golfing lifestyle. Is this really in the best interest of the people you represent, who value nature and are already struggling with a lack of affordable housing and growing infrastructure demands?

Thank you for your time and consideration,

Tyler

--

Tyler Stableford
970-319-9009 (c)
tylerstableford@gmail.com

October 10, 2024

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Commissioners,

My name is **Patty L. Frederick**. I am a resident who resides at 3720 County Road 115. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

I believe that the proposed development will have detrimental effects on our community. Some of my concerns are summarized below:

1. WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife.

Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible.

Adding the additional 577 housing units, as well as a 200-acre golf course, a general store, a fire station, and a possible skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

2. FIRE + SAFETY:

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 2 accessible emergency routes, without any additional traffic.

3. TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County

Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

4. WILDLIFE:

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding.

This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural.

Thank you for your time,

Patricia L. Frederick

October 14, 2024

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Re: Spring Valley Ranch proposed development by Storied Development

Dear Commissioners Jankovsky, Samson, and Martin:

My name is Lydia Frederick, and my two brothers and I own the property at 3720 CR 115, where our mother has lived since the early 1980s.

I am writing to you to add my voice in strong opposition to the proposed development plans of the Spring Valley Ranch.

One of the big draws to our mom's house is the abundant wildlife throughout the year: lark buntings and stellar jays at her bird bath, coots at Quigley's Pond, deer coming through her property to get a drink at the bird bath, the howls of coyotes late at night, the herds of elk roaming through neighboring pastures, and even the shepherds moving their sheep along CR 115 to higher ground.

The proposed development for SVR will have a major negative impact on the wildlife, making it difficult for their migration routes, and increasing the risk of being hit by traffic. The estimate of over 5,000 additional cars traveling along CR 115 and 114 practically guarantees more accidents between vehicles and wildlife.

My family and I, which now includes grandchildren and great grandchildren, have witnessed the increase in traffic, not only along CR 115, but along CR 114 and Highway 82 as well. The valley has seen many more houses built, yet the area retains its rural feel. But the demands of constructing this development means that during the build-out time, there will be many more trucks and equipment using these roads, competing with the local traffic that already exists. And once the project is complete, the estimated 5,000+ cars using these country roads will put an added burden on the County to maintain them.

Another concern with the proposed project is the tremendous draw on the aquifers which in turn could negatively impact the existing household wells in the area. In addition, the threat of wildfires and the need for adequate water to fight these fires and protect homes is a yearly worry. Colorado, especially the Western Slope, has experienced years of drought, and the idea of building multiple golf courses AND a ski slope in Spring Valley, which will require huge amounts of water to maintain, shows a lack of knowledge of Garfield County's environment.

In summary, this proposed development would destroy the bucolic setting of Spring Valley, harm the wildlife, drain precious water from the aquifer and add to the traffic congestion already existing on Hwy. 82, as well as CR 115, 114, and the other roads through the area.

Is Garfield County so desperate for revenue that the commissioners are willing to grant this preposterous development a green light? Please vote against this proposal for Spring Valley Ranch.

Sincerely,

A handwritten signature in cursive script that reads "Lydia Frederick".

Lydia Frederick, MLS
2560 So. Wolff St.
Denver, CO 80219

From: [Glenn Hartmann](#)
To: [Philip Berry](#); [Heather MacDonald](#)
Subject: FW: Garfield County website inquiry - Senior Planner
Date: Monday, February 10, 2025 8:28:31 AM

From: noreply@formstack.com <noreply@formstack.com>
Sent: Monday, February 10, 2025 8:25 AM
To: Glenn Hartmann <ghartmann@garfield-county.com>
Subject: Garfield County website inquiry - Senior Planner



Subject: Halt the Spring Valley Ranch Substantial PUD Amendment

Name: Evan Weger

Email: evan.weger@yahoo.com

Phone Number:

Message: Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Commissioners,

My name is Evan Weger. I am a resident who resides at 1622 Cooper Avenue. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

I believe that the proposed development will have detrimental effects on our community. Some of my concerns are summarized below:

1. WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife.

Global climate change and the on-going drought has contributed to water quality and

quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible.

Adding the additional 577 housing units, as well as a 200-acre golf course, a general store, a fire station, and a possible skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

2. FIRE + SAFETY:

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 2 accessible emergency routes, without any additional traffic.

3. TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

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This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural.

Thank you for your time,
Evan Weger

Kara Edewaard
663 Elk Springs Dr.
Glenwood Springs, CO 81601
kedewaard@gmail.com
817-319-1594

February 10, 2025

Garfield County Community Development Department

Attn: Planning Division
108 8th Street, Suite 401
Glenwood Springs, CO 81601

Board of County Commissioners

Garfield County Administration
108 8th Street, Suite 213
Glenwood Springs, CO 81601

**Subject: Water Use and Supply Concerns and Recommendations
Regarding the Spring Valley Ranch PUD Amendment**

Dear Garfield County Planners and Honorable Commissioners,

I am writing to express concerns regarding the proposed Spring Valley Ranch PUD Amendment and to highlight significant gaps in the Storied Development Updated Aquifer Sustainability Study and Updated Water Supply & Distribution Plan. Based on a review of reports prepared by Matrix Design Group for Garfield County, and SGM for the Elk Springs HOA, several key issues remain unresolved, raising serious questions about the long-term sustainability of the proposed development's water supply.

Key Concerns from Matrix Design Group and SGM

1. **Limited Water Supply** – Recharge rates may be overestimated, leading to aquifer depletion over time.
2. **Overstated Well Capacity** – Short pump tests do not confirm long-term well sustainability.
3. **Underestimated Irrigation Demand** – The projected golf course and residential irrigation needs may exceed estimates.
4. **Insufficient Storage & Emergency Planning** – There is no drought contingency plan or alternative water supply in case of shortages.
5. **Stormwater & Sewer Issues** – A lack of detailed runoff and wastewater impact analysis raises environmental concerns.

Responses from Storied Development Water Supply & Aquifer Studies

- The reports cite aquifer storage but lack long-term groundwater flow analysis.
- Well rehabilitation is planned, but there is no long-term monitoring commitment.
- Irrigation demand calculations retain optimistic efficiency assumptions (80%), despite expert concerns that 67% is more realistic.
- Additional water storage capacity has been added, but there is no backup supply plan in case of emergency.
- Basic stormwater and wastewater plans exist, but there is no extreme weather event modeling.

Comparison of Key Concerns & Remaining Gaps

Issue	Matrix Design & SGM Concern	Response & Remaining Gaps
Sustainable Water Supply	Recharge may be overestimated	No new recharge validation; loss to rivers unknown
Well Capacity	Short pump tests; no long-term data	Rehabilitation planned, but no monitoring commitment
Irrigation Demand	Golf & residential use may be underestimated	Kept high efficiency assumptions (80%)
Water Storage	Tanks may not support peak demand	Added storage but lacks emergency backup source
Stormwater & Sewer	Runoff & wastewater impact unclear	Basic plans included, but no extreme event modeling

Remaining Gaps & Recommendations

To ensure a sustainable and responsible approach to development, the following actions should be required before approval of the Spring Valley Ranch PUD Amendment:

1. **Recharge Estimates Need Validation** – Conduct long-term hydrogeologic studies to confirm sustainability.
2. **Well Performance Needs Monitoring** – Implement ongoing aquifer monitoring to track drawdown on nearby wells over time.
3. **Irrigation Demand Needs Reassessment** – Adjust irrigation efficiency assumptions to realistic values.
4. **Emergency Planning Lacks Detail** – Define drought response strategies & alternative water supply plans.

5. **Stormwater & Wastewater Require More Study** – Conduct extreme event modeling for runoff & wastewater impact.

Conclusion & Next Steps

While some concerns have been addressed, critical gaps remain in aquifer sustainability, irrigation demand, emergency planning, and stormwater management. More data, long-term monitoring, and contingency planning are necessary before final approval.

I urge Garfield County and the BOCC to require further hydrogeologic studies, updated irrigation demand calculations, and emergency water supply plans before moving forward with this approval of this PUD amendment. Thank you for your time and consideration of these concerns. I appreciate your commitment to responsible land use planning and look forward to your response.

Sincerely,
Kara Edewaard

3/31/25

Kara Edewaard
663 Elk Springs Drive
Glenwood Springs, CO 81601
kedewaard@gmail.com
March 31, 2025

Garfield County Community Development Department
108 8th Street, Suite 401
Glenwood Springs, CO 81601

To:
Glenn Hartmann, Director
Philip Berry, Planner
Garfield County Planning Commissioners
Garfield County Board of County Commissioners

RE: Wildlife Concerns Regarding Spring Valley Ranch PUD (PUAA-05-23-8967)

Dear Mr. Hartmann, Mr. Berry, Commissioners, and Members of the Board,

I am writing to express serious concerns regarding the wildlife impacts of the proposed Spring Valley Ranch PUD Substantial Modification/Amendment. After reviewing the Referral Comment Packet dated October 28, 2024, and particularly the detailed comments from Colorado Parks and Wildlife (CPW), it is clear that the proposed development presents significant environmental risks that warrant stronger oversight and mitigation.

CPW has declined to sign the Wildlife Baseline Conditions and Mitigation Plan, citing insufficient avoidance, minimization, and mitigation of impacts to critical habitats. The project area lies within high-priority wildlife habitats, including:

- Elk winter concentration areas (See Exhibit A)
- Elk production/calving areas (See Exhibit A)
- Mule deer winter range (See Exhibit B)
- Black bear and mountain lion ranges
- Habitat for sensitive plant species such as Harrington's Penstemon

Despite claims in the applicant's documents, CPW clarified that the development does not truly avoid impacts to these habitats. Instead, it fragments and degrades essential wildlife corridors, limits species mobility, and contributes to the broader pattern of

cumulative habitat loss in the region. The proposed recreation infrastructure, including 15–20 miles of new mountain biking trails, will further stress wildlife and erode habitat integrity unless carefully redesigned and restricted.

Compounding these impacts is the fact that the highest housing density in the plan—the proposed deed-restricted housing—is located squarely within elk production and winter concentration areas, further intensifying pressures on some of the most sensitive habitat. This location choice is especially troubling given the County's own wildlife protection requirements and the availability of alternative siting options.

These concerns are directly supported by the standards outlined in the Garfield County Land Use and Development Code (LUDC). Notably:

- LUDC § 4-203(E) requires that:

“Impacts to wildlife and wildlife habitat be avoided to the maximum extent feasible.”

The current plan does not meet this standard. Mitigation is used in place of true avoidance, contrary to the Code's intent.

- LUDC § 4-302(F)(3) states that approval of a PUD requires a finding that:

“The PUD will not have significant adverse effects on the natural environment, including... wildlife habitat.”

CPW's comments confirm this standard cannot be met in the project's current form.

Additional key concerns include:

- Declining elk herd productivity, with notably low calf-to-cow ratios in herd E-16
- Insufficient mitigation funding, with CPW recommending an increase in the real estate transfer fee from 0.4% to at least 0.75%
- Lack of enforceable seasonal restrictions and wildlife-friendly design standards
- Inadequate incorporation of CPW's Species Activity Mapping (SAM) data into development planning and trail routing

As stewards of Garfield County's natural resources, you have a responsibility—outlined in LUDC § 4-109(A)—to protect the long-term environmental health of the region through avoidance, minimization, or mitigation of development impacts. This project, as currently proposed, does not rise to that standard.

I urge you to:

1. Deny the PUD approval under LUDC § 4-302(F)(3) until the applicant demonstrates that significant adverse effects on wildlife habitat have been thoroughly addressed.
2. Require a revised Wildlife Mitigation Plan that directly incorporates CPW's recommendations.
3. Require relocation of the deed-restricted housing units out of the elk production and winter concentration areas to reduce pressure on critical habitat.
4. Mandate full consideration of indirect and cumulative impacts using the best available science and mapping tools.
5. Ensure meaningful, enforceable protections for elk calving and wintering habitat.
6. Require reevaluation of trail placement and recreation planning to align with CPW's trail planning guidance and wildlife impact minimization best practices.
7. Increase the real estate transfer fee to better fund mitigation and habitat restoration efforts.

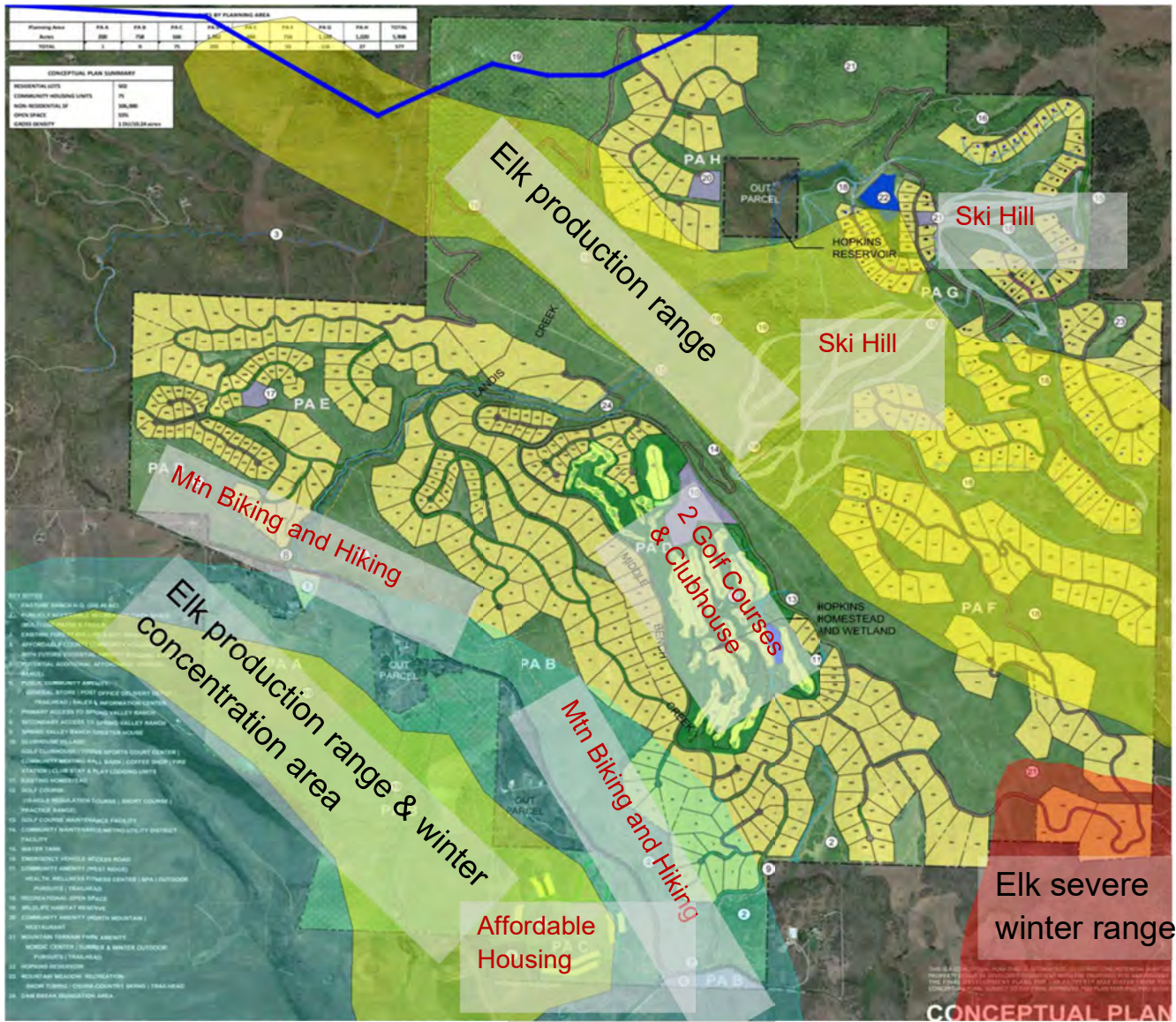
Thank you for your dedication to thoughtful land use planning and for considering these concerns in your decision-making process. The long-term health of our wildlife populations and ecosystems—and the economic and cultural benefits they bring to Garfield County—depend on it.

Sincerely,
Kara Edewaard

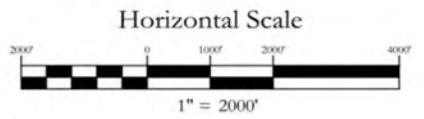


Frying Pan Elk Herd (Unit E-16) in the Spring Valley Ranch meadow – Winter Production Area

Exhibit A – PUD Elk Impacts



- ELK PRODUCTION RANGE
- ELK SEVERE WINTER RANGE
- ELK WINTER CONCENTRATION AREA
- ELK WINTER RANGE SOUTH OF BLUE LINE

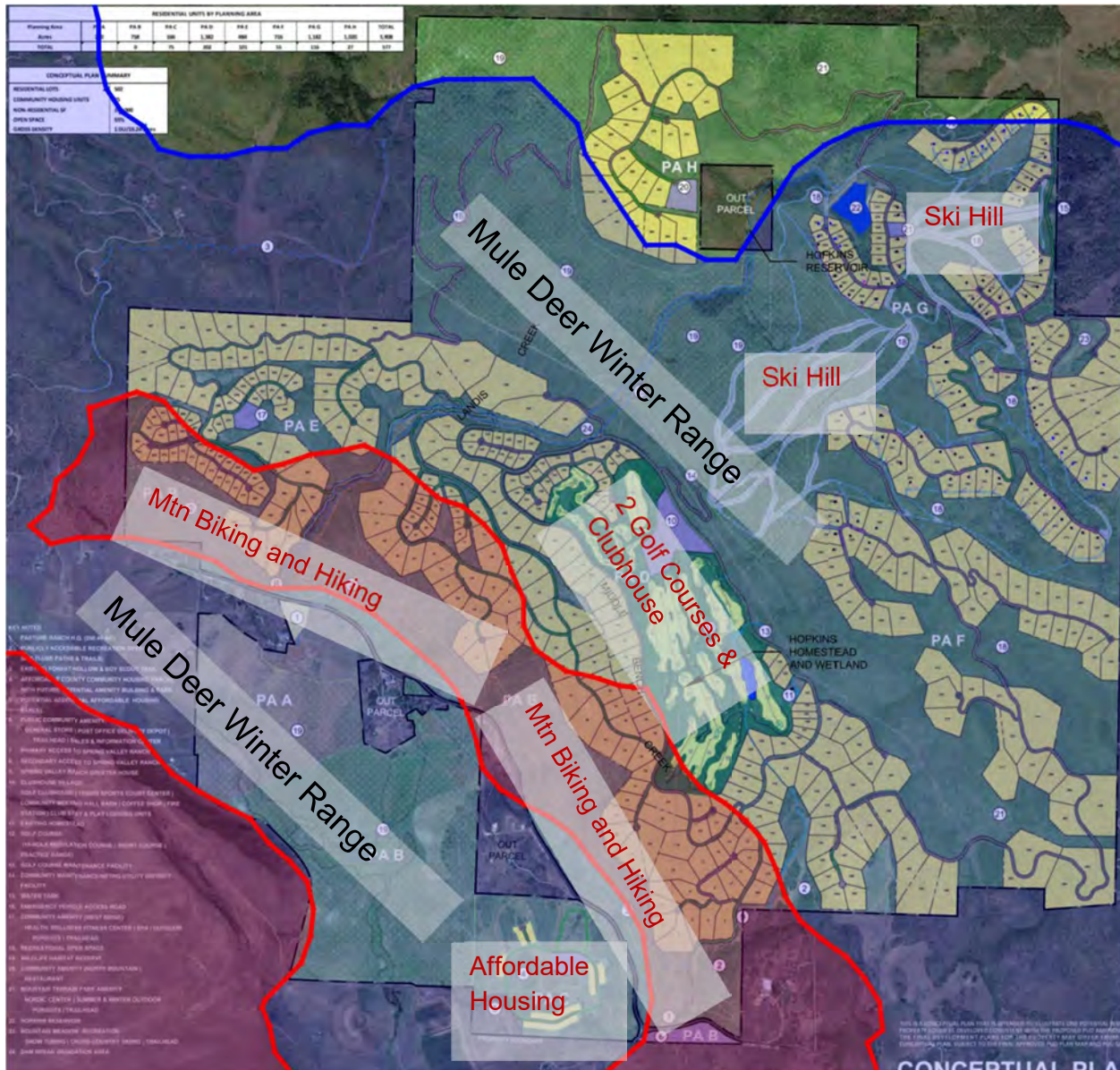


- NOTES:
- 1) Drawing based on 05-10-24 Conceptual Plan
 - 2) Elk range mapping per CPW SAM 12-22-2023
 - 3) This is a conceptual plan that is intended to illustrate one potential way the property could be developed consistent with the proposed PUD amendment. The final development plans for the property may differ from this conceptual plan, subject to the final approved PUD Plan Map and PUD Guide.

