

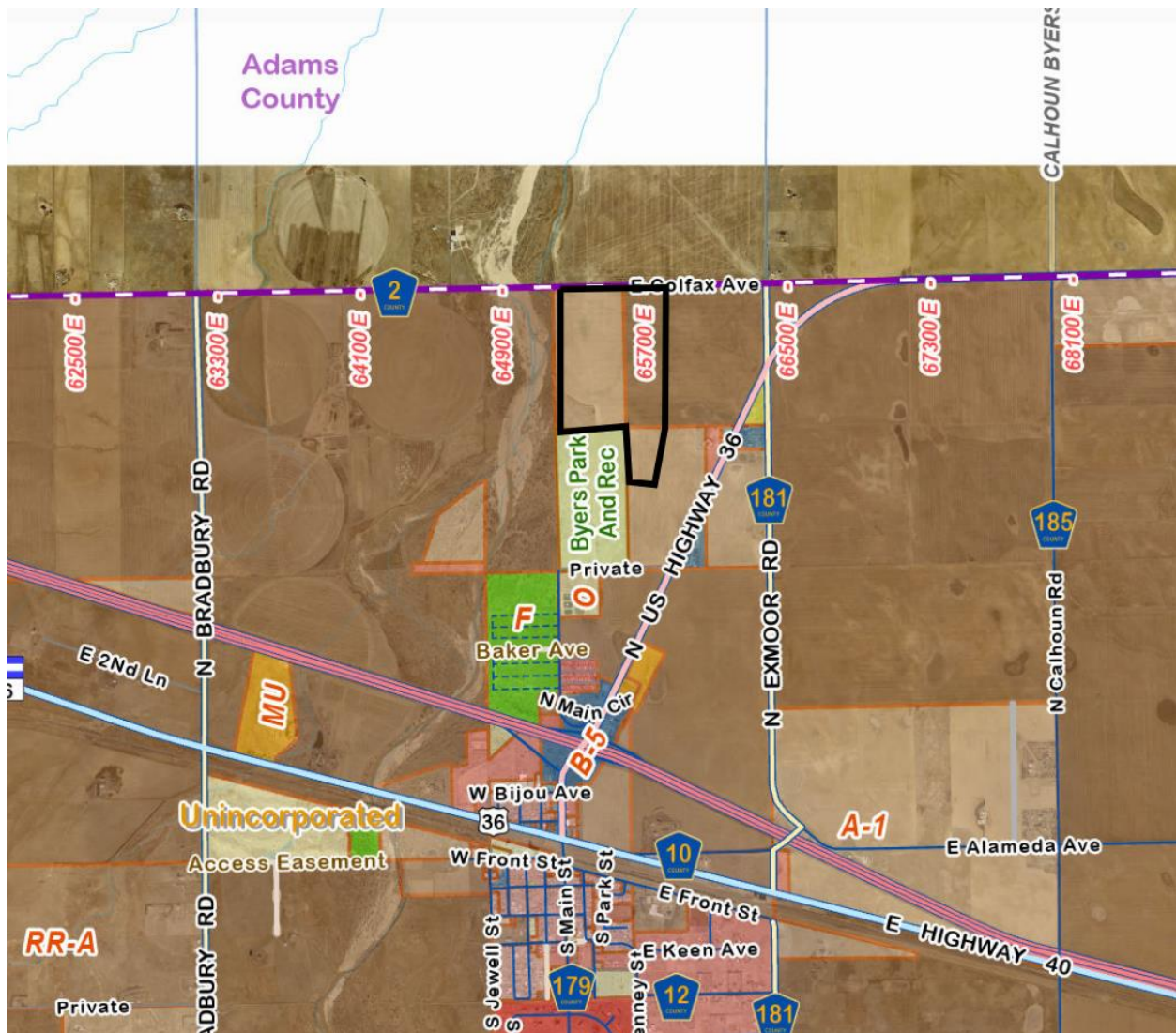
ARAPAHOE COUNTY PLANNING COMMISSION  
PUBLIC HEARING  
NOVEMBER 18, 2025  
6:30 PM

**SUBJECT: CASE NO. GDP25-001, MAY FARMS RV RESORT AND SANCTUARY, GENERAL DEVELOPMENT PLAN**

**KAT HAMMER, SENIOR PLANNER**

**LOCATION AND VICINITY MAP**

The subject property is approximately 150 acres and is located west of US Highway 36 and south of East 15<sup>th</sup> Avenue (Colfax Avenue) in Byers.



*Vicinity and Zoning Map  
(subject property outlined in black)*

## **ADJACENT SUBDIVISIONS, ZONING, AND LAND USE**

**North:** No subdivision, Agricultural-3 (A-3), Adams County, Agricultural

**East:** No subdivision, Agricultural Estate (A-E) & Agricultural-1 (A-1), Agricultural

**South:** No subdivision, A-1 & Open Space (O), Agricultural and Byers Park and Recreation Area

**West:** No subdivision, A-E, Agricultural

## **PURPOSE AND REQUEST**

John Paul Seman Jr. (applicant) on behalf of May Farms RV Resort and Sanctuary at Byers LLC (owner) is requesting a positive recommendation from the Planning Commission to the Board of County Commissioners for a General Development Plan (GDP) for a 150-acre parcel located south of E. Colfax Avenue, west of Highway 36, in Byers. The application includes a mixed-use development comprised of a Recreational Vehicle (RV) resort that includes commercial and residential recreational development, offering camping accommodations, and age-restricted housing, along with supporting uses such as a water park, hiking, and equestrian trails, general store, a clubhouse, and restaurant. The applicant is proposing two access points. The applicant will dedicate adequate right-of-way providing access from the south of the site connecting the site to US Highway 36. Secondary access is proposed with a rural road connecting to East 15<sup>th</sup> Avenue/East Colfax Avenue. Attached to this report is the proposed General Development Plan.

If this application is approved, the applicant will be required to submit a 1041 application (Regulations Governing Areas and Activities of State Interest) for a Major Water and Sewer Project), an associated Location and Extent (LE) for the extension of Byers Water and Sewer, a Specific Development Plan (SDP), Administrative Site Plan (ASP), preliminary plat and final plat applications for review and approval.

## **BACKGROUND**

The property is unplatted, zoned A-1 and A-E and is vacant. It is within the Byers Sub-Area Plan. The County is currently undergoing an update to the 2003 Byers Sub-Area Plan. As part of the update, staff convened an Advisory Committee with representatives from several agencies in Byers, with the purpose of providing insight and guidance to staff. Mr. Gary May (part of the ownership group for this application) was a member of the Advisory Committee, and he was also involved in the planning process for the original Byers Sub-Area Plan.

## **NEIGHBORHOOD OUTREACH**

The applicant sent mailed notice of this application to property owners within one-quarter of a mile of the subject property on March 17, 2025, prior to the formal application submittal. The applicant's narrative indicates the applicant held outreach meetings with the fire district, school district, local businesses and other leaders, Core Electric Cooperative and the Regional Economic Advancement Partnership (REAP). As of now, staff has not received any emails or calls from the public on this application currently. Any public comment received by staff will be relayed at the public hearing.

## **ANALYSIS OF THE GENERAL DEVELOPMENT PLAN APPLICATION**

### **1. The Comprehensive Plan**

The subject property is identified as Residential SF – More Than 1 Acre (RSF1) in the Byers SubArea Plan adopted June 24, 2003. However, the proposed update to the Byers SubArea Plan identifies this property as Mixed Use (MU). The Byers SubArea Plan update is on the agenda for the November 18, 2025, Planning Commission meeting and the December 9, 2025, Board of County Commissioners meeting. Staff is recommending a condition of approval requiring the Byers SubArea Plan Update to be approved by the Board of County Commissioners prior to approval of this application.

The proposed MU land use designation is intended to include a wide range of residential and commercial uses including single-family, attached and detached, restaurants, retail, office, medical, hospitality, gasoline sales and EV charging stations. For the updated 2025 Byers Subarea Plan, the Mixed-Use land use areas were expanded to include opportunities for economic development, including the proposed May Farms RV resort. The proposed May Farms RV resort is consistent with the Future Land Use Map in the draft 2025 Byers Subarea Plan.

This proposal is consistent with the following goals, policies and actions of the Byers Subarea Plan Update:

*Goal 8.1: Encourage a diverse range of businesses in Byers to expand the local economy and employment opportunities.*

The proposed MU development includes a diverse range of allowed uses in the GDP land use chart (sheet 3 of the attached GDP). If this application is approved it is expected to expand the local economy and provide additional employment opportunities.

*Goal 8.2: Promote tourism opportunities in Byers by focusing on the community's history, agriculture and prairie landscapes.*

Planning Area One (PA-1) of the GDP is intended to be a RV resort with supporting accessory uses and entertainment attractions and educational programming. Agri-tainment is a for profit business operation to provide educational and/or entertainment opportunities to its patrons in an agriculturally oriented environment by way of activities, events, demonstrations, displays, interactive participation, tours, lectures, and/or the sale of agriculturally related products, is proposed as a permitted use in PA-1.

*Action 8.2.2 Support developing tourism to Byers as an industry since it can be a recreation stop or destination, by capitalizing on local attractions such as the rodeo, Quint Valley fairgrounds, and overnight stays at the recreational vehicle park.*

This application is the referenced “recreational vehicle park” in this action.

### **2. Land Development Code Review**

Section 5-3.3.F of the Land Development Code allows a GDP to be approved if the proposal meets all of the following criteria:

*a. It generally conforms to the Arapahoe County Comprehensive Plan; and*

The proposed GDP is consistent with the proposed Byers SubArea Plan update, as stated in the previous section of this report.

*b. It complies with the standards for conventional rezoning pursuant to Section 5-3.2.B;*

*5-3.2.B.1 Recognize the limitations of existing and planned infrastructure, by thoroughly examining the availability and capability of water, sewer, drainage, and transportation systems to serve present and future land uses.*

The proposed water and sewer supplier is the Byers Water and Sanitation District. This district provided a will-serve letter indicating the property “is entitled to receive water and sewer services from the District upon the terms and conditions set forth in the Inclusion Agreement between the District and the Applicant.” The Board of Directors of the Byers Water and Sanitation District voted to approve the inclusion of the property in the District’s service territory on January 15, 2025. This inclusion was confirmed by order of the Arapahoe County District Court on February 27, 2025. The applicant has acknowledged they will need to continue to work with the Byers Water and Sanitation District to accommodate RV sewage, which will require pretreatment of the RV sewage.

The property is located in the West Bijou drainage basin and is outside of the South Metro Stormwater Authority (SEMSWA) and Mile High Flood District (MHFD) boundaries. The Engineering Services staff report states “no planning improvements will impact the West Bijou Drainage and floodplain.” The proposal impacts the rights-of-way in Colorado Department Of Transportation’s (CDOT’s) jurisdiction, including US Highway 36 and E. Colfax Ave. CDOT and Arapahoe County Engineering Division Services reviewed a Traffic Impact Study as part of this application; improvements to access will include egress and other access to East 15<sup>th</sup>/Colfax Avenue to the north.

*5-3.2.B.2 Assure compatibility between the proposed development, surrounding land uses, and the natural environment.*

The surrounding land uses are primarily agricultural grazing land with a few single-family residences. The adjacent property to the south is Quint Valley Fairgrounds owned by the Byers Park and Recreation District. According to the Byers Park and Recreation’s website this site offers sports fields, overnight camping, rodeo events, and other community events. This proposal will be compatible with the adjacent recreation uses.

Colorado Parks and Wildlife (CPW) provided comments with concerns regarding potential impacts to wildlife and wildlife habitat, such as habitat loss, habitat fragmentation, water use, development along and proximity to West Bijou Creek, which

is a High Priority Habitat (HPH) and riparian corridor for wildlife. (see Attachment 1 for CPW comments and the applicant's response).

The applicant provided a letter indicating that the applicant met with CPW representatives on October 8, 2025, to discuss their concerns. The letter indicates the applicant acknowledged all concerns and committed to working with CPW as this project moves into later approval phases, including the site development plan process. The applicant has also agreed to host a site tour for CPW representatives.

Specific recommendations and comments from CPW include:

The western half of the proposed project area borders West Bijou Creek, which is mapped as Mule Deer Winter Concentration Area High Priority Habitat (HPH). For the identified portions of the proposed project area that traverse Mule Deer Winter Concentration Area HPH, construction and development should be completed outside of the winter season, December 1<sup>st</sup> to April 30<sup>th</sup>. The applicant shall provide a map of the Mule Deer Winter Concentration Area, HPH, with the SDP application. If construction and development is proposed in this area, staff will include a condition of approval requiring construction and development to occur outside of the winter season with the SDP and other subsequent applications.

Mule Deer Migration Corridors are present along the western side of the proposed project area along West Bijou Creek. During construction the applicant shall avoid the riparian corridor to the maximum extent possible in order to keep the mule deer migration corridor along the river as open and undisturbed as possible. The applicant shall provide a narrative indicating how they intend to avoid the riparian corridor with the SDP application.

If prairie dog burrows are present on the site, CPW recommends a burrowing owl survey be conducted prior to any development. The applicant shall submit an environmental report with the SDP, including a report on terrestrial and aquatic animals present on-site. If it is found that there are prairie dog burrows on-site, staff will include a condition of approval requiring a burrowing owl survey with the SDP and other subsequent applications.

CPW is concerned with the safety and natural movement of mule deer, white-tailed deer and pronghorn antelope herds along and throughout the area of the proposed project. CPW recommends that if fencing (project perimeter or internal) is erected, either during or after this project, it should be the type that would allow the free passage of wildlife. The applicant will be required to provide fencing details for CPW's review with the SDP and ASP applications.

CPW recommends that a weed management plan be implemented in accordance with Arapahoe County standards to control and eliminate the control and spread of any noxious weeds in and around the site. The applicant shall submit an active weed management plan with the SDP and ASP applications for county and CPW review.

CPW recommends that all outdoor lighting be down shielded to minimize disturbance areas and dim the lights as much as possible. Lighting will be reviewed at the time of the ASP application.

CPW is concerned with recreational equestrian and public hiking trails accessing West Bijou Creek from the development; CPW recommends no ground disturbance within a minimum of 500 feet of the ordinary high-water mark of all surface waters, this includes hiking and recreating within the dry creek bed due to this area being crucial to wildlife. The location of hiking and equestrian trails will be identified on the SDP and ASP applications for CPW to review and provide additional comments/recommendations.

If a water park is approved for this development, it is recommended that the water park location be planned as far away from the riparian creek corridor as possible in order to prevent chlorine and other contaminants from getting into West Bijou Creek. The water park location will be reviewed at this time of SDP and ASP applications for CPW to review and provide additional comments/recommendations.

*5-3.2.B.3 Allow for the efficient and adequate provision of public services. Applicable public services include, but are not limited to, police, fire, school, parks, and libraries.*

The Arapahoe County Sheriff's Office (ACSO) provided comments indicating concerns about the number of guests and the population of the Town of Byers. ACSO stated the number of calls for service may be increased and it may impact the ACSO staffing on the Interstate 70 (I-70) corridor. The applicant acknowledges potential impacts and states they will work closely with law enforcement as the project evolves. The applicant also noted that the Douglas County Sheriff's Office has indicated negligible to no impacts on service call volume from the equivalent Jellystone RV Resort at the Town of Larkspur since its inception.

ACSO, specifically, the Office of Emergency Management (OEM) requested an evacuation plan as part of the applicant's traffic study. The applicant acknowledges and appreciates this important request but considers it to be outside the scope of a typical traffic impact study. The applicant has agreed to provide a comprehensive risk analysis and response plan for the Resort (see Attachment 2). ACSO reviewed Attachment 2 and found the applicant's response to be acceptable and had no other comments. Staff is recommending a condition of approval requiring the applicant to submit a draft risk analysis with the SDP application and a draft response plan with the ASP application.

Chief Mike Disher, Byers Fire Protection District, provided comment indicating the fire district will be able to cover the additional call volume as long as the applicant helps with the impact fees discussed with the applicant. Staff is recommending a condition of approval requiring the applicant to submit impact fees to the Byers Fire Protection District.

This application is proposing age-restricted housing for buyers aged 55 and over, and students are not expected to be generated from this proposed use. Tom Turrell,

Superintendent of Byers School District, indicated no concerns with this application and is not requesting land dedication or cash-in-lieu for the school district. Mr. Turrell believes this project will provide a good opportunity for high school students to get part-time jobs and promote business in the Byers area.

The applicant has engaged with Roger Harvey, Planning Manager, Arapahoe County Open Spaces, regarding parkland dedication and the potential contribution of adjacent property, owned by the applicant/property owner, to Arapahoe County Open Spaces to establish an in-lieu agreement. Arapahoe County Open Spaces requested the exact boundaries and/or parcels the applicant would like to dedicate so they can evaluate and discuss. Sheet one of the GDP plan set states, "The applicant will meet the required public land dedication set forth in the Land Development Code for parks and other public purposes." Dedication or cash-in-lieu will be required prior to the signature of the ASP and Final Plat. Trails will be provided and defined with the SDP and ASP applications.

The Arapahoe County Library District did not provide comments during the referral period; the proposed use is not expected to significantly impact the library district.

*5-3.2.B.4 Enhance convenience for the present and future residents of Arapahoe County by ensuring that appropriate supporting activities, such as employment, housing, leisure-time, and retail centers, are in close proximity to one another.*

The project proposes age-restricted housing, Agri-tourism, recreational opportunities, entertainment, retail, and employment opportunities near the Town of Byers, Colorado, which is considered a more rural community.

*5-3.2.B.5 Ensure that public health and safety is adequately protected against natural and man-made hazards, which include, but are not limited to, traffic noise, water pollution, airport hazards, and flooding.*

During the review of this application, the applicant has worked closely with the County Engineering Division and CDOT to ensure that the public is adequately protected. CDOT has one outstanding comment requesting the applicant update the drainage report to discuss and document that there will be no adverse impacts to CDOT right-of-way. This will be required prior to the approval of the Traffic Impact Study by the Arapahoe County Engineering Division. The project is expected to create construction-related noise and impact but after the project is constructed quiet hours at the RV park will be from 11 P.M. to 8 A.M. daily.

If a water park is approved for this development, it is recommended by CPW that the water park location be planned as far away from the riparian creek corridor as possible in order to prevent chlorine and other contaminants from getting into West Bijou Creek. The water park location will be reviewed at this time of SDP and ASP applications. Staff is also recommending an Environmental Report with the SDP to review aquatic activity and potential water pollution.

The subject property is not located near any airports; Denver International Airport (DIA) is approximately 35 miles from Byers, and Colorado Air and Space Port is 20 miles away. Colorado Geological Survey (CGS) indicates that the site contains one area of steep slopes, in the southwestern area of Planning Area one (PA-1), and is not exposed to any identified geological hazards that would preclude approval of the proposed uses and density. CGS has no objection to the approval of this application; however, it is requesting a site-specific preliminary geotechnical evaluation with the SDP (CGS waived the requirement for this application). The Engineering Services staff report states, “no planning improvements will impact the West Bijou Drainage and floodplain.

*5-3.2.B.6 Provide for accessibility within the proposed development, and between the development and existing adjacent uses. Adequate on-site interior traffic circulation, public transit, pedestrian avenues, parking, and thoroughfare connections are all factors to be examined when determining the accessibility of a site.*

The applicant is proposing two access points to reach the subject property, one from the intersection of North Main Street and State Highway 36 and another from East 15<sup>th</sup>/Colfax Avenue. CDOT reviewed the proposed access and has one outstanding comment requiring the applicant to update the drainage study to ensure the CDOT right-of-way is protected. The site is not near public transit, but the Town of Byers is well connected to the region through I-70 and county roadways. Interior circulation, pedestrian avenues, and parking are not depicted on the GDP document; these items will continue to be reviewed during the SDP and ASP applications, as the proposed uses are further defined. Arapahoe County Engineering Division reviewed the Traffic Impact Study and found it to be sufficient for this application.

*5-3.2.B.7 Minimize disruption to existing physiographic features, including vegetation, streams, lakes, soil types, and other relevant topographical elements.*

As mentioned above, CPW provided recommendations to minimize the disruption of vegetation. CGS indicated there is one area of the site with steep slopes but indicated no objection to the approval of this application. CGS waived a site-specific preliminary geotechnical evaluation for this application, but the applicant will be required to submit this with the SDP application, if this application is approved.

*5-3.2.B.8 Ensure that the amenities provided adequately enhance the quality of life in the area, by creating a comfortable and aesthetically enjoyable environment through conventions such as, the preservation of mountain views, the creation of landscaped open areas, and the establishment of recreational activities.*

This proposal aims to enhance the quality of life in the area by providing recreational activities for tourists and the Town of Byers residents, specifically a water park, community entertainment and educational programming. The proposed maximum building height for the age-restricted planning area is 40 feet, which is less than the maximum building height for the adjacent zone districts (A-E and A-1), which is 50 feet, and is not expected to greatly



impact mountain views. The GDP plan indicates between 15 and 25 percent unobstructed open space will be provided, varying based on the proposed density.

*5-3.2.B.9 Enhance the usable open spaces in Arapahoe County and provide sufficient unobstructed open space and recreational area to accommodate a project's residents and employees.*

The applicant has committed to providing unobstructed open space consistent with the LDC requirements. The applicant has also discussed the inclusion of adjacent parcels as public land dedication that would benefit open space and regional trail connectivity in the area. PA-1 will allow for public day use of the proposed facilities, including a water park and educational programming, agritourism activities, and local retail opportunities.

*5-3.2.B.10 Ensure the application complies with the requirements of this Resolution and the Arapahoe County Comprehensive Plan.*

The application complies with the requirements of the LDC and the Comprehensive Plan as stated above.

- c. It represents an improvement in quality over the strict application of the otherwise applicable zone district or development standards in this LDC, including but not limited to open space and access; environmental protection; vegetative preservation; efficiency in transportation systems and connectivity; alternative transportation options; improvements in utilities and services; or innovative housing or employment centers; and*

The applicant has discussed dedicating adjacent property owned by the applicant/property owner of the subject property to Arapahoe County Open Spaces. The property under consideration is adjacent to the existing Bijou Creek Open Space, which would benefit open space and regional trail connectivity. Arapahoe County Open Spaces was not provided with the exact boundary of the proposed property that may be dedicated, but they would like to further evaluate and discuss. Arapahoe County Open Spaces did indicate dedication as promising after initial review and discussions with the applicant. The proposal also includes an open space sanctuary with equestrian and hiking trails system, outdoor education and a satellite campus for the Butterfly Pavilion and a community events center. CPW has provided recommendations to ensure environmental protection and vegetative preservation as stated earlier in this report.

As part of this proposal, the applicant will need to extend water and sewer lines to the site, expanding the Byers Water and Sanitation District' boundary. The Town of Byers currently only has one assisted living facility. This proposal will provide age-restricted housing and employment opportunities for the Town of Byers residents.

