



Date: January 26, 2026

To: Alan Goldich, Senior Planner, Routt County

From: Friends of the Yampa

Re: Stagecoach Mountain Ranch Project – Public Comments

Thank you for the opportunity to provide public comments on the proposed Stagecoach Mountain Ranch (SMR). Friends of the Yampa's (FOTY) mission is to protect and enhance the environmental and recreational integrity of the Yampa River and its tributaries through stewardship, advocacy, partnerships, and education. FOTY has significant concerns regarding the impacts to water quality and flora and fauna from the proposed project, as well as the applicant's misapplication of the "unavoidability" criteria for encroaching into waterbody setbacks per the Routt County Unified Development Code.

Water Quality

The logic behind the applicant's Water Quality Monitoring Plan is flawed. The application materials state that the developer will identify two sites (one above the development and one below the development) and, using pre-construction data, will perform a regression on these sites to predict the lower site's water quality based on the upper site's water quality under the conditions that there is no influence on water quality from SMR. The applicant proposes to use this regression to identify if the development is causing water quality degradation, i.e., if the lower site's water quality is worse than predicted by the regression. However, the two proposed sampling sites are located at the upstream and downstream end of the Stetson Ranch parcel, which only accounts for the Raspberry Creek drainage. Impacts from the majority of SMR, and from what appears to be more than half of the drainage area of the ski area, are not captured by these two sites, as the lower sampling site is upstream of where these areas drain into.

FOTY also shares multiple concerns brought up in the comment letters submitted to the Routt County Planning Department from Northwest Colorado Council of Governments Water Quality/Quantity (QQ) and Cirrus Ecological Solutions, LC (Cirrus). First, the applicant's claim that SMR will decrease nutrient loading into Stagecoach Reservoir from current levels is *extremely* flawed due to overestimating current nutrient loads (which, in turn, reduces the future loading attributable to SMR), failing to account for the increased nutrient loading that consistently occurs when land use changes from forested to rural or urban, and Morrison Creek

Metropolitan Water and Sanitation District's statement that the additional wastewater treatment facility (WWTF) demand is forecasted to significantly increase the discharge of nutrients into the reservoir. This is particularly concerning considering that Stagecoach Reservoir is already suffering from the impacts of elevated nutrients in the form of multiple harmful algal blooms. Overall, as pointed out by QQ, the increased nutrient loading doesn't comply with the 208 Plan Policy #1.

Additional concerns previously brought up by QQ and Cirrus that FOTY also shares include the fact that the proposed effectiveness of using stormwater detention basins to manage stormwater runoff contains faulty assumptions, as no details on the dimensions of or management of these basins is supplied, and that the applicant does not discuss how pesticides, fertilizers, algaecides, deicing, and sanding materials will be managed to avoid water quality impacts, which is potentially a violation of 208 Plan Policy #9.

Flora and Fauna

The application does not consider impacts to aquatic wildlife. There is no mention of aquatic wildlife of any type in the Wildlife Mitigation Plan, leaving neither the developer nor the community with the ability to assess the health of these species nor with recommendations for how to mitigate the impacts of increased fishing pressure, prevent the spread of aquatic invasive species, and manage the threat of increased nutrient loading. FOTY agrees with Colorado Department of Wildlife's (CPW) request for an Aquatics Management Plan in their review letter.

On a related note, the applicant makes no mention of aligning the project and land management activities with CPW's Beaver Management and Conservation Strategy (BMCS), expected to be completed in late February 2026. This strategy codifies beavers as a keystone species of Colorado's rivers, streams, and wetlands, with the overall goal of the strategy being to "increase and sustain the prevalence of beaver and beaver-influenced wetlands in suitable habitats for the benefit of Colorado's stream and wetland ecosystems and the array of wildlife species that utilize them." The Aquatics Management Plan requested above should explicitly adopt a policy of coexistence with beaver in the event of human-beaver conflicts like flooding and should include a policy to avoid lethal removal or translocation unless all other available options have been exhausted through consultation with a beaver management professional.

Further related to aquatic wildlife, FOTY echoes CPW's concern with the applicant's plans to site the equestrian barn and septic systems in the Stetson Ranch area near the river due to the real threat of nutrient loading from waste, as CPW has identified this reach as high priority habitat for aquatic sportfish.

The Stetson Ranch management plans are further lacking because there is no consideration for how the 2.1 miles of river frontage through this parcel will be managed. This is a significant

reach of the Yampa River, and the applicant should develop a full management plan for how to maintain river and riparian health in this section, including plans for supporting riparian vegetation, managing recreational access, and preventing the introduction of aquatic nuisance species (ANS). Because most SMR members will reside in watersheds outside the Yampa for the majority of the year and because many of the top aquatic nuisance species (ANS) of concern (zebra mussels, quagga mussels, and New Zealand mud snails) can survive outside of the water on recreational gear for weeks on end, developing and operationalizing procedures to prevent ANS introduction will be crucial for maintaining the health of not only this section of river but the health of the Yampa watershed as a whole.

Further complicating how to maintain the health of this section of river is the fact that the wetlands mapping conducted as part of the application is inadequate, as the Stetson Ranch parcel wasn't mapped during wetland mapping. However, this is the area of SMR that contains the county's most valuable natural resource — the Yampa River. Avoiding encroaching into wetland on this parcel is therefore of the utmost importance to protect the river's health, and it obviously requires comprehensive and accurate wetland delineations to accomplish this avoidance. Additionally, the company that performed the wetlands delineation, Western Bionomics, has no website and is not included on the US Army Corps of Engineers' list of aquatic resource delineation consultants, calling the accuracy of the delineations in the areas of SMR that were mapped into question.