SPRING VALLEY RANCH	
FIGURE 3. ELK RANGE	
<i>Western Biometrics Inc.</i> Natural Resource Management Services 2000 WILSON LANE, BOZEMAN, MT 59717-0001	
Date: 01-30-2023	Drawn: KSC
SHEET NO.	
REVISED	
No.	Date
1	ADD NEW CPW ELK PRODUCTION RANGE 4-2-2024

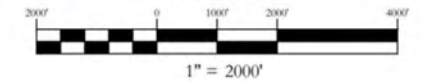


Exhibit A – PUD Mule Deer Impacts



█ MULE DEER WINTER CONCENTRATION AREA
█ MULE DEER WINTER RANGE

Horizontal Scale



NOTES:

- 1) Drawing based on 04-29-24 Conceptual Plan
- 2) Mule Deer Range mapping per CPW SAM 12-22-2023
- 3) This is a conceptual plan that is intended to illustrate one potential way the property could be developed consistent with the proposed PUD amendment. The final development plans for the property may differ from this conceptual plan, subject to the final approved PUD Plan Map and PUD Guide.

SPRING VALLEY RANCH		
FIGURE 4. MULE DEER RANGE		
<i>Western Bionomics Inc.</i> Natural Resource Management Services 1000 WEST 1000 SOUTH AVENUE, SUITE 100-100-1000		
Date: 1-30-2025	Drawn: KSC	Delivered:
SHEET NO. REVIEWS		
No.	Rev	Date
1	REVISE WINTER CONC AREA PER CPW	4-2-2024

From: robinvannorman@gmail.com
To: [Philip Berry](#)
Cc: "[j. vickroy](#)"
Subject: Spring Valley Ranch Development/Substantial PUD Amendment
Date: Saturday, February 22, 2025 8:04:04 PM

You don't often get email from robinvannorman@gmail.com. [Learn why this is important](#)

Feb. 22, 2025

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Mr. Berry,

We reside in Elk Springs in Garfield County. We are writing to the board of the Garfield County Commissioners office, with our strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

We believe that the proposed development will have detrimental effects on our community. Some of concerns are summarized below:

WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife. The two years that Spring Valley Ranch was filling up their reservoir the spring I rely on was significantly affected. Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible. Adding the additional 577 housing units, as well as 2 golf courses, a general store, a fire station, and

a South facing skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

FIRE:

I, Robin am a member of the Elk Springs Fire Mitigation committee. I am very aware of the alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 3 accessible emergency routes, without any additional traffic.

TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise. This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

WILDLIFE:

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring

Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding. This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural.

Thank you for your time.

Robin Van Norman & Jim Vickroy

720 Wood Nymph Ln
Glenwood Springs, CO 81601

From: [Lefort, Denise](#)
To: [Glenn Hartmann](#)
Cc: [Philip Berry](#)
Subject: Save Spring Valley
Date: Saturday, February 22, 2025 8:44:29 PM

Some people who received this message don't often get email from dlefort@coloradomtn.edu. [Learn why this is important](#)

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

I reside in Garfield County and work at CMC. I am greatly concerned of the negative impact it will have on the college and roads and traffic to get there. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs. I believe that the proposed development will have detrimental effects on our community. Water and fire and animals. Please do not ruin this land.

Some of concerns are summarized below:

WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife. The two years that Spring Valley Ranch was filling up their reservoir the spring I rely on was significantly affected.

Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible. Adding the additional 577 housing units, as well as 2 golf courses, a general store, a fire station, and a South facing skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

FIRE:

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 3 accessible emergency routes, without any additional traffic.

TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of

the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

WILDLIFE:

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding. This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural.

Thank you for your time,

Denise Lefort

Denise Lefort
Associate Professor Business

Colorado Mountain College
Glenwood Springs Colorado
dlefort@Coloradomtn.edu,
970-510-3308 (O) 864-361-0495 (C)

From: [Glenn Hartmann](#)
To: [Philip Berry](#)
Subject: FW: Garfield County website inquiry
Date: Wednesday, February 26, 2025 6:55:32 AM

From: Tom Jankovsky <tjankovsky@garfield-county.com>
Sent: Tuesday, February 25, 2025 8:48 PM
To: patricktullyking@gmail.com
Cc: Glenn Hartmann <ghartmann@garfield-county.com>
Subject: RE: Garfield County website inquiry

Patrick

Thank you for your email. I will forward it on to Community Development

From: noreply@formstack.com <noreply@formstack.com>
Sent: Tuesday, February 25, 2025 9:09 AM
To: Tom Jankovsky <tjankovsky@garfield-county.com>
Subject: Garfield County website inquiry



Subject: Opposition to Spring Valley development

Name: Patrick King

Email: patricktullyking@gmail.com

Phone number: (207) 653-9806

Message: Dear Mr. Jankovsky, I live in unincorporated Garfield County between highway 82 and the Spring Valley Ranch. I know the area well and I cannot imagine a development of this size being put in. I urge you to do whatever you can to oppose the project.

I am especially concerned about the water use and what happens if there's a significant fire up there. I'm on a well and it's my worst fear that one day I'll have no water for my home. I know people who are already having problems with their wells, how can we afford a development that uses 1,000,000 gallons per day in the summer? The Grizzly fire was a warning for us. I remember texting neighbors about spot fires near our properties. Putting 577 homes in an area where a big fire is likely is just irresponsible. Imagine the evacuation chaos down Red Canyon Road.

Lastly, I'm just tired of seeing empty second homes that take up a ton of resources in this county. My wife and I work hard, we bought a home, and we are raising our daughter here. Sadly, I see local people, people who grew up here, have to leave because they can't afford to live here. A luxury development like this only makes that problem bigger. Let's invest in the people whose families have been here for generations, who want to work in our schools, who want to raise families here.

I'll be at the April 9th meeting and I hope you oppose this project.

Thank you,

From: [Liz Caris](#)
To: [Philip Berry](#)
Subject: Spring Valley
Date: Monday, March 10, 2025 5:18:24 PM

You don't often get email from ecaris@comcast.net. [Learn why this is important](#)

Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

I reside in Garfield County. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

I believe that the proposed development will have detrimental effects on our community. Some of concerns are summarized below:

WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife. The two years that Spring Valley Ranch was filling up their reservoir the spring I rely on was significantly affected.

Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible.

Adding the additional 577 housing units, as well as 2 golf courses, a general store, a fire station, and a South facing skiing and sledding hill that the developers are proposing, would significantly affect these precious water sources.

FIRE:

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring

Valley already has only 3 accessible emergency routes, without any additional traffic.

TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for the proposed 10-12 years.

WILDLIFE:

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding. This development will have a major impact on wildlife and would make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

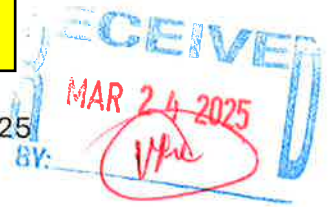
Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural.

Thank you for your time,
Bill and Liz Caris
Elk Springs Subdivision

Exhibit
6-71

3/20/2025



Garfield County Planning and Zoning
108 8th Street, Suite 101
Glenwood Springs, CO 81601
Mr. Glen Hartmann
Dear Mt Hartmann

My name is Philip Maass, I am a 28-year resident who lives in Elk Springs subdivision. I am writing to the board of the Garfield County Planning office, with my concerns for the proposed sale and development proposal of the Spring Valley Ranch, located in Glenwood Springs.

There are many reasons why this sale/development should not be allowed to be approved. Some of the main key points of concern are summarized below:

WATER- Water levels have been inconsistent since Colorado has been in a drought for over 15 years. Adding the additional 577 housing units, as well as a 200-acre golf course, a general store, a fire station, and a possible skiing and sledding hill that the developers are proposing, would significantly affect the water sources. We in Elk Springs monitor and control our water very carefully and would not want our water depleted or degraded due to this subdivision.

FIRE- There would be an alarming number of safety concerns if there were to be another fire in the area, for residents to get out safely as well as first responders to safely access the areas. If there were to be an increase in traffic on the roads (due to construction or daily commuting or random traffic), this could cause a problem with roads becoming blocked. I am on the Elk Spring fire mitigation committee and we taken numerous steps to improve our safety from fires including creating several fire breaks to slow down the spreading of fires and educating homeowners on the necessity of smart fire prevention. We are a nfpa "Firewise Community".

TRAFFIC- The significant amount of traffic increase that would be created in the area would affect many of the residents that currently live in the area, as well as residents and businesses around the area. I have seen the increase in traffic on Cty Rd 114 since I have lived here and the intersection with Hwy 82 is a huge traffic jam especially at rush hour. The layout of the service road next to Hwy 82 makes this intersection prone to large delays.

WILDLIFE- This development will have a major impact on wildlife and would make it extremely difficult for the wildlife's migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small-town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan.

We need to keep our rural mountain areas rural. We need to help protect our waters and protect the lands that the wildlife needs to survive

Philip Maass

From: [Ashley Ruby](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Perry Will](#); [Mike Samson](#); [Tom Jankovsky](#)
Date: Wednesday, March 26, 2025 6:57:14 AM

Some people who received this message don't often get email from rubyashley106@gmail.com. [Learn why this is important](#)

Tom Jankovsky, Mike Samson, Perry Will, Glenn Hartmann, Philip Berry,

I am writing to urge you to deny the Spring Valley Ranch Substantial PUD due to its significant threats to our community and environment.

This development risks:

Water Resources: Severe strain on our water supply, requiring thorough assessment..

Traffic Congestion: Exacerbated traffic, impacting safety and evacuation capacity.

Wildlife Habitat: Destruction of critical habitats and increased human-animal conflict.

Quality of Life: Diminished rural character and peaceful environment.

Please prioritize our community's long-term interests over short-term development gains.
Do not approve this project.

Keep our valley as is. Leave our mountains and the nature spaces that we have. We like it as is. We have enough golf courses.

Respectfully Submitted,

Ashley R. Gonzalez.
Be Kind to all kinds.

From: [Glenn Hartmann](#)
To: [Philip Berry](#); [Heather MacDonald](#)
Subject: FW: Garfield County website inquiry
Date: Sunday, March 30, 2025 5:41:35 PM

From: Tom Jankovsky <tjankovsky@garfieldcountyco.gov>
Sent: Friday, March 28, 2025 4:30 PM
To: KBLiving4Yahusha@yahoo.com
Cc: Glenn Hartmann <GHartmann@garfieldcountyco.gov>
Subject: RE: Garfield County website inquiry

Kelly

Thank you for your email, I will forward it on to Community Development

From: Communications <Communications@garfieldcountyco.gov>
Sent: Thursday, March 27, 2025 5:14 PM
To: Tom Jankovsky <tjankovsky@garfieldcountyco.gov>
Subject: Garfield County website inquiry



Subject: Spring Valley Ranch

Name: Kelly Black

Email: KBLiving4Yahusha@yahoo.com

Phone number: (720) 281-3618

Message: Garfield County Administration & Commissioners
108 8th Street, Suite 101
Glenwood Springs, CO 81601

Dear Garfield County Board of Commissioners,

I reside in Garfield County. I am writing to the board of the Garfield County Commissioners office, with my strong opposition to the proposed development proposal of the Spring Valley Ranch, located in Glenwood Springs.

I believe that the proposed development will have detrimental effects on our community,

including but not limited to:

WATER:

Water is one of my great concerns. This proposed development would have a catastrophic effect on the water source that is currently established. One of the main factors is that we, as a state, have been in a drought for more than 15 years, with inconsistent winter months to help with the water levels. There have already been water shortage experiences during the summer months that have affected not only homesteads in this area but also the livestock and wildlife.

Global climate change and the on-going drought has contributed to water quality and quantity issues for the entire Colorado River water system. Allowing them to utilize large quantities of this precious resource to irrigate and make snow is irresponsible.

Adding the additional 501 housing units, as well as 2 golf courses, a general store, a fire station, a South facing ski hill, and a sledding hill that the developers are proposing, would significantly affect these precious water sources.

FIRE:

There is an alarming number of safety concerns if there were to be another fire in the area today. If there were to be an increase in traffic on the roads then this could cause a problem with roads becoming blocked making it difficult for residents to get out safely, not to mention the first responders being able to safely access the area. Having these additional structures so close to each other would create more fire fuel and make it more difficult to control or fight a fire, compared to the current landscaping that is there. Spring Valley already has only 3 accessible emergency routes, without any additional traffic.

TRAFFIC:

The significant amount of traffic increase that would be created in the area would affect the residents that currently live in the area, as well as residents and businesses around the area. The traffic would increase to become unmanageable, and would not only affect County Road 114 but County Road 115, County Road 119, County Road 110, and all of the different road routes that go through Cattle Creek, over towards Missouri Heights and Cottonwood Pass towards Eagle. The road usage increase would create more dust, pollution, wildlife collisions and noise, This is just not something this area can endure. There would be a significant increase in traffic that would also affect Highway 82, which is already having many problems with the volume of traffic. The developers are indicating that traffic would increase to 5,700 trips a day on County Road 114 alone, not including the construction traffic that will take place for an estimated 10-16 years.

WILDLIFE:

The wildlife in the area has changed over the years but has been returning to the area for the last few years, including elk. Multiple herds of elk have re-established their migration routes that run through Spring Valley, Spring Valley Ranch, Lookout Mountain, Elk Springs, High Aspen Ranch and surrounding areas. Black bears have also been returning to the high mountains of the area, even after the Grizzly Creek Fire had pushed them out temporarily. There are a significant number of deer that have also created a home all throughout Spring Valley and the surrounding areas, as well as the white-tailed jackrabbits. Mountain lions still live within Spring Valley, Lookout Mountain, and surrounding areas as a part of their territory for feeding and breeding. This development will have a major impact on wildlife and would

make it extremely difficult for their migration routes to breeding to being hit by traffic. They would be forced to move to another area that will not be able to accommodate their needs to survive.

Please consider the negative impacts that this proposed development for the Spring Valley Ranch would have on the neighboring residents and the county as well. This development would not benefit the community or the county, it would be taking away from local businesses and the small town mountain charm we have. It would also not be consistent with many sections of the Garfield County 2030 Comprehensive Plan. We need to keep our rural mountain areas rural.

Thank you for your time,

Kelly Black

From: [Kat Bird](#)
To: [Glenn Hartmann](#); [Philip Berry](#); [Perry Will](#); [Mike Samson](#); [Tom Jankovsky](#)
Subject: NO TO THE SPRING VALLEY DEVELOPMENT
Date: Friday, March 28, 2025 3:58:29 PM

Some people who received this message don't often get email from birdkat97@gmail.com. [Learn why this is important](#)

Dear Tom Jankovsky, Mike Samson, Perry Will, Glenn Hartmann, Philip Berry,

Thank you for ALL you do for our community and The Roaring Fork Valley.

I am writing to urge you to deny the Spring Valley Ranch Substantial PUD due to its significant threats to our community and environment. I am a former Colorado Mountain College student, and now long time valley local since 2014, I've seen so much growth and I worry that Glenwood Springs does not have the resources to support a luxury community of this volume. The valley has already grown beyond what any of us can sustain. We need to be realistic about our landscape, our environment and future as a community. Do we really want more vacation homes and people who don't contribute to the community?

This development risks:

Water Resources: Severe strain on our water supply, requiring thorough assessment..

Traffic Congestion: Exacerbated traffic, impacting safety and evacuation capacity.

Wildlife Habitat: Destruction of critical habitats and increased human-animal conflict.

Quality of Life: Diminished rural character and peaceful environment.

Please prioritize our community's long-term interests over short-term development gains.
Do not approve this project.

Respectfully Submitted,

Katherine Bird

From: [Barbie](#)
To: [Philip Berry](#)
Subject: SVR
Date: Monday, March 31, 2025 9:46:27 AM

You don't often get email from barbmax@gmail.com. [Learn why this is important](#)

Philip Berry,

Thank you for ALL you do for our community and The Roaring Fork Valley.

I am writing to urge you to deny the Spring Valley Ranch Substantial PUD due to its significant threats to our community and environment.

This development risks:

Water Resources: Severe strain on our water supply, requiring thorough assessment..

Traffic Congestion: Exacerbated traffic, impacting safety and evacuation capacity.

Wildlife Habitat: Destruction of critical habitats and increased human-animal conflict.

Quality of Life: Diminished rural character and peaceful environment.

Please prioritize our community's long-term interests over short-term development gains.
Do not approve this project.

Respectfully Submitted,

Barbara Maxson

Sent from my iPhone

Gregg Minion MD
119 Monarch Road
Glenwood Springs, CO 81601
913-219-6040
gminion@gmail.com

Esteemed Members of the County Commission, Planning Commission, Community Development Department and County Staff, thank-you for your time, energy, and the effort that you have put into evaluating the Spring Valley Ranch (SVR) PUD Amendment Substantial Modification.