- d. It is consistent with the purpose of the Planned Unit Development District as stated in Section 5-3.3.A of this LDC; and*

The purpose of the PUD zone district is to allow greater flexibility in development standards, prevent monotonous urban landscapes and promote health, safety and welfare of the residents of Arapahoe County. The PUD rezoning process allows new design concepts for land development and the ability to adjust to current trends in lifestyle and commerce that could not be achieved by strict adherence to the standards of the LDC. The proposed PUD application intends to create a mixed-use development providing increased tax revenue and offering opportunities for community entertainment and educational programming. The proposed PUD would not be permitted in a conventional zone district and offers short-term seasonal stay options as well as age-restricted housing.

- e. *Any modifications to the standards and requirements of this LDC are warranted by the layout and design of the site, amenities incorporated into the development plan, or by the need to protect or avoid unique site features; and*

The applicant is not proposing any modifications to the standards and requirements of LDC. The applicant has committed to providing the required unobstructed open space, parking, landscaping and screening. The PUD does not request any modification to the fence, sign and lighting regulations.

In addition to the above criteria, a GDP must also meet the following criteria:

- a. *Building heights will not create significant adverse impacts on surrounding properties; and,*

The proposed maximum building height is lower than the maximum building height of the adjacent zone districts and is not expected to create significant adverse impacts on surrounding properties. Outside referrals provided recommendations to minimize significant adverse impacts on surrounding properties, specifically CDOT, CPW and ACSO.

- b. *It demonstrates an efficient use of land that facilitates a more economical arrangement of buildings, vehicular and pedestrian circulation systems, and utilities; and,*

The proposed mixed-use development facilitates two primary unique uses. Additionally, the proposed agri-tainment uses are in alignment with the rural character of Byers. The arrangement of buildings, pedestrian circulation and utilities will be further evaluated with the SDP and ASP applications, if this application is approved.

- c. *It provides efficient street and trail connectivity to existing adjacent development that generally conforms with the Comprehensive Plan; and*

A TIS was reviewed by Arapahoe County Engineering Services Division and CDOT. The applicant will be providing two points of access to the site through E. Colfax Avenue and Hwy 36. The subject parcel is adjacent to property owned by Byers Park and Recreation; the applicant has been in discussions with Arapahoe County Open Spaces regarding land

dedication and trail connectivity. As stated above, the application generally conforms with the proposed update to the Byers SubArea Plan.

- d. *It provides or expands access to existing open space and preserves and protects natural features; and*

As stated above, the property is adjacent to existing open space, and the applicant and Arapahoe County Open Spaces are discussing dedication and trail connectivity opportunities. The applicant has committed to working with CPW to protect natural features; an environmental report will be required with the SDP.

- e. *It includes efficient general layouts for major water, sewer, and storm drainage areas.*

The proposed water and sewer supplier is the Byers Water and Sanitation District, who provided a will-serve letter. The Board of Directors of the Byers Water and Sanitation District voted to approve the inclusion of the property in the District's service territory on January 15, 2025. This inclusion was confirmed by order of the Arapahoe County District Court on February 27, 2025. The GDP plan is not required to show the general layout for water and sewer; this will be analyzed with a 1041, L&E, SDP and ASP. The GDP shows three drainage areas, two are located on the east side of the property, furthest away from West Bijou Creek.

### 3. Referral Comments

Comments received during the referral comment period and throughout the review of this application are attached to this report (Attachment 3). As mentioned above, staff is recommending five conditions of approval to address CPW, ASCO and Byers Fire District's concerns.

There is one outstanding comment from CDOT requiring the applicant to update the drainage report to discuss and document that there will be no adverse impacts to CDOT right-of-way. This will be required prior to approval of the TIS and signature of the GDP plan set.

### **STAFF FINDINGS**

Staff has reviewed the plans, supporting documentation, and referral comments. Based upon review of applicable policies and goals in the Comprehensive Plan, review of the development regulations, and analysis of referral comments, our findings include:

1. The proposed May Farms RV Resort and Sanctuary General Development Plan generally conforms to the Arapahoe County Comprehensive Plan.
2. The proposed May Farms RV Resort and Sanctuary General Development Plan meets the Arapahoe County Land Development Code, zoning regulations, and procedures stated in Section 5-3.3 for consideration and approval of a Planned Unit Development application under the Land Development Code.

### **STAFF RECOMMENDATION**

Considering the findings and other information provided herein, Staff recommends approval of Case No. GDP25-001, May Farms RV Resort and Sanctuary, General Development Plan, subject to the following conditions of approval:

1. Prior to the signature of the final copy of these plans, the applicant must address Public Works and Development Staff comments and concerns.
2. This approval is contingent upon the approval of the County-initiated update to the 2003 Byers Sub-Area Plan, case number LR25-001.
3. The applicant shall provide a map of the Mule Deer Winter Concentration Area with the Specific Development Plan application.
4. The applicant shall submit an environmental report with the Specific Development Plan.
5. The applicant shall submit a weed management plan with the Specific Development Plan and Administrative Site Plan applications.
6. The applicant shall submit a draft risk analysis with the Specific Development Plan application and a draft response plan with the Administrative Site Plan application.

#### Alternatives

The Planning Commission has alternatives that include the following:

1. Recommend approval of the proposed General Development Plan.
2. Continue to a date certain for more information.
3. Recommend denial of the proposed General Development Plan.

#### **CONCURRENCE**

The Public Works and Development Planning and Engineering Services Divisions have reviewed the application, and the Arapahoe County Public Works Department is recommending conditional approval of this case.

#### **PLANNING COMMISSION DRAFT MOTIONS**

##### **Recommend Conditional Approval**

In the case of GDP25-001, May Farms RV Resort and Sanctuary, General Development Plan, I have reviewed the staff report, including all exhibits and attachments, and have listened to the applicant's presentation and any public comment as presented at the hearing, and hereby move to recommend approval of this application based on the findings in the staff report, subject to the following conditions:

1. Prior to the signature of the final copy of these plans, the applicant must address Public Works and Development Staff comments and concerns.
2. This approval is contingent upon the approval of the County-initiated update to the 2003 Byers Sub-Area Plan, case number LR25-001.

3. The applicant shall provide a map of the Mule Deer Winter Concentration Area with the SDP application.
4. The applicant shall submit an environmental report with the Specific Development Plan.
5. The applicant shall submit a weed management plan with the Specific Development Plan and Administrative Site Plan applications.
6. The applicant shall submit a draft risk analysis with the Specific Development Plan application and a draft response plan with the Administrative Site Plan application.

Below are Draft Motions that can be used as general guidance in preparing an alternative motion if the Planning Commission reaches a different determination:

Recommend Denial

In the case of GDP25-001, May Farms RV Resort and Sanctuary, General Development Plan, I have reviewed the staff report, including all exhibits and attachments, and have listened to the applicant's presentation and any public comment as presented at the hearing, and hereby move to recommend denial this application based on the following findings:

1. *State new findings in support of denial as part of the motion.*

Continue to Date Certain:

In the case of GDP25-001, May Farms RV Resort and Sanctuary, General Development Plan, I move to continue the hearing to [*date certain*], 6:30 p.m., to obtain additional information and to further consider the information presented.

**BRYAN D. WEIMER, PWLF**  
Director

Lima Plaza  
6924 South Lima Street  
Centennial, Colorado 80112-3853  
720-874-6500  
arapahoeco.gov



## Planning Commission's Summary Report

**Date:** October 23, 2025  
**To:** Arapahoe County Planning Commission  
**From:** Sue Liu, PE., Engineering Services Division  
**Case name:** GDP25-001 May Farms RV Resort and Sanctuary

### Purpose and Recommendation

The purpose of this report is to communicate the Engineering Services Staff findings, comments, and recommendations regarding the land use application(s) identified above.

### Scope/Location:

The owner, May Farms RV Resort & Sanctuary at Byers is proposing to rezone 150-acres properties located in Section 4, Township 4 South, Range 61 West of the Sixth Principal Meridian within the Town of Byers. The proposed development will include 700 camp sites, 400 dwelling units and a maximum of 100,000 SF of commercial development. The site is located west of US Highway 36 and south of East 15<sup>th</sup> Avenue (or Colfax Avenue).

There are no floodplains located on the site. The existing access point is located on US36. Improvements to access will include egress and other access to E 15<sup>th</sup> Avenue to the north. No planning improvements will impact the West Bijou Creek Drainage and Floodplain.

**Engineering Services Staff has reviewed the land use application(s) and has the following findings and comments:**

1. This application is for the General Development Plan (GDP). It is the zoning component of a three-part PUD process, followed by Specific Development Plan (SDP) and Administrative Site Plan (ASP). The GDP relies on preliminary design components, all civil construction plans and final design will accompany the ASP.
2. This parcel is outside of Southeast Metro Stormwater Authority (SEMSWA) and Mile High Flood District (MHFD) boundaries.
3. This parcel is in the West Bijou Creek drainage basin.
4. This proposal impacts the rights-of-way in CDOT jurisdiction – HWY 36. The applicant is responsible for obtaining any approvals to access improvement, access permit and ROW dedication from this jurisdiction for State Highway.
7. This development is subject to the Rural Transportation Impact Fee (RuTIF). RuTIF fees to be collected at time of building permit.
8. This development will require a Subdivision Improvement Agreement (SIA) to guarantee on- site and off-site public improvements during each Final Plat or Administrative Site Plan process.

**Engineering Services Staff is recommending the land use application(s) favorably subject to the following conditions:**

1. The applicant agrees to address the Division of Engineering Services' comments and concerns as identified within this report.
2. The applicant agrees to address comments issued by CDOT.



ARAPAHOE COUNTY

**Arapahoe County  
Public Works and Development  
Planning Division**

6924 S. Lima Street  
Centennial, Colorado 80112  
Phone: 720-874-6650  
[www.arapahoegov.com](http://www.arapahoegov.com)

**Land Development Application**

This form must be **complete**.

Land Development Application materials received after 2pm  
shall be date stamped received the following business day.

APPLICANT NAME:	ADDRESS:  PHONE:  EMAIL:	CONTACT:  TITLE:
OWNER(S) OF RECORD NAME(S):	ADDRESS:  PHONE:  EMAIL:	SIGNATURE(S):  _____
ENGINEERING FIRM NAME:	ADDRESS:  PHONE:  EMAIL:	CONTACT:  TITLE:
Pre-Submittal Case Number: Q ____ - _____ Pre-Submittal Planner: _____ Pre-Submittal Engineer: _____		
State Parcel ID No. (AIN no.):		
Parcel Address or Cross Streets:		
Subdivision Name & Filing No:		
EXISTING		PROPOSED
Zoning:		
Project Name:		
Site Area (Acres):		
Density (Dwelling Units/Acre):		
Building Square Footage:		
Disturbed Area (Acres):	N/A	
CASE TYPE (S)		
<input type="checkbox"/> _____ <input type="checkbox"/> _____ <input type="checkbox"/> _____		
THIS SECTION IS FOR OFFICE USE ONLY		
Case No:	Assigned Planner:	Assigned Engineer:
TCHD Fee: \$	Planning Fee(s): \$	Engineering Fee(s): \$
This land use application shall be submitted with all required application fees. Incomplete applications will not be accepted. Submittal of this application <i>does not</i> establish a vested property right in accordance with C.R.S. 24-68-105(1). Processing and review of this application may require the submittal of additional information, subsequent reviews, and/or meetings, as outlined in the Arapahoe County Land Development Code.		



**JPS Law Group**  
**ATTORNEYS AT LAW**

23 South Kalamath Street  
Suite 200  
Denver, CO. 80223  
TEL (720) 377-0703  
FAX (303) 832-4818

March 17, 2025

Arapahoe County Public Works & Development  
Planning Division  
6924 S. Lima Street  
Centennial, CO. 80112

Re: May Farms RV Resort & Sanctuary @Byers/Letter of Intent

Dear Public Works and Development:

On behalf of the property owner May Farms RV Resort & Sanctuary @Byers, our firm is submitting the attached land development application and letter of intent (LOI). Previously, we submitted an application and LOI on March 1, 2024, and participated in a pre-submittal meeting with county staff experts on March 21, 2024, and November 7, 2024.

General Project Concept

The May Farms RV Resort and Sanctuary at Byers site consists of 150 acres located in Byers, Colorado. The site is located in Section 4, Township 4 South, Range 61 West of the Sixth Principal Meridian within the Town of Byers. The site is presently zoned A1 Agricultural and is predominantly hay production and/or private open space. The site is located west of US Highway 36 and south of East 15<sup>th</sup> Avenue (or Colfax Avenue).

The proposed development will include 700 camp sites, 400 short term residential units, and associated support amenities, including welcome center, laundry, water park, and recreational equestrian and hiking trails.

Project Requirements

The project site has been approved for inclusion in the Byers Water and Sanitation District (Arapahoe Court approval for Order of Inclusion pending). The project is also within the service area of CORE Electric Cooperative. The proposed project will require upgrading on-site power to three-phase. CORE has reviewed the site and plan has provided a will serve letter.

There are no flood plains located on the site. The existing access point is located on US36. Improvements to access will include egress and other access to E. 15<sup>th</sup> Avenue to the north. Gates will not be proposed for regular access, but will utilize a knox-box for emergency fire ingress and egress. As part of the proposed layout a new welcome center and check-in facility will be built off of the current Main Street, away from US36 access point in order to allow for stacking of RV's during peak periods for check-in.

The development team has initiated preliminary discussions with Byers Fire in order to establish preliminary requirements. We will continue to work with Byers Fire to address all concerns of the District.

A Traffic Impact Study will be completed subsequent to the rezoning and PUD approval. Because of its inclusion in the Byers Water and Sanitation District, a Phase 1 Drainage report will be prepared in conjunction with, during and after the CDPHE-mandated water treatment upgrade study and construction.

### Impact/Project Summary

The project timeline is highly variable due to jurisdictional approval timelines and financing considerations. Ultimately the project will be maintained and operated by Sun Communities (NYSE: SUI), a national RV resort franchise company that operates across the United States, including in nearby Larkspur, Colorado. It is the goal of Sun Communities to meet market demand for first-class RV resort accomodations while being an important contributor to the town of Byers and the I70 corridor communities.

This application and LOI reflects the progress made by the developer since the pre-submittal meetings as well as the staff-distributed meeting notes:

- The project will be a rural Agri-tourism oriented development encompassing several segmented development parcels including a RV resort and campground with associated amenities, an age 55+ adult resort housing community with attendant retail, entertainment, and restaurant uses, a substantial open space nature sanctuary with equestrian and hiking trails systems, outdoor education, and a satellite campus for the Butterfly Pavilion, an activity node encompassing private indoor and outdoor water parks, adventure center, skills course, and community events center. These uses are captured in the attached, revised sketch plan.
- The preliminary requested zoning is Planned Unit Development (PUD). The density is 8.0-10.0 U/ac. The hours of operation will vary depending upon the specific development segment as well as season and time of year.
- The project will help to address the substantial and growing demand for rural Agri-tourism, Agri-tainment, Heritage Tourism, Medi-tourism and family-oriented tourist camping facilities. The project will generate needed economic activity in rural Arapahoe County and employment opportunities, including for Byers and adjacent community's

youth. Located adjacent to Interstate 70 Exit 316 and within one hour drive time of many local tourism attractions and medical facilities, the project site will also allow for water to serve a potential future substation accommodating the expansion of Byers Fire Protection District No. 9 and its emergency response capabilities as well as regional medical and health facility development.

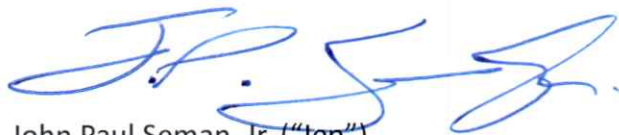
- The project will provide productive and sustainable uses of the property that is consistent with the Arapahoe County Comprehensive Plan and specifically, Tourism Goal EH 5, Rural Goal RA-EH-2 by encouraging the development of Agri-tourism, Agri-tainment, and other destination attractions. Additionally, the project is consistent with the proposed changes and anticipated updates to the Byers Subarea Plan which captures the community's vision and encourages growth and development in Byers north of Interstate 70.
- The PUD will provide needed flexibility in the development standards for a unique and important development project that cannot be achieved by the strict application of any other zone district, including the existing zone district. The PUD will permit a high quality development project that protects nearby properties and it is consistent with the purpose of the Planned Unit Development District as stated in Section 5-3.3.A of the Arapahoe County Land Development Code.
- The development team is making substantial progress with community outreach, including an approved inclusion in the Byers Water and Sanitation District. Additionally, outreach meetings have been conducted with the fire district, school district, local business and other leaders, Core Electric Cooperative, and the Regional Economic Advancement Partnership. Per the presubmittal meeting notes, the development team will mail notice of the proposed rezoning to all property owners within ¼ mile of the proposed project, including a project description, FAQs, and contact information for the development team and County planning staff.
- No planned improvements will impact the West Bijou Creek drainage and floodplain, and all plans assure the protection of the Creek.
- In addition to the traffic study impact study, the developers will work with CDOT regarding required right of way improvements, and access to US36. It is our understanding from CDOT that Colfax Avenue to the north is not a state access highway.

As the owner's representative, our firm will be the main point of contact.

Thank you for your attention to this application.

Sincerely,

JPS LAW GROUP

A handwritten signature in blue ink, appearing to read 'J.P. Seman, Jr.', with a stylized flourish at the end.

John Paul Seman, Jr. ("Jep")

Attorney At Law/Owner's Representative

23 S. Kalamath Street, Suite 200

Denver, CO. 80223

730-377-0703 direct/ 303-638-7000 mobile

jseman@jps-law.net

## **MAY FARMS RV RESORT & SANCTUARY @BYERS**

### **ZONING NARRATIVE**

INTRODUCTION: THE PURPOSE OF THIS SECTION IS TO ESTABLISH GENERAL PROVISIONS AND CLARIFY STANDARDS AND REQUIREMENTS FOR THE DEVELOPMENT WITHIN THE MAY FARMS RV RESORT AND SANCTUARY GENERAL DEVELOPMENT PLAN (GDP).

THE PROPERTY IS COMPRISED OF ONE PARCEL, 1985-00-0-00-047 +/-150 ACRES CURRENTLY ZONED A-1 IN UNINCORPORATED ARAPAHOE COUNTY. THE PARCEL WILL SUBSEQUENTLY BE CALLED MAY FARMS RV RESORT AND SANCTUARY. THE GENERAL DEVELOPMENT PLAN DELINEATES TWO PLANNING AREAS TO CREATE A OUTDOOR RECREATION AND RESIDENTIAL MASTER PLAN BASED ON THE BYERS SMALL AREA PLAN AND ARAPAHOE COUNTY'S COMPREHENSIVE PLAN.

THE DESTINATION RESORT & RECREATION (DDR) CHARACTER IS A MIX OF LODGING, RECREATION, AND VISITOR-SERVING AMENITIES. THIS INCLUDES RV RESORTS, GLAMPING ACCOMMODATIONS, ECO-LODGES, AND OTHER SHORT-TERM AND SEASONAL STAY OPTIONS DESIGNED TO OFFER AN INTEGRATED HOSPITALITY EXPERIENCE. DDR DEVELOPMENTS MAY FEATURE SUPPORTING COMMERCIAL USES SUCH AS RESTAURANTS, RETAIL SHOPS, ENTERTAINMENT VENUES, EVENT SPACES, AND RESORT-STYLE AMENITIES. THE RESIDENTIAL CHARACTER IS BASED ON CURRENT STANDARDS WITHIN ARAPAHOE COUNTY CODE.

INTENT: MAY FARMS RV RESORT AND SANCTUARY IS A PROPOSED MIXED-USE PUD DEVELOPMENT COMPRISED OF RESIDENTIAL AND RECREATIONAL COMMERCIAL DEVELOPMENT OFFERING CAMPING ACCOMMODATIONS, AND AGE-TARGETED HOUSING, ALONG WITH SUPPORTING USES SUCH AS A CLUBHOUSE, WATER PARK, GENERAL STORE AND RESTAURANT. LOCATED NORTH OF I-70 AND WEST OF HWY 36, THE SITE IS WITHIN THE DESIGNATED GROWTH AREA OF BYERS, CO, AND ALIGNS WITH THE COMPREHENSIVE PLAN AND SMALL AREA PLAN.

THE DEVELOPMENT WILL PROVIDE EMPLOYMENT OPPORTUNITIES, INCREASE TAX REVENUE, AND OFFER OPPORTUNITIES FOR COMMUNITY ENTERTAINMENT AND EDUCATIONAL PROGRAMMING. THE PROPOSED USE PRESERVES THE SMALL-TOWN CHARACTER, SUPPORTS HABITAT RESTORATION, AND SERVES AS A TRANSITION BETWEEN HIGHER-DENSITY MIXED-USE DEVELOPMENT ALONG I-70 AND HWY 36 AND THE BIJOU CREEK OPEN SPACE.

ORGANIZATION: THE MAY FARMS RV RESORT AND SANCTUARY IS SHOWN AS TWO PLANNING AREAS. PLANNING AREA 1 IS INTENDED TO A RECREATIONAL VEHICLE RESORT WITH SUPPORTING ACCESSORY USES AND ENTERTAINMENT ATTRACTIONS. PLANNING AREA 2 IS INTENDED TO BE AGE-TARGETED RESIDENTIAL WITH SUPPORTING ACCESSORY USES TO PROMOTE AN ACTIVE LIFESTYLE. A PROPOSED LOCAL COLLECTOR ROAD ON THE EASTERN EDGE RUNNING PARALLEL TO HWY 36 WILL PROVIDE ACCESS FROM THE SOUTH FROM HWY 36 AND ACCESS TO THE NORTH, WHICH IS INTENDED TO PROVIDE EMERGENCY VEHICLE ACCESS. THIS LOCAL COLLECTOR WILL HAVE A DEDICATED PUBLIC ROW WITH A SHARED USE AGREEMENT WITH THE SURROUNDING PROPERTY OWNERS. THE GENERAL DEVELOPMENT PLAN PROPOSES A MAXIMUM OF 700 RECREATIONAL SITES, 400 DWELLING UNITS AND A MAXIMUM OF 100,000 SQUARE FEET OF COMMERCIAL DEVELOPMENT.

RESIDENTIAL UNITS ARE LIMITED TO PLANNING AREA 2. RESIDENTIAL: RESIDENTIAL DEVELOPMENT WILL TRANSITION IN DENSITY FROM THE SOUTH AND EAST PORTIONS OF PLANNING AREA 2 TO THE NORTH AND WEST PERIMETER OF THE SITE ADJACENT TO BIJOU CREEK OPEN SPACE. DUPLEX AND SINGLE-FAMILY UNITS INCLUDING COURTYARD PATIO HOMES ARE INTENDED FOR THIS PLANNING AREA. A DENSITY RANGE OF 8-12 DU/ACRE IS PERMITTED IN THIS PLANNING AREA. RECREATION COMMERCIAL: RECREATIONAL DEVELOPMENT WILL TRANSITION IN DENSITY FROM THE SOUTH AND EAST PORTIONS OF PLANNING AREA 1 TO THE LESSER DENSITY ON THE WEST PERIMETER OF THE SITE ADJACENT TO BIJOU CREEK OPEN SPACE. A DENSITY RANGE OF 6-10 DU/ACRE IS PERMITTED IN THIS PLANNING AREA. ACCESSORY COMMERCIAL USES TO SUPPORT THE RESORT WILL BE LOCATED AT THE SOUTHERN AND CENTRAL PORTION OF THE PLANNING AREA.