Finally, management of invasive plants is not well thought out. The application materials contain no mention of coordinating with the Routt County Weed Program (RCWP) or aligning activities with the County's Weed Management Plan. In fact, they don't mention RCWP at all other than to say that they're available for technical assistance. Moreover, it's highly concerning that the applicant proposes for the Homeowners' Association to be the entity providing technical assistance and education relating to invasive plant management, not the RCWP, when the RCWP is the local entity with the most knowledge and expertise relating to this topic.

Waterbody Setback Encroachments

The applicant proposes to encroach into the waterbody setback in 19 different areas of SMR. It is particularly alarming that 11 of these proposed waterbody encroachments are ski runs, as the applicant has proposed using treated effluent for snowmaking. This process typically does not remove PFAS and other "forever chemicals" that persist in the environment indefinitely, not does it remove pharmaceuticals. The impacts of applying these emerging contaminants to uplands on wildlife, vegetation, and humans are not well understood, and treated wastewater typically contains elevated salt levels, which can change spring runoff patterns due to impacts to soil porosity and soil moisture.

The evidence presented by the applicant in their request for variances to be granted for the proposed waterbody setback encroachments (i.e., the evidence for “unavoidability”) is inadequate and often misapplied. First, the applicant argues that the connection of proposed ski runs to existing ski runs is required to safely route skiers to termination points as evidence of the unavoidability clause 3.31.E.2.a, “Construction outside the setback would substantially create or contribute to a hazardous condition.” However, setbacks are important tools for protecting water resources, and the developer should make every effort to design its ski runs both for the safety of their clients and in compliance with waterbody setbacks.

Similarly, the applicant argues that the interconnectivity of proposed roadways and proposed ski runs to existing infrastructure is required for the development to proceed as evidence of the unavoidability clause 3.31.E.2.e, “Denial of the proposed development in the setback would result in denying the landowner all economically viable use of the subject parcel.” Denying roads and ski runs in certain areas would not deny all economic profitability of the development, as there are many revenue streams from different areas of the development: the proposed marketplace, the wellness center, and other commercial spaces are a few examples. FOTY doubts that all of these ski runs and roads are required to make the development economically viable.

Finally, the applicant argues that the proposed roads provide roadside ditches to route runoff away from roadways and proposed infrastructure to mitigate the risk of potential hazards, and that culverts are proposed at waterbody crossings to route water beneath roadways as evidence of the unavoidability clause 3.31.E.2.g, “The proposed development consists of a structure or other improvement to eliminate or reduce potential flood hazards or damage.” This is a blatant misapplication of the unavoidability clause, as this exemption is for structures that are built *specifically* to protect existing structures (like a new berm to protect an existing road), not for new structures that include a structure to reduce flood hazards.

In relation to the overall criteria for granting variances for encroaching into waterbody setbacks, the Routt County Unified Development Code specifies that variances will only be granted when “all adverse impacts will be adequately mitigated” (3.31.E.2.c). These mitigation measures include requirements like preserving existing significant vegetation within and surrounding wetlands areas (3.31.F.1.b), replacing disturbed wetlands areas in-kind and on-site (3.31.F.2.c), and avoiding disturbance of streambeds, stream banks, and streamside vegetation (3.31.F.1.d). In response to how adverse impacts will be adequately mitigated per subsection 3.31F, the applicant states on page 5 of their “Waterbody Setback Encroachment” narrative that “a Habitat Restoration and Revegetation Plan [“the Plan”] is provided with this application that demonstrates restoration of disturbed wetland areas.” However, no mention is made in the Plan of preserving existing significant vegetation nor of avoiding disturbance of streambeds and riparian areas. Perhaps most concerning is that many of the species listed in the Plan’s restoration and revegetation seed mixes for areas impacted by roadways and ski runs – the two types of

infrastructure proposed to encroach on wetlands and waterbodies – are upland vegetation species, including serviceberry, lupine, and Oregon grape. There does not appear to be any specialized consideration given to the restoration or mitigation of wetlands damaged as part of the proposed project’s activities. The application therefore fails to meet the requirement of the Unified Development Code to mitigate adverse impacts to waterbodies and wetlands.

Additional Concerns

FOTY echoes the concerns expressed in the comment letters from MCMWSD, Upper Yampa Water Conservancy District (UYWCD), and Cirrus that 1) the developers’ proposed delay in assisting MCMWSD in applying for a new discharge permit and upgrading the MCMWSD wastewater treatment facility (WWTF) is unacceptable, 2) the irrigation water source and associated calculations are mere assumptions, 3) the applicant’s assumption that treated wastewater will be available to use for snowmaking is inappropriate, as this is not currently an approved use of treated wastewater in Colorado, and 4) the developer should support the existing USGS water quality program currently managed by Routt County and incorporate new monitoring sites into this program instead of starting their own.

FOTY appreciates the opportunity to participate in the public comment process for the proposed Stagecoach Mountain Ranch project. Our organization’s mission compels us to address our concerns with projects that have the potential to impact the environmental and recreational integrity of the Yampa River system, which includes SMR. We request that the Planning Department consider our comments when reviewing the developer’s resubmittal applications and when developing a recommendation to the Planning Commission and Board of County Commissioners on whether to approve this project.

Sincerely,

Karen Wogsland
President, Board of Directors
Friends of the Yampa