During the process of collecting over 1,000 signatures against the SVR, I personally spoke with two hundred local residents. Only a handful expressed support for the development. Their singular concern relates to the rights of private landowners. The other individuals all voiced their concern and opposition.

I would like to share some of the concerns related to the Spring Valley Ranch PUD.

Comprehensive Plan/LUDC: This is a partial list of issues that do not comply with the Comprehensive Plan 2030: eliminating Sprawl, limiting growth, protecting historic lands, supporting new and existing agriculture and impacting our rural appeal and character. The PUD also does not comply with multiple Garfield County Land Use Development codes. (LUDC). For example, there is a lack of demonstrated need for the proposed facilities, services or housing. The current homesites and agricultural operations have not changed to such a degree as to support the proposed commercial operations nor this type of residences. (4-113.C) Outside of walking / biking trails, and access to a convenience store, use will be limited to homeowners on this private development. What was once open space will become an unnecessary development made up of 85% expensive 2nd homes when what is needed locally is more affordable housing. For the above reasons and many others, the proposal is not in general conformance with the Comprehensive Plan 2030. Primarily, it conflicts with the Comprehensive Plan's Vision: "Garfield County is dedicated to ..., protecting wildlife, maintaining or improving the quality of our natural environment and preserving the county's rural and western heritage." The Spring Valley Ranch (SVR) PUD brings little needed change to Spring Valley, Garfield County or the region. Residents that are in opposition are not antigrowth or anti-development, rather in support of responsible growth and development.

Business Concerns: What data do we have on the quality and quantity of jobs that purportedly will be created? Are these high quality, high paying and long standing jobs? What will the Spring Valley Ranch PUD do to regional competition for skilled and

unskilled labor? Will this drive up the cost of labor? What will this do to travel times on Hwy 82? Per the Comprehensive Plan the development should not create competition between new and viable existing businesses such as exist at Thunder River. A Job Generation report might be useful in addressing some of these concerns. This development will have a negative impact on existing businesses via direct competition.

Affordable Housing: There is an inadequate number of affordable dwelling units planned for the number of jobs created. The Spring Valley Ranch PUD plan includes 77 affordable dwelling units. The PUD submittal estimates adding roughly 200 jobs. This discrepancy will increase the housing deficit in an area that is already starved for reasonable priced housing. This will add to travel times, pollution and worsen quality of life.

Roads: Will the roads, especially County road 114/CMC Road, be able to accommodate the projected 3300 to 5700 trips per day not including construction traffic? Will CR 114 be safe for pedestrian CMC students in light of the fact that there is no public transportation planned. For that matter, will the roads (CR 113,110,115) be safe for walkers and bicyclists in general? This begs the question, can these steep two lane, winding roads, which are icy in winter, ever safely handle the traffic to which they will be exposed. Another Traffic Information Study that better evaluates the impact to CR115 and CR110 roads needs to be completed. Can the roads be constructed so that they have adequate access and capacity as required by the LUDC (Article 7-107), especially in the case of emergency evacuation. As outlined in the Phasing plan, there will be overlap of the road improvements and housing construction. This will negatively impact the travel time and enjoyment of living in Spring Valley for at least a decade. The improvements mentioned in the Phasing Plan need to be expressly characterized prior to the SVR PUD being approved.

Fire: A major concern is fire evacuation. How long will it take to evacuate the area if there is a wildfire? One estimate is greater than 11 hours. There is a suggestion that sheltering in place would be appropriate. Unfortunately this may not be acceptable to the residents, workers and visitors. This could lead to Fire, EMS, residents, workers and visitors all accessing roads that are limited in access and capacity. This is a real concern in light of the multiple wildfires we have experienced: Coal Seam, Storm King, Lake Christine, Grizzly Creek etc) Over the last few years Spring Valley homeowners have had issues with obtaining homeowners insurance secondary to fire risk. One can assume that this trend will continue as it has in the rest of the country.

Water: Whether the planned water use is sustainable is unknown. Current residents of Spring Valley have significant concerns related to this issue. Without proof of adequate, reliable, physical long-term and a legal water supply (7-104) to irrigate the private golf

courses, ski hills, landscape and open space it must be assumed that it does not exist. In the face of aridification, with water resources that are already over allocated, these questions require an accurate answer prior to moving forward with this project. The application of 1,000,000 plus gallons of water per day can only be characterized as misuse. It is everyone's responsibility to protect and preserve this precious resource. What would the Spring Valley Ranch have the other individuals, both wildlife and people do, if the water in the area becomes inadequate to accommodate the needs of all? Groundwater pollution from the homes and golf courses are a legitimate concern that needs to be addressed. We should all be alarmed by the use of this quantity of surface and groundwater. Further characterization of the aquifer must be completed prior to approval.

Wildlife: Wildlife will suffer. Where elk and deer once roamed freely they will now be impeded. The build will further stress the Frying Pan Elk herd that per CPW already shows signs of decline caused by habitat fragmentation, interruption of migration corridors, an impact to summer and winter range and a change in access to surface water. Houses, roads, people, trails, dogs, golf and skiing will continue to negatively impact an already disturbing trend in a decrease in the calving/production of this foundation species. This trend will have an impact on the existence and economic value of the Frying Pan Elk Herd. Concerns about wildlife-people interactions must be considered in light of the bear and mountain lion in the area. An increase in vehicle animal strikes will be an additional consequence.

Economic Impact: How will this development impact home valuations and property taxes in the surrounding area? Who will cover costs to revegetate the land if this is a failed community? What costs will be incurred by the County to support ongoing infrastructure needs secondary to the SVR? At the rate we are building there will be little undeveloped land left in Spring Valley and this part of Garfield County.

The citizens of Garfield County do not want, nor need a private life-style community that is incompatible with the region's rural landscape and agricultural heritage. This is basically a request to build a development similar in size to the combined land mass of Carbondale and Glenwood combined, 5 miles up a steep, winding, 2 lane road. Any harm to the environment, once done, will not be easily undone.

Just because we have the ability to bring a concept to fruition does not mean we are required to. We ought to promote and protect the 5900 acres from unnecessary development. This area should remain wild and biodiverse.

Now that we are aware of the negative impacts of the development of Spring Valley Ranch, we should act accordingly as it relates to the consumption of a massive amount

of water, impact of fire, wildlife, traffic, road safety, water quality and compatibility with the surrounding area to name a few issues. The changes requested in the PUD application do not warrant placing Spring Valley hostage for another 20 plus years in light of the high risk and low reward that the area is being asked to accept. What was once a novel idea, no longer has a place in this area. Outside of housing, the development is incompatible with surrounding land uses.

For many reasons, some of which are outlined above, this is an inappropriate development in an inappropriate location. Do we even have data that supports the need for the 500 multimillion dollar home? (Marketing Survey)

It is my belief that this development will negatively impact the quality of life for all residents of the surrounding region, not just Spring Valley. As it is planned, Spring Valley Ranch brings no new or unique amenities to our community. As such this is not a development which will add to our lives. If anything, the Spring Valley Ranch will detract from our enjoyment.

I respectfully request denial of the Spring Valley Ranch PUD Substantial Amendment.

Sincerely,

Gregg Minion MD

Objection to Storied Development's proposed *glutinous* use of finite water resources in the Spring Valley Aquifer for developing Spring Valley Ranch

Dear Planning and Zoning Staff and Commissioners,

I am not a dedicated NIMBY nor am I anti-development. In fact, I was the primary land planner and project manager for the Elk Springs development. I am however opposed to mindless development that is knowingly wasteful of our increasingly most valuable and limited natural resource - water. The likely proposed mining of the Spring Valley Aquifer to nurture golf courses above 7000 feet in elevation is irresponsible to the environment and all other water users in Spring Valley which includes the CMC Spring Valley Campus. Storied Development's dismissive response to neighbor's genuine concerns of mining the aquifer is consistent with a development that has no desire to fit in with the rural setting of Spring Valley, respect its existing residents, or serve the interests of Garfield County.

Storied's own water analysis notes the Spring Valley Aquifer is not a unified basin, but rather a collection of elevated and lower aquifers. No study has been conducted to analyze the rate by which water passes from the elevated aquifers to the lower basin or the extent to whether it even does so. Storied claims an incredible 600 acre-feet of water flows down Landis Creek but presents no historical or recent proof of this claim. They dissemble by saying this massive flow will provide most of their irrigation needs but then refuse to limit irrigation from wells. And finally, and most importantly, if the aridification trend of the past 20 years continues, Storied's *glutinous* use of water for golf courses will most definitely mine and deplete the aquifer - even by their own generous calculations of the infiltration rate of precipitation.

I do not term their proposed water use *glutinous* without good reason. The Elk Springs PUD has consumptive water rights of approximately 70 acre-feet to serve approximately 420 EQRs (one sixth of an acre-foot per EQR). Storied Development wants to consume 974.5 acre-feet of water to serve 695 EQRs (one and four tenths acre-feet per EQR). This is consumptive use of water per EQR at a rate **eight times greater** than Elk Springs PUD. This *glutinous consumption* of water in a closed basin with no external water sources is wasteful, nonsensical and should not be condoned.

Very Truly Concerned Citizen,



Greg S Boecker

March 31, 2025

Re: Hearing of the Spring Valley Ranch Substantial PUD Amendment, April 9

Dear Garfield County Commissioners,

My first visit to Spring Valley was in 1987 and I was struck by the beauty of the open land, the sprawling ranches, the peaceful grazing cattle and the herds of mule deer and elk. One summer morning I was fortunate to see a magnificent mountain lion sunning himself on a rock in the front yard. The rural environment of Garfield County was stunning in its simplicity, particularly against the backdrop of the commanding vista of Mt. Sopris.

I own several lots in Elk Springs as well as owning Elk Mesa which shares a property line with Elk Springs to the north. I have a vested interest in the overall health of the surrounding valley. Storied Development's plans for the Spring Valley Ranch development appears to fly in the face of the rural surrounding area. The Storied proposal runs counter with adjacent land uses in terms of water use, development amenities, CR 114, wildfire evacuation needs, wildlife corridors etc.

I am not anti-development. I am a real estate developer who is aware of the fragility of Spring Valley. Currently, County Road 114 is stretched to the breaking point and the thought of 577 additional families trying to flee a fire on an inadequately sized road is dangerous to the extent of being criminal. The drought is here to stay, and water must be viewed as a diminishing resource that should be treasured. Storied acts as though the aquifer is bottomless and golf courses, bountiful surface irrigation and a ski hill make sense. The arid climate of Spring Valley is completely inappropriate for the "water hogging" proposal of Storied. A responsible developer should consider the limitations of the fragile water supply in a fire prone area.

There are many issues of concern with Storied's development. I am not a scientist or engineer. The commission will be hearing from the experts on those relevant topics. Tell Storied to go back to the drawing board and create a plan that can be supported by the people who live in the Roaring Fork Valley and those who appreciate the rural atmosphere of Spring Valley.

Respectfully and with grave concern,

Barbara Neal

Barbara Neal

Brian Lorch
347 Wood Nymph Ln.
Glenwood Springs CO, 81601
970-485-9232
Blorch11@gmail.com

**Exhibit
6-79**

Submitted via email to

Glenn Hartmann and Phillip Berry

March 31, 2025

Dear esteemed Garfield County Commissioners, Planning Commissioners and Community Development Staff,

Thank you for this opportunity to voice my concerns regarding the pending proposal to amend the Spring Valley Ranch PUD, and thank you for your on-going efforts to guide development in Garfield County,

INTRODUCTION

My name is: Brian Lorch and I live at: 347 Wood Nymph, within a direct line of sight of the Spring Valley Ranch. I have a Master's degree in Watershed Sciences from CSU and I worked for the Community Development Department in Summit County, CO for over 22 years: First as an Environmental Planner, and then I led the Open Space and Trails Department for almost 20 years. I reviewed countless development requests for code compliance during my tenure there.

Based on my review of Georgia-based Storied Development's (Proponent) proposed Major Amendment to the Spring Valley Ranch (SVR) Planned Unit Development (PUD), I believe that the PUD must be denied because private resort scheme proposed for the Spring Valley Ranch fails to meet numerous provisions of the Garfield County Land Use Development Code (LUDC), any one of which justifies denial. It also defies the Vision and numerous policies in the Comprehensive Plan, is incompatible with the rural character of surrounding land uses, and will cause irreversible adverse impacts to the natural environment and the community.

PLEASE DON'T FALL FOR THE "BAIT AND SWITCH" PUD AMENDMENT

This development proposal is not Conservation Clustering. The submitted PUD Plan seeks to maximize profits by dispersing small groups of lots all over the property, specifically to be near future ski and golf facilities, and is an attempt to create a massive new loophole in the development code. This proposal would fragment any natural resource values of the proposed Open Space and could set precedent that the community will never recover from.

The Bait: According to the SVR PUD Guide (2024), the Proponent has offered to identify a minimum of 55% of the property as Open Space to gain the advantages of Conservation Clustering. However, the clusters of homes are proposed to be spread across the landscape to all corners of the property, and into the most ecologically sensitive areas of the property.

The Switch: The Proponent's planned uses of the Open Space ignore the Garfield County regulations, policies, and standards (LUDC Sections 7-501B1 through 7-501B8)

The Land Use Schedule proposed in the PUD Guide would entitle the Proponent to construct golf courses, driving ranges, shooting ranges, tennis courts, ball fields, ski hills, chairlifts, and snowmaking facilities, eating and drinking establishments, and parking lots within PUD areas designated as Open Space. These proposed Open Space uses are

clearly not “designed to protect and not detract from existing wildlife habitat and natural features of the land such as Steep slopes, Riparian areas, ...” (Section 7-501B3).

But there is more: the Proponent is proposing the ability to construct accessory gravel operations, batch plants, water impoundments, water tanks, reservoirs, water treatment and distribution facilities, power transmission and distribution lines, solar energy systems, telecommunication facilities, utility distribution facilities, and commercial or support structures within the Open Space. This list of uses and activities is completely inconsistent with protection of Wildlife, their habitat, and the resource values of the Open Space. The County’s definition of Open Space allows outdoor recreation. However, using the Proponent’s reckoning, the back of my car would likely be considered Open Space, because that is where I throw my outdoor recreation junk.

And to put the nail in the coffin for the Open Space proposed at SVR: The Proponent also slipped in language to allow any of these facilities and parking lots on the Open Space to be lighted for use after dark, permanently shewing away wildlife and destroying the cherished dark-sky character of this rural area.

In over 20 years of working to acquire and preserve Open Space, I have never heard any friend or foe of Open Space suggest allowing such a list of incongruous uses. This list defies any rational interpretation of the concept of Open Space promulgated in the Garfield County LUDC and Comprehensive Plan. Falling victim to this sham would certainly obliterate the rural character of the Spring Valley area, and more importantly it could set precedent that will alter land uses in the entirety of Garfield County in the future.

THE MAJOR PUD AMENDMENT MUST STAND ON ITS OWN

The Proponent repeatedly touts comparisons with the existing PUD as rational for approving their private development scheme, suggesting that private recreation facilities have already been approved. However, the PUD amendment would replace any past approvals, and the proposed Amendment must stand on its own based upon current policies and regulations. There is also a strong argument to assert that past entitlements have expired.

The proposal includes dozens of violations and conflicts with the LUDC and Comprehensive Plan, any one of which is sufficient grounds for denial of this amendment.

- **The Garfield Development code does not include developed downhill ski areas as allowed recreational activities in the rural landscape, and this change in land use would require a code revision.**
- **The PUD Resort Scheme Conflicts with the LUDC Sections 7-102, 7-103, 7-106, 7-107, 7-202, 7-207, 7-208, 7-301, 7-304, 7-501B1, 7-501B2, 7-501B3, 7-501B4, 7-501B8, and 7-600:**

The State of Colorado referrals highlight some of these concerns.

Colorado Parks and Wildlife Referral: “we cannot agree that the wildlife impacts associated with developing the Spring Valley Ranch would be addressed were this plan to be implemented. “(9/2/2024). This referral highlights critical conflicts with numerous LUDC and Comp. Plan regulations and policies.

Colorado Geologic Survey Referral: CGS “strongly recommends” that the county require a revised geologic hazards evaluation (2/23/2024). This indicates conflicts with Section 7-207F3 and others.

Colorado Division of Water Resources (CDWR) Referral: “the developer does not currently have specific water rights for snowmaking.” (9/12/2024 and pers. comm.3/26/2025). This identifies conflicts with LUCD Section 7-104: “All applications for Land Use Change shall have an adequate, reliable, physical, long-term and legal water supply to serve the use...,” and other policies.

The PUD Resort Scheme conflicts with the Garfield Comp. Plan Vision and Policies in Sections 7-P2, 7-P3, 7-P5, 7-P6, 8-P1, 8-P2, and 8-P3:

The proposal conflicts with the Comprehensive Plan’s Vision: “Garfield County is dedicated to . . . , protecting wildlife, maintaining or improving the quality of our natural environment and preserving the county’s rural and western heritage.” The Proposal also conflicts with numerous Comp. Plan policies regarding water, natural resources, habitat and wildlife.

This scattered private resort development plan conflicts with Open Space requirements and policies the LUDC and Comprehensive Plan including, but not limited to:

- Section 7-501 B1: The Open Space shall be designed as large contiguous tracts where small “islands” of Open Space are discouraged.”
- Section 7-501 B2: The Open Space shall be designed to connect to available existing Open Space on neighboring properties or tracts of public lands in order to create larger regional tracts of contiguous Open Space.
- Section 7-501 B3: The Open Space shall be designed to protect and not detract from existing wildlife habitat and natural feature of the land such as stee slopes and riparian areas.
- **Section 7-501 B8: The Open Space shall not be reserved for any other type of use.**

This unacceptable plan for the lot layout will have critical environmental and community impacts and must be denied.

SVR IS NOT A VIABLE, APPROPRIATE, OR SUSTAINABLE LOCATION FOR THIS RESORT SCHEME



“No Snow Ski Hill: February, 2025



Deer Valley Development: February, 2025

The picture on the left shows the location of the proposed ski resort and the surrounding area proposed for development. This scenic hillside provides a cherished backdrop that is visible from much of the Roaring Fork Valley. The fact that this picture shows almost no snow in February indicates why this hillside is so critical for wildlife habitat in the winter.

The picture on the right shows the impact of less than a dozen homes and their access roads on a similar slope at Deer Valley, Utah. The ecological impacts shown at Deer Valley, would be multiplied 10-fold in the proposed PUD amendment which would spread almost 100 homes up to, and above the ridgeline, lighting up Spring Valley and much of the Roaring Fork Valley. All of the additional outdoor facilities proposed for construction as part of the resort scheme will guarantee that the scattered land between the lots will not retain Open Space or habitat values.

THE NATURE, SCALE, LOCATION, AND INTENSITY OF THE PROPOSED USES ARE NOT COMPATIBLE WITH THE RURAL CHARACTER, ADJACENT LAND USE OR ALLOWED USES OF OPEN SPACE.