COMMERCIAL DEVELOPMENT IS PERMITTED, WITH PROJECTS UP TO 100,000 SF OF ENTERTAINMENT, RETAIL, AND SERVICE-ORIENTED DEVELOPMENT TO SUPPORT THE CAMPGROUND RESORT. PARKS, OPEN SPACE & TRAILS: OPEN SPACE DEDICATIONS ARE TO BE CONSISTENT WITH THE COUNTY'S LAND DEVELOPMENT CODE AND ARE INTENDED TO SUPPORT NEW RESIDENTIAL AND RECREATION COMMERCIAL USES.

THE APPLICANT WILL MEET THE REQUIRED PUBLIC LAND DEDICATION SET FOR IN THE LDC FOR PARKS, SCHOOLS, AND OTHER PUBLIC FACILITIES AND FOR UNOBSTRUCTED OPEN SPACE THROUGH MULTIPLE PHASES OF DEVELOPMENT. A COMMUNITY AMENITY SPACE OR PARK IS TO BE IN THE RESIDENTIAL PLANNING AREA AND APPROPRIATELY SIZED BASED ON PROJECTED NUMBER OF RESIDENTS. TRAILS WILL BE PROVIDED AND DEFINED WITH FUTURE SPECIFIC DEVELOPMENT PLAN (SDP) AND ADMINISTRATIVE SITE PLAN (ASP) SUBMITTALS. CREDITS FOR EXCESS PUBLIC LAND DEDICATIONS AND UNOBSTRUCTED OPEN SPACE AND RECOGNITION FOR QUALIFIED IMPROVEMENTS CONSTRUCTED THEREIN MAY BE REQUESTED BY THE DEVELOPER AND CONSIDERED FOR APPROVAL BY THE COUNTY AT THE TIME OF THE SPECIFIC DEVELOPMENT PLAN OR ADMINISTRATIVE SITE PLAN. THIS MAY INCLUDE FUTURE INCLUSION OF ADJACENT PARCELS AS PUBLIC LAND DEDICATIONS THAT SUBSTANTIALLY BENEFIT UNOBSTRUCTED OPEN SPACE AND REGIONAL TRAIL CONNECTIVITY. CREDITS MAY BE CARRIED FORWARD INTO FUTURE PHASES OF DEVELOPMENT. DEFICITS IN PUBLIC LAND DEDICATIONS AND UNOBSTRUCTED OPEN SPACE MAY BE REQUESTED BY THE DEVELOPER AND CONSIDERED FOR APPROVAL WITH THE SDP OR ASP PER PHASE, AND MAY BE MET VIA CREDITS FROM A PREVIOUS PHASE, OR INCLUSION OF PUBLIC LAND DEDICATION ON ADJACENT PARCEL THAT SUBSTANTIALLY IMPROVES UNOBSTRUCTED OPEN SPACE AND TRAIL CONNECTIVITY. DEVELOPER SHALL PAY CASH IN LIEU IN ACCORDANCE WITH THE ARAPAHOE COUNTY LDC IN THE CASE THAT OPEN SPACE CANNOT BE MET ON SITE. UNOBSTRUCTED OPEN SPACE REQUIREMENTS LAND USE / DENSITY (CALCULATED ON A GROSS BASIS) MINIMUM AMOUNT OF UNOBSTRUCTED OPEN SPACE (PERCENTAGE OF NET SITE AREA) RESORT - (DRR) - UP TO 6 DU/AC 15% RESORT - (DRR) - 6.1 TO 10 DU/AC 20% RESIDENTIAL - (M-R) - UP TO 8 DU/AC 20% RESIDENTIAL - (M-R) - UP TO 8.1-12 DU/AC 25% NOTES: 1. PARK ACREAGE SHALL BE INCLUDED IN THE OVERALL OPEN SPACE DEDICATION CALCULATIONS. 2. PARK DEDICATIONS SHALL BE PROVIDED AT THE RATIO OF 1 ACRE PER 1000 RESIDENTS SCHOOLS & OTHER DEDICATIONS NO SCHOOL SITES ARE PROJECTED TO BE LOCATED WITHIN THIS SITE. SCHOOL FEES SHALL BE CALCULATED BASED ON THE STUDENTS EXPECTED TO BE GENERATED FROM EACH RESIDENTIAL DEVELOPMENT AS STIPULATED IN THE ARAPAHOE COUNTY LAND DEVELOPMENT CODE. FUTURE SUBDIVISION/PLATS PLANNING AREA BOUNDARIES MAY BE ALTERED BY UP TO A CUMULATIVE 15% WITHOUT REQUIRING A MAJOR AMENDMENT TO THIS GENERAL DEVELOPMENT PLAN. PHASING EXISTING AGRICULTURAL USES SHALL

REMAIN UNTIL ISSUANCE OF BUILDING PERMITS IN PLANNING AREAS 1 AND 2. MODIFICATIONS TO THE EXISTING LAND USES MAY BE PHASED. GENERAL USE NOTES: I. DENSITY - LODGING/RESIDENTIAL UNIT TRANSFERS TRANSFER(S) OF RESIDENTIAL/RECREATION UNITS FROM PLANNING AREA TO PLANNING AREA (MAXIMUM OF 20% PER PARCEL) IS PERMITTED BY DEVELOPER WITHOUT REQUIRING ADDITIONAL COUNTY APPROVALS. UNIT TRANSFERS SHALL BE TRACKED BY THE DEVELOPER WITH EACH SUCH TRANSFER AT THE PRELIMINARY PLAT STAGE. ONCE A PLANNING AREA HAS BEEN FULLY PLATTED THROUGH THE SUBDIVISION PROCESS, ANY REMAINING/UNPLATTED RESIDENTIAL UNITS DESIGNATED ON THE GENERAL DEVELOPMENT PLAN WITHIN SAID PLANNING AREA SHALL REMAIN AVAILABLE FOR TRANSFER TO OTHER UNPLATTED PLANNING AREAS WITHOUT REQUIRING ADDITIONAL COUNTY APPROVALS. II. OVERALL DENSITY INCREASE ANY REQUEST FOR TOTAL DENSITY OVER AND ABOVE PERMITTED DENSITY SHOWN ON THE LAND USE SCHEDULE WILL BE CONSIDERED A MAJOR AMENDMENT TO THIS GDP AND MUST FOLLOW THE PROCEDURES OUTLINED IN THE LAND DEVELOPMENT CODE (LDC). III. PLANNING AREA BOUNDARIES PLANNING AREA ACREAGES AND BOUNDARIES ARE PRELIMINARY AND SUBJECT TO CHANGE WITH DETAILED PLANNING. RESIDENTIAL PARCEL ACREAGES MAY CHANGE UP TO 15% WITHOUT A MAJOR AMENDMENT TO THIS GENERAL DEVELOPMENT PLAN. CHANGES WILL RESULT IN CORRESPONDING CHANGES IN THE PLANNING AREA YIELDS SHOWN ON THE LAND USE SCHEDULE FOR TOTAL ACRES, DENSITY, AND TOTAL UNITS. IV. ALLOCATION OF DENSITY BY OWNER WITHIN EACH PLANNING AREA, OWNER WILL HAVE THE RIGHT TO ALLOCATE THE ALLOWED CAMPSITES, LODGING UNITS WITHIN A PERMANENT STRUCTURE AND/OR NON\_RESIDENTIAL SQUARE FOOTAGE TO PARCELS OF LAND THEREIN. SUCH ALLOCATIONS MAY BE SET FORTH IN A DEED, DEED OF TRUST, PLAT OR OTHER DOCUMENT SIGNED BY OWNER AND RECORDED IN THE REAL PROPERTY RECORDS OF ARAPAHOE COUNTY, COLORADO. ONCE SO ALLOCATED, SUCH DENSITIES MAY BE REALLOCATED BY OWNER (IN THE SAME MANNER AS SET FORTH IN THE PREVIOUS SENTENCE) ONLY WITH THE CONSENT OF THE OWNER OF THE LAND TO WHICH THE DENSITIES HAVE BEEN ALLOCATED, OR, IN THE CASE OF AN ALLOCATION SET FORTH IN AN UNRELEASED DEED OF TRUST SIGNED BY OWNER, THE CONSENT OF THE BENEFICIARY OF SUCH DEED OF TRUST. OWNER MAY, FROM TIME TO TIME, ASSIGN THE RIGHT TO ALLOCATE THE DENSITIES WITHIN ANY PLANNING AREA TO ANY OWNER OF LAND WITHIN THE PROPERTY, OR TO A LENDER, BY A WRITTEN ASSIGNMENT SIGNED BY OWNER AND RECORDED IN THE REAL PROPERTY RECORDS OF ARAPAHOE COUNTY, COLORADO. THE ASSIGNEE WILL HAVE ALL OF THE RIGHTS OF OWNER UNDER THIS SECTION WITH RESPECT TO SUCH PLANNING AREA. WHEN ANY ALLOCATIONS OR ASSIGNMENTS ARE MADE BY OWNER IT WILL PROVIDE THE TOWN WITH A TABLE, SIGNED BY OWNER, ESTABLISHING THE THEN STATUS OF ALL SUCH ALLOCATIONS AND ASSIGNMENTS WITHIN THE PARTICULAR PLANNING AREA AND, UPON REQUEST OF THE TOWN, WILL PROVIDE THE TOWN WITH COPIES OF THE RECORDED DOCUMENTS, WHICH ESTABLISH SAME. IV. GENERAL NOTES i. ALL RESIDENTIAL DEVELOPMENT WILL CONFORM TO THE STANDARDS SET FORTH IN THIS GENERAL DEVELOPMENT PLAN. SPECIFIC BULK STANDARDS NOT ADDRESSED BY THIS GDP SHALL BE GOVERNED BY THE ARAPAHOE COUNTY LAND DEVELOPMENT CODE AS THOSE STANDARDS MAY BE ADOPTED OR AMENDED AT THE TIME OF LAND USE APPLICATION SUBMITTAL. j. ACCESS SHOWN IN THIS GENERAL DEVELOPMENT PLAN IS PRELIMINARY AND SUBJECT TO APPROVAL WITH FINAL PLAT AND ADMINISTRATIVE SITE PLAN FOR DEVELOPMENT BY THE COUNTY'S PUBLIC WORKS DEPARTMENT. k. DRAINAGE IS PRELIMINARY AND SUBJECT TO FINAL APPROVAL BY PUBLIC WORKS WITH FINAL PLAT AND ADMINISTRATIVE SITE PLAN. l. PARKS, AMENITY / RECREATION AREAS, AND DETENTION AREA LOCATIONS ARE SUBJECT TO CHANGE. FINAL LOCATIONS TO BE REVIEWED AND APPROVED WITH FINAL PLAT AND ADMINISTRATIVE SITE PLAN. m. NO HABITABLE BUILDING OR STRUCTURES SHALL BE PLACED

WITHIN 50 FT OF ANY PLUGGED AND ABANDONED OIL AND GAS WELL. SETBACK AS APPLICABLE SHALL BE DELINEATED ON ALL FUTURE PLATS. n. ANY PROPOSED USE NOT CLASSIFIED IN THIS GENERAL DEVELOPMENT PLAN SHALL BE PROHIBITED UNLESS THE COUNTY DETERMINES THE USE IS CONSISTENT WITH ONE OF THE CATEGORIES INCLUDED IN THIS TABLE. SIMILAR USES MAY BE APPROVED BY THE DIRECTOR WHEN COMPATIBLE WITH SURROUNDING USES AND STRUCTURES. v. TRAFFIC A TRAFFIC STUDY WILL BE PROVIDED TO MEET ARAPAHOE COUNTY GUIDELINES SUBSEQUENT TO THE REZONING AND GENERAL DEVELOPMENT PLAN APPROVAL. A TRIP BUDGET IS DEFINED BY THE TRIP GENERATION WITHIN THE TRAFFIC IMPACT STUDY. THIS TRIP BUDGET WILL BE ESTABLISHED DURING A SUBSEQUENT STUDY PRIOR TO PRELIMINARY AND FINAL SITE PLAN SUBMISSIONS. TRAFFIC LETTERS WILL BE PROVIDED WITH THE PRELIMINARY AND FINAL SITE PLANS TO TRACK THE TRIPS (DAILY AND/OR PEA HOUR) AND MONITOR THE AMOUNT OF THE TRIP BUDGET WILL BE UTILIZED AND HOW MANY TRIPS REMAIN AVAILABLE. IN THE CASE THAT AN INDIVIDUAL PARCEL GENERATES TRIPS IN EXCESS OF ITS TRIP BUDGET, THE OVERALL PROJECT WILL BE IN COMPLIANCE SO LONG AS THE ADDITIONAL GENERATED TRIPS IN THE INDIVIDUAL PARCEL CREATE NO NEGATIVE IMPACTS TO THE EXISTING INFRASTRUCTURE SUCH AS THE ROADWAYS AND THE STORM DRAINAGE SYSTEMS, AND THE PROJECT AS A WHOLE IS BELOW THE APPLICABLE TOTAL TRIP BUDGET FOR MAY FARMS RV RESORT AND SANCTUARY. IN THE CASE THAT AN INDIVIDUAL PARCEL GENERATES TRIPS IN EXCESS OF ITS TRIP BUDGET, THE OVERALL PROJECT WILL BE IN COMPLIANCE SO LONG AS THE ADDITIONAL GENERATED TRIPS IN THE INDIVIDUAL PARCEL CREATE NO NEGATIVE IMPACTS TO THE EXISTING INFRASTRUCTURES SUCH AS THE ROADWAYS AND THE STORM DRAINAGE SYSTEMS, AND THE PROJECT AS A WHOLE IS BELOW THE APPLICABLE TOTAL TRIP BUDGET FOR MAY FARMS RESORT AND SANCTUARY. THE APPLICANT WILL BE REQUIRED TO PREPARE A TRANSPORTATION DEMAND MANAGEMENT PLAN FOR REVIEW AND APPROVAL WITH THE SPECIFIC DEVELOPMENT PLAN. 02 OF 05 ARAPAHOE COUNTY CASE NUMBER: GDPQ24-089 MAY FARMS RV RESORT AND SANCTUARY- GENERAL DEVELOPMENT PLAN THE PARCELS LOCATED IN SECTION 4, TOWNSHIP 4 SOUTH, RANGE 61 WEST OF THE 6TH PRINCIPAL MERIDIAN, COUNTY OF ARAPAHOE, STATE OF COLORADO PLANNING AREA 1: PLANNING AREA 1 IS ORGANIZED AROUND A RECREATIONAL VEHICLE CAMPGROUND MODEL, WITH GUESTS ARRIVING FROM THE SOUTH TO A CENTRALIZED CHECK-IN AND WELCOME CENTER. SUPPORTING ACCESSORY USES SUCH AS A GENERAL STORE ARE ANTICIPATED IN THIS AREA. TRANSITIONING TO THE NORTH, THE PLANNING AREA WILL BE COMPRISED OF RECREATIONAL VEHICLE CAMPGROUND SPOTS AND GLAMPING ACCOMMODATIONS WITH UNIFORM DENSITIES AND LAYOUTS DESIGNED TO CONSIDER VIEW CORRIDORS AND CONNECTIVITY TO THE BIJOU CREEK OPEN SPACE. THE PLANNING AREA WILL PROVIDE OPPORTUNITIES FOR AGRITOURISM, LOCAL RETAIL, RECREATION AND RECREATION VEHICLE USES. A CENTRAL AMENITY CORE WILL ALSO BE PROVIDED IN THIS PLANNING AREA TO PROVIDE RECREATION AND ENTERTAINMENT OPTIONS INCLUDING AN ANTICIPATED CLUBHOUSE AND WATER FOCUS AMENITY. PLANNING AREA 2: PLANNING AREA 2 IS INTENDED TO BE AGE-TARGETED RESIDENTIAL INCLUDING SINGLE FAMILY AND/OR DUPLEX STYLE RESIDENCES. LOCATED NORTH OF THE PLANNING AREA 1, THE PLANNING AREA IS ACCESSED FROM THE EAST FROM THE NEW PROPOSED COLLECTOR ROAD. THE PLANNING AREA WILL BE ARRANGED TO TAKE ADVANTAGE OF AN AMENITY CORE FOR THE RESIDENTS TO PROMOTE AN ACTIVE LIFESTYLE AND TAKE ADVANTAGE OF THE PROXIMITY TO BIJOU CREEK OPEN SPACE. TRAILS AND PATHS WILL BE PROVIDED TO PROMOTE A WALKABLE COMMUNITY





**COLORADO**

**Parks and Wildlife**

Department of Natural Resources

**Northeast Regional Office**

**6060 Broadway**

**Denver, CO 80216**

**P 303.291.7227**

August 11, 2025

Kathleen Hammer

Senior Planner Public Works and Development

6924 S. Lima Street

Englewood, CO 80112

(720) 874-6666

KHammer@arapahoegov.com

RE: May Farms RV Resort and Sanctuary / Referral GDP25-001 / Arapahoe County

Dear Ms. Hammer,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the first step of a three-step proposed General Development Plan application, known as GDP25-001 of the May Farms RV Resort and Sanctuary Project. The project is located on private property that is currently zoned for agriculture in Section 4 of Township 4 South, Range 61 West in the Town of Byers, Arapahoe County, Colorado. CPW understands that the proposed use of the site is to create an RV park and sanctuary on 150 acres alongside West Bijou Creek. The proposed development will include 700 camp sites, 400 short-term residential units with associated support amenities, including welcome centers, laundry facilities, recreational equestrian and hiking trails, and also the development of a water park with waterslides.

The mission of CPW is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has a statutory responsibility to manage all wildlife species in Colorado, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this project.



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Richard Reading, Chair · James 'Jay' Tutchton, Vice-Chair · Eden Vardy, Secretary · Jessica Beaulieu · Frances Silva Blaney · John Emerick · Tai Jacober · Dallas May · Jack Murphy · Gabriel Otero · Murphy Robinson

After review of the proposed project and location, CPW would like to share some concerns and also recognize several potential impacts to wildlife and wildlife habitat such as habitat loss, habitat fragmentation, concerns with water use, development along and proximity to West Bijou Creek which is a High Priority Habitat (HPH) riparian corridor for wildlife.

**CPW recognizes and values the importance of areas known as High Priority Habitats (HPH).** Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High Priority Habitats are defined as sensitive habitats where CPW has recent maps regarding sensitive wildlife use, plus scientifically-backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity maps that are collected and updated for a variety of species and their particular habitats; CPW provides these maps to the public and regulatory agencies for the environmental assessment and land use commenting of proposed development on a given parcel, and general scientific research.

Aquatic Native Species Conservation Waters are areas of High Priority Habitat identified within the State of Colorado's 2015 State Wildlife Action Plan (SWAP). This HPH layer is designated for the recovery, conservation, protection, or enhancement of native fish species, and to aid in the conservation of other native aquatic species, such as amphibians, crustaceans, or mollusks (includes CPW Tier 1 and 2 SWAP Species). These surface water features provide critical habitat for native aquatic wildlife, such as amphibians and fish, while also providing crucial habitat for mammals, birds, and reptiles that utilize the habitat.

Within the proposed Project area, there is a possibility of sensitive aquatic native species (fish, amphibians, invertebrates) presence within West Bijou Creek. CPW recommends no surface occupancy and no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters and the implementation of appropriate storm water and sediment control BMPs.

Mule Deer Winter Concentration Areas are areas of High Priority Habitat defined as the part of the winter range where mule deer densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average of five winters out of ten.

The western half of the proposed project area borders West Bijou Creek, which is mapped as Mule Deer Winter Concentration Area HPH. For the identified portions of the proposed project area that traverse Mule Deer Winter Concentration Area HPH, CPW typically recommendations be implemented during construction:

- Complete construction and development in these areas outside of the winter season, which December 1st to April 30th.

Mule Deer Migration Corridors are High Priority Habitats with a specific mappable site through which large numbers of animals migrate and the loss of which has the potential to change mule

deer migration routes. With regard to the proposed development of May Farms RV Resort and Sanctuary, Mule Deer Migration Corridors are present along the western side of the proposed project area along West Bijou Creek. For the identified portions of the proposed Project area that traverse Mule Deer migration corridor, CPW recommends the following recommendations be implemented during construction:

- CPW recommends avoiding the riparian corridor to the maximum extent possible in order to keep the mule deer migration corridor along the river as open and undisturbed as possible.

If prairie dog burrows are present at the site, CPW recommends that burrowing owl surveys be conducted prior to any development. Burrowing owls are listed as a State Threatened species and are known to nest on flat treeless ground with short vegetation in active or inactive prairie dog burrows or the burrows of other terrestrial wildlife. Because burrowing owls are included in the protections afforded by the Migratory Bird Treaty Act, it is important to avoid actions that could negatively impact the owls, nests, and eggs.

To best avoid or minimize impacts to Burrowing Owls within the project area, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends adherence to [CPW's Burrowing Owl Survey Protocol](#).
- CPW recommends conducting targeted surveys for any activities resulting in ground disturbance between March 15<sup>th</sup> and October 31<sup>st</sup>.
- If nesting Burrowing Owls are present, no human encroachment or surface disturbance should occur within a 200-meter buffer of nesting burrows from March 15<sup>th</sup> to August 31<sup>st</sup>.
- If Burrowing Owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until late fall after they have migrated.

With regard to fencing, CPW is concerned for the safety and natural movement of mule deer, white-tailed deer and pronghorn antelope herds along and throughout the area of the proposed project. CPW recommends that if fencing (project perimeter or internal) is erected, either during or after the project, it should be the type that would allow the free passage of wildlife.

Fencing plans should avoid the use of woven wire-type fences that will trap or prevent the movement of wildlife. This would include avoiding the use of wrought iron fences or fences with spikes on top where deer could become impaled. CPW recommends using three or four-strand smooth-wire fencing with a bottom strand height of 17 inches above ground level and a maximum top strand height of 42 inches above ground level, along with the installation of double stays between posts.

CPW's "[Fencing with Wildlife in Mind](#)" brochure.

CPW recommends that an active weed management plan be implemented in accordance with Arapahoe County standards to control and eliminate the control and spread of any noxious weeds in and around the site. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them.

Also of importance is the revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. It is preferable that native vegetation be retained on-site during the operational lifespan of the project, both as potential habitat for wildlife and to ensure successful reclamation of the project area, as noxious weeds could spread to adjacent habitats outside the project area. CPW recommends that the applicant consult with Arapahoe County and the Natural Resource Conservation Service (NRCS) for current noxious weed best management practices.

Artificial lighting of the area at night has been documented to potentially negatively affect wildlife species of all sizes, from small macroinvertebrates to large mammals. These effects are often species-specific, and in some cases may be beneficial to one species within a local ecological community, but detrimental to another species within the same ecological community. These impacts could be expected year-round and can affect both local resident species and migrating wildlife, which may lead to collisions with other animals and structures, exhaustion, increased depredation, and direct mortality. Nighttime artificial lighting may also disrupt nocturnal species that are not accustomed to a significant increase in artificial light, leading to temporary blindness and disorientation, which may also increase the likelihood of collisions with infrastructure on site. CPW recommends that all outdoor lighting be down-shielded to minimize disturbance areas and dim the lights as much as practicable.

Per U.S. Fish and Wildlife Service recommendations<sup>1</sup>, all outdoor lighting should be limited to warmer colors with “longer wavelengths (>560 nm) and lower correlated color temperatures (CCT<3000 Kelvin degrees)” (“Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service”). Per the American Bird Conservancy, CCTs ranging from 2200 Kelvin Degrees to 2700 Kelvin Degrees are the preferred range of color. (Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass | Sheppard, PHD<sup>2</sup>) CPW recommends the latter range of lighting color options for implementation at the project site.

The intentional feeding of any wildlife is greatly discouraged and even prohibited in Colorado with the exception of feeding birds from bird feeders (2 CCR 406-0 #021.A pursuant to 33-6-104(1): Feeding or Attracting - Big Game, 33-6-131(1): Feeding or Attracting - Bear Citation).

---

<sup>1</sup> “Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service.” *FWS.gov*, 4 May 2023, [www.fws.gov/story/threats-birds-collisions-nighttime-lighting](https://www.fws.gov/story/threats-birds-collisions-nighttime-lighting).

<sup>2</sup> Sheppard, PHD, Christine. *Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass*. American Bird Conservancy, 11 May 2022, [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf](https://chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf).

The feeding of wildlife such as deer, elk, bear, coyote, and foxes by any type of feeding, baiting, salt blocks, or any other means of attracting wildlife is illegal. Feeding of wildlife can also be extremely harmful to wildlife and to humans alike. Please see the following CPW publications for more information:

Do Not Feed Wildlife: <http://cpw.state.co.us/learn/Pages/do-not-feed-wildlife.aspx>

CPW recognizes some other concerns regarding the proposed development along West Bijou Creek. This area has been mapped by CPW for a variety of wildlife species, including but not limited to: pronghorn (overall range and winter range), wild turkey (overall range and production area), and general habitat for nesting raptors along with roosting and foraging habitat for birds of prey.

CPW is concerned with recreational equestrian and public hiking trails accessing West Bijou Creek from this development and would like to reiterate that CPW recommends no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters, this includes hiking and recreating within the dry creek bed due to this area being crucial to wildlife.

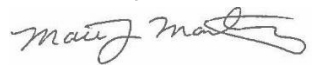
CPW would also like to bring attention and concern to the proposed development of a water park on the site. Water quantity and water use is of great concern in such a western arid environment. It is quite possible that the proposed water park will include pools, water slides and the need for water treatment and chlorination.

Concerns about water quantity during and water quality after chlorination and other human treatment is of concern due to the sensitive nature of nearby West Bijou Creek. If a water park is approved for development, it is recommended that the water park location be planned as far away from the riparian creek corridor as possible in order to prevent chlorine and other contaminants from getting into West Bijou Creek.

Finally, it is important to note that incremental and cumulative loss of natural areas and open space will, over time, significantly degrade the overall quality of wildlife habitat in the area. Although relatively moderate in acreage, it is important to know that the development of May Farms RV Resort and Sanctuary contributes to the overall fragmentation of and loss of native short grass prairie habitat in Colorado and in Arapahoe County.

Thank you again for the opportunity to comment on the proposed May Farms RV Resort and Sanctuary project in Arapahoe County Colorado. CPW appreciates the consideration of recommendations to help avoid and minimize impacts to wildlife and wildlife habitat. CPW looks forward to hearing back from the applicant with a management plan to address wildlife habitat concerns outlined above. If you have any additional questions regarding wildlife concerns for this project, please contact District Wildlife Manager Travis Harris at (303) 915-8444 or [travis.harris@state.co.us](mailto:travis.harris@state.co.us)

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Martinez", with a stylized flourish at the end.

*Matt Martinez*  
*Area Wildlife Manager*

Cc: M. Leslie, T. Harris



**JPS Law Group**  
**ATTORNEYS AT LAW**  
23 South Kalamath Street  
Suite 200  
Denver, CO. 80223  
TEL (720) 377-0703  
FAX (303) 832-4818

October 17, 2025

Arapahoe County Public Works & Development  
Planning Division  
6924 S. Lima Street  
Centennial, CO. 80112

Re: May Farms RV Resort & Sanctuary @Byers (GDP25-001)/Response to CPW Comments

Dear Public Works and Development:

This letter will confirm discussions with the Colorado Parks and Wildlife (CPW) regarding their questions about the proposed GDP for May Farms RV Resort & Sanctuary at Byers.

On October 8, 2025, the Applicant met with CPW representatives Lexi Hamous Miller, Travis Harris, and Matt Martinez. CPW raised questions and provided suggestions regarding a variety of topics, including wildlife migration and habitat, night time lighting, traffic, parking, aquatic and other species assessment, and mitigation steps.

The Applicant acknowledged all concerns and committed to working with CPW as this project moves into later approval phases, including the Site Development Plan process. The Applicant will also host a site tour for CPW representatives.

As always, we are happy to discuss.



Jep Seman, Attorney (Owner Representative)  
JPS Law Group  
23 S. Kalamath St., Suite 200  
Denver, CO. 80223  
720-377-0703 direct  
jseman@jps-law.net



**From:** Nathan Fogg  
**To:** Kathleen Hammer  
**Subject:** RE: May Farms - GDP25-001  
**Date:** Wednesday, September 17, 2025 12:12:07 PM  
**Attachments:** image003.png  
image005.png  
image007.png  
image008.png  
image009.png  
image010.png  
image011.png  
image012.jpg  
image001.png  
image002.png

That is perfectly acceptable. No other comments, and I appreciate the applicant’s willingness to continue engaging in the emergency planning process.

-N

**Nathan Fogg**  
Director  
Office of Emergency Management  
13101 E. Broncos Parkway  
Centennial, Colorado 80112-  
720-874-3659  
-

www.ArapahoeSheriff.org  


**From:** Kathleen Hammer <KHammer@arapahoe.gov>  
**Sent:** Tuesday, September 16, 2025 6:07 PM  
**To:** Nathan Fogg <NFogg@arapahoe.gov>  
**Subject:** RE: May Farms - GDP25-001

Hi Nate,

Please find the applicant’s response to comments attached. Please let me know if there are any outstanding items no later than September 30<sup>th</sup>.

Other application documents can be found here: <https://aca-prod.accela.com/ARAPAHOE/Cap/CapDetail.aspx?Module=Planning&capID1=25CAP&capID2=00000&capID3=0025K&agencyCode=ARAPAHOE>

Thanks,  
Kat Hammer



**From:** Nathan Fogg <NFogg@arapahoe.gov>  
**Sent:** Thursday, August 7, 2025 1:46 PM  
**To:** Jep Seman <jseman@jps-law.net>; Kathleen Hammer <KHammer@arapahoe.gov>  
**Subject:** RE: May Farms - GDP25-001

Exactly right, on both counts, regarding the plan and the stay vs. go considerations; and the numbers, if they come back the way I think will, would likely dive a conversation with responders and your team about a novel approach to pre-plan a defend in place strategy

Thanks, Jep and Kat.

Nate

**From:** Jep Seman <jseman@jps-law.net>  
**Sent:** Thursday, August 7, 2025 11:00 AM  
**To:** Kathleen Hammer <KHammer@arapahoe.gov>; Jep Seman <jseman@jps-law.net>; Nathan Fogg <NFogg@arapahoe.gov>  
**Subject:** RE: May Farms - GDP25-001

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Kat. We are working on a response to Nate Fogg’s query. Our traffic engineer has some thoughts, and we also believe his evacuation questions is a good one, but just one element of an overall emergency plan (in some instances, evacuation will be the absolute worst tactic as it can clog roads, etc).

Look forward to seeing your team’s comments. We will endeavor to respond and resubmit quickly.

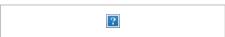
Jep  
303-638-7000

**From:** Kathleen Hammer <KHammer@arapahoe.gov>  
**Sent:** Wednesday, August 6, 2025 12:47 PM  
**To:** Jep Seman <jseman@jps-law.net>; Nathan Fogg <NFogg@arapahoe.gov>  
**Subject:** RE: May Farms - GDP25-001

Hello Jep,

I am wrapping up the second review and wanted to circle back on this. Have you had time to prepare something for Nate, or can we expect something with the next submittal?

Thanks,  
Kat Hammer



**From:** Jep Seman <jseman@jps-law.net>  
**Sent:** Tuesday, July 15, 2025 3:19 PM  
**To:** Nathan Fogg <NFogg@arapahoe.gov>; Jep Seman <jseman@jps-law.net>; Kathleen Hammer <KHammer@arapahoe.gov>  
**Subject:** RE: May Farms - GDP25-001

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, Nate. We will go to work on this.

Jep  
303-638-7000

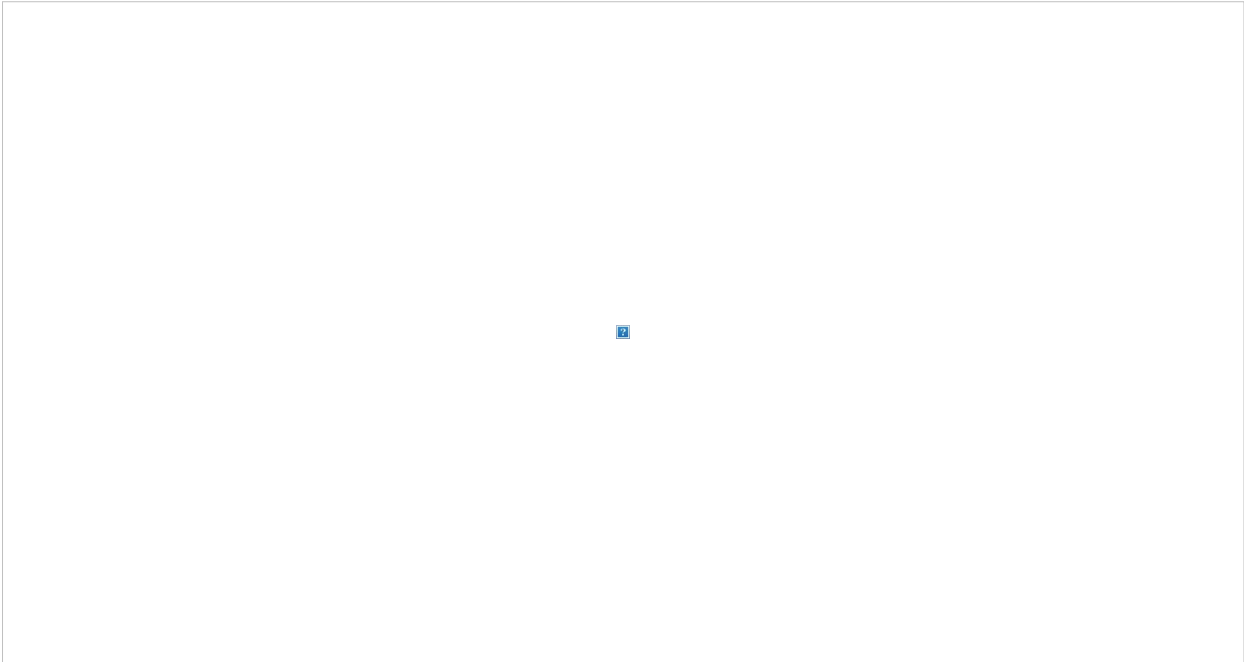
**From:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>  
**Sent:** Tuesday, July 15, 2025 1:03 PM  
**To:** Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>; Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>  
**Subject:** RE: May Farms - GDP25-001

Jep,

As I get older, time compresses, so recent, as noted below is a relative term. The major specific incident that we worked on the May Farms property was in 2020. In fact, we had two there within days. Gary will likely remember the one I am referring to here are we put on a little air show with firefighting helicopters in addition to dozens of trucks and firefighters.

In the map below you see the area in blue with the fire symbol is what caught. The park just east in red was evacuated. It was a difficult task and as often happens in the alluvial plains around our dry creeks, firetrucks get stuck and the actual firefighting is difficult, making the evacuations more crucial to public safety. So, the question, really for a fire preplan is, can get an order of magnitude estimate, assuming full capacity for the park, for evacuation. The idea being fire impinging on the RV park, we may dedicate all resources to evacuation instead of fire suppression or some percentages in between. Having a professional estimate of the time it would take to clear the park assists in the pre-event deployment and evacuation plans.

If that needs more explanation, feel free to call my cell: 303-435-\*9849



**From:** Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>  
**Sent:** Monday, July 14, 2025 11:13 AM  
**To:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>; Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>; Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>  
**Subject:** RE: May Farms - GDP25-001

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, Sir.

Jep  
303-638-7000

**From:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>  
**Sent:** Monday, July 14, 2025 11:08 AM  
**To:** Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>; Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>  
**Subject:** RE: May Farms - GDP25-001

I am out of the office the rest of the day and will respond in more detail tomorrow. But the short question is really, assuming max occupancy at the site, how long would it take to move those folks out? 2 hours? 4? I'll be more specific tomorrow.

-Nate

**Nathan Fogg**  
Director  
Office of Emergency Management  
13101 E. Broncos Parkway  
Centennial, Colorado 80112-  
720-874-3659  
-

[https://linklock.titanbo.com/analyse?url=https%3A%2F%2Fwww.ArapahoeSheriff.org&data=6JxNyz0QAIEQQOHTQCIB\\_LUGbkzCYC\\_0JlJuaAu1kYAip3y0sTE738s1gToPrzDiaoz5b\\_YQ1icOGTUWqMsB2Sf0n38jcFy0LRMyOIUFkx0SevFBzRkxhVQwJvF\\_8CX2sS\\_SS6615rTU0\\_CUUF2sVZ\\_cFE00sTQ%3F](https://linklock.titanbo.com/analyse?url=https%3A%2F%2Fwww.ArapahoeSheriff.org&data=6JxNyz0QAIEQQOHTQCIB_LUGbkzCYC_0JlJuaAu1kYAip3y0sTE738s1gToPrzDiaoz5b_YQ1icOGTUWqMsB2Sf0n38jcFy0LRMyOIUFkx0SevFBzRkxhVQwJvF_8CX2sS_SS6615rTU0_CUUF2sVZ_cFE00sTQ%3F)  
□□□□□

---

**From:** Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>  
**Sent:** Monday, July 14, 2025 9:41 AM  
**To:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>; Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>  
**Cc:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>  
**Subject:** RE: May Farms - GDP25-001

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Kat and Nathan:

LSC, our traffic engineer, informs that they rarely include evacuation plans in traffic impact studies. He has asked for additional feedback on precisely what you are asking for. Even better, an example or two of previously approved evacuation plans. Is there a link to/or other information describing the existing plan the SO has in place?

Happy to discuss.

Thank you,

Jep Seman, Attorney  
JPS Law Group  
720-377-0703 direct  
303-638-7000 mobile  
[jseman@jps-law.net](mailto:jseman@jps-law.net)

---

**From:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>  
**Sent:** Friday, July 11, 2025 1:04 PM  
**To:** Jep Seman <[jseman@jps-law.net](mailto:jseman@jps-law.net)>  
**Cc:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>  
**Subject:** May Farms - GDP25-001

Hi Jep,

It was a pleasure speaking with you this morning. I have copied Nathan Fogg, Manager of Emergency Management with the Sheriff's Office, on this email. He reviewed the TIS and did not find anything about estimated time to evacuate the property if required. Is this something your traffic engineer could weigh in on and include in the TIS? He mentioned there have been several good fires in the area in the recent past and evacuation is an absolute problem.

Thanks,  
Kat



**Kat Hammer**  
Senior Planner  
Public Works & Development  
6924 S Lima St | Englewood, CO 80112  
O: 720.874.6666  
[Arapahoegov.com](http://Arapahoegov.com)  
[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

CATEGORY	COMPANY	NAME	REFERRAL COMMENTS	APPLICANT'S RESPONSE
ARAPAHOE COUNTY AGENCIES				
	ARAPAHOE COUNTY ASSESSOR-COMMERCIAL	BEVERLY REYNOLDS		
	ARAPAHOE COUNTY ASSESSOR'S OFFICE	MELISSA GUZZINO		
	ARAPAHOE COUNTY ENERGY SPECIALIST	AVA PECHERZEWSKI		
	ARAPAHOE COUNTY OPEN SPACES	ROGER HARVEY	Based on Plan Set and Letter of Intent Parkland, Dedication for parks will be provided for and met/ Open Spaces has no comment and is supportive of project.	Applicant has engaged with Mr. Harvey regarding parkland dedication and the potential contribution of adjacent lands owned by the applicant to Open Spaces to establish an in-lieu agreement. These discussions will continue as the project evolves into subsequent phases.

	ARAPAHOE COUNTY PUBLIC HEALTH DEPARTMENT - LAND USE REFERRALS	STEVEN CHEVALIER	ACHD requests review of the will serve letter when issued. Existing wells on property.	The project has been formally annexed into the Byers Water and Sanitation District. Applicant will review and properly abandon any existing irrigation and stock wells, if required by the Colorado Division of Water Resources.
	ARAPAHOE COUNTY PUBLIC WORKS - BUILDING DIVISION	GREG BRAGDON	Review Building Division Commercial - New Construction Pre-Submittal Considerations document included in referral comments packet.	Applicant acknowledges requirements, including coordinating all development reviews and approvals with Planning and Engineering Services Division, Fire Authority review, building permits, construction documents, and the like.
	ARAPAHOE COUNTY PUBLIC WORKS MAPPING DIVISION	JOHN SVECHOVSKY		
	ARAPAHOE COUNTY R&B REFERRALS	DOUGLAS STERN	No comments	
	ARAPAHOE COUNTY/PWD ENG/TRAFFIC OPS	KARL PACKER		
CITIZEN ORG & HOA				

	EAST ARAPAHOE COUNTY/ADVISORY PLANNING COMMISSION			
		Jack Bell	I discussed with many in the area of Byers and there were no negative comments and minimal concerns about changes of the norm. There was discussion of the sewage treatment plant required by the state that it needs to be in place when the project opens. Overall, this is a good opportunity for the community.	Any requirement and timeline for a new sewage treatment plan is properly within the purview of the district.
			No objections	
			Good responses. Mostly favorable.	
	REAP -I-70 CORRIDOR REGIONAL ADVANCEMENT PARTNERSHIP			
	REAP -I-70 CORRIDOR REGIONAL ADVANCEMENT PARTNERSHIP	KIRK HOWELL		
	REAP-I-70 CORRIDOR REGIONAL ADVANCEMENT PARTNERSHIP	BRIAN FALLIN		
	REAP-I-70 CORRIDOR REGIONAL ADVANCEMENT PARTNERSHIP	KIP CHEROUTES		

	UNINCORPORATED ARAPAHOE COUNTY ECONOMIC DEVELOPMENT (UACED)	TRACY CARTER	<p>On behalf of Unincorporated Arapahoe County Economic Development, we are pleased to offer our full support for the proposed development project located on approximately 150 acres in Byers, Colorado. This visionary project, featuring 700 recreational vehicle campsites, 400 short-term residential units, and a wide range of support amenities—including welcome centers, laundry facilities, a water park, and recreational equestrian and hiking trails—will bring significant economic, social, and recreational benefits to the community and surrounding region. The thoughtful design of this development addresses the increasing demand for high-quality outdoor recreation, family-oriented amenities, and short-term residential accommodations. Byers' strategic location makes it an ideal site for a sanctuary-like environment where visitors can experience both leisure and adventure in a safe, welcoming, and sustainable setting. We recognize that the project will:</p> <ul style="list-style-type: none"><li>• Stimulate local economic development through tourism, job</li></ul>	<p>Applicant agrees the proposed project will generate clear community benefit and the description of the age-restricted single family housing portion of the project is largely accurate and will be comprised of manufactured housing units.</p>
--	---	--------------	---	--

			<p>creation, and small business opportunities.</p> <ul style="list-style-type: none"><li>• Provide much-needed lodging and recreational options that enhance the area's attractiveness as a destination.</li><li>• Offer diverse activities that promote physical well-being, outdoor education, and appreciation of natural spaces.</li><li>• Strengthen community assets by investing in infrastructure and complementary services.</li></ul> <p>We applaud the project’s balanced approach to growth, recreation, and conservation and believe it will serve as a model for future developments. We encourage its approval and look forward to seeing the lasting positive impact it will have on Byers and the broader region.</p>	
ENVIRONMENT & OPEN SPACE				
	PHILLIPS 66 COMPANY REAL ESTATE SERVICES	JARED LARSEN		
FIRE				



	BYERS FIRE PROTECTION DISTRICT #9	MIKE DISHER	Byers Fire will be able to cover the additional call volume as long as the RV park helps with the talked about in lieu of impact fees discussed.  Applicant- please discuss the impact fees you discussed with the fire district in your response.	The applicant met with Byers Fire and will continue to engage regarding anticipated call volume and other impacts, and potential impact fees.
FLOODPLAIN/WETLANDS				
	US ARMY CORPS OF ENGINEERS	ELLISON KOONCE		
	US ARMY CORPS OF ENGINEERS	ELLISON KOONCE		
HEALTH DEPARTMENT/AIR QUALITY				
	CDPHE/ DEPARTMENT OF HEALTH & ENVIRONMENT - STATE OF COLORADO	RICHARD COFFIN	Concerns/comments regarding fugitive dust and other air quality impacts as well as controls for mud and dirt carry-out and disturbed areas related to the project construction phase.	The applicant acknowledges and will adhere to all requirements.
	CDPHE/COLORADO DEPARTMENT OF HEALTH/BROWNFIELD/SUPERFUND	DOUG JAMISON		
	COLORADO DEPT OF HEALTH (CDPHE)	AARON LAMPLUGH		
	EPA/LCRD BRANCH	MARK HENDRIX		
HOA				

	No HOAs within 1,000 feet.			
LIBRARY				
	ARAPAHOE LIBRARY DISTRICT- REFERRALS	LINDA SPEAS		
LOCAL GOV MAILING LIST				
	DRCOG-DENVER REGIONAL COUNCIL OF GOVERNMENTS	ASHLEY SUMMERS		
PARK & RECREATION				
	ARAPAHOE PARK & RECREATION DISTRICT	DELOS SEARLE	No comments	
	BYERS PARK & RECREATION DISTRICT	ANNIE KNOX		
PLANNING OFFICES				
	ADAMS COUNTY REFERRALS	JEN RUTTER		
POST OFFICE				
	BYERS POST OFFICE	DREW OHLER		
SCHOOLS				
	BYERS SCHOOL DISTRICT 32J	TOM TURRELL	I don't have any concerns about this project; I think it'll provide a good opportunity for high school students to get part-time jobs and promote business in the Byers area.	Applicants met with school to discuss CIL fees, which will not be required for age-restricted residential development.
SHERIFF				

	ARAPAHOE COUNTY SHERIFF- OFFICE OF EMERGENCY MANAGEMENT (OEM)	NATHAN FOGG	All concerns have been addressed. OEM appreciates the applicant's willingness to continue to engage in the emergency planning process.	
	ARAPAHOE COUNTY SHERIFF'S OFFICE - COMMUNITY RESOURCE UNIT	DENNIS MEYER		
	ARAPAHOE COUNTY SHERIFF'S OFFICE - LAND USE REFERRALS	KENNETH MCKLEM	Concerning ref., the number of guests ref. the population of the town. May increase calls for service and impact staffing on I70 on the corridor.	Acknowledged. Will closely coordinate with law enforcement as the project evolves.
	ARAPAHOE COUNTY/SHERIFF/CRIME PREVENTION UNIT	JASON PRESLEY		
SOIL OR CONSERVATION				
	COLORADO GEOLOGICAL SURVEY - STATE OF COLORADO	JILL CARLSON	The site contains one area of steep slopes, in the southwestern area of PA-1 and appears to be mostly outside of the West Bijou Creek 100-year flood hazard limits and is not exposed to any identified geological hazards that would preclude approval of the proposed uses and density. Colorado Geological Survey (CGS) has no objection to the approval of this application, however, is requesting a site-specific preliminary geotechnical evaluation with the SDP.	Applicant acknowledges the recommendation for a site-specific Geotechnical Report at the SDP phase of the approval process and will prepare same.