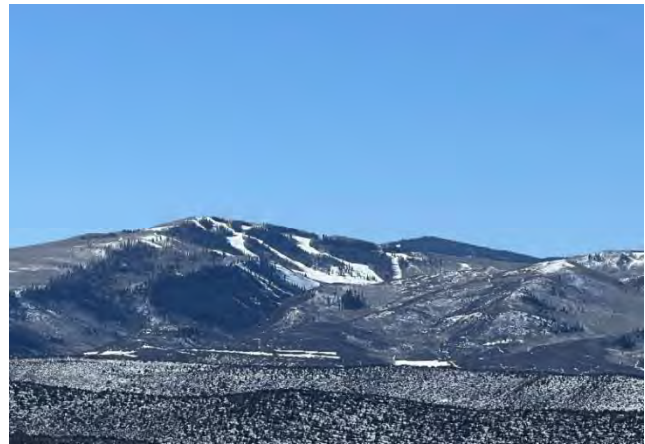
Photos of Tasker Club by Storied Development: near Park City, Utah

The Proponent’s promotional materials showing their “private lifestyle resort” concept make it clear that the proposal is fundamentally incompatible with the rural character of the surrounding land uses in Spring Valley.

THE PRIVATE SKI RESORT SCHEME IS DOOMED TO FAIL AT THE PERIL OF COMMUNITY CHARACTER.



Spring Valley Ranch, February 26, 2025



Sunlight Ski Area, February 26, 2025

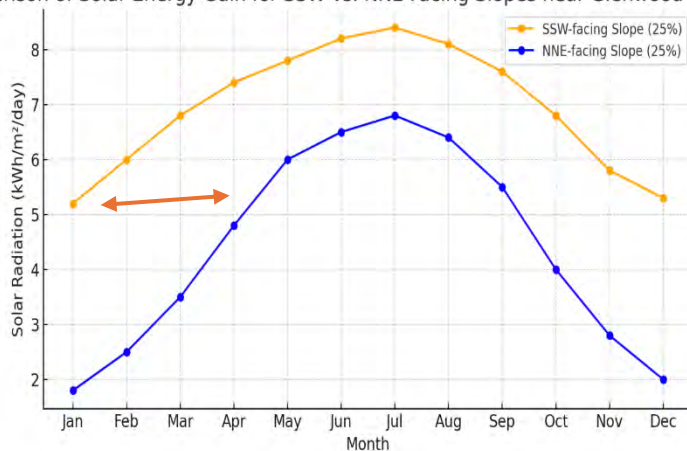
The two pictures above were taken at the same location and time in February of 2025, and contrast SVR with nearby Sunlight Ski area. Please note that Sunlight is white and is predominantly treed because the northerly slope aspects hold snow, whereas the south facing SVR does not. While Colorado residents may observe this difference between south and north facing hills daily, the Georgia Proponent may understandably be less familiar with this phenomenon.



According to Coloradoskihistory.com over 145 ski areas have gone defunct since the turn of the 20th century, primarily due to the lack of a skiable snowpack, and only about 30 remain.

To illustrate this difference, the graph below compares the solar radiation on south-southwest (SSW) facing slopes, like Spring Valley Ranch, to a north-northeast (NNE) facing slope, like the nearby Sunlight Resort.

Comparison of Solar Energy Gain for SSW vs. NNE Facing Slopes near Glenwood Springs, CO



Ski Areas Unable to Open: Business News

This graph indicates that the proposed ski hill at SVR would receive approximately three times more solar radiation on January 1 than Sunlight Ski Area. This makes it unlikely that there will be enough snow accumulation to make even the easiest ski hills viable, and steeper slopes have an even greater differential in solar gain between north and south facing slopes in winter.

To artificially increase the value of SVR lots, the PUD amendment proposes to thwart nature with a tenuous scheme to produce manmade snow. The frivolous and unsustainable nature of this water and power demand is highlighted by viewing the horizontal timeline on the above graph. The daily solar energy input melting snow on a SSW facing hill near Glenwood Springs during early January is even greater than a NNE facing hill receives in mid-April. Therefore, even continual snowmaking efforts throughout the season will probably accumulate insufficient snow for reliable skiing given the location, elevation, slopes and aspects of SVR.

Although the PUD proposal does not specify the size and extent of the proposed ski area, it is clear this effort will require extensive infrastructure on the Open Space. Sunlight Resort makes snow on about 4% of its area and the Aspen Ski Areas have the capacity to cover about 16% of their ski hills. The intense solar radiation and lower elevation of SVR will require snowmaking on the majority of the proposed ski area.

The project designer projected that the snowmaking demand would require a snowmaking capacity of about 500,000 gallons per day for 3 months. In contrast, 500,000 gallons is roughly the total amount of snowmaking water used at Sunlight Ski Resort in a full year, according to the Aspen Times. Therefore, the proposed ski area represents an unsustainable waste of precious water and resources and is doomed to fail. The proposed metro district and the

community will be left with denuded and altered slopes and access roads, chairlifts, dispersed snowmaking and lift facilities, and associated ski resort “junk” spread across the Open Space when the futility of skiing on this site becomes apparent.

These snowmaking guns and snow cats moving snow all night are incompatible with the rural character of Spring Valley. The Colorado Division of Resources has also stated that the Proponent does not have the legal water rights to make snow in winter. Instead of providing data to “prove” the existence of physical or “wet” water to run the proposed snowmaking system, the Proponent’s water reports do not disclose or evaluate this use.

According to one manufacturer’s website, each snowmaking gun can rival the noise of a chainsaw. The projected water use indicates that dozens of guns will be running simultaneously all night long for months compounding the noise impacting neighbors and displacing wildlife.

Lighting on each of the proposed homesites and at all the facilities proposed to be located on this prominent hillside and ridge will permanently diminish the night sky character of this area and degrade the Open Space in conflict with the LUDC. Downcast lighting will not mitigate the change in community character or the wildlife impacts to the fractured Open Space because it will overhang so much rural landscape that is generally devoid of trees.



As stated earlier, the Garfield Development Code does not allow this private developed downhill ski area in the rural landscape, and this change in land use would require a code revision. The private ski resort is incompatible with the rural character and this proposed change in land use must be denied.

WATER, WATER, ... BUT FROM WHERE?

The sculpture in the Grand Junction Veterans Memorial Park boldly proclaims, “In The West, When You Touch Water, You Touch Everything,”-Wayne N. Aspinall. The Garfield County Commissioners have wisely embraced and articulated this concern in Section of 7-104 of the LUDC and the Comprehensive Plan.

The April 2024 water report by Colorado Water Engineering, submitted by the Proponent, is an in-office review of a paper exercise completed by Gamba Engineering in 1990, and employs the same methods and assumptions with some updates to weather and precipitation records to reflect warmer and dryer climate conditions since 1990. The County commissioned a review of this report by Matrix Engineering that identified serious concerns with the assumptions and lack of data in the Proponent’s water reports. The SGM Engineering Comments and Concerns for Spring Valley Ranch Amendment (September 2024) commissioned by the potentially impacted well users in the aquifer concludes:

“SGM’s analysis of the SVR development’s water supply availability reveals significant concerns regarding aquifer sustainability recharge rates, groundwater storage volume and demand calculations. The Aquifer Sustainability Report’s assumptions about aquifer storage, recharge and water balance lack sufficient justification and fail to account for critical factors such as prolonged dry periods and inter-aquifer dynamics. There is a serious risk of aquifer mining due to overestimated recharge rates and proposed high water use. To ensure sustainable water management, SVR should provide more comprehensive analysis, validate its assumptions and limit its high-water -use activities.”

Instead of characterizing the availability of water with pumping or groundwater data, the SVR water reports are based on simplistic assumptions, such as; all water that infiltrates into the ground in the entire Spring Valley basin enters the aquifer, stays in the aquifer, moves toward the SVR wells, and will remain available for the Proponent to pump. The reports include no indication of how the Proponent will address injury to other well users from SVR well drawing down and drying up wells during seasonal or extended dry periods.

As stated previously, these water reports also make no mention of winter snowmaking use, listing outdoor water use as zero from November through March. It would be irrational to assert that the Proponent has proven that they have “an adequate, reliable, physical, long-term and legal water supply” for all of the proposed uses in the PUD, or that they have proven that their proposed demand to squeeze almost one million gallons of water per day out of the aquifer will not drastically injure the community.

The residents surrounding Spring Valley implore the Community Development Department to save public dollars and avoid on-going stress to the community by not considering any future Spring Valley Ranch PUD amendment submittals complete until any applicant has provided sufficient long-term well data and groundwater modeling to meet its burden to prove that it has sustainable legal and physical water for all of the proposed water uses, and that these uses will not harm existing water users, the community, or the environment. This burden should not be borne by Garfield County Government or the community.

THE COMMUNITY MUST NOT “FOOT THE BILL” FOR THIS PRIVATE RESORT SCHEME

The community must not be forced to foot the bill for all of the adverse environmental and social impacts associated with the proposed private resort:

- Aquifer drawdown from the frivolous and unsustainable waste of water must not dry up wells, causing economic hardship and catastrophic loss of economic and natural resource values of neighboring lands, as well as the lands within SVR.
- Undisclosed power demand for snowmaking and private resort facilities will require additional transmission lines and power infrastructure.
- Recreation facilities must not degrade the ecological and wildlife values of designated Open Space.
- Noise and light pollution must not obliterate the quiet nature and dark night sky of this rural area.
- The proposed Private Resort is **fundamentally incompatible** with the character of the surrounding land uses.
- The adverse community impacts of this proposal will not be addressed by removing the ski area, golf course, and/or other elements of the private resort scheme as a condition of PUD approval, because these facilities direct and define the entire development pattern of the PUD amendment.

The list of issues that should lead to denial of this proposal far exceeds the limits that I can provide in this letter and includes:

- Loss of wildlife and biodiversity
- Traffic, Safety and infrastructure concerns
- Pollution of air, surface water, groundwater, and soils
- Sprawling Residential and Commercial Development
- Dispersed physical and visual impacts of dispersed ski and golf facilities
- Potential for erosion and landslides
- Light and Noise Pollution
- Excessive and unsustainable use of water, power, and resources
- Visual and physical impacts of infrastructure expansion and new facilities
- Flawed economic analysis overstates benefits while not disclosing full public costs
- Loss of rural character and agricultural Heritage
- And the list goes on....

CONCLUSION

Approving the proposed Open Space “Bait and Switch” by allowing a Proponent to identify portions of a PUD as Open Space, then ignore the county standards for Opens Space, will create loopholes in the development code that any future developers could drive their bulldozers through. The extent and distribution of the proposed land disturbance in this PUD amendment proposal is clearly driven by the goal to construct private ski hills and private resort facilities. Therefore, it is not sufficient to remove the golf course, commercial area, and/or ski area as a condition of approval.

The County’s water study and other studies have highlighted the prospect for economic catastrophe for all existing well users, as well as the agricultural heritage of Spring Valley, when this proposal dries up surrounding wells and surface water. The livelihood and well-being of most of the area residents must not be put at risk pandering to the unsustainable desires of a select few.

It is essential to consider the sum of all the proposed resort facilities, along with the lot development plan, and their unmitigated cumulative impacts to the environment, the community, and the rural character.

I respectfully request the denial of the proposed Spring Valley Ranch PUD Amendment due to conflicts with the LUDC and the Comprehensive Plan, and based on the sum of all of the unresolved environmental and social issues raised by the community and outlined in this letter. Please send this proposal back to the drawing board.

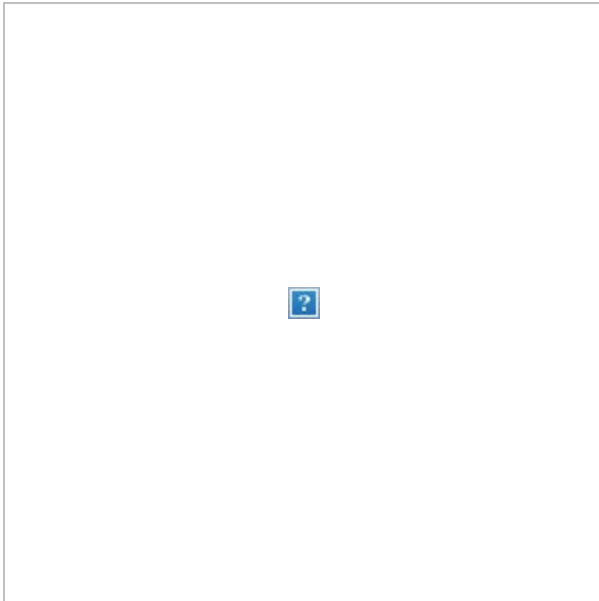
Thank you again for your consideration of the issues provided in this letter and for your ongoing service to our community.

Respectfully submitted

Brian Lorch

Brian Lorch

From: [Communications](#)
To: [Philip Berry](#)
Subject: Garfield County website inquiry - Senior Planner
Date: Monday, March 31, 2025 12:47:43 PM



Subject: Spring Valley Ranch PUD

Name: CLAYTON SMITH

Email: csmith@rvsginc.com

Phone Number: 19703793080

Message: Dear Philip,

Please accept this letter as my comments regarding the Spring Valley Ranch PUD application that is currently under review. My family has lived here in the Valley for three generations, my children being the 4th generation, and I am writing to you today with a factual concern about the proposed development on the Spring Valley Ranch. My family and I live in Spring Valley immediately below the proposed development. This massive project, funded by a powerful hedge fund and aimed at creating a "luxury lifestyle" community for the ultra-wealthy, threatens to destroy this part of the community, and everything that makes our rural home special. While the developer may see this as an opportunity for profit, I see it as a devastating blow to the community, the environment, and the very essence of what this place has always been about.

Please note previous developers have misled the public. In 2007, a representative for the project stated, "We really intend to go forward with a project at Spring Valley

Ranch. We're in the development business... This is not a paper subdivision that we're trying to float here and flip to somebody else." This statement (published by the Post Independent) which was made to reassure the public, was proven false when the previous development was ultimately approved by a narrow margin, by previous BOCC, based on those very promises. Since then, our valley, rivers, watersheds, and traffic infrastructure have drastically changed, problems that were ignored back then are now far worse.

A Community at Risk

The scale of this development is incomprehensible. A sprawling luxury complex, including two private golf courses, a ski resort, an athletic club, and other commercial spaces, will not only cater to a select few but will entirely bypass the needs of the people who have called this area home for generations. What is the point of economic growth when it benefits 2nd homeowners and leaves those of us who have maintained the very fabric of this rural community? Private golf courses, athletic facilities, and ski areas won't benefit this community, ITS PRIVATE.

More alarming is the impending destruction of our water supply. Our wells are already stretched thin, this development will undoubtedly consume the resources we rely on for our daily lives—water that is essential for our homes, our farms, and our livelihoods. Several of my neighbors already must haul their domestic water when their wells start to dry up during the driest months some years. Families will no longer be able to survive here. How can we stand by and watch as this development puts our future at risk, all for the benefit of a few?

Further Loss or Displacement of Roaring Fork Families

Local roads, already struggling to handle current traffic, will be overwhelmed by thousands of additional vehicles each day. The closure of Red Canyon Road will sever access for families who depend on it as their main route, leaving parents of this community unable to get their children to school or to work without a VERY significant increase in travel time. Daily commutes becoming a never-ending struggle for residents will force families to vacate Spring Valley, and potentially the Roaring Fork area for good. Some of The Spring Valley community will be left with no choice but to sell, forced out by the overwhelming pressures of inadequate infrastructure and water shortages. Benefiting a hedge fund from Georgia, and a select group of ultra wealthy that will not be a full-time part of the community.

A Loss of Nature's Beauty

The environmental toll—an irreversible loss that cannot be measured in dollars or economic growth. Wildlife that calls this area home will be displaced, forced into decreased grazing spaces, and unsustainable regions, leaving entire herds at risk. It is my understanding that CPW already considers the elk herd in this area at great risk. The seasonal lake that forms from snow runoff in the lower end of the valley, where our wildlife has found peace and solace for generations, will be lost forever to a private golf course.

Growth should not come at the cost of losing access, water, and Wildlife. This development impacts our water and road ways we NEED. I implore you to see beyond the numbers and the possible promises of increased tax revenues. Please consider the very real, lasting damage this development will inflict on us, the people who live here, and the environment.

This simply comes down to losing 4 NEEDED living components: Water, Access,

Habitat, and our Community.

Please, do not let this project go forward. We are not opposed to growth, but we must ask for growth that is thoughtful, respectful, and sustainable—growth located in an appropriate place and that benefits everyone, not just the privileged few.

Thank you for your time and for considering the impact this development will have on our community. I trust you will make the right choice and recommend full denial of the development.

Clayton Smith

From: [Andrea Beiswanger](#)
To: [Philip Berry](#)
Subject: Spring Valley PUD
Date: Monday, March 31, 2025 2:38:10 PM

You don't often get email from andrea.beisy@gmail.com. [Learn why this is important](#)

Dear Philip Berry,

Thank you for ALL you do for our community and The Roaring Fork Valley.

I am writing to urge you to deny the Spring Valley Ranch Substantial PUD due to its significant threats to our community and environment.

This development risks:

Water Resources: Severe strain on our water supply, requiring thorough assessment. I live in Pinyon Mesa and we already have a HUGE water problem. Our water is supplied by Elk Springs and they have increased our water rates by 5 fold the last year. As a neighborhood we are taking great steps trying to decrease water usage and conserve. I am terrified of all the wells drying up in the future and our entire development needing to ship water to our homes just so we can have water to drink. Spring Valley would be a complete detriment to our environment and water supply! Wasting more precious water just so a few more wealthy people can have their own golf course, swimming pool and ski hill!

Traffic Congestion: Exacerbated traffic, impacting safety and evacuation capacity. If you've ever driven by Thunder river market during rush hour you know it's a death trap. I have seen so many near misses every day. There are 6 entrances in a tiny area. Already, there are so many aggressive drivers just trying to make it through the light. Not to mention all of the pedestrians trying to walk across 82 to get on the bus. That entire area needs to be changed and made safer for pedestrians and vehicles. Adding up to 5,000 more vehicles a day will just cause more accidents and more deaths.

Wildlife Habitat: Destruction of critical habitats and increased human-animal conflict.

Quality of Life: Diminished rural character and peaceful environment.

Please prioritize our community's long-term interests over short-term development gains. Do not approve this project.

Respectfully Submitted,
Andrea Beiswanger

From: [Brooke Winschell](#)
To: [Philip Berry](#)
Cc: [Glenn Hartmann](#)
Subject: FW: Garfield County website inquiry - Community Development
Date: Monday, March 31, 2025 4:37:27 PM
Attachments: [image001.png](#)

Here is another Spring Valley response.