	DEER TRAIL & EAST ADAMS CONSERVATION DISTRICT			
TRANSPORTATION				
	CDOT-DEP. OF TRANSPORTATION/ STATE OF CO-REGION ONE	BRAD SHEEHAN	Outstanding comments:  The drainage report must be discussed and document that there will be no adverse impacts to CDOT ROW.	
	FEDERAL RAILWAY ADMINISTRATION - REGION 6	STEVE JANKOWSKI		
	PUBLIC UTILITIES COMMISSION - RAILROAD CROSSINGS	PAM FISCHHABER		
	UNION PACIFIC RAILROAD	RS CARROLL		
UTILITIES OR PHONE				
	BIJOU TELEPHONE CO-OP	BRIAN CREVELING		
	CENTURYLINK NETWORK REAL ESTATE DEPARTMENT		No comments	
	COGCC- COLORADO NATURAL GAS	CODY STOUMBAUGH	The project, May Farms RV Resort & Sanctuary, is located in Colorado Natural Gas certified service territory, however Colorado Natural Gas has no objection to the proposed project and rezoning of existing agricultural land.	Applicant acknowledges the project is located within the service territory and will collaborate with the gas utility once the project

				design phase commences.
	IREA	BROOKS KAUFMAN	No objections	
	PHILLIPS 66	EDMOND BROOKS		
WATER & SANITATION				
	NORTH KIOWA BIJOU GROUNDWATER DISTRICT 4483	ANDREW MCCLARY		
WELL AND SEPTIC				
	DIVISION OF WATER RESOURCES- STATE ENGINEER/GROUNDWATER	IOANA COMANICIU	The proposed water supplier is the Byers Water and Sanitation District. The District has not provided a letter committing to serving the proposed recreational vehicle resort and sanctuary.	The project has been formally annexed into the Byers Water and Sanitation District service territory. Counsel to the District is preparing a will-serve letter.
WILDLIFE & ANIMAL				
	COLORADO PARKS & WILDLIFE/ 1ST POINT OF CONTACT	MATT MARTINEZ	Colorado Parks and Wildlife provided comments with concerns regarding potential impacts to wildlife and wildlife habitat such as habitat loss, habitat fragmentation, water use, development along and proximity to West Bijou Creek which is a High Priority Habitat (HPH) riparian corridor for wildlife.	The applicant met with CPW on October 8, 2025. CPW raised questions and provided suggestions regarding a variety of topics, including wildlife mitigation and habitat, nighttime lighting, traffic, parking, aquatic and other species assessment and

				mitigation steps. The applicant acknowledged all concerns and committed to working with CPW as this project moves into later approval phases. The applicant will host a site tour for CPW representatives.
--	--	--	--	--



May 8, 2025

To: Kathleen Hammer; khammer@arapahoegov.com  
CC: Conner Gerken; cgerken@arapahoegov.com

Subject: GDP25-001, May Farms RV Resort and Sanctuary, 1985-04-4-00-214 and  
1985-00-0-00-037

Dear Kat:

Land Use case reviews are conducted by Arapahoe County Public Health (ACPH) when they:

- Utilize an On-site Wastewater Treatment System (OWTS) or individual water well.
- Involve sewage disposal plans for subdivisions, a review of the water supply quality report of a proposed water supply for the subdivision will also take place.
- Are suspected of being impacted by flammable gas from a nearby landfill, or if they involve a past, present, or proposed solid waste disposal site.

**Landfill Operations:**

There are no documented landfills, past, present or planned that are within 1,000 feet of these properties.

**Septic and Wastewater Systems:**

There is an existing septic system that services the commercial facility at 64001 US Highway 36. The septic system record drawing has been included with this letter. The file contents for the septic system can be located here: <https://gis.arapahoegov.com/SepticSearch/> or by contacting ACPH at [water@arapahoegov.com](mailto:water@arapahoegov.com).

It is noted that Byers Water and Sanitation District has affirmed May Farms RV Resort and Sanctuary's inclusion in the expanded service area. ACPH requests review the will serve letter, once issued, along with the planned developments, to determine if the applicant will need to apply to ACPH or CDPHE for wastewater permitting based on flows/projected volumes.

**Water Systems:**

There are several existing wells on this property, 181622 (Stock), 4469-FP-R (Irrigation), 573-RFP-R (Irrigation), 407-WCB (Irrigation), 3332-FP-R (Irrigation), 64260-F (Other), 33169 (Domestic). The applicant may conduct a due diligence examination of records at the Division of Water Resources, <https://dwr.state.co.us/Tools/WellPermits>, to ensure any existing wells on the property are properly abandoned, if applicable.

If you have any questions, please feel free to contact me, Amara Thomas at  
PHLANDUSE@Arapahoe.gov

Regards,

Amara Thomas  
Environmental Health Specialist  
Arapahoe County Public Health





BRYAN D. WEIMER, PWLF

Director

Lima Plaza  
6924 South Lima Street  
Centennial, Colorado 80112-3853  
720-874-6500  
arapahoeco.gov



### BUILDING DIVISION COMMERCIAL - NEW CONSTRUCTION PRE-SUBMITTAL CONSIDERATIONS

- **NOTICE:** The Building Division requires Planning Division review, and approval prior to proceeding with Building Permit Plan Review. A Building Permit application submitted prior to approval by Planning and the Arapahoe County Engineering Services Division may not be reviewed by Building Division without the express written approval of the Building Official. Plan review may resume upon notification from the Planning Division that the application is approved & released for Building Permit plan review, and that final planning documents have been recorded (Previously referred as "Mylars"). It is the applicant's responsibility to coordinate any and all development review approvals with Planning & Engineering Services Divisions as may be applicable.
- **NOTICE:** Multiple Buildings on the Same Lot - The Building Division requires all detached individual buildings and/or structures on the same lot apply for a separate building permit. This includes separate permits for site elements such as swimming pools, spa's, mail buildings, maintenance buildings, trash bin/compactor enclosures, tensile membrane structures (shade sails), pre-engineered shade structures, etc. Each independent building or structure requiring its own permit shall have its own Construction Document package for plan review. Please contact the Building Division to confirm, a Building Division pre-application meeting may be required.
- **NOTICE:** Separate permit requirements include, but are not limited to: Temporary Construction Trailer, Sales Trailers, Access Control, Low-Voltage / Data, Building Signage, Fire Department / Authority, Temporary Generators, Hi-piled Storage, etc.
- All remaining or unaddressed issues pertaining to upstream Divisions must be satisfied prior to permit issuance. (Mapping, Planning, Engineering / Flood, Zoning, etc.)
- CDPHE / Asbestos, Local Health Department, Local Water / Sewer Authority approval may also apply, to include "will serve" documentation and/or confirmation from the Colorado Water Conservation Board / Authority re: well-water permit approval.
- **Local Fire Authority Review:** Fire Authority review is a separate application & review process specific to the requirements of the applicable Fire Authority of the given site of the work. Fire Authority plan review may proceed concurrent with Building Division plan review.
- Provide a complete copy of the Local Fire Authority drawing set approval & permit card, and/or documentation expressly stating that a permit is not required. (Required prior to permit issuance)

- Provide full set of Construction Documents (CD) that are 100% complete, ready for review, submitted as a complete package, and to include but not limited to:
  - Civil / Site Plan; Landscape; Geotechnical / Soils Report(s)
  - Architectural (Site accessibility Plan, Life-Safety Code Plan/Analysis & Egress Plan)
  - Structural; Mechanical; Plumbing; Electrical
  - Fire Detection / Suppression (Review by Fire Authority)
- Construction Documents submittal required to be uploaded as one CD set of documents. (One compiled, Complete, and Fully Bookmarked by Discipline CD set of documents)
- Construction Documents shall have a clear drawing set organization identified; all drawing disciplines included within the set to be listed on the drawing index.
- Documents must be uploaded in a .PDF format and stamped "Construction Documents".
- Documents security must not be protected to disallow changing or adding markups; Changing the Document & Adding Markups must be "Allowed".
- Documents must follow the established electronic file naming convention as listed on the Arapahoe County Website.
- Provide a Code study in conformance with all currently published County amendments, minimum posted adopted design criteria, and to also include:
  - 2021 IBC
  - 2021 IRC (Where applicable)
  - 2021 IPC
  - 2021 IMC
  - 2021 IFGC
  - 2021 IECC
  - 2021 IEBC, ISPSC (Where applicable)
  - 2023 NEC (As adopted July 9, 2024)
  - 2017 ANSI A-117.1
- All submittals must be stamped, signed & dated by a Colorado Licensed Professional Architect / Engineer in responsible charge / of record, where applicable.
- Be advised that Arapahoe County has adopted a resolution to formally recognize the 2021 International Fire Code, as a component applicable to building construction in the County. (Not a formal Code adoption)
- **NOTICE:** Incomplete submittals will be rejected, and partial reviews will not be conducted.
- HB23-1233 may apply this scope depending on submittal date re: documents for construction / permit. (Effective March 1, 2024)
- HB22-1362 may apply this scope depending on submittal date re: documents for construction / permit. (Effective upon adoption of 2023 NEC / July 2024)
- HB23-1057 may apply this scope depending on submittal date re: documents for construction / permit. (Effective January 1, 2024)



**COLORADO**  
Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

Kat Hammer  
Senior Planner  
Arapahoe County Public Works & Development  
6924 S Lima St Englewood, CO 80112

**VIA EMAIL**

RE: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Dear Kat Hammer,

The Colorado Department of Public Health and Environment's Air Pollution Control Division (APCD or Division) received a request for an air quality administrative review concerning the proposed May Farms RV Resort and Sanctuary project as described in your correspondence dated April 22, 2025. The Division has reviewed the project letter and respectfully offers the following comments. Please note that the following Air Quality Control Commission (AQCC) regulations may not be inclusive of the regulations the proposed project will be subject to. It is the responsibility of the involved parties to determine what regulations they are subject to and follow them accordingly.

**Land Development**

We also note that projects similar to this proposal often involve land development. Under Colorado air quality regulations, land development refers to all land clearing activities, including but not limited to land preparation such as excavating or grading, for residential, commercial or industrial development. Land development activities release fugitive dust, a pollutant regulated by the Division. Small land development activities are not subject to the same reporting and permitting requirements as large land activities. Specifically, land development activities that are less than 25 contiguous acres and less than 6 months in duration do not need to report air emissions to the Division. It is important to note that even if a permit is not required, fugitive dust control measures including the Land Development APEN Form APCD-223 must be followed at the site. Fugitive dust control techniques commonly included in the plan are included in the table below.

Control Options for Unpaved Roadways	
Watering	Use of chemical stabilizer
Paving	Controlling vehicle speed
Graveling	
Control Options for Mud and Dirt Carry-Out Onto Paved Surfaces	
Gravel entry ways	Washing vehicle wheels
Covering the load	Not overfilling trucks
Control Options for Disturbed Areas	
Watering	Application of a chemical stabilizer
Revegetation	Controlling vehicle speed
Compaction	Furrowing the soil
Wind Breaks	Minimizing the areas of disturbance



Please refer to the website <https://cdphe.colorado.gov/apens-and-air-permits> for information on land use APENs and permit forms. Click on “Land Development” to access the land development specific APEN form. Please contact KC Houlden, Construction Permits Unit Supervisor, at 303-692-4092, [kenneth.houlden@state.co.us](mailto:kenneth.houlden@state.co.us) if you have any specific questions about APENs and permit forms.

### **Federal General Conformity**

The federal General Conformity rule applies to federally funded projects in federal nonattainment and air quality maintenance areas, such as the Denver Metro/North Front Range severe ozone nonattainment area.<sup>1</sup> Within these areas, the general conformity rule applies to any “Federal action” not specifically exempted by the Clean Air Act or Environmental Protection Agency (EPA) regulations, i.e., any non-exempt activity by a federal governmental department, agency or instrumentality, or any activity that such an entity supports in any way, provides financial assistance for, or licenses, permits, or approves.

The federal general conformity rule and associated EPA guidance provides for a federal department or instrumentality to determine if the estimated emissions resulting from a proposed action in a nonattainment or maintenance area are below EPA’s de minimis levels (<https://www.epa.gov/general-conformity/de-minimis-emission-levels>) for the applicable National Ambient Air Quality Standard (NAAQS).<sup>2</sup> Note that this project is located in the the Denver Metro/North Front Range 2015 serious and 2008 severe ozone nonattainment areas. The General Conformity de minimis levels for the 2015 Denver Metro/North Front Range serious ozone nonattainment area are 50 tons per year of the ozone precursors VOCs or NOx and 25 tons per year for the 2008 Denver Metro/North Front Range severe nonattainment area. If a federal department or instrumentality determines that its action will result in emissions that are below the de minimis levels, the action is exempt and detailed air quality analysis is not required. Information about the general conformity rule, including training and frequently asked questions, is available at <https://www.epa.gov/general-conformity>.

If you have any other questions or need additional information, please use the contact info listed above, or e-mail or call me directly. Thank you for contacting the Air Pollution Control Division about your project.

Sincerely,  
Brendan Cicone  
Air Quality and Transportation Planner  
General SIP Unit  
Air Pollution Control Division  
Colorado Department of Public Health and Environment  
303-691-4104 // [brendan.cicone@state.co.us](mailto:brendan.cicone@state.co.us)

---

<sup>1</sup> U.S. EPA, Green Book, Colorado, [https://www3.epa.gov/airquality/greenbook/anayo\\_co.html](https://www3.epa.gov/airquality/greenbook/anayo_co.html)

<sup>2</sup> U.S. EPA, De Minimis Tables, <https://www.epa.gov/general-conformity/de-minimis-tables>



# COLORADO GEOLOGICAL SURVEY

1801 Moly Road  
Golden, Colorado 80401



Matthew L. Morgan  
State Geologist and  
Director

May 19, 2025

Kat Hammer  
Arapahoe County Public Works and Development  
Planning Division

**Location:**  
39.7376, -104.221

**Subject: GDP25-001, May Farms RV Resort and Sanctuary**  
**Arapahoe County, CO; CGS Unique No. AR-25-0021**

Dear Kat:

At your request (April 22, 2025), the Colorado Geological Survey has reviewed the May Farms RV Resort and Sanctuary referral. I understand the applicant proposes up to 700 RV camp sites, 400 DUs, and resort-related commercial amenities on 150 acres located north of Byers.

**Mineral resource potential.** According to the Atlas of Sand, Gravel, and Quarry Aggregate Resources, Colorado Front Range Counties (Schwochow et al, Colorado Geological Survey Special Publications 5-A, Plate 2, and 5-B, Byers Quadrangle, 1974), the property is **not** mapped as containing a sand, gravel, or quarry aggregate resource.

The applicant has requested a waiver of the requirement to provide a geotechnical report for this step of the three-step PUD process. The site contains one area of steep slopes, in the southwestern area of proposed PA-1, is not undermined, appears to be mostly outside of the West Bijou Creek 100-year flood hazard limits (**the scale on the general development plan is incorrect**, so it is difficult to georeference), and is not exposed to any identified geologic hazards that would preclude approval of the proposed residential-commercial uses and density. CGS therefore has no objection to approval of GDP25-001. **However, CGS recommends that the county require a site-specific preliminary geotechnical evaluation for area(s) of proposed permanent structures, to be submitted with the next project application.** Potential geotechnical constraints that will need to be considered include, but are not necessarily limited to:

**Collapsible and expansive soils.** The site is mapped as underlain by eolian (wind-deposited) soils. Eolian soils tend to be loose, fine-grained, low density, and hydrocompactive, meaning they can lose strength, settle, compress, or collapse under a structural load and/or when water infiltrates the soils. Thick columns of compressible or collapsible soils can result in significant settlement and structural damage. Alternatively, clay minerals and clayey pockets within the surficial soils may exhibit structurally damaging volume changes (shrink-swell) in response to changes in water content. Potentially highly expansive claystones and shales are present at unknown depth beneath the surficial soils. If claystone layers capable of producing high swell pressures are present within a few feet of foundation bearing depths, they can cause structural damage if not properly characterized and mitigated.

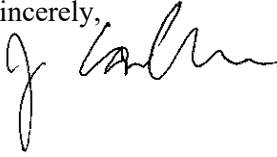
A site-specific, preliminary geotechnical investigation consisting of drilling, sampling, lab testing and analysis is needed to: determine the thickness and extent to which the site soils are subject to collapse under loading and/or wetting; characterize soil and bedrock engineering properties such as density, strength, water content, and swell/consolidation potential; determine depths to groundwater, bedrock, and any impermeable layers that

Kat Hammer  
May 19, 2025  
Page 2 of 2

might lead to development of a perched water condition; verify the feasibility of full-depth basements, if planned; and provide earthwork, foundation, floor system, subsurface drainage, and pavement recommendations for design purposes. It is imperative that grading, surface drainage, and subsurface drainage are correctly designed, constructed and maintained to prevent wetting of potentially collapsible soils surrounding and below foundation elements.

Thank you for the opportunity to review and comment on this project. If you have questions or require additional review, please call me at (303) 384-2643, or e-mail [carlson@mines.edu](mailto:carlson@mines.edu).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jill Carlson', with a stylized, flowing script.

Jill Carlson, C.E.G.  
Engineering Geologist

**From:** [Justin Gutierrez](#)  
**To:** [Kathleen Hammer](#)  
**Cc:** [Cody Stoumbaugh](#)  
**Subject:** RE: [EXTERNAL EMAIL] ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary  
**Date:** Tuesday, April 22, 2025 2:51:52 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Kat,

The project, May Farms RV Resort & Sanctuary, is located in Colorado Natural Gas certified service territory, however Colorado Natural Gas has no objection to the proposed project and rezoning of existing agricultural land.

Thanks,

-  
*Justin Gutierrez*  
*Engineer*  
Summit Utilities, Inc.  
[jgutierrez@SummitUtilitiesInc.com](mailto:jgutierrez@SummitUtilitiesInc.com)  
Direct: (720) 954-2804  
Office: (720) 981-2123 [x11187]

---

**From:** Cody Stoumbaugh <[cstoumbaugh@coloradonaturalgas.com](mailto:cstoumbaugh@coloradonaturalgas.com)>  
**Sent:** Tuesday, April 22, 2025 2:40 PM  
**To:** Justin Gutierrez <[JGutierrez@Summitutilitiesinc.com](mailto:JGutierrez@Summitutilitiesinc.com)>  
**Subject:** FW: [EXTERNAL EMAIL] ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary



**Cody L. Stoumbaugh**  
Manager of Colorado Operations  
Colorado Natural Gas  
Mobile: 720-626-5143  
[www.ColoradoNaturalGas.com](http://www.ColoradoNaturalGas.com)  
[cstoumbaugh@coloradonaturalgas.com](mailto:cstoumbaugh@coloradonaturalgas.com)

---

**From:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>  
**Sent:** Tuesday, April 22, 2025 2:23 PM

**To:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>

**Cc:** Sue Liu <[SLiu@arapahoegov.com](mailto:SLiu@arapahoegov.com)>

**Subject:** [EXTERNAL EMAIL] ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Hello,

Please use the link below to access documents for a General Development Plan application, known as GDP25-001. This application is the first step of the three-step Planned Unit Development process. If approved, the applicant will need to submit a Specific Development Plan and Administrative Site Plan for approval. Additional referral requests will be sent with those applications.

The application proposes a recreational vehicle and sanctuary on 150 acres located in Byers, Colorado. The proposed development will include 700 camp sites, 400 short-term residential units, and associated support amenities, including welcome centers, laundry, water park, and recreational equestrian and hiking trails.

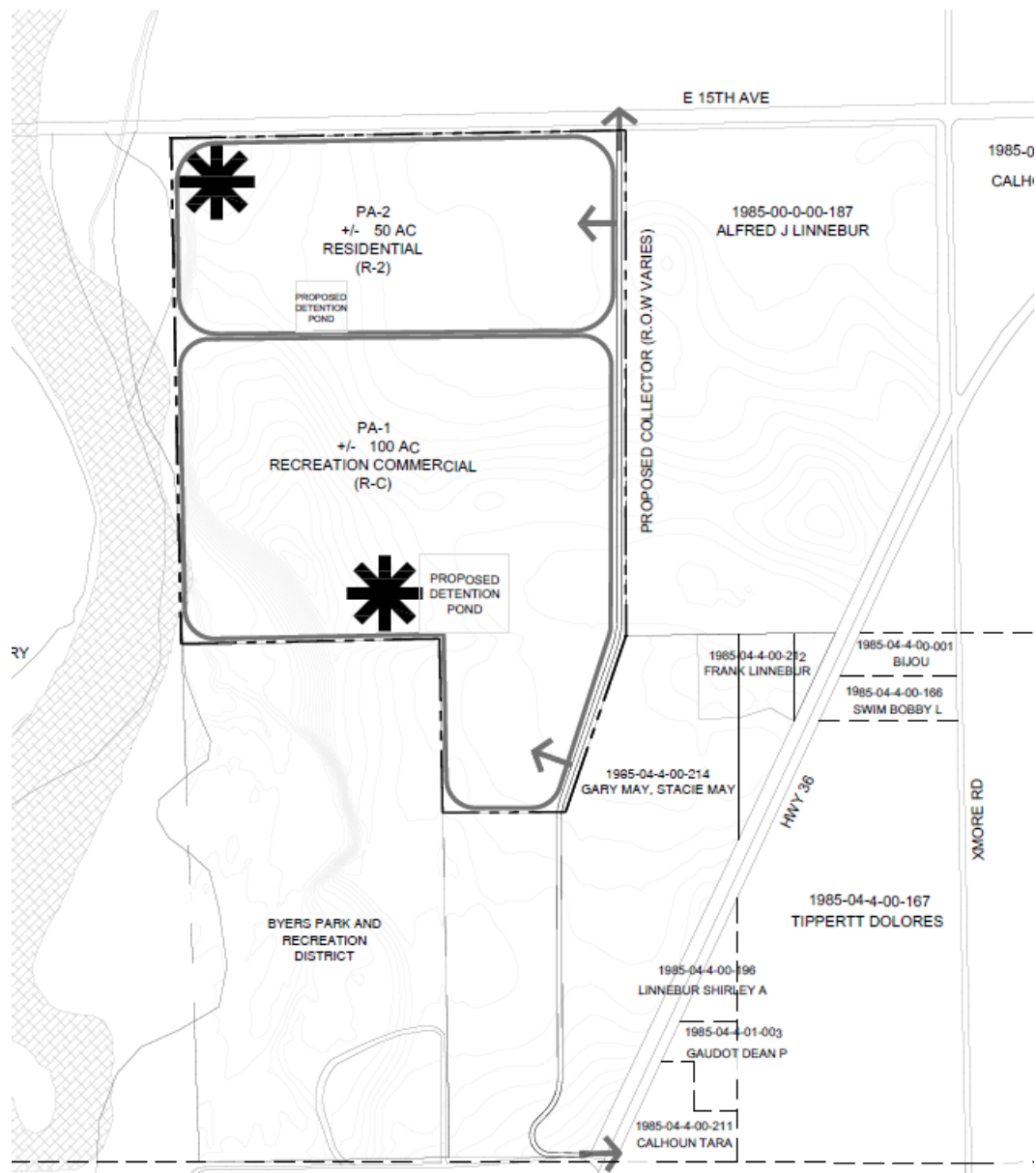
Please note a Phase 1 Drainage Report and Traffic Impact Study (TIS) were not submitted with this application but will be required with the resubmittal. Staff will send out another referral after those two items are submitted. If there is anything you would like to be included as part of the TIS, please provide comment.