Thanks,

Brooke A. Winschell



Community Development Administrative Specialist

Community Development Department

bwinschell@garfieldcountyco.gov

Direct 970-945-1377 Ext. 4212

T: 970-945-8212 | F: 970-384-3470

108 8th St, Suite 401 | Glenwood Springs, CO 81601

From: Communications <Communications@garfieldcountyco.gov>
Sent: Monday, March 31, 2025 4:08 PM
To: Glenn Hartmann <GHartmann@garfieldcountyco.gov>; Brooke Winschell <BWinschell@garfieldcountyco.gov>
Subject: Garfield County website inquiry - Community Development



Subject: Spring Valley Development

Name: Lisa Sansom

Email: lisesansom@aol.com

Phone Number: 19709480466

Message: Lisa and Paul Sansom
1613 Cattle Creek Road, Carbondale CO 81623

March 31, 2025
Garfield County Commissioners and
Garfield County Planning Commission
108 8th Street, Glenwood Springs , CO 81601

Dear Commissioners and Planners,
We have lived in the Roaring Fork Valley for 47 years, 38 of those as homeowners in Cattle Creek (113 Road.) We are writing to express our concern about the proposed development in Spring Valley by Storied Development.

Since September 2009 when our well went dry, we have had to haul all of our water. This was after new construction at CMC and housing developments in the area were completed. Many other property owners in the valley have also had to start having their water trucked in. We understand that this new project intends to use a million gallons per day. We are concerned about where this water will come from and how that will further drain the aquifer and affect other residences' wells. The porous nature of the gypsum/limestone in this area should be taken under consideration, as water sources can easily drop under ground and disappear.

After the use of a million gallons per day, what is the plan for water treatment and it's return to the environment? With the construction of a low altitude south facing ski area, unfathomable amounts of water will be needed to make snow. If this is even possible, where will the spring run off from this go? Red Canyon cannot handle that amount of water without flooding and environmental damage.

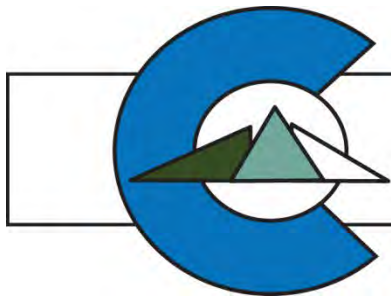
Many years of drought and several nearby wildfires (Panorama, Grizzly Creek, Fisher Creek and Basalt Mountain, all within a 10 mile radius to Spring Valley) have caused us to be extra fire conscious. It seems the lack of egress and the pressure of so much development will have a disastrous outcome to new and current residents. The county roads in this area could not handle evacuation traffic.

We have so many additional concerns, but the last one we'd like to mention is the displacement of wildlife. Even with the dispersed smaller development in the area, we have seen a huge rise in the numbers of species traveling through our area to access water and grazing . A huge development will drive the animals off the hillsides down to the valley floor with Highway 82 as an obstacle to their crucial remaining habitat.

Please keep these concerns in mind when determining if the Storied Development project is right for our rural area and quality of environment.

Sincerely yours,

Lisa and Paul Sansom



Garfield County

Exhibit
7

Community Development Department

Spring Valley Ranch PUD Amendments (File PUAA-05-23-8967) Referral Comments

Referral Exhibit No.	Referral Description
7-1	Carbondale and Rural Fire Protection District – February 6, 2024
7-2	Colorado State Forest Service – February 1, 2024
7-3	Colorado Geologic Survey – February 23, 2024
7-4	Garfield County Public Health – February 23, 2024
7-5	Garfield County Consulting Engineer – February 6, 2024, August 15, 2023
7-6	Garfield County Road and Bridge – January 30, 2024, January 13, 2025
7-7	Garfield County Vegetation Management – February 13, 2024
7-8	Colorado Parks and Wildlife – September 3, 2024, February 27, 2024, February 20, 2024
7-9	U.S. Army Corps of Engineers – February 8, 2024
7-10	Glenwood Springs Fire Department – February 8, 2024
7-11	Consulting Traffic Engineer – August 15, 2024
7-12	RFTA – March 25, 2024
7-13	Glenwood Springs – February 26, 2024
7-14	Eagle County – February 20, 2024
7-15	CDPHE – January 19, 2024
7-16	AVLT – April 4, 2024
7-17	CDOT – May 9, 2024 March 25, 2024
7-18	Consulting Water Engineer – September 6, 2024, March 24, 2025
7-19	DWR – September 12, 2024



Exhibit
7-1

Spring Valley Ranch PUD Amendment Plan Review

Date: August 16, 2023 – Revised Review 02-06-2024

Project: PUD Amendment

Applicant: Storied Development, LLC.
Rich Wagner – 530-4483157
9875 N. Tuhaye Park Drive
Kamas, UT 84036

Owner: Spring Valley Holdings, LLC
Martin Van Ardenne – 415-738-0295
600 Montgomery ST
40th Floor
San Francisco, CA 94111

COMMENTS ON AMENDMENT

The staff of the Carbondale & Rural Fire Protection District is providing the following comments on the Spring Valley Ranch PUD Amendment Application as a courtesy based on a referral by Garfield County planning staff for an initial review and preliminary comments. As the subject property is outside the boundary of the District, the District does not have administrative jurisdiction. Therefore, the comments that follow are advisory only in nature and the district shall not be held responsible for its interpretation of the facts stated by the applicant or the district's interpretation and understanding of the County's planning process and County land use code.

EMS Response

- CRFPD recommends that consideration be made to how EMS with Advanced Life Support (ALS) response and transport will be conducted and subsidized. Our concern is that with the additions to the recreational activities that are proposed, call volume will increase in the area, and currently there is no plan to provide Emergency Medical Services.
- Based on the current emergency ambulance response distance and planned development of a ski area, CRFPD recommend a helicopter landing zone be designated for emergent transport.
 - Clear width to landing zone = 300 feet.
 - Safety Circle = 90 feet.
 - Pad = 20 feet.

7.11.2 Fire Protection

- With professional observation and experience, the plan for an all-volunteer fire service is not recommended. Consider a combination department with paid full-time responders that will help to manage the training, response and administration of the two fire houses and their firefighting apparatus.
 - Considerations:
 - Training Plan.
 - Recertification of training and administration.
 - Maintenance and replacement requirements.

7.11.2 (8)(10) Road Access and Fire Protection Standards



- Aerial and fire apparatus access with no comment needed.
- CRFPD recommends that the project team consider expanding the construction plan for fire stations to include employee housing to incentivize employees needed to manage operations.

7.11.1 Wildfire Mitigation/Q Wildfire Mitigation Report 2023

- Credit for the strong Wildfire Mitigation Report on the proposed PUD. This report assists with the development of a CWPP plan that will help in the continued wildfire preparedness and emergency response strategies. CRFPD strongly recommends that the LCMD work toward a “Fire Wise Community” designation to help in the education of residents and to fund large scale wildland fire mitigation projects.
- Consideration should be made for residents to shelter in place within their own homes depending on class of construction as recommended in the 2021 IWUIC. The Wildfire Mitigation Report talks about Collection point pre-designated to facilitate evacuating citizens with the golf course clubhouse being considered for the point (PP 34). Many times people are caught in their vehicles trying to leave a fast-moving fire. Consider areas for safety zones that include their own homes in some circumstances.

The comments pertaining to the establishment of a new PUD plan map and PUD guide governing future development of the property are based on the unincorporated status and the establishment of the Landis Creek Metropolitan District (LCMD). It is prudent for the stakeholders to evaluate recommendations from the experts of Carbondale and Rural Fire Protection District to help in the protection of life and property.

Revised Plan Review with additional comments 02-06-2024
For Glenn Heartmen.

Sec 1.08 Transportation Impact Study.

1. Reference comment on Directional Distribution of CR 115.
 - a. We need to be looking at 115 (Red Canyon Rd) as an emergency access and egress element for the entire community as the area continues growth and not just keep assuming that 114 will manage egress. I recognize that the McDowell engineering's response is to close 115 and open to emergency vehicles only if this project is approved. Without substantial improvements to 115, I do not recommend this road for emergency vehicles either. What are our options for road improvement looking at 115 as an egress road for wildfire or another emergency's?

Sec 7.11.1 Wildfire Mitigation

1. I like the Fire Adapted Community standards but also would like this idea taken to the next level and become a Fire Wise Community that will allow for more direct ownership to the home owners in helping to continue the work for the subdivision. This also will allow for the possibility for grants in the mitigation of the area.

Sec 5.11.7 Fire Protection

1. Fire Protection Standards (7)
 - a. Fire-Flow Requirements for One and two-family dwellings, Group R-3 and R-4 Buildings and townhouse will meet the requirement of Appendix B of the IFC 2015 as adopted by Garfield County Ordinance No. 2018-02.



February 1st, 2024

Glenn Hartmann and Philip Berry
Garfield County Community Development Department

Dear Glenn and Philip,

Subject: PUA-05-23-8967 – Spring Valley Ranch PUD – Substantial Modification/Amendment

The wildfire hazard for the proposed developments are **Low**. However, a low rating does not mean a development is immune to the effects of wildfire. There are still wildfire hazards that should be mitigated by following the recommendations listed in this review. During the review of properties we look at many factors relating to wildfire hazard including: slope and aspect, lot size, natural fuels, road systems and access, and available water sources. Most of the recommended action items have been addressed in *Document 1.17 Wildfire Mitigation Report*.

In areas adjacent to proposed structures and also where clearing for development is not expected to occur, such as open spaces and natural areas, fuels reduction and maintenance of past treatments should occur. The goal of fuels reduction is to reduce the amount of combustible fuel available to a fire and thus reducing fire intensity so that a structure may survive a wildfire and/or crews can safely suppress a fire. Ladder fuels, surface fuels and crown fuels should be targeted as referenced in *The Home Ignition Zone: A guide to preparing your home for wildfire and creating defensible space*. The *Wildfire Mitigation Report* addressed several fuels treatments to help reduce fuels, promote defensible space, create roadside fuel breaks, and annual mowing, so following through on these activities is integral to wildfire safety. In addition, expanding on these fuels treatments and being proactive in identifying areas of concern in the future is important to the residents' safety.

As addressed in the *Wildfire Mitigation Report*, it is highly recommended that defensible space be created around any new or existing development in Zones 1 (0-5 ft from structure), 2 (5-30 ft from structure) and 3 (30-100 ft from structure). Defensible space is an area around a structure in which the forest fuels have been removed, reduced, or modified to reduce wildfire intensity. This is critical when taking into account wildfire suppression efficacy for this development. In addition, the density of homes and their small average lot size makes defensible space that much more important.

Again as referenced in the *Wildfire Mitigation Report*, 'Hardened' home construction techniques are an important factor in reducing the probability of home ignitions from both wildland fuels and from structure to structure ignitions. It is recommended that noncombustible roof, decking and siding materials be used in all new construction. Roofing and siding materials are the two biggest factors in structure ignitability during a

wildfire. By taking these steps you will lessen the risk of the structure being consumed during a wildfire.

For further information on the Home Ignition Zone please refer to the following publications.

https://csfs.colostate.edu/media/sites/22/2021/04/2021_CSFS_HIZGuide_Web.pdf

If you have additional questions or need clarification on any recommendations feel free to contact our office.

Sincerely,
Matthew Mastalir

Matthew Mastalir
Forester
Colorado State Forest Service
Rifle Field Office
(970) 625-3969

1801 Moly Road
Golden, Colorado 80401



Matthew L. Morgan
State Geologist and
Director

February 23, 2024

Glenn Hartmann, Director, and
Philip Berry, Planner III
Garfield County Community Development

Location:
39.515, -107.227

Subject: Spring Valley Ranch PUD – Substantial Modification/Amendment
File Number PUA-05-23-8967; Garfield County, CO; CGS Unique No. GA-24-0007

Dear Glenn and Philip:

The Colorado Geological Survey has reviewed the Spring Valley Ranch PUD Substantial Modification / Amendment referral. I understand the applicant proposes a 577-unit development on approximately 5908 acres southeast of Glenwood Springs. The available referral documents include a Geologic Evaluation, Spring Valley Ranch, County Road 115 (CTL|Thompson, Inc. Project No. GS06730.000-115, February 23, 2023), and a response to Garfield County Comments, Spring Valley Ranch (CTL, December 14, 2023).

CGS recognizes that a PUD has previously been approved for this property, and that the proposed modification maintains “the same density in a more compact and clustered format.” However, since CTL’s original geological evaluations were completed in 1998-2003, more detailed geologic mapping has been completed¹. Areas of mapped landslides are more extensive than shown on CTL’s February 2023 Geologic Hazard Maps and in the 3/1/2023 Spring Valley Ranch Impact Analysis by Western Bionomics.

While landslides and areas of potentially unstable slopes, soil creep, and slope failure complex may appear to be dormant or stable under existing conditions, the proposed development will involve ground disturbances, including grading, cuts and fills for roads, utilities, driveways and building pads. This will change existing load and drainage patterns, potentially destabilizing slopes and resulting in local slope failure, or instability and slope movement on a larger scale.

If the soils on or near any part of the proposed development or surrounding area become saturated through excessive rainfall, snowmelt, landscape irrigation, a water or sewer pipeline failure, infiltration from onsite wastewater treatment systems (OWTS), or other source of water, the soils could lose strength and fail slowly or catastrophically.

Ground movement at any scale is likely to result in damage to homes, yards, driveways, utilities, and roads. Avoidance is the preferred mitigation for landslides, and CGS discourages grading and development within and adjacent to identified landslide and potentially unstable slope areas.

CGS strongly recommends that the county require the following prior to approval of any plat or grading:

- a revised geologic hazards evaluation specifically addressing landslide and development-related slope instability hazards, and demonstrating that existing slopes and proposed constructed slopes will have a factor of safety of at least 1.5 under developed conditions. The evaluation should include slope stability analysis of proposed road, driveway and building pad cuts, fills, and retaining walls exceeding four feet.

The impact on stability of changes in grading, loading, groundwater levels, precipitation and infiltration, vegetation, etc. must be evaluated.

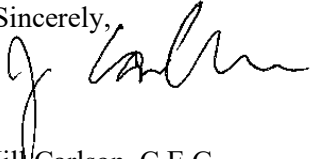
- Slope stability, rockfall, debris inundation, and evaporite-related subsidence risks should be evaluated and reviewed at a phase- or filing-specific scale once a lot layout is proposed, and prior to preliminary plat approval.

Site-specific geotechnical recommendations should include strategies for mitigating local slope instability, including maximum allowable temporary and permanent cut and fill heights and slope angles, based on site-specific, undisturbed and residual shear strength and friction angle values.

CGS is available to review additional geologic/geotechnical information and analysis provided to the county.

Thank you for the opportunity to review and comment on this project. If you have questions or need further review, please call me at (303) 384-2643, or email carlson@mines.edu.

Sincerely,



Jill Carlson, C.E.G.
Engineering Geologist

¹ Kirkham, R.M., Streufert, R.K., and Cappa, J.A., 2009, Geologic Map of the Shoshone Quadrangle, Garfield County, Colorado, Colorado Geological Survey, Map Series MS-35, 1:24,000,

Kirkham, R.M. and Widmann, B.L., 2008, Geologic Map of the Carbondale Quadrangle, Garfield County, Colorado, Colorado Geological Survey, Map Series MS-36, 1:24,000, and

Kirkham, R.M., Streufert, R.K., Cappa, J.A., Shaw, C.A., Allen, J.L., and Schroeder, T.J. II, 2009, Geologic Map of the Glenwood Springs Quadrangle, Garfield County, Colorado, Colorado Geological Survey, Map Series MS-38, 1:24,000.



195 W. 14th Street
Rifle, CO 81650
(970) 625-5200

2014 Blake Avenue
Glenwood Springs, CO 81601
(970) 945-6614

Garfield County Community Development
108 8th Street
Glenwood Springs, CO 81601
Attn: Glenn Hartmann, Director
Philip Berry, Planner III

RE: Spring Valley Ranch PUD, Substantial Modification/Amendment
Parcel ID Nos.: 218716100169, 218720100168, 218726200168, & 218733100152
4000 County Road 115
Glenwood Springs, Colorado
File # PUA-05-23-8967

February 23, 2024

Glenn and Philip,

Garfield County Public Health (GCPH) has reviewed the application for the Spring Valley PUD Substantial Modification/Amendment, and we have the following comments.

1. Drinking Water: The applicant proposes that the development will be served potable water by the Landis Creek Metropolitan District (LCMD). The applicant indicates that LCMD will be responsible for obtaining appropriate Colorado Department of Public Health and Environment (CDPHE) permits and will operate a community water system for the PUD. The applicant provided a Legal Water Supply Report and a Water Supply and Distribution Plan which indicated adequate water supply and quality. The domestic water supply for Spring Valley Ranch will be provided by numerous wells and a spring on the property. The Water Supply and Distribution Plan indicated that all the existing well casings and pipes will be replaced. Some of the wells will need to be redrilled. Pump testing will be completed at each well after rehabilitation and redrilling.

Staff recommends a condition of approval that new pump test data be provided to Garfield County once rehabilitation and redrilling of the wells is complete. Also, as this water system will be regulated by CDPHE, staff recommends a condition of approval that the applicant provide documentation from CDPHE that the water system meets their requirements for domestic water distribution.

2. Wastewater: The applicant proposes that wastewater generated by residences and other uses at the PUD will be collected and treated by the Spring Valley Sanitation District (SVSD) at the Spring Valley Wastewater Treatment Facility (WWTF). The applicant indicated that the existing Spring Valley WWTF was designed, constructed, and has capacity to treat the wastewater generated by the full buildout of the Spring Valley Ranch PUD. The applicant provided a "will serve" letter from SVSD for the proposed PUD.

Because of the flows treated by the WWTF, the facility will be regulated by CDPHE and not Garfield County. Staff recommends a condition of approval that the applicant provide documentation that the Spring Valley WWTF is operating with a current license from CDPHE.

3. Mixed-Use District: The applicant indicates that there will be a mixed-use district in the PUD that will provide amenities and services to the community including a clubhouse/lodge, dining facilities, retail stores, and convenience services.

Staff recommends a condition of approval that all food distribution uses shall be properly reviewed, licensed, and inspected by GCPH Consumer Protection staff and any appropriate federal, state, and local agencies that have jurisdiction over these facilities.

4. Noise: The applicant has presented multiple uses that are likely to generate noise as part of the PUD, including the multi-use district, a golf course, and a ski area with snowmaking. The applicant did not provide a noise study to analyze the potential noise generated by these uses and their potential effects on residents.

Staff recommends a condition of approval to include a noise study to examine if the noise generated by proposed uses other than residential at the PUD will exceed CRS 25-12-103 Sound Standards.