Comments should be sent no later than **Monday, May 19, 2025.**

Application and Associated Documents: <https://aca-prod.accela.com/ARAPAHOE/Cap/CapDetail.aspx?Module=Planning&capID1=25CAP&capID2=00000&capID3=0025K&agencyCode=ARAPAHOE>

Site Location: <https://gis.arapahoegov.com/arapamap?PD=Y2H94>





Thanks,  
Kat



**ARAPAHOE COUNTY**

**Kat Hammer**

Senior Planner

Public Works & Development

6924 S Lima St | Englewood, CO 80112

O: 720.874.6666

[Arapahoegov.com](http://Arapahoegov.com)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

*This message originated from within the company. Please do not forward it to anyone outside the company without the sender's approval.*

*If you received this message in error, please do not read, copy, or share it. Instead, please notify the sender immediately and permanently delete all copies in your possession.*



**COLORADO**

**Parks and Wildlife**

Department of Natural Resources

**Northeast Regional Office**

**6060 Broadway**

**Denver, CO 80216**

**P 303.291.7227**

August 11, 2025

Kathleen Hammer

Senior Planner Public Works and Development

6924 S. Lima Street

Englewood, CO 80112

(720) 874-6666

KHammer@arapahoegov.com

RE: May Farms RV Resort and Sanctuary / Referral GDP25-001 / Arapahoe County

Dear Ms. Hammer,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the first step of a three-step proposed General Development Plan application, known as GDP25-001 of the May Farms RV Resort and Sanctuary Project. The project is located on private property that is currently zoned for agriculture in Section 4 of Township 4 South, Range 61 West in the Town of Byers, Arapahoe County, Colorado. CPW understands that the proposed use of the site is to create an RV park and sanctuary on 150 acres alongside West Bijou Creek. The proposed development will include 700 camp sites, 400 short-term residential units with associated support amenities, including welcome centers, laundry facilities, recreational equestrian and hiking trails, and also the development of a water park with waterslides.

The mission of CPW is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has a statutory responsibility to manage all wildlife species in Colorado, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this project.



Jeff Davis, Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Richard Reading, Chair · James 'Jay' Tutchton, Vice-Chair · Eden Vardy, Secretary · Jessica Beaulieu · Frances Silva Blaney · John Emerick · Tai Jacober · Dallas May · Jack Murphy · Gabriel Otero · Murphy Robinson

After review of the proposed project and location, CPW would like to share some concerns and also recognize several potential impacts to wildlife and wildlife habitat such as habitat loss, habitat fragmentation, concerns with water use, development along and proximity to West Bijou Creek which is a High Priority Habitat (HPH) riparian corridor for wildlife.

**CPW recognizes and values the importance of areas known as High Priority Habitats (HPH).** Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High Priority Habitats are defined as sensitive habitats where CPW has recent maps regarding sensitive wildlife use, plus scientifically-backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity maps that are collected and updated for a variety of species and their particular habitats; CPW provides these maps to the public and regulatory agencies for the environmental assessment and land use commenting of proposed development on a given parcel, and general scientific research.

Aquatic Native Species Conservation Waters are areas of High Priority Habitat identified within the State of Colorado's 2015 State Wildlife Action Plan (SWAP). This HPH layer is designated for the recovery, conservation, protection, or enhancement of native fish species, and to aid in the conservation of other native aquatic species, such as amphibians, crustaceans, or mollusks (includes CPW Tier 1 and 2 SWAP Species). These surface water features provide critical habitat for native aquatic wildlife, such as amphibians and fish, while also providing crucial habitat for mammals, birds, and reptiles that utilize the habitat.

Within the proposed Project area, there is a possibility of sensitive aquatic native species (fish, amphibians, invertebrates) presence within West Bijou Creek. CPW recommends no surface occupancy and no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters and the implementation of appropriate storm water and sediment control BMPs.

Mule Deer Winter Concentration Areas are areas of High Priority Habitat defined as the part of the winter range where mule deer densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average of five winters out of ten.

The western half of the proposed project area borders West Bijou Creek, which is mapped as Mule Deer Winter Concentration Area HPH. For the identified portions of the proposed project area that traverse Mule Deer Winter Concentration Area HPH, CPW typically recommendations be implemented during construction:

- Complete construction and development in these areas outside of the winter season, which December 1st to April 30th.

Mule Deer Migration Corridors are High Priority Habitats with a specific mappable site through which large numbers of animals migrate and the loss of which has the potential to change mule

deer migration routes. With regard to the proposed development of May Farms RV Resort and Sanctuary, Mule Deer Migration Corridors are present along the western side of the proposed project area along West Bijou Creek. For the identified portions of the proposed Project area that traverse Mule Deer migration corridor, CPW recommends the following recommendations be implemented during construction:

- CPW recommends avoiding the riparian corridor to the maximum extent possible in order to keep the mule deer migration corridor along the river as open and undisturbed as possible.

If prairie dog burrows are present at the site, CPW recommends that burrowing owl surveys be conducted prior to any development. Burrowing owls are listed as a State Threatened species and are known to nest on flat treeless ground with short vegetation in active or inactive prairie dog burrows or the burrows of other terrestrial wildlife. Because burrowing owls are included in the protections afforded by the Migratory Bird Treaty Act, it is important to avoid actions that could negatively impact the owls, nests, and eggs.

To best avoid or minimize impacts to Burrowing Owls within the project area, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends adherence to [CPW's Burrowing Owl Survey Protocol](#).
- CPW recommends conducting targeted surveys for any activities resulting in ground disturbance between March 15<sup>th</sup> and October 31<sup>st</sup>.
- If nesting Burrowing Owls are present, no human encroachment or surface disturbance should occur within a 200-meter buffer of nesting burrows from March 15<sup>th</sup> to August 31<sup>st</sup>.
- If Burrowing Owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until late fall after they have migrated.

With regard to fencing, CPW is concerned for the safety and natural movement of mule deer, white-tailed deer and pronghorn antelope herds along and throughout the area of the proposed project. CPW recommends that if fencing (project perimeter or internal) is erected, either during or after the project, it should be the type that would allow the free passage of wildlife.

Fencing plans should avoid the use of woven wire-type fences that will trap or prevent the movement of wildlife. This would include avoiding the use of wrought iron fences or fences with spikes on top where deer could become impaled. CPW recommends using three or four-strand smooth-wire fencing with a bottom strand height of 17 inches above ground level and a maximum top strand height of 42 inches above ground level, along with the installation of double stays between posts.

CPW's "[Fencing with Wildlife in Mind](#)" brochure.

CPW recommends that an active weed management plan be implemented in accordance with Arapahoe County standards to control and eliminate the control and spread of any noxious weeds in and around the site. Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them.

Also of importance is the revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. It is preferable that native vegetation be retained on-site during the operational lifespan of the project, both as potential habitat for wildlife and to ensure successful reclamation of the project area, as noxious weeds could spread to adjacent habitats outside the project area. CPW recommends that the applicant consult with Arapahoe County and the Natural Resource Conservation Service (NRCS) for current noxious weed best management practices.

Artificial lighting of the area at night has been documented to potentially negatively affect wildlife species of all sizes, from small macroinvertebrates to large mammals. These effects are often species-specific, and in some cases may be beneficial to one species within a local ecological community, but detrimental to another species within the same ecological community. These impacts could be expected year-round and can affect both local resident species and migrating wildlife, which may lead to collisions with other animals and structures, exhaustion, increased depredation, and direct mortality. Nighttime artificial lighting may also disrupt nocturnal species that are not accustomed to a significant increase in artificial light, leading to temporary blindness and disorientation, which may also increase the likelihood of collisions with infrastructure on site. CPW recommends that all outdoor lighting be down-shielded to minimize disturbance areas and dim the lights as much as practicable.

Per U.S. Fish and Wildlife Service recommendations<sup>1</sup>, all outdoor lighting should be limited to warmer colors with “longer wavelengths (>560 nm) and lower correlated color temperatures (CCT<3000 Kelvin degrees)” (“Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service”). Per the American Bird Conservancy, CCTs ranging from 2200 Kelvin Degrees to 2700 Kelvin Degrees are the preferred range of color. (Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass | Sheppard, PHD<sup>2</sup>) CPW recommends the latter range of lighting color options for implementation at the project site.

The intentional feeding of any wildlife is greatly discouraged and even prohibited in Colorado with the exception of feeding birds from bird feeders (2 CCR 406-0 #021.A pursuant to 33-6-104(1): Feeding or Attracting - Big Game, 33-6-131(1): Feeding or Attracting - Bear Citation).

---

<sup>1</sup> “Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service.” *FWS.gov*, 4 May 2023, [www.fws.gov/story/threats-birds-collisions-nighttime-lighting](https://www.fws.gov/story/threats-birds-collisions-nighttime-lighting).

<sup>2</sup> Sheppard, PHD, Christine. *Misguiding Light: The Role Artificial Light Plays in Bird Mortality from Collisions with Glass*. American Bird Conservancy, 11 May 2022, [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf](https://chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf).

The feeding of wildlife such as deer, elk, bear, coyote, and foxes by any type of feeding, baiting, salt blocks, or any other means of attracting wildlife is illegal. Feeding of wildlife can also be extremely harmful to wildlife and to humans alike. Please see the following CPW publications for more information:

Do Not Feed Wildlife: <http://cpw.state.co.us/learn/Pages/do-not-feed-wildlife.aspx>

CPW recognizes some other concerns regarding the proposed development along West Bijou Creek. This area has been mapped by CPW for a variety of wildlife species, including but not limited to: pronghorn (overall range and winter range), wild turkey (overall range and production area), and general habitat for nesting raptors along with roosting and foraging habitat for birds of prey.

CPW is concerned with recreational equestrian and public hiking trails accessing West Bijou Creek from this development and would like to reiterate that CPW recommends no ground disturbance (year-round) within a minimum of 500 feet of the ordinary high water mark of all surface waters, this includes hiking and recreating within the dry creek bed due to this area being crucial to wildlife.

CPW would also like to bring attention and concern to the proposed development of a water park on the site. Water quantity and water use is of great concern in such a western arid environment. It is quite possible that the proposed water park will include pools, water slides and the need for water treatment and chlorination.

Concerns about water quantity during and water quality after chlorination and other human treatment is of concern due to the sensitive nature of nearby West Bijou Creek. If a water park is approved for development, it is recommended that the water park location be planned as far away from the riparian creek corridor as possible in order to prevent chlorine and other contaminants from getting into West Bijou Creek.

Finally, it is important to note that incremental and cumulative loss of natural areas and open space will, over time, significantly degrade the overall quality of wildlife habitat in the area. Although relatively moderate in acreage, it is important to know that the development of May Farms RV Resort and Sanctuary contributes to the overall fragmentation of and loss of native short grass prairie habitat in Colorado and in Arapahoe County.

Thank you again for the opportunity to comment on the proposed May Farms RV Resort and Sanctuary project in Arapahoe County Colorado. CPW appreciates the consideration of recommendations to help avoid and minimize impacts to wildlife and wildlife habitat. CPW looks forward to hearing back from the applicant with a management plan to address wildlife habitat concerns outlined above. If you have any additional questions regarding wildlife concerns for this project, please contact District Wildlife Manager Travis Harris at (303) 915-8444 or [travis.harris@state.co.us](mailto:travis.harris@state.co.us)

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Martinez", with a stylized flourish at the end.

*Matt Martinez*  
*Area Wildlife Manager*

Cc: M. Leslie, T. Harris





**From:** [Mike Disher](#)  
**To:** [Kathleen Hammer](#)  
**Subject:** May Farms Referral  
**Date:** Wednesday, May 7, 2025 11:08:05 AM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Kathleen, attached is the requested referral for the May Farms RV Park. Byers Fire will be able to cover the additional call volume as long as the RV park helps with the talked about in lieu of impact fees discussed. Let me know if you have any questions.



GDP25-001 External Referral Routing Sheet.docx

--



*Chief Mike Disher  
Byers Fire Rescue  
303-475-6505*

June 2, 2025

Kat Hammer, Senior Planner  
Arapahoe County Public Works and Development  
Transmitted via email: [KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)

**Re: May Farms RV Resort and Sanctuary**

Case No. GDP25-001

Part of Section 4, Township 4 South, Range 61 West, 6<sup>th</sup> P.M.

Water Division 1, Water District 1

Kiowa Bijou Designated Basin

CDWR Assigned Referral No. 34042

Dear Kat Hammer:

We have reviewed your April 22, 2025 submittal concerning the above referenced proposal for a recreational vehicle resort and sanctuary on approximately 150 acres. The development proposes 700 camp sites, 400 short-term residential units, associated support amenities, welcome centers, laundry, water park, and recreational equestrian and hiking trails.

This referral does not appear to qualify as a “subdivision” as defined in section 30-28-101(10)(a), C.R.S. Therefore, pursuant to the State Engineer’s March 4, 2005 and March 11, 2011 memorandums to county planning directors, this office will only perform a cursory review of the referral information and provide informal comments. The comments do not address the adequacy of the water supply plan for this project or the ability of the water supply plan to satisfy any County regulations or requirements. In addition, the comments provided herein cannot be used to guarantee a viable water supply plan or infrastructure, the issuance of a well permit, or physical availability of water.

The proposed water supplier is the Byers Water and Sanitation District ("District"). The District has not provided a letter committing to serve the proposed recreational vehicle resort and sanctuary, although the parcel is pending Inclusion into the District.

Pursuant to section 30-28-136(1)(h)(II), C.R.S., a municipality or quasi-municipality is required to file a report with the county and the State Engineer documenting the amount of water which can be supplied to the proposed development without causing injury to existing water rights. A report of this nature was not included. Please see the attached State Engineer's [March 4, 2005](#) memorandum for additional information.

Should you have any questions, please contact Ariel Hacker of this office at [Ariel.Hacker@state.co.us](mailto:Ariel.Hacker@state.co.us).

Sincerely,



Ioana Comaniciu, P.E.

Water Resource Engineer

Ec: Byers Water and Sanitation District file

March 16, 2005

MEMORANDUM

TO: ALL COUNTY LAND USE PLANNING DIRECTORS

FROM: DICK WOLFE, ASSISTANT STATE ENGINEER

SUBJECT: UPDATED MEMORANDUM REGARDING SUBDIVISIONS

Attached is a memorandum from Hal Simpson, State Engineer, that provides important information regarding actions that will be taken by the State Engineer's Office ("SEO") when reviewing subdivision water supply plans. This memorandum replaces the one that was previously sent to County Planning Directors, dated August 7, 1995.

I ask you and your staff to read this memorandum and become familiar with the actions that will be taken by the SEO. The information in this memorandum is a valuable guide that will save time for your staff, SEO staff, and especially the developers that we all serve. For ease of reading, the memorandum is organized as follows:

- **Memorandum** from Hal Simpson regarding subdivision review performed by the SEO (2 pages)
- **Attachment A** – Information requirements of the SEO for the four different "types" of water sources (5 pages)
- **Attachment B** – Guidelines for the county to evaluate a water supply for a land use action that does not involve a subdivision (3 pages)
- **Attachment C** – *WATER SUPPLY INFORMATION SUMMARY FORM* (1 page)
- **Attachment D** – State map showing the Denver Basin and the Designated Ground Water Basins

We recommend that a copy of the memorandum and the Attachments A, C and D be provided to all parties that plan to subdivide property in your county. This letter will be placed on our website. If you have further questions, please call the SEO in Denver and ask to talk to me or the Team Leader for your water division.

March 4, 2005

MEMORANDUM

TO: ALL COUNTY LAND USE PLANNING DIRECTORS

FROM: HAL SIMPSON, STATE ENGINEER

SUBJECT: STATE ENGINEER'S ACTIONS ON PROPOSED WATER SUPPLIES  
FOR LAND USE ACTIONS

On August 7, 1995, I sent a memorandum to the Land Use Planning Directors for each county in the state. The memorandum addressed the State Engineer's responsibilities in providing "an opinion regarding material injury likely to occur to decreed water rights by virtue of diversion of water necessary or proposed to be used to supply the proposed subdivision and adequacy of proposed water supply to meet requirements of the proposed subdivision" as required under Section 30-28-136(h)(l) C.R.S. The primary objective of that memo was to inform the Land Use Planning Directors and their staff ("County") that effective August 31, 1995, the State Engineer's Office ("SEO") would no longer respond to comments regarding county land use actions that do not involve the subdivision of land as defined in Section 30-28-101(10)(a) C.R.S. ("Subdivision"). The reason I adopted that approach in 1995 was to ensure that my staff would be able to satisfy the statutory requirement of responding to those land use actions that do meet the definition of a Subdivision.

In addition to explaining that approach, the memorandum provided a *Water Supply Information Summary* form and Guidelines for the County's use in determining exempt well permit availability in situations that did not involve a Subdivision.

I find it is appropriate to update the information provided in that memorandum. This memorandum supercedes the memorandum dated August 7, 1995. County land use planning directors and their staff should read this memorandum and become familiar with the content. **A copy of this memorandum should be provided to all developers that are submitting a water supply plan to the county. This memorandum provides valuable information that will guide the developer when creating a water supply plan for a subdivision and reviewing this memorandum will save the developer valuable time and resources in many cases.**

**SUBDIVISION WATER SUPPLY PLAN REVIEW**

The SEO will continue to provide timely review and an opinion regarding material injury and adequacy for water supply plans for Subdivisions as those water supply plans are submitted to the SEO by referral from the County. The opinion will be completed within the statutory 21-day requirement. The SEO'S Water Supply Plan Review Requirements For Subdivisions are found in Attachment A on Page 3.

The SEO will not respond to water supply plans that are submitted by parties other than the County. This includes amended water supply plans that address concerns raised by the SEO in a previous response. Those amended plans must also be submitted through the County.

The SEO has no statutory responsibility to review land use actions that do not involve the subdivision of land as defined in Section 30-28-101(10)(a). These actions include, but are not limited to lot line adjustments, zone change requests, special use of land, division by exemption, and cluster developments. To assist the County in evaluating the water supply for these 'non-Subdivision' land use actions, this memorandum includes water supply evaluation guidelines in Attachment B, Page 8. If the County finds it is appropriate to submit a written request concerning a specific 'non-Subdivision' land use action, the SEO will perform a cursory review and provide only informal comments regarding the proposed water supply. Those comments will identify any concerns or issues that the SEO identifies through cursory review that may present themselves at such time that the developer of the subject land implements the water supply. The comments will not state an opinion on the adequacy of the water supply or the ability of the water supply plan to satisfy any County regulations or requirements. The comments cannot be used to guarantee a viable water supply plan or infrastructure, the issuance of a well permit, or physical availability of water. If the SEO does not identify concerns or issues related to the proposed water supply, the SEO will respond with no comment regarding the water supply. The response will also state that the SEO does not necessarily take the position that the water supply plan is valid.

Therefore, each referral submitted to the SEO must clearly identify whether the proposed action is a Subdivision or does not qualify as a Subdivision according to the definition in C.R.S. 30-28-101(10)(a).

## **WATER SUPPLY PLAN INFORMATION FOR SUBDIVISIONS**

The water supply plan must be included in all Subdivision referrals from the County. That plan must identify the Subdivision's estimated water supply requirements and demonstrate the adequacy of the proposed water supply. The *WATER SUPPLY INFORMATION SUMMARY* form that is included with this memo as Attachment C on Page 11 may be used as a guide and in many cases will be sufficient. However, for many subdivisions the water supply plan must include a water supply report. The Water Supply Information Summary or the report should identify, at a minimum: the number of lots; the type of use and the demand, by lot; and the total water requirement. The SEO will review the Water Supply Information Summary or water supply report to ensure the water use values are reasonable for the described uses and are consistent with SEO accepted demand/consumptive use values unless specific information is supplied to support different use values or the values are indicated in a court approved augmentation plan or, for a subdivision located in a Designated Basin, a Ground Water Commission approved replacement plan. The SEO may consider, but is not obligated to follow County Land Development Codes or Rules.

The maps in Attachment D on Page 12 show the boundaries of the Designated Basins and the approximate locations of the Denver Basin bedrock aquifers.

## **ATTACHMENT A**

The SEO will apply specific review criteria to water supply plans that rely on sources of water as listed below:

### **SEO'S WATER SUPPLY PLAN REVIEW REQUIREMENTS FOR SUBDIVISIONS**

#### **1. Source is a Municipality or Quasi-Municipality**

If the water supply is to be provided by a municipality or quasi-municipality (i.e. a Water District, a Water and Sanitation District, etc.), the SEO will review the submittal to ensure that it includes:

- a. A letter of commitment from the municipality or quasi-municipality referencing the subdivision name (as submitted to the county) and a level of commitment in terms of uses to be served.
- b. As required by C.R.S. 30-28-136(1)(h)(II), a report from the municipality or quasi-municipality documenting the amount of water that can be supplied to the subdivision, containing the following:
  - i. A summary of the water rights owned and controlled by the municipality.
  - ii. The anticipated yield of these rights in both an average and dry year.
  - iii. The present demand on the municipality, and the anticipated demand due to commitments for service entered into by the municipality that are not yet supplied.
  - iv. The amount of uncommitted firm supply the municipality has available for future commitment and development.
  - v. A map of the municipality's service area.

The above information should be provided in a manner that demonstrates that the municipality has sufficient water resources to meet its commitments in terms of an overall annual water supply and daily availability. Note that, for many of these providers, the SEO maintains files that document the firm water supplies and the amount of water that has been committed to subdivisions. If that information is on file, this statement may not be necessary.

The SEO may request updated information from the municipality or quasi-municipality if it appears the information has not been updated within three calendar years, or when the commitments reach a total that is close to the firm yield (approximately 90 percent)

- c. Proposed uses that correspond to the uses of the municipality or quasi-municipality's water rights.
- d. For a Subdivision located in a Designated Basin, proposed place of use (the Subdivision) that corresponds with the place of use listed on Permit or Determination of Water Right.