5. Radon: *Staff recommends that any new buildings constructed utilize radon-resistant new construction (RRNC) practices to prevent radon gas exposure, which is the leading cause of lung cancer among non-smokers in Colorado. After construction, a radon test should be conducted, and a fan installed on the pre-installed passive system if necessary. Free radon test kits are available at Garfield County Public Health offices in Rifle and Glenwood Springs and at the Clean Energy Economy for the Region (CLEER) located at the Third Street Center in Carbondale.*

Thank you,



Edward R. "Ted" White, P.E.
Environmental Health Specialist III
Garfield County Public Health
2014 Blake Avenue
Glenwood Springs, CO 81601
(970) 665-6383
twhite@garfield-county.com

**MOUNTAIN CROSS
ENGINEERING, INC.**

Civil and Environmental Consulting and Design

February 06, 2024

Mr. Glenn Hartmann
Garfield County Planning
108 8th Street, Suite 401
Glenwood Springs, CO 81601

RE: Spring Valley Ranch PUD Application: PUA-05-23-8967

Dear Glenn:

This office has reviewed the documents provided for the Substantial Modification/Amendment application for Spring Valley Ranch PUD. The submittal was found to be thorough and well organized. The review generated the following comments:

1. The Applicant should provide a plan showing the proposed intersection improvements with Hwy 82 and Red Canyon Road/CR 115.
2. The Applicant states that RFTA service does not extend up to the proposed PUD. The Applicant should address if RFTA services would be extended as the project is built out.
3. The Impact Analysis mentions the Ute Ladies-Tresses as an endangered species but does not address if the proposed PUD will have any impacts on habitat or plants.
4. The Existing Drainage & Flood Hazard Report does not estimate the impacts that the proposed PUD would have on the post-project runoff flow-rates. The Applicant should address how and where the anticipated increase in runoff flow rates will be mitigated to provide locations for storm water appurtenances.
5. The PUD Guide should discuss hunting and whether or not it will be allowed.
6. Time frames for what would be considered as "temporary" for industrial uses should be included in the PUD Guide.
7. Shared driveways are proposed as two 8' lanes, with a 16' total width. This would be considered too narrow for emergency vehicles to pass other vehicles. Consideration should be given to increase to 10' lanes with a 20' width and/or provisions added for longer lengths of shared driveways to require pull-outs.
8. Maximum grades of 12% is proposed for driveways. This is generally considered too steep for fire and emergency vehicles. The maximum grade should be changed to 10% or limitations placed on when 12% grades would be allowed.
9. Site specific geo-hazard analysis should be included with site specific geotechnical reports for building permitting. Mitigation should be required as might be necessary.

Feel free to call if you have any questions or comments.

Sincerely,

Mountain Cross Engineering, Inc.
Chris Hale, PE

Glenn Hartmann

From: Chris@mountaincross-eng.com
Sent: Tuesday, August 15, 2023 12:13 PM
To: Glenn Hartmann
Subject: RE: Courtesy Referral Spring Valley Ranch PUD Amendment

Glenn:

The application materials that were provided were reviewed for completeness. A complete review of the materials was not performed at this time with the assumption that the final/complete application will be provided for comments in the future. If this assumption is incorrect, please let me know and I will conduct a more thorough review. Concerning the completeness of the information provided:

- The Application materials are somewhat vague on the Winter Recreation facilities. A small ski area would require infrastructure and perhaps ski lifts that would introduce another entity for approvals.
- The traffic analysis is thorough however the recommendations for improvements to each of the intersections was not apparent.
- The drainage report doesn't provide an analysis of the post development conditions, i.e. regional detention ponds, preliminary pipe sizes, etc.
- The Applicant should provide a preliminary/conceptual drainage plan. This would ideally help set up planned locations for future stormwater detention treatment/storage areas.
- There was not a will serve letter provided from the natural gas company.
- The application materials did not mention or include avalanches in the geo-hazard analysis.
- The application materials did not evaluate steep slopes or a slope analysis.
- The water system layout should have a system analysis/verification of pipe sizes and fire flows. Additionally verification of tank volumes and locations would be helpful. Upper tank location feasibility for construction and access should be verified. Additionally the Applicant might consider dual tanks or an alternative location for redundancy in the upper zone to allow for water service to continue during repairs and maintenance. These could have impacts on the PUD zoning.

Call or email any questions or comments. Let me know if this email is sufficient or if you would prefer the comments be in a formal letter. Thanks.

Sincerely,
Mountain Cross
Engineering, Inc.
Chris Hale, P.E.
826 1/2 Grand Avenue
Glenwood Springs, CO 81601
Ph: 970.945.5544
Fx: 970.945.5558

From: Glenn Hartmann <ghartmann@garfield-county.com>
Sent: Wednesday, July 26, 2023 8:02 PM
To: Hannah Klausman <hannah.klausman@cogs.us>; jbarnes@carbondaleco.net; Chris Hale <Chris@mountaincross-eng.com>; Brian Killian - CDOT <brian.killian@state.co.us>; Robin Pitt <robin.pitt@cogs.us>; koliver@carbondalefire.org;

Bill Gavette <gavette@carbondairefire.org>

Subject: Courtesy Referral Spring Valley Ranch PUD Amendment

Dear Hannah, Jared, Chris, Brian, Robin and Bill: Attached below is a link to the Spring Valley Ranch PUD Amendment Application. While we are still doing completeness review of the major application submittals we are referring it to you for your initial review and preliminary comments. This referral is consistent with the IGA between the County and local municipalities. Once the Application is determined to be complete another referral and comment period on the Application (including any updates/additions) will occur.

This referral will give you the opportunity to identify any areas of the submittals which are deficient or for which you feel additional Application materials are warranted. The goal is to ensure a thorough and complete review process. In addition to any comments if you would like to meet with County Staff and/or the Applicant please let me know and we can set that up as well.

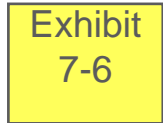
<https://www.dropbox.com/scl/fo/7zgrcrot4suge5daf9rzo/h?dl=0&rlkey=0ba3pz5is7rgmaep7nmnv7rq5>

If you can provide your initial thoughts by August 16th that timing would be most appreciated. Thanks very much for your assistance with this major project review.

Sincerely,

Glenn Hartmann
Principal Planner
970-945-1377 x1570
Ghartmann@garfield-county.com

From: [Dale Stephens](#)
To: [Glenn Hartmann](#)
Cc: [Philip Berry](#)
Subject: Spring valley
Date: Monday, January 13, 2025 2:14:52 PM



Good afternoon, After our meeting last week I said that I would put to gather a list of issues on county roads 110,114,and115. After driving these areas with the District Forman hear is what we came up with.

1. Having accel and deceleration lanes out of the subdivisions coming up 114. (Paint Brush WY, Pinyon Mesa DR. 110 and 114 Intersection, Auburn Ridge Ln.and the Colorado Animal Rescue and the easterly entrance into the Collage.)These turn lanes in my opinion should be addresses sooner than later.
2. The intersection on 114 and 115 should be converted into a three way stop intersection or a traffic circle instead of the current intersection.
3. Red Canyon needs to be widened 24 ft. and guardrail installed in the canyon itself. If widening cant be accomplished this should be a one lane road down hill traffic only. This would keep construction traffic and the public going the same direction in the canyon and people not having to back up with trailers ect. As of now if you meet someone in the canyon one party is having to move out of the way to get passed each other.

I believe this should all be done in their first phase of construction, And was wondering about having a bond on the road during the construction phases. Let me know what you think.

Thanks,Dale

From: [Wyatt Keesbery](#)
To: [Glenn Hartmann](#); [Philip Berry](#)
Cc: [Dale Stephens](#); [Harry Shiles](#)
Subject: RE: Spring Valley Ranch PUD Amendment Referral Request
Date: Tuesday, January 30, 2024 7:54:27 AM

All,

I will stick with my comments I have expressed in the past. CR 115 is not a viable route, and I would like to see it used as emergency access only, but that is a BOCC decision. The intersection of CR 114 and Hwy 82 needs fixed, as it currently is a mess. The additional traffic will just create more congestion issues. There will need to be appropriate stacking and a proper turn lane on CR 114 and a sufficient acceleration lane installed on HWY 82. CR 114 and CR 115 will also need to have sufficient turn lanes into the housing areas, and upgrades to the road will need to be addressed as well.

Thanks

Wyatt

WYATT KEESBERY
DIRECTOR
GARFIELD COUNTY ROAD AND BRIDGE
0298 CR 333A
RIFLE, CO. 81650
WKEESBERY@GARFIELD-COUNTY.COM
970-625-8601 OFFICE
970-309-6073 CELL

From: Glenn Hartmann <ghartmann@garfield-county.com>

Sent: Friday, January 19, 2024 10:50 AM

To: Kelly Cave <kcave@garfield-county.com>; Casey Lawrence <clawrence@garfield-county.com>; Chris Bornholdt <cbornholdt@garcosheriff.com>; Ted White <twhite@garfield-county.com>; Jannette Whitcomb <jwhitcomb@garfield-county.com>; DJ Ridgeway <djridgeway@garfield-county.com>; Dan Goin <dagoin@garfield-county.com>; Harry Shiles <hshiles@garfield-county.com>; Dale Stephens <dstephens@garfield-county.com>; Wyatt Keesbery <wkeesbery@garfield-county.com>; Levy Burris <lburris@garcosheriff.com>; Scott Aibner <saibner@garfield-county.com>; Steve Anthony <santhony@garfield-county.com>; Sarah LaRose <slarose@garfield-county.com>; Brian Killian - CDOT <brian.killian@state.co.us>; Sullivan - DNR, Megan <megan.sullivan@state.co.us>; kamie.long@colostate.edu; CGS_LUR <CGS_LUR@mines.edu>; Localreferral - CDPHE, CDPHE <cdphe_localreferral@state.co.us>; Matt Yamashita <matt.yamashita@state.co.us>; John Groves (John.Groves@State.co.us) <John.Groves@State.co.us>; Boyatt - DNR, Peter <peter.boyatt@state.co.us>; Canetti - DNR, Samantha <samantha.canetti@state.co.us>; jake.stanton@state.co.us; SPA-RD-CO <spa-rd-co@usace.army.mil>; RLSnyder@blm.gov; Larry Sandoval <lsandoval@blm.gov>; nyla_murphy@fws.gov; jkirschvink@fs.fed.us; joseph.fazzi@usda.gov; jbarnes@carbondaleco.net; Hannah Klausman <hannah.klausman@cogs.us>; Bill Gibson <bill.gibson@eaglecounty.us>; Chris Hale <Chris@mountaincross-eng.com>; Karl Oliver <koliver@carbondalefire.org>; Robin Pitt <robin.pitt@cogs.us>; acole@rfschools.com; Eric Mangeot <eric.mangeot@lrewater.com>; Rick Lofaro <rick@roaringfork.org>; gcha@garfieldhousing.com; cheryl@garfieldhousing.com; Cox, Jason



Date: February 13, 2024

To: Glenn Hartmann & Philip Berry, Garfield County Community Development

From: Sarah LaRose & Steve Anthony, Garfield County Vegetation Management

Re: Vegetation Management Comments on Spring Valley Ranch PUD – Substantial Modification/Amendment, PUA-05-23-8967

Dear Mr. Hartmann and Mr. Berry,

In regards to the application for the Spring Valley Ranch PUD – Substantial Modification/Amendment, PUA-05-23-8967, Garfield County Vegetation Management would like to request the following of the applicant at the time of preliminary planning:

- 1) **Noxious Weed Inventory:** An updated Noxious Weed Survey performed by a qualified plant ecologist or botanist during the growing season.

While the current Weed Management Plan does contain findings from a January 2022 weed survey, staff has concerns that species present during the initial submission period (2009/2010) may still be present but were not detected at the time of this survey. Specific weeds of concern include: absinth wormwood (*Artemisia absinthium*), diffuse knapweed (*Centaurea diffusa*), Canada thistle (*Cirsium arvense*), plumeless thistle (*Carduus acanthoides*), common burdock (*Arctium minus*), Dalmatian toadflax (*Linaria dalmatica*), houndstongue (*Cynoglossum officinale*), leafy spurge (*Euphorbia esula*), musk thistle (*Carduus nutans*), Russian knapweed (*Rhaponticum repens*), Scotch thistle (*Onopordum acanthium*), and yellow toadflax (*Linaria vulgaris*).

- 2) **Rare Plant Survey:** A survey performed by a qualified plant ecologist or botanist for Harrington's Penstemon (*Penstemon harringtonii*).

This plant is ranked globally as a G3 and statewide as an S3 by the Colorado Natural Heritage Program, meaning it is considered "vulnerable through its range or found locally in a restricted range (21 to 100 occurrences, or 3,000 to 10,000 individuals)".

- This plant is found exclusively in Colorado. There are 74 known occurrences in Eagle, Garfield, Grand, Pitkin, Routt, and Summit counties. It is found primarily in dry, sagebrush-dominated communities between 6,400 and 9,400 feet in elevation. USDA

Forest Service Region 2 has designated *P. harringtonii* a sensitive species; it is also included on the Bureau of Land Management Colorado State Sensitive Species List. It is not listed as threatened or endangered under the Federal Endangered Species Act, nor is it currently a candidate for listing.

- If found, the locations of *P. harringtonii* shall be identified in general terms as they pertain to building envelopes. In addition, an acknowledgment and reference to Harrington's penstemon in the covenants may help increase awareness of this plant and alert property owners of its significance.

- 3) Prior to initiating any project or phase of the Spring Valley Ranch PUD, staff will require the submission of the following:
 - Revegetation and Disturbance Reclamation Plan and Cost Estimate (by a qualified landscape architect)
 - Financial Security to Guarantee Revegetation and Reclamation
 - Weed Management and Reclamation Plan (see required elements below)

Required Elements of Weed Management and Reclamation Plan:

The purpose of the Weed Management and Reclamation plan is to ensure that the development does not result in: (i) erosion and dust generation, (ii) the propagation of noxious weeds, (iii) the excessive loss of wildlife habitat and food sources, and (iv) long-term visual eyesores. The financial security allows the County to perform reclamation in the event that the developer abandons the project or does not perform adequate reclamation.

The Weed Management and Reclamation Plan must discuss the following:

Section 1: Soil Handling

Must include: (i) the area of land disturbed and volume of soil moved, (ii) provisions for salvaging on-site topsoil, (iii) a timetable for eliminating topsoil and/or aggregate piles, (iv) plan that provides for soil cover if any disturbances or stockpiles sit exposed for a period of 90 days or more, and (v) erosion control and dust suppression measures and management.

Section 2: Weed Management Plan

Must include: (i) An inventory and site map that shows County Listed Noxious Weeds and Colorado Listed A & B Noxious Weeds; (ii) A Weed Management Plan that addresses inventoried weeds in a timely and effective manner (note: Garfield County may require the submittal of treatment records); and (iii) persons or entities responsible for continued monitoring and mitigation of any State of Colorado listed noxious weeds within the area as well as prescribed treatment method(s) and timing

Section 3: Site Revegetation and Reclamation

Must include: (i) plant material list (be specific, scientific and common names required); (ii) planting schedule (include timing, methods, and provisions for watering, if applicable); and (iii) a map of the area that will be disturbed. (Note: Any straw or hay used as mulch or as an erosion control barrier must be certified as weed-free by the State of Colorado Department of Agriculture).

Section 4: Cost Estimate

Cost estimate is used to determine the amount of the financial security and must be provided by a qualified landscape architect. Line items within the cost estimate must include: (i) mobilization; (ii) earthmoving; (iii) seed and planting; (iv) mulch, erosion control, and dust suppression; (iv) irrigation; and (v) weed management.

The applicant will need to quantify the surface area of disturbance that would need to be reseeded. These areas would be outside of building envelopes and landscape situations and would be road shoulders (not the actual road), utility easements, and common areas (that aren't landscaped). This information would determine if a revegetation security is necessary. The minimum area threshold of surface area disturbance in which a security may be required is 1 acre.

Financial Security:

The security may be in the form of a bond, letter of credit, or cash through a Treasurer's Deposit Agreement. If the applicant uses a bond for security, it will be their responsibility to make sure that the bond is kept current and renewed until the vegetation has been successfully reestablished according to the Reclamation Standards section in the Garfield County Weed Management Plan. The Standards at the date of permit issuance are cited in Sections 4.06, 4.07 and 4.08 of the Plan.

Please provide the County Attorney's Office with bond continuation certificates when there is a renewal.

County Inspection and Release of Financial Security: When the project has been completed and vegetation reestablished, the developer (permit holder) calls the County Vegetation Manager (970-945-1377 x 4315) and requests an inspection. If the vegetation has been successfully established the Vegetation Management Department will bring the security release request to the Board of County Commissioners for their consideration.



COLORADO

Parks and Wildlife

Department of Natural Resources

Glenwood Springs (Area 8) Service Center
0088 Wildlife Way
Glenwood Springs, CO 81601
970.947.2920

Exhibit
7-8

9/3/2024

Garfield County Community Development Department
108 8th Street, Suite 401
Glenwood Springs, Colorado 81601

Attention: Glenn Hartmann, Director, and Philip Berry, Planner III

Re: PUA-05-23-8967 Spring Valley Ranch PUD - Substantial Modification/Amendment

Dear Mr. Hartmann and Mr. Berry,

Colorado Parks & Wildlife (CPW) appreciates the opportunity to further comment on the Spring Valley Ranch PUD - Substantial Modification/Amendment. CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors.

CPW will not be a signatory to the current Wildlife Baseline Conditions and Mitigation Plan at this time, as we cannot agree that the wildlife impacts associated with developing the Spring Valley Ranch PUD would be addressed were this plan to be implemented.

Communications Summary

CPW, Storied Living, and their representatives have communicated about the Spring Valley PUD since November 2022. CPW's February 27, 2024 comment letter submitted to Garfield County clarifies interactions between these parties during that timeframe. Since the February 27, 2024 comment letter, CPW has communicated with Kelly Colfer regarding the Wildlife Baseline Conditions and Mitigation Plan (WMP). Mr. Colfer met virtually with CPW representatives on March 8, 2024, to discuss outstanding concerns. Subsequent email exchanges occurred. On May 6, 2024, CPW provided Kelly Colfer with a technical feedback document on the WMP as submitted to CPW on April 11, 2024. This technical feedback document stated that "CPW cannot 'agree that the wildlife impacts associated with the development of the Spring Valley Ranch PUD would be addressed were this plan to be implemented.'" CPW will not be a signatory to the WMP for this development. CPW will continue to work with Garfield County to have our requests incorporated via the



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair • Richard Reading, Vice-Chair • Karen Bailey, Secretary • Jessica Beaulieu
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county approval process.” On May 8, 2024, Mr. Colfer requested clarification that CPW would not sign the WMP. CPW’s stance was clearly stated in the March 8, 2024, virtual meeting and reiterated in the technical feedback document. On May 9, 2024, CPW responded via email that it was Mr. Colfer’s decision to leave the signatory line in or to remove it; CPW further clarified the decision to decline signing the WMP. Mr. Colfer replied that the endorsement and signature sections of the Report would be removed.