#### **2. Source is Wells Withdrawing Tributary Ground Water or any Designated Ground Water from a Non-Denver Basin Aquifer**



If the water supply is to be provided by wells withdrawing tributary ground water or designated ground water from any non-Denver Basin aquifer:

- a. The SEO will review the submittal to ensure that all uses are consistent with the uses in a court-decreed augmentation plan or, if in a designated basin, the uses in a commission approved replacement plan.

(Note: For areas outside of the Designated Basins, a source of water that is approved through a substitute water supply plan is not an acceptable water supply for inside domestic uses; a court decreed augmentation plan is required. However, if the water supply plan includes lawn and garden irrigation from a source that is not yet subject of a court-decreed augmentation plan, the SEO will evaluate that component of the water supply plan for adequacy and potential injury independently, however, the source of water to be used for lawn and garden irrigation may be subject to curtailment until the developer acquires a court-approved augmentation plan for that source. The SEO will not comment unfavorably on the entire plan due to failure of that one aspect.)

- b. If in a Designated Basin, the SEO will review the submittal to ensure that the proposed place of use (the subdivision) corresponds with the place of use listed on the well permit.
- c. State statute requires that the SEO provide an opinion regarding the water supply's adequacy to meet the requirements of a proposed subdivision [C.R.S. 30-28-136(h)(l)]. Therefore, the SEO will review the submittal to ensure that there is evidence that a water supply is physically adequate. This evidence should be in the form of a hydrologist's or geologist's report that may include information from a test well or wells.

**3. Source is Individual, On-lot, Exempt/Small Capacity Wells Withdrawing Denver Basin Ground Water Considered to be Nontributary\*\*, or Other Ground Water Determined to be Nontributary. The Water that has not been adjudicated or is not Subject of a Determination of Water Right**

If the water supply is to be provided by individual on-lot wells from a Denver Basin aquifer and is considered nontributary\*\*, or a formation that is determined to be nontributary by statutory definition [C.R.S. 37-90-103(10.5)], and the ground water has not been adjudicated or is subject of a Determination of Water Right, the SEO will review the water supply plan to ensure that:

(\*\* note: for a subdivision located in a Designated Basin, the subdivision may also use a source that is not-nontributary with a 4 percent replacement requirement, without the need for a replacement plan)

- a. The developer has identified a specific source (for example, Dawson, Denver, Arapahoe, Laramie-Fox Hills),
- b. The developer has properly quantified the amount of water using aquifer characteristics that are consistent with the Denver Basin Rules or site-specific information that has been validated by the SEO geotechnical staff.

- c. The subdivision's proposed water supply has not been previously allocated through existing decrees, well permits, pre-Senate Bill 213 type wells, Determinations of Water Rights, or other claims to the water.
- d. The amount of water available annually, on the basis of an aquifer life of 100 years, is greater than or equal to the amount of water required.

(Note: The amount of water available annually should be quantified as described in Rule 8 of the Statewide Nontributary Ground Water Rules. **The water supply plan must ensure that the smallest parcel in the subdivision has adequate land area such that the calculation of the water available underlying that land area is sufficient to satisfy its needs.** Small parcels may not 'borrow' land area from larger parcels to increase the amount of water available to the small parcel since the well permit will ultimately be issued pursuant to C.R.S. 37-92-602(3)(b)(I) or 37-90-105(3)(c), which requires a land area evaluation. If the developer cannot provide a water supply to the smaller parcels because of this, the developer may pursue a water court decree or Determination of Water Right that will "separate" the water from the land and allow it to be deeded to individual landowners in the amounts necessary to provide a water supply.

Additionally, to satisfy a county's "300-year water supply approach", the developer may state that each lot will use one aquifer for a portion of the 300-year period (the first 100 years), then, a deeper aquifer for subsequent portions of the 300-year period (the remaining 200 years). This approach is acceptable, however, it is entirely the developer's responsibility to identify, by lot number, the aquifer that will be used for each lot and for which period of time. In no case will the SEO approve a plan where the engineer makes that determination in the response to the County or where that determination is left to the well permit applicant or permit evaluator in the future. In this situation, the SEO response will state that the lot owners should be notified through plat notes or other means of the specific restrictions.)

- e. The amount of water available considers any 300-year water supply approach or similar approach that is currently used by the referring county.
- f. The proposal meets all applicable Ground Water Management District rules, if located within a Designated Basin.

**4. Source is from a Denver Basin Aquifer that has been Decreed or, for the Designated Basins, is Subject of a Determination of Water Right**

If the ground water is from a Denver Basin aquifer and is considered to be nontributary or not-nontributary and has been adjudicated by Water Court or has a Determination of Water Right/Permit issued by the Ground Water Commission, the SEO will review the water right to ensure that:

- a. The developer has identified a specific source (for example, Dawson, Denver, Arapahoe, or Laramie-Fox Hills aquifer),
- b. The amount of water available annually, according to the court-approved decree or Commission-approved Determination of Water Right/Permit, is

greater than or equal to the amount of water required for the entire subdivision.

(Note: The adjudication/quantification of nontributary or not nontributary ground water "separates" the ownership of the water from the land. Therefore, individual lot owners that apply for well permits will require a 'special warranty deed' or other document by which ownership of an amount of water is transferred to the lot owner from the original landowner. Such a deed will not be necessary if a Homeowner's Association ("HOA") will be created to take ownership of the water rights and the HOA will have the necessary mechanism to convey the water rights to members of the HOA. The water supply plan must identify whether water will be deeded to individual lot owners or owned by a HOA. In comments to the County, the SEO will add a note that indicates whether there will be a "HOA" that will take ownership of the water rights and to which each homeowner must belong. If so, well permit applicants will not require a "special warranty deed" granting them the rights to use the amount of water identified in the water supply plan. If water will be deeded to individual lot owners, well permit applicants will be required to provide to this office a copy of the 'special warranty deed' or other document conveying the water right to the lot owner.)

- c. The proposed uses correspond to the uses of the vested water rights to be used.
- d. If in a Designated Basin, the proposed place of use (the Subdivision) corresponds with the place of use listed on the well permit or Determination of Water Right.
- e. The water supply plan is consistent with the specific terms and conditions of a court-approved augmentation plan or Ground Water Commission-approved replacement plan, if one was developed.
- f. The amount of water available considers any 300-year water supply approach or similar approach that is currently used by the referring county.

(Note: To satisfy a county's "300-year water supply approach", the developer may state that each lot will use one aquifer for a portion of the 300-year period (the first 100 years), then, a deeper aquifer for subsequent portions of the 300-year period (the remaining 200 years). Or, a developer may state that a predetermined number of lots will use a shallower aquifer while other lots will use a deeper aquifer. These approaches are acceptable, however, it is entirely the developer's responsibility to identify, by lot number, the aquifer that will be used for each lot and for which period of time. In no case will the SEO approve a plan where the engineer makes that determination in the response to the County or where that determination is left to the well permit applicant or permit evaluator in the future. In these situations, the SEO response will state that the lot owners should be notified through plat notes or other means of the specific restrictions.)

Additionally, the following comments apply to the four SOURCE OF WATER SUPPLY categories listed above.

1. If the water supply plan relies on an adjudicated water right, and the decree for that water right is not yet final, the SEO will not include consideration of the water that is subject of that water right. Similarly, if the water supply plan relies on water rights, changes to water rights, or replacement plans that are pending review by the Ground Water Commission but have not been approved, the SEO will not include consideration of the water that is subject of that water right.
2. The SEO's determination that a water supply is "adequate" requires evidence that volume and flow rate required is physically and legally available, but does not necessarily include infrastructure beyond the wellhead, storage vessel, diversion or release point. For example, the SEO does not comment on the design of the piping and pump stations needed to deliver water throughout the system at required pressures.
3. The adequacy of a water supply plan in the Denver Basin aquifers is evaluated using estimates of legally available water based on information available at the SEO and may not necessarily reflect the physical availability of water. Water in the Denver Basin aquifers is allocated based on a 100-year aquifer life under the provisions of C.R.S. 37-90-137(4)(b)(I). For planning purposes the county should be aware that the economic life of a water supply based on wells in a given Denver Basin aquifer may be less than the 100 years indicated due to anticipated water level declines. Furthermore, the water supply plan should not rely solely upon non-renewable aquifers. Alternative renewable water resources should be acquired and incorporated in a permanent water supply plan that provides future generations with a water supply.

## **ATTACHMENT B**

### **WATER SUPPLY EVALUATION GUIDELINES FOR LAND USE ACTIONS THAT DO NOT INVOLVE A SUBDIVISION**

The SEO will not provide a comprehensive opinion for land use actions that do not involve a Subdivision. In these cases the developer must rely on an engineering consultant or use the guidelines included below. In any case, the decision to issue a well permit will not be evaluated until a well permit application has been submitted to the SEO. In situations where the land use action will be creating a parcel of land (for example, recorded exemption), the SEO cannot accept well permit applications until the land use action is final.

These guidelines may be used by your staff or the developer to make a preliminary determination of the availability of a well permit for parcels addressed in land use actions that do not involve a subdivision of land and which rely on a well as a water supply. The SEO will evaluate well permits according to the criteria described below using rules and statutes in place at the time of application. Well permits of the types described below can often be approved under the 2004 statutes when the land involved meets the respective parcel definition and the proposed well will meet the water use and return flow conditions stated below. Note the SEO's evaluation process may find that there is a well on the subject parcel or on a neighboring parcel that may 'encumber' the land on the parcel and prevent the SEO from issuing a well permit.

Below are the possible categories of land use actions that do not involve a subdivision and the types of well permit for which the SEO may evaluate an application:

1. **a) 'Pre June 1, 1972' Parcels; b) Parcels created after June 1, 1972 to which the statutory definition of a subdivision does not apply; or c) Parcels that the County has "Exempted" from the subdivision process**

#### **Description**

- a. A parcel that was created prior to June 1, 1972 (the date on which SB72-35 was enacted). A well permit applicant will need to submit proof that the parcel existed prior to June 1, 1972. This may be in the form a plat or deed of transfer dated before June 1, 1972. The documentation must include a legal description of the parcel. Or,
- b. A parcel that was created after June 1, 1972 and satisfies the criteria in C.R.S. 30-28-101(10)(c). Or,
- c. A parcel that was created after June 1, 1972 and has been exempted from the "subdivision process" by the County as described in C.R.S. 30-28-101(10)(d). A well permit applicant will need to submit proof that the parcel has been exempted from the "subdivision process" in the form a county resolution or plat with the proper documentation.

#### **Well Permit Evaluation for Areas Outside a Designated Basin**

- a. The SEO will evaluate this type of parcel for a Household Use Only well permit.
- b. If the applicant requests, the SEO will evaluate this type of parcel for a 'Commercial Exempt' well permit (Drinking and Sanitary uses only in a single business, not to exceed 0.33 acre-feet annually and not to be used for any outside purposes.)

- c. If the parcel overlies a nontributary Denver Basin aquifer or a not nontributary Denver Basin aquifer with a "four-percent replacement" requirement, the landowner has the potential to get a well permit for additional dwellings and outside domestic uses.
- d. If the parcel overlies a nontributary Denver Basin aquifer, the landowner has the potential to get a well permit for commercial uses beyond Drinking and Sanitary uses and 0.33 acre-feet annually.

#### **Well Permit Evaluation for Areas Inside a Designated Basin**

- a. The SEO will evaluate this type of parcel for a residential well permit for no more than three single-family dwellings, including the normal operations associated with such dwellings including the irrigation of not more than one acre of land; subject to all applicable Ground Water Management District Rules if the parcel is located within such a district.
- b. If the applicant requests, the parcel may be evaluated for small-capacity commercial use subject to all applicable Ground Water Management District rules.

## **2. "35-acre" Parcels**

### **Description**

A parcel that is 35 acres or larger and not composed of multiple subdivided parcels. A well permit applicant must submit a legal description of the parcel.

#### **Well Permit Evaluation for Areas Outside a Designated Basin**

- a. For most areas of the state, the SEO will evaluate this type of parcel for household use and outside uses. Unless the applicant specifically requests livestock uses only, the SEO will evaluate the well permit for use in up to three single-family dwellings, one acre of home lawn and garden irrigation, domestic animal watering and livestock watering.
- b. If the applicant requests, the SEO will evaluate this type of parcel for a 'Commercial Exempt' well permit (Drinking and Sanitary uses only in a Single business, not to exceed 0.33 acre-feet annually)
- c. If the parcel overlies a nontributary Denver Basin aquifer or another aquifer determined to be nontributary, the landowner has the potential to get a well permit for commercial uses beyond Drinking and Sanitary uses and 0.33 acre-feet annually.

#### **Well Permit Evaluation for Areas Inside a Designated Basin**

- a. The SEO will evaluate this type of parcel for a residential well permit for no more than three single-family dwellings, including the normal operations associated with such dwellings including the irrigation of not more than one acre of land; subject to all applicable Ground Water Management District Rules if the parcel is located within such a district.

- b. If the applicant requests, the parcel may be evaluated for small-capacity commercial use subject to all applicable Ground Water Management District rules.

### **3. 'Cluster Development' Parcels**

#### **Description:**

A parcel that satisfies the statutory provisions of C.R.S. 30-28-401, 30-28-402, 30-28-403, and 30-28-404, as amended in 2001. The County may approve cluster developments in accordance with a rural land use planning process enacted and adopted by the County. At least two-thirds of the total tract area must be reserved for preservation of open space. The number of residential lots may not exceed one lot for each seventeen and one-half acres of total tract area.

No later than ten days after County approval of a cluster development, the County shall notify the SEO of such approval and shall provide a copy of the approved rural land use plan that includes the cluster development. For administrative purposes, the plan must include a copy of a survey plat that describes the entire land area associated with the plan, identifies the set aside open space area, and describes the residential lots within the land area..

#### **Well Permit Evaluation for Areas Outside a Designated Basin**

The SEO will evaluate this type of parcel for household use and outside uses. The uses of the well will be limited by a permitted maximum annual amount. One well permit may be obtained for each residential lot. The total amount of water available to all lots in the cluster development is equal to one acre-foot for each full 35-acre-parcel, with no consideration for any additional fraction of a 35-acre parcel. The total amount available will be divided equally between each of the lots.

For example, a Cluster Development with seven lots on 150 acres has four full 35-acre parcels. Therefore four acre-feet of water is available to the lots in the development. Split evenly among the seven lots, the four acre-feet allows for 0.57 acre-feet annually per lot.

Parcels that are approved as a part of a cluster development are not eligible for consideration for uses greater than those described above. For example, a 35-acre lot that is part of a cluster development, will not be eligible for use beyond those allowed by the parcel's allotment of the one acre-foot per full 35-acre parcel.

#### **Well Permit Evaluation for Areas Inside a Designated Basin**

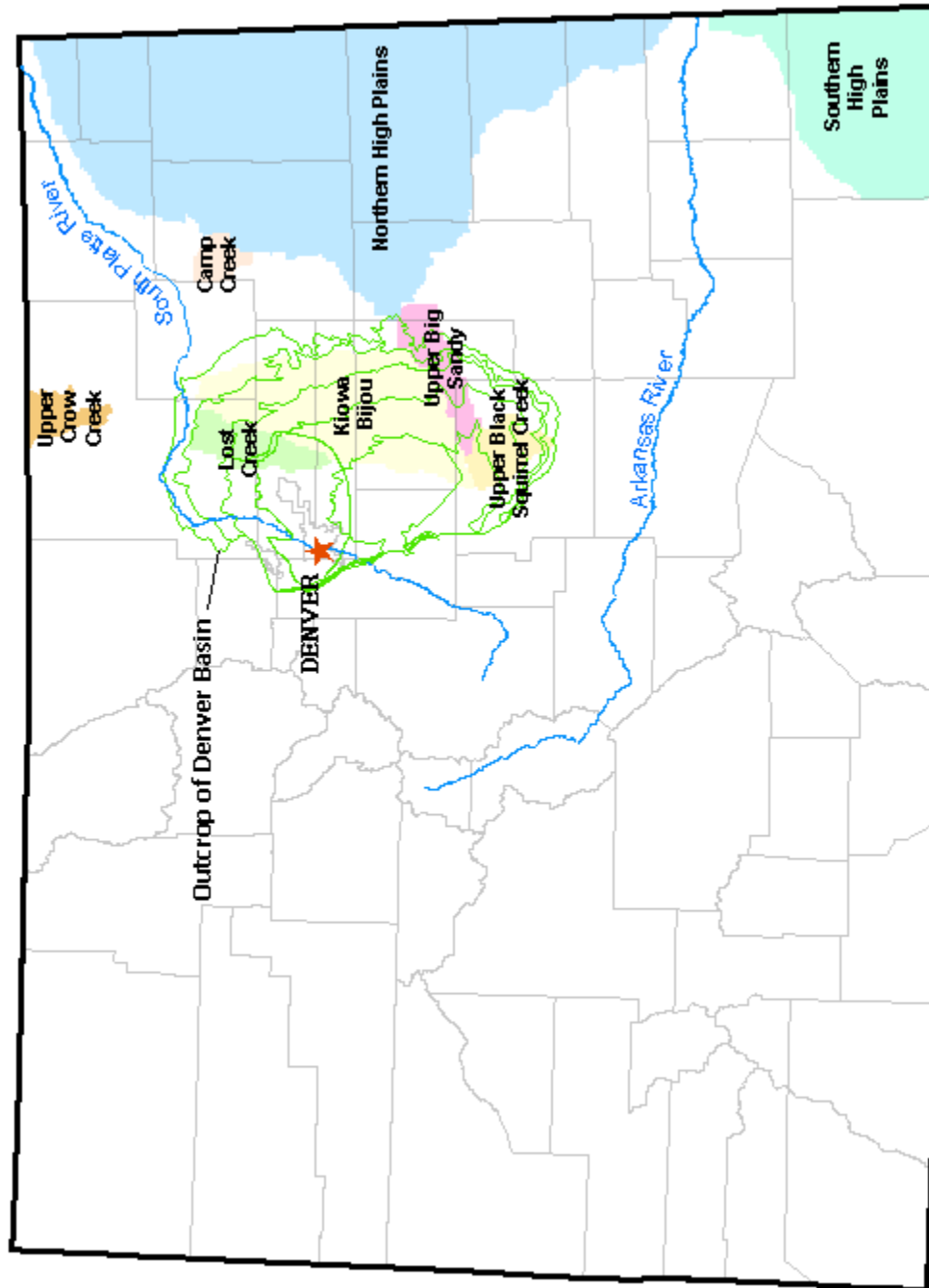
The SEO will evaluate applications for a residential well permit for no more than one single-family dwelling, including the normal operations associated with such dwelling including the irrigation of not more than one acre of land; subject to all applicable Ground Water Management District Rules if the parcel is located within such a district.

**Attachment C**

FORM NO. GWS-76 02/2005	<b>WATER SUPPLY INFORMATION SUMMARY</b> STATE OF COLORADO, OFFICE OF THE STATE ENGINEER 1313 Sherman St., Room 818, Denver, CO 80203 Phone – Info (303) 866-3587 Main (303) 866-3581 Fax (303) 866-3589 <a href="http://www.water.state.co.us">http://www.water.state.co.us</a>		
Section 30-28-133,(d), C.R.S. requires that the applicant submit to the County, “Adequate evidence that a water supply that is sufficient in terms of quantity, quality, and dependability will be available to ensure an adequate supply of water.”			
1. NAME OF DEVELOPMENT AS PROPOSED:			
2. LAND USE ACTION:			
3. NAME OF EXISTING PARCEL AS RECORDED:			
SUBDIVISION: _____, FILING (UNIT) _____, BLOCK _____, LOT _____			
4. TOTAL ACREAGE:	5. NUMBER OF LOTS PROPOSED _____ PLAT MAP ENCLOSED? <input type="checkbox"/> YES or <input type="checkbox"/> NO		
6. PARCEL HISTORY – Please attach copies of deeds, plats, or other evidence or documentation.			
A. Was parcel recorded with county prior to June 1, 1972? <input type="checkbox"/> YES or <input type="checkbox"/> NO B. Has the parcel ever been part of a division of land action since June 1, 1972? <input type="checkbox"/> YES or <input type="checkbox"/> NO If yes, describe the previous action: _____			
7. LOCATION OF PARCEL – Include a map delineating the project area and tie to a section corner.			
_____ 1/4 of the _____ 1/4, Section _____, Township _____ <input type="checkbox"/> N or <input type="checkbox"/> S, Range _____ <input type="checkbox"/> E or <input type="checkbox"/> W Principal Meridian: <input type="checkbox"/> Sixth <input type="checkbox"/> New Mexico <input type="checkbox"/> Ute <input type="checkbox"/> Costilla <b>Optional GPS Location:</b> GPS Unit must use the following settings: Format must be <b>UTM</b> , Units must be <b>meters</b> , Datum must be <b>NAD83</b> , Unit must be set to <b>true N</b> , <input type="checkbox"/> Zone 12 or <input type="checkbox"/> Zone 13 Easting: _____ Northing: _____			
8. PLAT – Location of all wells on property must be plotted and permit numbers provided.			
Surveyor's Plat: <input type="checkbox"/> YES or <input type="checkbox"/> NO If not, scaled hand drawn sketch: <input type="checkbox"/> YES or <input type="checkbox"/> NO			
9. ESTIMATED WATER REQUIREMENTS		10. WATER SUPPLY SOURCE	
USE	WATER REQUIREMENTS		
	Gallons per Day	Acre-Feet per Year	
HOUSEHOLD USE # _____ of units	_____	_____	<input type="checkbox"/> EXISTING WELL <input type="checkbox"/> DEVELOPED SPRING WELL PERMIT NUMBERS _____ _____ _____
COMMERCIAL USE # _____ of S. F	_____	_____	<input type="checkbox"/> NEW WELLS - PROPOSED AQUIFERS – (CHECK ONE) <input type="checkbox"/> ALLUVIAL <input type="checkbox"/> UPPER ARAPAHOE <input type="checkbox"/> UPPER DAWSON <input type="checkbox"/> LOWER ARAPAHOE <input type="checkbox"/> LOWER DAWSON <input type="checkbox"/> LARAMIE FOX HILLS <input type="checkbox"/> DENVER <input type="checkbox"/> DAKOTA <input type="checkbox"/> OTHER: _____
IRRIGATION # _____ of acres	_____	_____	<input type="checkbox"/> MUNICIPAL <input type="checkbox"/> ASSOCIATION <input type="checkbox"/> COMPANY <input type="checkbox"/> DISTRICT NAME _____ LETTER OF COMMITMENT FOR SERVICE <input type="checkbox"/> YES or <input type="checkbox"/> NO
STOCK WATERING # _____ of head	_____	_____	WATER COURT DECREE CASE NUMBERS: _____ _____ _____
OTHER: _____	_____	_____	
TOTAL	_____	_____	
11. WAS AN ENGINEER'S WATER SUPPLY REPORT DEVELOPED? <input type="checkbox"/> YES or <input type="checkbox"/> NO IF YES, PLEASE FORWARD WITH THIS FORM. (This may be required before our review is completed.)			
12. TYPE OF SEWAGE DISPOSAL SYSTEM			
<input type="checkbox"/> SEPTIC TANK/LEACH FIELD  <input type="checkbox"/> LAGOON  <input type="checkbox"/> ENGINEERED SYSTEM (Attach a copy of engineering design.)		<input type="checkbox"/> CENTRAL SYSTEM DISTRICT NAME: _____ <input type="checkbox"/> VAULT LOCATION SEWAGE HAULED TO: _____  <input type="checkbox"/> OTHER: _____	



**ATTACHMENT D**  
**COLORADO STATE MAP SHOWING**  
**THE DENVER BASIN AND THE DESIGNATED BASINS**





**Public Works and Development**

6924 S. Lima Street Centennial, Colorado 80112 Phone: 720-874-6650; FAX 720-874-6611

[www.co.arapahoe.co.us](http://www.co.arapahoe.co.us)

**Planning Division**

***Referral Routing***

Case Number/Name:	GDP25-001, May Farms RV Resort and Sanctuary
Planner:	Kat Hammer – <a href="mailto:khammer@arapahoegov.com">khammer@arapahoegov.com</a>
Engineer:	Sue Liu – <a href="mailto:sliu@arapahoegov.com">sliu@arapahoegov.com</a>
Date sent:	April 22, 2025
Date to be returned:	May 19, 2025

The enclosed development application has been submitted to the Arapahoe County Planning Office for consideration. Due to the close proximity of the proposed development to your property or area of influence, this development proposal is being referred to your agency for comment. Please examine the referenced materials and check the appropriate line before returning the form to the Arapahoe County Planning Office. Responding on or before the date indicated above is appreciated.

	COMMENTS	INSERT YOUR ORGANIZATION & NAME/SIGNATURE
<input type="checkbox"/>	I Have NO Comments to make on the case as submitted	
<input checked="" type="checkbox"/>	I Have the following comments to make related to the case:	<u>Jack Bell Citizen Board</u>

**Comments:** (responding by email, letter, or an email attachment is optional)

I discussed with many in the area of Buyers and there were no negative comments and minimal concerns of changes of the norm.

There was discussion of the sewage treatment plant required by the state that it need to be in place when the project opens.

Overall this is a good opportunity for the community.

**From:** [Sue Liu](#)  
**To:** [Nathan Fogg](#); [Kathleen Hammer](#)  
**Subject:** RE: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary  
**Date:** Thursday, April 24, 2025 2:45:43 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image015.png](#)  
[image017.png](#)  
[image018.png](#)  
[image019.png](#)  
[image020.png](#)  
[image021.png](#)  
[image022.png](#)  
[image023.png](#)  
[image003.png](#)  
[image005.png](#)  
[image008.png](#)

---

The traffic impact study (TIS) is based on the trip generations from the proposed uses. The TIS will evaluate the traffic impacts to the area and recommend the mitigations to these impacts & the necessary roadway improvements as well.



**Sue Liu, P.E., CFM**

Engineer III

Department of Public Works and Development

6924 S. Lima St. | Centennial, CO 80112

Direct: 720-874-6546 | Engineering: 720-874-6500

[Arapahoeco.gov](http://Arapahoeco.gov)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

---

**From:** Nathan Fogg <NFogg@arapahoegov.com>

**Sent:** Thursday, April 24, 2025 2:33 PM

**To:** Sue Liu <SLiu@arapahoegov.com>; Kathleen Hammer <KHammer@arapahoegov.com>

**Subject:** RE: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Thanks, Sue. Will the traffic study delineate the drain time for the development at the 100% rated occupancy? If not, can it? Another thought is the differential between passenger vehicles and RVs as that as to impact movement.

---

**From:** Sue Liu <[SLiu@arapahoegov.com](mailto:SLiu@arapahoegov.com)>

**Sent:** Thursday, April 24, 2025 2:12 PM

**To:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>; Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>

**Subject:** RE: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Nathan,

Engineering does not support to waive the traffic impact study. The applicant agrees to

submit the traffic impact study with the 2<sup>nd</sup> submittal. Thank you.



Sue Liu, P.E., CFM

Engineer III

Department of Public Works and Development

6924 S. Lima St. | Centennial, CO 80112

Direct: 720-874-6546 | Engineering: 720-874-6500

[Arapahoeco.gov](http://Arapahoeco.gov)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

---

**From:** Nathan Fogg <[NFogg@arapahoegov.com](mailto:NFogg@arapahoegov.com)>

**Sent:** Thursday, April 24, 2025 2:05 PM

**To:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>

**Cc:** Sue Liu <[SLiu@arapahoegov.com](mailto:SLiu@arapahoegov.com)>

**Subject:** RE: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Given that my team as worked several large wildfires in this area, including with evacuations, I do not support a waiver for a traffic impact study. Further, I believe the draft WUI code from the state will be in effect by the 1 JAN 2026. In the event we would need to evacuate this area, I am concerned that getting notifications and an evacuation done in a timely manner, especially given the road infrastructure, will require additional planning that is not yet apparent in the documents uploaded.

**Nathan Fogg**

Director

Office of Emergency Management

13101 E. Broncos Parkway

Centennial, Colorado 80112-

720-874-3659

-

[www.ArapahoeSheriff.org](http://www.ArapahoeSheriff.org)



---

**From:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>

**Sent:** Tuesday, April 22, 2025 2:23 PM

**To:** Kathleen Hammer <[KHammer@arapahoegov.com](mailto:KHammer@arapahoegov.com)>

**Cc:** Sue Liu <[SLiu@arapahoegov.com](mailto:SLiu@arapahoegov.com)>

**Subject:** ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

Hello,

Please use the link below to access documents for a General Development Plan application, known as GDP25-001. This application is the first step of the three-step Planned Unit Development process. If approved, the applicant will need to submit a Specific Development Plan and Administrative Site Plan for approval. Additional referral requests will be sent with those applications.

The application proposes a recreational vehicle and sanctuary on 150 acres located in Byers, Colorado. The proposed development will include 700 camp sites, 400 short-term residential units, and associated support amenities, including welcome centers, laundry, water park, and recreational equestrian and hiking trails.

Please note a Phase 1 Drainage Report and Traffic Impact Study (TIS) were not submitted with this application but will be required with the resubmittal. Staff will send out another referral after those two items are submitted. If there is anything you would like to be included as part of the TIS, please provide comment.

Comments should be sent no later than **Monday, May 19, 2025.**

Application and Associated Documents: <https://aca-prod.accela.com/ARAPAHOE/Cap/CapDetail.aspx?Module=Planning&capID1=25CAP&capID2=00000&capID3=0025K&agencyCode=ARAPAHOE>

Site Location: <https://gis.arapahoegov.com/arapamap?PD=Y2H94>



Thanks,  
Kat



**Kat Hammer**

Senior Planner

Public Works & Development

6924 S Lima St | Englewood, CO 80112

O: 720.874.6666

[Arapahoegov.com](http://Arapahoegov.com)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)



**Public Works and Development**

6924 S. Lima Street Centennial, Colorado 80112 Phone: 720-874-6650; FAX 720-874-6611

[www.co.arapahoe.co.us](http://www.co.arapahoe.co.us)

**Planning Division**

***Referral Routing***

Case Number/Name:	GDP25-001, May Farms RV Resort and Sanctuary
Planner:	Kat Hammer – <a href="mailto:khammer@arapahoegov.com">khammer@arapahoegov.com</a>
Engineer:	Sue Liu – <a href="mailto:sliu@arapahoegov.com">sliu@arapahoegov.com</a>
Date sent:	April 22, 2025
Date to be returned:	May 19, 2025

The enclosed development application has been submitted to the Arapahoe County Planning Office for consideration. Due to the close proximity of the proposed development to your property or area of influence, this development proposal is being referred to your agency for comment. Please examine the referenced materials and check the appropriate line before returning the form to the Arapahoe County Planning Office. Responding on or before the date indicated above is appreciated.

	COMMENTS	INSERT YOUR ORGANIZATION & NAME/SIGNATURE
<input checked="" type="checkbox"/>	I Have NO Comments to make on the case as submitted	<u>Arapahoe County Open Spaces</u>
<input type="checkbox"/>	I Have the following comments to make related to the case:	<u>Roger Harvey – Planning Mnager</u>

**Comments:** (responding by email, letter, or an email attachment is optional)

Based on Plan Set and Letter of Intent Parkland Dedication for parks will be provided for and met/ Open Spaces has no commnet and is supportive of project.



**COMMENTS ON  
GDP 25-001: MAY FARMS RV RESORT AND SANCTUARY  
BY  
I-70 REGIONAL ECONOMIC DEVELOPMENT PARTNERSHIP  
MAY 19, 2025**

Watkins

Bennett

Strasburg

Byers

Deer Trail

Aurora

Adams  
County

Arapahoe  
County

Colorado  
Air & Space  
Port

REAP, an economic development agency of Arapahoe County, wishes to inform and educate reviewers about this application and put it in context with the eastern plains economic landscape.

Byers, Colorado (pop 1,000) is stagnant and graying. But many economic development stars are aligning in a way that balances small town attitudes with a more progressive vision.

A recent academic study broke into four categories the attitudes of growth in rural communities: “bring it on”, “it’s coming regardless”, “growth will be limited by externalities” and “stay away”. Byers has all four. Three of the four categories at least acknowledge growth.

These are the stars that align with the project application. Momentum abounds.

- Byers Sub Area Plan. Expected rezoning north of I-70 will energize agritourism.
- Enterprise Zone. Now extends to Byers to spur business growth, and job creation.
- Byers School District. Brings relevant Career and Technical Education to the new economy.
- Byers School District. A new campus greenhouse starts the visioned Byers pollinator corridor.
- Byers Water District. A county-funded pipeline north of I-70 is now under construction.
- Byers Park and Recreation District. Quint Valley Fairgrounds and Rodeo with new master plan.
- West Bijou Basin. County master plan sees open space and cottonwood-lined trails.
- Alternative energy. CORE’s solar-generated energy is “fit to serve” the proposed project site.
- Sun Communities. Byers as a tourist market is vetted by the national franchiser for RV resorts.
- Butterfly Pavilion. Is interested in Byers for facility and program partnerships.

REAP wishes to clarify the meaning of proposed seasonal housing known as casitas. Like “agritourism”, a new term in the planning lexicon, a casita is simply a manufactured dwelling with kitchen, bathroom, bedroom, living room. From 800 sq ft. Owners can add on. Built, transported, installed per state and county authority. [www.cavco.com](http://www.cavco.com). Casitas are adjacent to RV spaces and occupied by 55+ owners.

Jellystone Larkspur is a good RV/casita model. It reports that the RV/casita population are short-term adults with families. The town of Larkspur reports that crime is low and local revenue is higher.

REAP wishes to look ahead. If this application is approved, a Main Street plan will emerge for tourists and locals with appropriate job-creating retail, restaurants, hospitality and recreation opportunities. Residents will have access to the planned water park. There is clear community benefit.

Lastly, REAP wishes to acknowledge the work of the planning staff. On May 13 BOCC approved a land use unheard of a year ago- energy storage. Now it must quickly learn agritourism uses in wide open spaces. Balancing the new with the planning code requires flexibility. REAP extends its gratitude.

**REAP Mission Statement**

Stimulate private investment in order to increase opportunities for employment, expand the tax base, broaden the economy, and generally improve the quality of life of our citizens.



**From:** [Tom Turrell](#)  
**To:** [Kathleen Hammer](#)  
**Cc:** [Sue Liu](#)  
**Subject:** Re: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary  
**Date:** Sunday, May 18, 2025 10:51:53 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sorry I was late turning this in. I guess it's not due till tomorrow so I'm actually ahead of the game.

I don't have any concerns with this project, I think it'll provide a good opportunity for high school students to get part-time jobs and promote business in the Byers area.

---

**From:** Kathleen Hammer <KHammer@arapahoegov.com>  
**Sent:** Tuesday, April 22, 2025 2:22 PM  
**To:** Kathleen Hammer <KHammer@arapahoegov.com>  
**Cc:** Sue Liu <SLiu@arapahoegov.com>  
**Subject:** ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please use the link below to access documents for a General Development Plan application, known as GDP25-001. This application is the first step of the three-step Planned Unit Development process. If approved, the applicant will need to submit a Specific Development Plan and Administrative Site Plan for approval. Additional referral requests will be sent with those applications.

The application proposes a recreational vehicle and sanctuary on 150 acres located in Byers, Colorado. The proposed development will include 700 camp sites, 400 short-term residential units, and associated support amenities, including welcome centers, laundry, water park, and recreational equestrian and hiking trails.

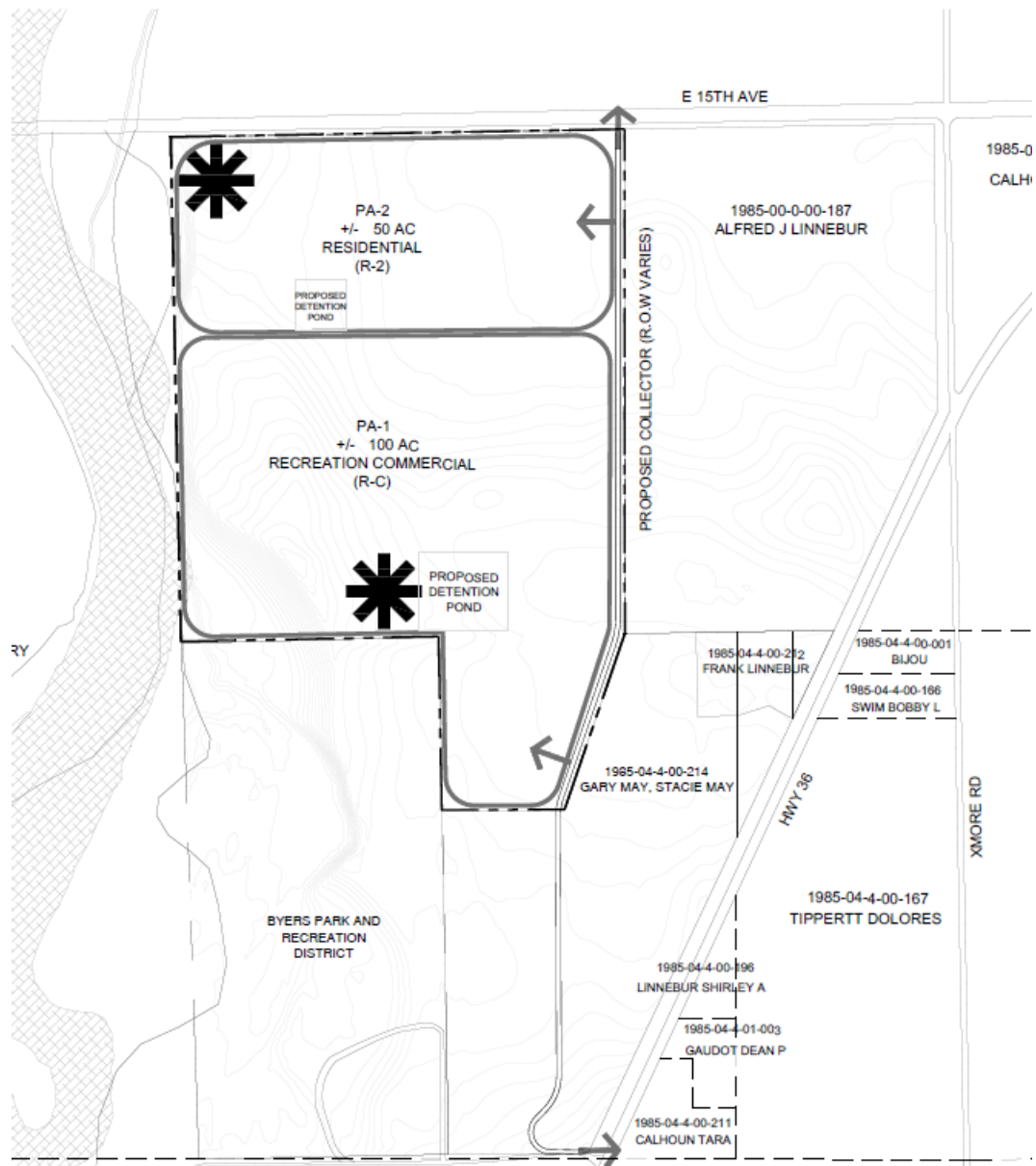
Please note a Phase 1 Drainage Report and Traffic Impact Study (TIS) were not submitted with this application but will be required with the resubmittal. Staff will send out another referral after those two items are submitted. If there is anything you would like to be included as part of the TIS, please provide comment.

Comments should be sent no later than **Monday, May 19, 2025.**

Application and Associated Documents: <https://aca-prod.accela.com/ARAPAHOE/Cap/CapDetail.aspx?>

[Module=Planning&capID1=25CAP&capID2=00000&capID3=0025K&agencyCode=ARAPAHOE](https://gis.arapahoegov.com/arapamap?PD=Y2H94)

Site Location: <https://gis.arapahoegov.com/arapamap?PD=Y2H94>



Thanks,  
Kat



**ARAPAHOE COUNTY**

**Kat Hammer**  
Senior Planner  
Public Works & Development

6924 S Lima St | Englewood, CO 80112

O: 720.874.6666

[Arapahoe.gov](http://Arapahoe.gov)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

**It is the policy of Byers School District 32J to not discriminate on the basis of age, race, religion, color, national origin, sex, marital status, sexual orientation, pregnancy, national origin, ancestry, citizenship, gender identity, disability, and any other protected status in its programs, services or activities as required by Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973, Title II / ADA as amended. Inquiries regarding compliance and/or grievance procedures may be directed to the school district's Title IX officer Stacy Sondburg, 303-822-5292, [sondburg.stacy@byers.k12.co.us](mailto:sondburg.stacy@byers.k12.co.us), 444 East Front Street, Byers, CO 80103.**

**Es política del Distrito Escolar Byers 32J no discriminar por motivos de edad, raza, religión, color, origen nacional, sexo, estado civil, orientación sexual, embarazo, origen nacional, ascendencia, ciudadanía, identidad de género, discapacidad y cualquier otro estado protegido en sus programas, servicios o actividades según lo requiere el Título VI de la Ley de Derechos Civiles de 1964, según enmendada; Título IX de las Enmiendas a la Educación de 1972; y la Sección 504 de la Ley de Rehabilitación de 1973, Título II / ADA según enmendada. Las consultas sobre el cumplimiento y / o los procedimientos de quejas pueden dirigirse a Stacy Sondburg, oficial del Título IX del distrito escolar, 303-822-5292, [sondburg.stacy@byers.k12.co.us](mailto:sondburg.stacy@byers.k12.co.us), 444 East Front Street, Byers, CO 80103.**



**Public Works and Development**

6924 S. Lima Street Centennial, Colorado 80112 Phone: 720-874-6650; FAX 720-874-6611

[www.co.arapahoe.co.us](http://www.co.arapahoe.co.us)

**Planning Division**

***Referral Routing***

Case Number/Name:	GDP25-001, May Farms RV Resort and Sanctuary
Planner:	Kat Hammer – <a href="mailto:khammer@arapahoegov.com">khammer@arapahoegov.com</a>
Engineer:	Sue Liu – <a href="mailto:sliu@arapahoegov.com">sliu@arapahoegov.com</a>
Date sent:	April 22, 2025
Date to be returned:	May 19, 2025

The enclosed development application has been submitted to the Arapahoe County Planning Office for consideration. Due to the close proximity of the proposed development to your property or area of influence, this development proposal is being referred to your agency for comment. Please examine the referenced materials and check the appropriate line before returning the form to the Arapahoe County Planning Office. Responding on or before the date indicated above is appreciated.

	COMMENTS	INSERT YOUR ORGANIZATION & NAME/SIGNATURE
<input type="checkbox"/>	I Have NO Comments to make on the case as submitted	
<input checked="" type="checkbox"/>	I Have the following comments to make related to the case:	<u>K.C. McKlem, ACSO Public Safety Bureau Chief</u>

**Comments:** (responding by email, letter, or an email attachment is optional)

Concerning ref. the number of guests ref. the population of the town. May increase calls for service and impact staffing on I70 on the corridor.

**From:** [Tracy Carter](#)  
**To:** [Kathleen Hammer](#)  
**Cc:** [Sue Liu](#)  
**Subject:** Re: ArapCO Referral - GDP25-001 - May Farms RV Resort and Sanctuary  
**Date:** Thursday, May 8, 2025 12:52:39 PM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

## **Statement of Support Proposed Recreational Vehicle and Sanctuary Development – Byers, Colorado**

On behalf of Unincorporated Arapahoe County Economic Development , we are pleased to offer our full support for the proposed development project located on approximately 150 acres in Byers, Colorado. This visionary project, featuring 700 recreational vehicle campsites, 400 short-term residential units, and a wide range of support amenities—including welcome centers, laundry facilities, a water park, and recreational equestrian and hiking trails—will bring significant economic, social, and recreational benefits to the community and surrounding region.

The thoughtful design of this development addresses the increasing demand for high-quality outdoor recreation, family-oriented amenities, and short-term residential accommodations. Byers' strategic location makes it an ideal site for a sanctuary-like environment where visitors can experience both leisure and adventure in a safe, welcoming, and sustainable setting.

We recognize that the project will:

- Stimulate local economic development through tourism, job creation, and small business opportunities.
- Provide much-needed lodging and recreational options that enhance the area's attractiveness as a destination.
- Offer diverse activities that promote physical well-being, outdoor education, and appreciation of natural spaces.
- Strengthen community assets by investing in infrastructure and complementary services.

We applaud the project's balanced approach to growth, recreation, and conservation and believe it will serve as a model for future developments. We encourage its approval and look forward to seeing the lasting positive impact it will bring to Byers and the broader region.

Respectfully,

UACED ~

On Apr 22, 2025, at 2:22 PM, Kathleen Hammer  
<KHammer@arapahoegov.com> wrote:

Hello,

Please use the link below to access documents for a General Development Plan application, known as GDP25-001. This application is the first step of the three-step Planned Unit Development process. If approved, the applicant will need to submit a Specific Development Plan and Administrative Site Plan for approval. Additional referral requests will be sent with those applications.

The application proposes a recreational vehicle and sanctuary on 150 acres located in Byers, Colorado. The proposed development will include 700 camp sites, 400 short-term residential units, and associated support amenities, including welcome centers, laundry, water park, and recreational equestrian and hiking trails.

Please note a Phase 1 Drainage Report and Traffic Impact Study (TIS) were not submitted with this application but will be required with the resubmittal. Staff will send out another referral after those two items are submitted. If there is anything you would like to be included as part of the TIS, please provide comment.

Comments should be sent no later than **Monday, May 19, 2025.**

Application and Associated Documents: <https://aca-prod.accela.com/ARAPAHOE/Cap/CapDetail.aspx?Module=Planning&capID1=25CAP&capID2=00000&capID3=0025K&agencyCode=ARAPAHOE>

Site Location: <https://gis.arapahoegov.com/arapamap?PD=Y2H94>

<image002.png>

Thanks,  
Kat

<image001.png>

**Kat Hammer**  
Senior Planner  
Public Works & Development

6924 S Lima St | Englewood, CO 80112

O: 720.874.6666

[Arapahoe.gov](http://Arapahoe.gov)

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Nextdoor](#) | [Youtube](#)

<GDP25-001 External Referral Routing Sheet.docx><1-GDP25-001-Letter of Intent.pdf>

Tracy Carter  
303-947-4669