The final WMP was delivered to CPW as a courtesy on June 3, 2024 (about a week after the PUD was resubmitted to Garfield County, per Mr. Colfer’s estimation) with the endorsement and signature sections still present. CPW has concerns that the final WMP language stating “By its execution of this document, CPW hereby agrees that the wildlife impacts associated with the development of the Spring Valley Ranch PUD would be addressed were this plan to be implemented” misrepresents CPW’s position.

Mitigation Hierarchy Application

The Wildlife Mitigation Plan proposes a .4% transfer tax to fund wildlife habitat improvement projects. CPW urges Garfield County to require the real estate transfer fee percentage be 0.75% via a Condition of Approval or other regulatory mechanism.

CPW utilizes the mitigation hierarchy of avoid, minimize, and mitigate when analyzing land use proposals. Avoidance measures leave wildlife habitat functionally intact with no direct, indirect, or cumulative adverse impacts to wildlife resources. Minimization efforts reduce adverse impacts on wildlife resources from anthropogenic disturbance. Still, minimization efforts will not compensate for the permanent loss of wildlife habitat and the associated direct and indirect impacts to wildlife resources within, and adjacent to, the footprint of a proposal such as this. Effective mitigation would result in habitat uplift or improvement for the impacted wildlife populations at spatial and temporal scales equal to, or exceeding the proposed anthropogenic disturbances. In the immediate area, a 1:1 ratio protecting 5,908 off-site acres in perpetuity is difficult or impossible to achieve. Few neighboring landscapes offer the same acreage of quality habitat. The requirement of a meaningful real estate transfer fee will help minimize, and in some scenarios begin to mitigate, the impacts of this development. The costs associated with appropriate habitat uplift projects in the immediate area will be extremely high.

Section 6.4.1.7 of the WMP summarizes avoidance measures but does not distinguish between direct and indirect impacts on wildlife. Direct impacts occur from the conversion of habitat; indirect impacts occur from altered wildlife behavior in response to habitat conversions and changing landscape uses. Indirect impacts to elk and mule deer remain on the portions of Spring Valley Ranch that are not subject to full habitat conversion.



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair • Richard Reading, Vice-Chair • Karen Bailey, Secretary • Jessica Beaulieu

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- The WMP should clarify that the development proposal “Avoid direct impacts to 58% of the elk production range on Spring Valley Ranch.’
- The WMP should clarify that the development proposal “Avoid direct impacts to 54% of elk winter range on Spring Valley Ranch.
- Regarding the “Avoid impacts to active raptors nests” statement: CPW did not identify any minimization measure listed in the WMP for raptors or migratory birds. Avoidance measures would include conducting annual nesting surveys before commencing construction or disturbance activities. Requiring meaningful avoidance measures to avoid impacts on raptors and migratory birds will help Spring Valley Ranch remain in compliance with the Migratory Bird Treaty Act.

Section 6.4.1.7 of the WMP summarizes the minimization measures, which includes the statement “CPW Indemnification from Wildlife Damage Claims.” This is not a minimization measure, as this does not provide any direct benefit to a wildlife population. This is a stand-alone statement that should be expanded upon elsewhere in the WMP; the context for this statement is critical and implementation will be subject to relevant state statutes.

Additional Comments & Context

In the technical feedback document provided to Spring Valley Ranch on May 6, 2024, CPW requested that the WMP prohibit the placement of pet food outside to reduce wildlife and domestic pet conflicts. This language was not incorporated. CPW also requested that the WMP acknowledge the Garfield County Comprehensive Plan, which contains big game management statements. The Garfield County Comprehensive Plan was not incorporated. The technical feedback document provided corrections to elk and mule deer statistics, which were updated; however, the current mule deer statement in section 4.2.2 erroneously references the 2021 post-hunt population estimate and buck-to-doe ratios (this should reference the 2023 post-hunt population and buck-to-doe ratios).

For a complete understanding of the wildlife resources impacted by this proposal, please review CPW’s comment letter to Garfield County dated February 27, 2024. This letter provides critical background information on the impacted wildlife resources and justification for protecting those resources (including economic value to Garfield County and the State of Colorado). In summary, the Spring Valley PUD is located within the following [High Priority Habitats](#)¹, for which CPW has sound spatial data and science-backed avoidance, minimization, and mitigation recommendations:

¹ Colorado Parks & Wildlife. (n.d.). Colorado Parks & Wildlife Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado. High Priority Habitats. https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf



Jeff Davis, Director, Colorado Parks and Wildlife

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- Elk winter concentration areas: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.
- Elk production areas: Defined as that part of the overall range of elk occupied by the females of the species from May 15 to June 15 for calving. Only known areas are mapped and this does not include all production areas for the elk Data Analysis Unit.
- Mule deer winter concentration area: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.

Thank you for considering CPW's comments on the Spring Valley Ranch PUD - Substantial Modification/Amendment application. Please contact the following CPW staff to discuss the content of this letter.

- Peter Boyatt, District Wildlife Manager, at peter.boyatt@state.co.us
- Matt Yamashita, Area 8 Area Wildlife Manager, at matt.yamashita@state.co.us
- Dani Neumann, NW Region Land Use Specialist, at danielle.neumann@state.co.us

Sincerely,



Matt Yamashita, Area 8 Area Wildlife Manager



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Dallas May, Chair • Richard Reading, Vice-Chair • Karen Bailey, Secretary • Jessica Beaulieu

Marie Haskett • Jack Murphy • Gabriel Otero • Duke Phillips, IV • James Jay Tutchton • Eden Vardy



COLORADO

Parks and Wildlife

Department of Natural Resources

Glenwood Springs (Area 8) Service Center
0088 Wildlife Way
Glenwood Springs, CO 81601
970.947.2920

February 27, 2024

Garfield County Community Development Department
108 8th Street, Suite 401
Glenwood Springs, Colorado 81601

Attention: Glenn Hartmann, Director, and Philip Berry, Planner III
Re: PUA-05-23-8967 Spring Valley Ranch PUD - Substantial Modification/Amendment

Dear Mr. Hartmann and Mr. Berry,

Colorado Parks & Wildlife (CPW) appreciates the opportunity to comment on the Spring Valley Ranch PUD - Substantial Modification/Amendment. CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors.

The Spring Valley Ranch PUD is located about 3 miles east of Glenwood Springs and encompasses 5,908.43 acres. The current application includes 577 residential units, an 18-hole golf course and short golf course, and numerous non-residential supporting uses and structures. The current application maintains the approved density of 577 residential units in a more clustered format than previous iterations. This allows for more open space with 15-20 miles of new public mountain bike trails, wildlife habitat reserves, golf courses, and ski trails.

CPW amends our previous letter dated February 20, 2024, to clarify meetings held with Storied Living and Kelly Colfer of Western Bionomics to discuss the Spring Valley Ranch PUD. CPW staff attended a virtual meeting with Kelly Colfer on November 11, 2022, for a preliminary discussion. This was followed by a meeting with Kelly Colfer, Storied Living representatives, and CPW staff on December 13, 2022, at the CPW Glenwood Springs Service Center. The Spring Valley Ranch PUD team explained their plans were still under

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development. Broad topics of avoiding, minimizing, and mitigating adverse impacts on wildlife resources were discussed but no specific advice or recommendations were given to the development team by CPW. It was communicated to CPW that the development team would request additional meetings with CPW once the application was closer to the final draft form. One follow-up phone discussion was had with Kelly Colfer in January of 2023 to recap action items discussed at the December 13, 2022 meeting. During the December 13, 2022, meeting (and reiterated in the January 2023 phone discussion) CPW offered to further review the trail design, further discuss a potential agricultural field restoration project, and anticipated the opportunity to review a draft Wildlife Mitigation Plan. CPW has not had any communication with the development team since January of 2023. CPW anticipated attending future meetings with the Spring Valley Ranch PUD development team to proactively discuss avoidance, minimization, and mitigation strategies that reduce adverse impacts on wildlife resources. For the reasons clarified below, CPW has concerns with this proposal and finds the Wildlife Mitigation Plan incomplete; CPW is not ready to sign the Wildlife Mitigation Plan at this time.

General Comments

The Spring Valley PUD is located within the following [High Priority Habitats](#)¹, for which CPW has sound spatial data and science-backed avoidance, minimization, and mitigation recommendations:

- Elk winter concentration areas: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.
- Elk production areas: Defined as that part of the overall range of elk occupied by the females of the species from May 15 to June 15 for calving. Only known areas are mapped and this does not include all production areas for the elk Data Analysis Unit.
- Mule deer winter concentration area: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.

Additional big game habitats include general elk and mule deer winter range and summer concentration areas. CPW understands the desire for additional housing and recreational

¹ Colorado Parks & Wildlife. (n.d.). Colorado Parks & Wildlife Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado. High Priority Habitats. https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf

opportunities but this development will severely fragment and degrade habitat essential for wildlife. While many of the species listed in this letter will be impacted, one species of greater concern is the local elk population. Elk are considered an umbrella species whereby enhancing and protecting elk habitat will indirectly protect other species associated with those habitats. The elk herd (Data Analysis Unit E-16) in this portion of Game Management Unit 444 is generally bounded by I-70 to the North, Glenwood Springs to the West, Hwy 82 to the South, and multiple subdivisions to the East. Spring Valley Ranch represents a significant portion of the local elk herd's available range.

Increased habitat fragmentation from development and recreation will concentrate wildlife into smaller refuges. This increases exposure to disease, causes overutilization of the land resulting in poor habitat quality, causes unwanted impacts to agricultural lands through long-term degradation of forage base, and increases damage to human infrastructure. CPW analyzes direct, indirect, and cumulative impacts on wildlife populations when commenting on land use proposals. Direct impacts result from the habitat conversion due to the proposal's footprint. Indirect impacts on wildlife result from altered behaviors around the footprint of a proposal. Cumulative impacts result from multiple alterations of baseline habitat conditions that impact wildlife populations. It is important to consider the cumulative impacts of multiple projects across this landscape. A single project of this scale will have direct and indirect impacts, both major and minor, but the cumulative impacts of multiple projects on the same landscape can have far greater effects on wildlife. Figure 4. Page 13 of the applicant's narrative report shows a good illustration highlighting current land uses and subdivisions. When factoring in the Lake Springs subdivision and ongoing development at the Elk Springs subdivision, the cumulative effects start to compound.

Elk Herd E-16 is currently managed under the [2013 Frying Pan River Elk Herd E-16 Data Analysis Unit Plan](#)². When this plan was being written, the Garfield County Board of County Commissioners submitted a formal letter during the public comment period. The full version of this letter is located in Appendix 4. The Garfield County Board of County Commissioners requested that CPW manage elk in E-16 at the current population size (plus or minus 20%). In 2023 CPW began updating elk management plans across the Northwest portion of the state, including the Frying Pan River herd. On November 13, 2023, CPW presented to the Garfield County Board of County Commissioners during their scheduled board meeting on the proposed

² Colorado Parks & Wildlife. (n.d.). *E-16 Data Analysis Unit Plan 2013 - Colorado Parks and Wildlife*. E-16 Data Analysis Unit Plan 2013. https://cpw.state.co.us/Documents/Hunting/BigGame/DAU/Elk/E16_FryingPanRiver.pdf

elk management objectives for the upcoming 2024 Frying Pan Elk Herd E-16 Data Analysis Unit Plan. At this time, the County Commissioners verbally indicated support to maintain the elk population at current numbers. The loss of over 5,908 acres of critical elk habitat from direct, indirect, and cumulative impacts will make managing to maintain the current elk population challenging.

The Spring Valley Ranch Impacts Analysis document acknowledges that the “E-16 calf ratio has been declining since 1996 (CPW 2013), a sign that herd productivity is declining and a concerning metric for wildlife managers.” This statement refers to calf-to-cow ratios, which is one metric used by CPW to project elk herd health and resilience. For example, 45 calves to 100 cows indicate a stable, sustainable herd. In the last decade, E-16 has experienced low calf-to-cow ratios; averaging calf numbers in the low 30’s per 100 cows. The Spring Valley Ranch Impacts Analysis correctly identifies this trend as a concerning metric for wildlife managers. Increasing development and recreation continue to contribute to low population numbers and herd vitality.

Wildlife Mitigation Strategy

CPW utilizes the mitigation hierarchy of avoid, minimize, and mitigate when analyzing land use proposals. Avoidance measures leave wildlife habitat functionally intact with no direct, indirect, or cumulative adverse impacts to wildlife resources. Minimization efforts reduce adverse impacts on wildlife resources from anthropogenic disturbance. Still, minimization efforts will not compensate for the permanent loss of wildlife habitat and the associated direct and indirect impacts to wildlife resources within, and adjacent to, the footprint of a proposal such as this. CPW has noted that 1,100 acres of Wildlife Habitat Reserves are planned to be maintained and native vegetation left intact. Simply avoiding developing the Wildlife Habitat Reserves does not constitute mitigation. The language in this plan assumes that undeveloped portions of Spring Valley Ranch will remain viable, high-quality habitats that will be utilized by big game in the same manner as pre-development. Effective mitigation would result in habitat uplift for the impacted wildlife populations at spatial and temporal scales equal to, or exceeding the proposed anthropogenic disturbances. The establishment of a Wildlife and Wildfire Trust in the form of a real estate transfer tax has been presented as a mitigation option. In the immediate area, a 1:1 ratio protecting 5,908 off-site acres in perpetuity is difficult. Few neighboring landscapes offer the same acreage of quality habitat.

The Wildlife Mitigation Plan proposes a 0.2% transfer tax to fund the Wildlife and Wildfire Trust. CPW suggests increasing the real estate transfer tax percentage to 1.5% with 50% of the revenue allocated to wildlife habitat improvement projects, permanent wildlife habitat protection projects, and code enforcement staff to ensure residential compliance with all wildlife protection codes. The Wildlife and Wildfire Trust charter, which is not currently drafted, should ensure proper wildlife values are at the forefront of fund distribution. Advisory groups, including CPW, should be a part of the Wildlife and Wildfire Trust project evaluations and decisions. CPW urges Garfield County to require meaningful mitigation measures as a Condition of Approval if this application moves forward.

Spring Valley Ranch Impacts Analysis Comments

Section 6.4.1.2 Wildlife Impact Mitigation, found in the Spring Valley Ranch Impacts Analysis document, details avoidance measures. The second and third bullets should state “avoid direct impacts...” These measures do not avoid indirect or cumulative impacts on elk production and winter ranges. The minimization measures proposed appropriately meet the definition of “minimization.” However, the proposed recreation disturbance does not include comprehensive minimization efforts, as detailed further below in our letter. The first bullet point under Mitigation describes the “designation of over 1,100 acres of Wildlife Habitat Reserves.” This designation constitutes an avoidance measure, not a mitigation measure. The proposed mitigation plan language reads “...the Wildlife Mitigation Plan shall not be amended without the written consent of the local CPW District Wildlife Manager and Garfield County Board of County Commissioners.” CPW requests that the Wildlife Mitigation Plan shall not be adopted without the written consent of the local CPW District Wildlife Manager and Garfield County Board of County Commissioners.

Appendix B – Wildlife Baseline Conditions & Mitigation Plan Comments

The county application materials represent the first time CPW has viewed the proposed Wildlife Baseline Conditions & Mitigation Plan, which solicits a CPW signature. CPW finds Appendix B to be incomplete at this time. Appendix B omits mention of indirect and cumulative impacts on wildlife resources and focuses exclusively on direct impacts, in addition to including measures that do not align with CPW’s standard recommendations. As previously noted in our letter, the language in this plan assumes that undeveloped portions of Spring Valley Ranch will remain viable, high-quality habitats that will be utilized by big game in the same manner as pre-development.

Section 6. Wildlife Mitigation Objectives 1-9 detail avoidance and minimization measures as goals. This section should include mitigation goals to fully meet the intent of a Wildlife Mitigation Plan. The recreation minimization language in this section has the same challenges as the recreation minimization language in Section 6.4.1.2 of the Impacts Analysis.

Section 7.1.1 lists Designated Open Space as a wildlife impact avoidance measure. It is unclear to CPW how this Open Space constitutes avoidance of direct, indirect, and cumulative impacts on wildlife resources. Section 7.1.1 states “The Conceptual Plan avoids direct impacts to 55% of the property by setting aside 3,249 acres as open space.” This appears to be misleading, as CPW’s interpretation of these numbers from document 1.05 Conceptual Plan includes the golf course. The conversion of wildlife habitat to a golf course does not constitute avoidance of wildlife impacts. CPW would appreciate clarification of these numbers.

Section 7.2.7 Golf Course and Open Space Management states that “an Open Space Management Plan shall be developed with wildlife habitat preservation and wildfire management in mind as a primary goal.” CPW did not find the complete proposed Open Space Management Plan language within the application materials. Section 7.2.7.a) does prohibit all persons within the PUD from “chasing, scaring, frightening, disturbing, or otherwise harassing wildlife as a part of efforts to force wildlife off golf courses and open space areas during the winter feeding and spring/summer production seasons.” CPW reminds the applicant that harassment of wildlife is already illegal at all times pursuant to Colorado Revised Statute § 33-6-128.

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The Spring Valley PUD is also located within the following habitats, which create human-wildlife conflict concerns:

- Black bear overall range and fall concentration area.
- Mountain lion overall range.

In addition, many other wildlife species utilize the ranch during various times of the year including but not limited to wild turkey, coyote, red fox, bobcat, and numerous small mammals and songbirds. Various raptors and owls utilize the project area as well. Human food sources associated with residential areas, including garbage, pet food, barbeque grills, and birdfeeders, can attract black bears, coyotes, foxes, raccoons, skunks, and other unwanted wildlife. If the Spring Valley PUD is considered for approval, the following recommendations are made to minimize the potential for human-wildlife conflict:

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- No compost piles should be allowed on the property.

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the Northwest Region of Colorado (Garfield County's land mass represents approximately 13% of this region):

- 4,701 jobs.
- \$173,000,000 in salaries and wages.
- \$287,000,000 in GDP contribution.
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The above numbers, sourced from the SCORP, are directly acknowledged in Garfield County's Comprehensive Plan 2030. Garfield County should consider how this application interfaces with Section 8 of the [Garfield County Comprehensive Plan 2030](#)⁷. Together, hunting and fishing contribute \$3.5 billion to Colorado's economy and support more than 25,000 jobs statewide⁸. These numbers further emphasize the importance of maintaining viable wildlife populations for Coloradans.

Thank you for the consideration of CPW's comments on the Spring Valley Ranch PUD - Substantial Modification/Amendment application. Please contact the following CPW staff to discuss the content of this letter.

- Peter Boyatt, District Wildlife Manager, at peter.boyatt@state.co.us
- Matt Yamashita, Area 8 Area Wildlife Manager, at matt.yamashita@state.co.us
- Dani Neumann, NW Region Land Use Specialist, at danielle.neumann@state.co.us

Sincerely,



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Matt Yamashita, Area 8 Area Wildlife Manager

Cc: Peter Boyatt, District Wildlife Manager
Danielle Neumann, Land Use Specialist
Julie Mao, Terrestrial Biologist



COLORADO

Parks and Wildlife

Department of Natural Resources

Glenwood Springs (Area 8) Service Center
0088 Wildlife Way
Glenwood Springs, CO 81601
970.947.2920

Exhibit
7-8
(Previous
Comments)

February 20, 2024

Garfield County Community Development Department
108 8th Street, Suite 401
Glenwood Springs, Colorado 81601

Attention: Glenn Hartmann, Director, and Philip Berry, Planner III
Re: PUA-05-23-8967 Spring Valley Ranch PUD - Substantial Modification/Amendment

Dear Mr. Hartmann and Mr. Berry,

Colorado Parks & Wildlife (CPW) appreciates the opportunity to comment on the Spring Valley Ranch PUD - Substantial Modification/Amendment. CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors.

The Spring Valley Ranch PUD is located about 3 miles east of Glenwood Springs and encompasses 5,908.43 acres. The current application includes 577 residential units, an 18-hole golf course and short golf course, and numerous non-residential supporting uses and structures. The current application maintains the approved density of 577 residential units in a more clustered format than previous iterations. This allows for more open space with 15-20 miles of new public mountain bike trails, wildlife habitat reserves, golf courses, and ski trails.

CPW met with the Spring Valley Ranch PUD development team on November 11, 2022, to discuss the proposal. The Spring Valley Ranch PUD team explained that plans were still under development. Broad topics of avoiding, minimizing, and mitigating adverse impacts on wildlife resources were discussed but no specific advice or recommendations were given to

Jeff Davis, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
Marie Haskett · Jack Murphy · Gabriel Otero · Duke Phillips, IV · Gary T. Skiba · James Jay Tutchton · Eden Vardy



the development team by CPW. It was communicated to CPW that the development team would request additional meetings with CPW once the application was closer to the final draft form. CPW has not had any communication with the development team since the November 11, 2022 meeting. CPW anticipated attending future meetings with the Spring Valley Ranch PUD development team to proactively discuss avoidance, minimization, and mitigation strategies that reduce adverse impacts on wildlife resources. For the reasons clarified below, CPW has concerns with this proposal and finds the Wildlife Mitigation Plan incomplete; CPW is not ready to sign the Wildlife Mitigation Plan at this time.

General Comments

The Spring Valley PUD is located within the following [High Priority Habitats](#)¹, for which CPW has sound spatial data and science-backed avoidance, minimization, and mitigation recommendations:

- Elk winter concentration areas: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.
- Elk production areas: Defined as that part of the overall range of elk occupied by the females of the species from May 15 to June 15 for calving. Only known areas are mapped and this does not include all production areas for the elk Data Analysis Unit.
- Mule deer winter concentration area: Defined as that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average 5 winters out of 10.

Additional big game habitats include general elk and mule deer winter range and summer concentration areas. CPW understands the desire for additional housing and recreational opportunities but this development will severely fragment and degrade habitat essential for wildlife. While many of the species listed in this letter will be impacted, one species of greater concern is the local elk population. Elk are considered an umbrella species whereby enhancing and protecting elk habitat will indirectly protect other species associated with those habitats. The elk herd (Data Analysis Unit E-16) in this portion of Game Management Unit 444 is generally bounded by I-70 to the North, Glenwood Springs to the West, Hwy 82

¹ Colorado Parks & Wildlife. (n.d.). Colorado Parks & Wildlife Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado. High Priority Habitats. https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf

to the South, and multiple subdivisions to the East. Spring Valley Ranch represents a significant portion of the local elk herd's available range.

Increased habitat fragmentation from development and recreation will concentrate wildlife into smaller refuges. This increases exposure to disease, causes overutilization of the land resulting in poor habitat quality, causes unwanted impacts to agricultural lands through long-term degradation of forage base, and increases damage to human infrastructure. CPW analyzes direct, indirect, and cumulative impacts on wildlife populations when commenting on land use proposals. Direct impacts result from the habitat conversion due to the proposal's footprint. Indirect impacts on wildlife result from altered behaviors around the footprint of a proposal. Cumulative impacts result from multiple alterations of baseline habitat conditions that impact wildlife populations. It is important to consider the cumulative impacts of multiple projects across this landscape. A single project of this scale will have direct and indirect impacts, both major and minor, but the cumulative impacts of multiple projects on the same landscape can have far greater effects on wildlife. Figure 4. Page 13 of the applicant's narrative report shows a good illustration highlighting current land uses and subdivisions. When factoring in the Lake Springs subdivision and ongoing development at the Elk Springs subdivision, the cumulative effects start to compound.

Elk Herd E-16 is currently managed under the [2013 Frying Pan River Elk Herd E-16 Data Analysis Unit Plan](#)². When this plan was being written, the Garfield County Board of County Commissioners submitted a formal letter during the public comment period. The full version of this letter is located in Appendix 4. The Garfield County Board of County Commissioners requested that CPW manage elk in E-16 at the current population size (plus or minus 20%). In 2023 CPW began updating elk management plans across the Northwest portion of the state, including the Frying Pan River herd. On November 13, 2023, CPW presented to the Garfield County Board of County Commissioners during their scheduled board meeting on the proposed elk management objectives for the upcoming 2024 Frying Pan Elk Herd E-16 Data Analysis Unit Plan. At this time, the County Commissioners verbally indicated support to maintain the elk population at current numbers. The loss of over 5,908 acres of critical elk habitat from direct, indirect, and cumulative impacts will make managing to maintain the current elk population challenging.

² Colorado Parks & Wildlife. (n.d.). *E-16 Data Analysis Unit Plan 2013 - Colorado Parks and Wildlife*. E-16 Data Analysis Unit Plan 2013. https://cpw.state.co.us/Documents/Hunting/BigGame/DAU/Elk/E16_FryingPanRiver.pdf

The Spring Valley Ranch Impacts Analysis document acknowledges that the “E-16 calf ratio has been declining since 1996 (CPW 2013), a sign that herd productivity is declining and a concerning metric for wildlife managers.” This statement refers to calf-to-cow ratios, which is one metric used by CPW to project elk herd health and resilience. For example, 45 calves to 100 cows indicate a stable, sustainable herd. In the last decade, E-16 has experienced low calf-to-cow ratios; averaging calf numbers in the low 30’s per 100 cows. The Spring Valley Ranch Impacts Analysis correctly identifies this trend as a concerning metric for wildlife managers. Increasing development and recreation continue to contribute to low population numbers and herd vitality.

Wildlife Mitigation Strategy

CPW utilizes the mitigation hierarchy of avoid, minimize, and mitigate when analyzing land use proposals. Avoidance measures leave wildlife habitat functionally intact with no direct, indirect, or cumulative adverse impacts to wildlife resources. Minimization efforts reduce adverse impacts on wildlife resources from anthropogenic disturbance. Still, minimization efforts will not compensate for the permanent loss of wildlife habitat and the associated direct and indirect impacts to wildlife resources within, and adjacent to, the footprint of a proposal such as this. CPW has noted that 1,100 acres of Wildlife Habitat Reserves are planned to be maintained and native vegetation left intact. Simply avoiding developing the Wildlife Habitat Reserves does not constitute mitigation. The language in this plan assumes that undeveloped portions of Spring Valley Ranch will remain viable, high-quality habitats that will be utilized by big game in the same manner as pre-development. Effective mitigation would result in habitat uplift for the impacted wildlife populations at spatial and temporal scales equal to, or exceeding the proposed anthropogenic disturbances. The establishment of a Wildlife and Wildfire Trust in the form of a real estate transfer tax has been presented as a mitigation option. In the immediate area, a 1:1 ratio protecting 5,908 off-site acres in perpetuity is difficult. Few neighboring landscapes offer the same acreage of quality habitat.

The Wildlife Mitigation Plan proposes a 0.2% transfer tax to fund the Wildlife and Wildfire Trust. CPW suggests increasing the real estate transfer tax percentage to 1.5% with 50% of the revenue allocated to wildlife habitat improvement projections, permanent wildlife habitat protection projects, and code enforcement staff to ensure residential compliance with all wildlife protection codes. The Wildlife and Wildfire Trust charter, which is not currently drafted, should ensure proper wildlife values are at the forefront of fund distribution. Advisory groups, including CPW, should be a part of the Wildlife and Wildfire

Trust project evaluations and decisions. CPW urges Garfield County to require meaningful mitigation measures as a Condition of Approval if this application moves forward.

Spring Valley Ranch Impacts Analysis Comments

Section 6.4.1.2 Wildlife Impact Mitigation, found in the Spring Valley Ranch Impacts Analysis document, details avoidance measures. The second and third bullets should state “avoid direct impacts...” These measures do not avoid indirect or cumulative impacts on elk production and winter ranges. The minimization measures proposed appropriately meet the definition of “minimization.” However, the proposed recreation disturbance does not include comprehensive minimization efforts, as detailed further below in our letter. The first bullet point under Mitigation describes the “designation of over 1,100 acres of Wildlife Habitat Reserves.” This designation constitutes an avoidance measure, not a mitigation measure. The proposed mitigation plan language reads “...the Wildlife Mitigation Plan shall not be amended without the written consent of the local CPW District Wildlife Manager and Garfield County Board of County Commissioners.” CPW requests that the Wildlife Mitigation Plan shall not be adopted without the written consent of the local CPW District Wildlife Manager and Garfield County Board of County Commissioners.

Appendix B – Wildlife Baseline Conditions & Mitigation Plan Comments

The county application materials represent the first time CPW has viewed the proposed Wildlife Baseline Conditions & Mitigation Plan, which solicits a CPW signature. CPW finds Appendix B to be incomplete at this time. Appendix B omits mention of indirect and cumulative impacts on wildlife resources and focuses exclusively on direct impacts, in addition to including measures that do not align with CPW’s standard recommendations. As previously noted in our letter, the language in this plan assumes that undeveloped portions of Spring Valley Ranch will remain viable, high-quality habitats that will be utilized by big game in the same manner as pre-development.

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Sincerely,



Matt Yamashita, Area 8 Area Wildlife Manager

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From: [Emery, Ashley R CIV USARMY CESPA \(USA\)](#)
To: [Glenn Hartmann](#); [Philip Berry](#)
Cc: [Crosson, S B \(Brad\) CIV USARMY CESPA \(USA\)](#)
Subject: Comment Request Response // City of Glenwood Springs - Spring Valley Ranch PUD // SPA-2024-00048
Date: Thursday, February 8, 2024 1:37:59 PM

Some people who received this message don't often get email from ashley.r.emery@usace.army.mil. [Learn why this is important](#)

Mr. Berry/Mr. Hartmann,

Thank you for providing the opportunity for the U.S. Army Corps of Engineers to comment on the proposed subject project or activity relative to potential impacts to aquatic resources. **Our initial desktop review of the proposed Spring Valley Ranch PUD indicates that the footprint of the proposed project intersects with potential waters of the United States. However, we would need additional information to provide a definitive determination.** If the activity should have the potential to result in the discharge of dredged or fill material into waters of the United States, then the project proponent should work directly with our office to acquire necessary Department of the Army permits, if applicable, as described in the following paragraphs.

Section 404 of the Clean Water Act requires a permit from us for the discharge of dredged or fill material into waters of the United States. Waters of the United States may include, but are not limited to, rivers, streams, lakes, ponds, wetlands, wet meadows, and seeps. To ascertain the extent of waters on the project site, the project proponent should prepare a delineation of aquatic resources, in accordance with the applicable standards, including the 1987 Wetland Delineation Manual, the Regional Supplement to the Corps of Engineers Delineation Manual: Arid West Region (Version 2.0), and the South Pacific Division's Map and Drawing Standards and Guidelines. These standards can be found on our website at: <https://www.spa.usace.army.mil/Missions/Regulatory-Program-and-Permits/Jurisdiction/>.

An aquatic resource delineation should be evaluated prior to developing a range of alternatives that meet the project purpose. The range of alternatives considered for this project should include alternatives that avoid and minimize impacts to wetlands, streams, or other waters of the United States. In the event it can be clearly demonstrated there are no practicable alternatives to discharging dredged or fill material into waters of the United States, compensatory mitigation may be required.

For more information about our program or to locate a list of consultants that prepare aquatic resource delineations and permit application documents, please visit our website at <https://www.spa.usace.army.mil/Missions/Regulatory-Program-and-Permits>. Please refer to identification number SPA-2024-00048 in any correspondence concerning this project. If you have any questions, please contact me by email at ashley.r.emery@usace.army.mil, or telephone at (970) 243-1199 ext. 1010.

Kind Regards,

Ashley Emery
Northwest Colorado Branch
Albuquerque District
US Army Corps of Engineers
Office: 970-243-1199 ext 1010

February 8, 2024

Spring Valley Ranch PUD Amendment Comments

The staff of the Glenwood Springs Fire Department and the Glenwood Springs Rural Fire Protection district provides the following comments based on referral by the Garfield County planning board. These comments are advisory in nature after only preliminary discussions and initial review of planned amendment to the Spring Valley PUD.

EMS Response:

- With the planned increase in population, the development of recreational facilities and increase in traffic, careful consideration needs to be given to how EMS, specifically Advanced Life Support, is going to be provided.
- With the distance and time for transport to nearest hospital, a dedicated helicopter landing zone should be designated to industry standards for patients with acute needs.

Fire Protection Plan:

- A plan developed to show how the fire station is to be staffed with qualified and trained personnel equipped to deal with fire and EMS needs of the community.
- Agreements formed with Garfield County Communications and surrounding fire departments to operate within the system that is already in place. Several automatic aid agreements and mutual aid agreements are being used to alleviate higher call volumes and share resources for incidents located further away from central areas of current fire districts.
- Homes to be built to the 2021 International Wildland Urban Interface Code standards and have approved NFPA 13D systems installed.

Access:

- We are satisfied that roads within the subdivision will be built to good standard to allow fire department access with turnaround areas, be maintained and kept free of snow during winter, and have adequately spaced fire hydrants.
- There is concern about the quality of Red Canyon Road and the ability to handle extra traffic. We feel that the subdivision should have both Red Canyon and Spring Valley roads bought up to Garfield County Road standards for a two-lane street. Traffic accidents along these routes also create a demand for our resources to be used and there is a history of accidents on Red Canyon due to its narrow conditions.
- A concern about traffic build-up at Red Canyon Rd/Hwy 82 and Spring Valley Road/Hwy 82. Turn lanes and timed traffic control devices to be built to CDOT standards for expected vehicle volume.

No current agreement for fire staffing, use of resources and response between the Landis Creek Metropolitan District and the Glenwood Springs Fire Department exists. It is important for the stakeholders of the Spring Valley PUD subdivision to review the comments provided and continue to consult with Operation Level Chief Officers in the Roaring Fork Valley.

Robin Pitt

Fire Marshal, Glenwood Springs Fire Department

Glenn Hartmann

From: Dan Cokley <DanC@sgm-inc.com>
Sent: Tuesday, August 15, 2023 12:25 PM
To: Glenn Hartmann
Cc: Wyatt Keesbery
Subject: RE: Courtesy Referral Spring Valley Ranch PUD Amendment

Glenn

I have not been able to get into the detail of this report. It's well done, McDowell does good work. A couple questions I have are as follows

- **Internal Trip Reduction** – I do not necessarily agree with the methodology used and the reductions applied but need to get into more detail to technically express that.
 - The SHAC reduction for residential mixed use is acceptable at 2% and 8% (Section 4.3 & Table 4)
 - The GarCo vs On-site employee housing reduction should apply only to “work trips”, 4 per day. Which equates to 14% rather than 23% (Table 4)
 - I do not agree with the Non-Residential trip reduction in Table 5 and would need to spend more time, or have a discussion with McDowell. The standard is to use NCHRP #684 Internal Trip Reduction spreadsheet. Which would result in lower trip reductions. It may not affect the final conclusions.
- **Directional Distribution** – Assuming a 95% (CR 114) and 5% (CR 115) is reasonable if CR 115 is to remain open to public use. If it will be closed, except to emergency vehicles, if a project of this size is approved, the assumption should be used that all traffic uses CR 114. Would like input from the County here. This also probably does not change the conclusions.
- **CR 114 and CR 115 improvements** – Are generally triggered by existing volumes. Would the County like any input on share percentage or anything else from SGM here?

Let me know if you would like to discuss and have me formalize a response.

Thanks,
Dan

From: Glenn Hartmann <ghartmann@garfield-county.com>
Sent: Wednesday, July 26, 2023 8:36 PM
To: Dan Cokley <DanC@sgm-inc.com>
Subject: FW: Courtesy Referral Spring Valley Ranch PUD Amendment

Hi Dan: I intended to include you on this referral. Traffic issues are a key consideration so thanks very much for your preliminary input. Thanks. Glenn.

Glenn Hartmann
Principal Planner
970-945-1377 x1570
Ghartmann@garfield-county.com

From: Glenn Hartmann
Sent: Wednesday, July 26, 2023 8:02 PM
To: Hannah Klausman <hannah.klausman@cogs.us>; 'jbarnes@carbondaleco.net' <jbarnes@carbondaleco.net>; Chris Hale <Chris@mountaincross-eng.com>; Brian Killian - CDOT <brian.killian@state.co.us>; Robin Pitt <robin.pitt@cogs.us>; 'koliver@carbondalefire.org' <koliver@carbondalefire.org>; Bill Gavette

<gavette@carbondalearfire.org>

Subject: Courtesy Referral Spring Valley Ranch PUD Amendment

Dear Hannah, Jared, Chris, Brian, Robin and Bill: Attached below is a link to the Spring Valley Ranch PUD Amendment Application. While we are still doing completeness review of the major application submittals we are referring it to you for your initial review and preliminary comments. This referral is consistent with the IGA between the County and local municipalities. Once the Application is determined to be complete another referral and comment period on the Application (including any updates/additions) will occur.

This referral will give you the opportunity to identify any areas of the submittals with are deficient or for which you feel additional Application materials are warranted. The goal is to ensure a thorough and complete review process. In addition to any comments if you would like to meet with County Staff and/or the Applicant please let me know and we can set that up as well.

<https://www.dropbox.com/scl/fo/7zgrcrot4suge5daf9rzo/h?dl=0&rlkey=Oba3pz5is7rgmaep7nmnv7rq5>

If you can provide your initial thoughts by August 16th that timing would be most appreciated. Thanks very much for your assistance with this major project review.

Sincerely,

Glenn Hartmann
Principal Planner
970-945-1377 x1570
Ghartmann@garfield-county.com

Glenn Hartmann

From: Dan Cokley <DanC@sgm-inc.com>
Sent: Monday, July 31, 2023 8:45 AM
To: Glenn Hartmann
Subject: RE: Courtesy Referral Spring Valley Ranch PUD Amendment

You don't often get email from danc@sgm-inc.com. [Learn why this is important](#)

Hey Glenn, hope you had a good weekend! I will send comments back by 8/16.

Thanks,
Dan

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