

| CATEGORY                 | COMPANY                             | NAME             | REFERRAL COMMENTS                                                                                                                                            | APPLICANT'S RESPONSE                                                                                                                                                                                                                                                         |
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| 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. |

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

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|  | EAST ARAPAHOE<br>COUNTY/ADVISORY PLANNING<br>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<br>ADVANCEMENT PARTNERSHIP |               |                                                                                                                                                                                                                                                                                                                     |                                                                                                              |
|  | REAP -I-70 CORRIDOR REGIONAL<br>ADVANCEMENT PARTNERSHIP | KIRK HOWELL   |                                                                                                                                                                                                                                                                                                                     |                                                                                                              |
|  | REAP-I-70 CORRIDOR REGIONAL<br>ADVANCEMENT PARTNERSHIP  | BRIAN FALLIN  |                                                                                                                                                                                                                                                                                                                     |                                                                                                              |
|  | REAP-I-70 CORRIDOR REGIONAL<br>ADVANCEMENT PARTNERSHIP  | KIP CHEROUTES |                                                                                                                                                                                                                                                                                                                     |                                                                                                              |

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|  | UNINCORPORATED ARAPAHOE<br>COUNTY ECONOMIC<br>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> |
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|                          |                                          |              | <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                     |                                          |              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |

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|                               | 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.<br><br>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-<br>REFERRALS         | LINDA SPEAS    |                                                                                                                                                                               |                                                                                                                        |
| LOCAL GOV MAILING<br>LIST |                                                 |                |                                                                                                                                                                               |                                                                                                                        |
|                           | DRCOG-DENVER REGIONAL<br>COUNCIL OF GOVERNMENTS | ASHLEY SUMMERS |                                                                                                                                                                               |                                                                                                                        |
| PARK & RECREATION         |                                                 |                |                                                                                                                                                                               |                                                                                                                        |
|                           | ARAPAHOE PARK & RECREATION<br>DISTRICT          | DELOS SEARLE   | No comments                                                                                                                                                                   |                                                                                                                        |
|                           | BYERS PARK & RECREATION<br>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                   |                                                 |                |                                                                                                                                                                               |                                                                                                                        |

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|                      | ARAPAHOE COUNTY SHERIFF-<br>OFFICE OF EMERGENCY<br>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<br>OFFICE - COMMUNITY RESOURCE<br>UNIT    | DENNIS MEYER   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                   |
|                      | ARAPAHOE COUNTY SHERIFF'S<br>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<br>COUNTY/SHERIFF/CRIME<br>PREVENTION UNIT                 | JASON PRESLEY  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                   |
| SOIL OR CONSERVATION |                                                                     |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                   |
|                      | COLORADO GEOLOGICAL SURVEY -<br>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. |

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

|                    |                                                            |                 |                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                       |
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|                    |                                                            |                 |                                                                                                                                                                                                                                                                                                             | design phase commences.                                                                                                                                                                                                                               |
|                    | IREA                                                       | BROOKS KAUFMAN  | No objections                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                       |
|                    | PHILLIPS 66                                                | EDMOND BROOKS   |                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                       |
| WATER & SANITATION |                                                            |                 |                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                       |
|                    | NORTH KIOWA BIJOU<br>GROUNDWATER DISTRICT 4483             | ANDREW MCCLARY  |                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                       |
| WELL AND SEPTIC    |                                                            |                 |                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                       |
|                    | DIVISION OF WATER RESOURCES-<br>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<br>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 |

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|  |  |  |  | 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)

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<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.

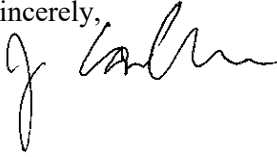
A site-specific, preliminary geotechnical investigation consisting of drilling, sampling, lab testing and analysis is needed to: determine the thickness and extent to which the site soils are subject to collapse under loading and/or wetting; characterize soil and bedrock engineering properties such as 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](#)

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**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]

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**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.

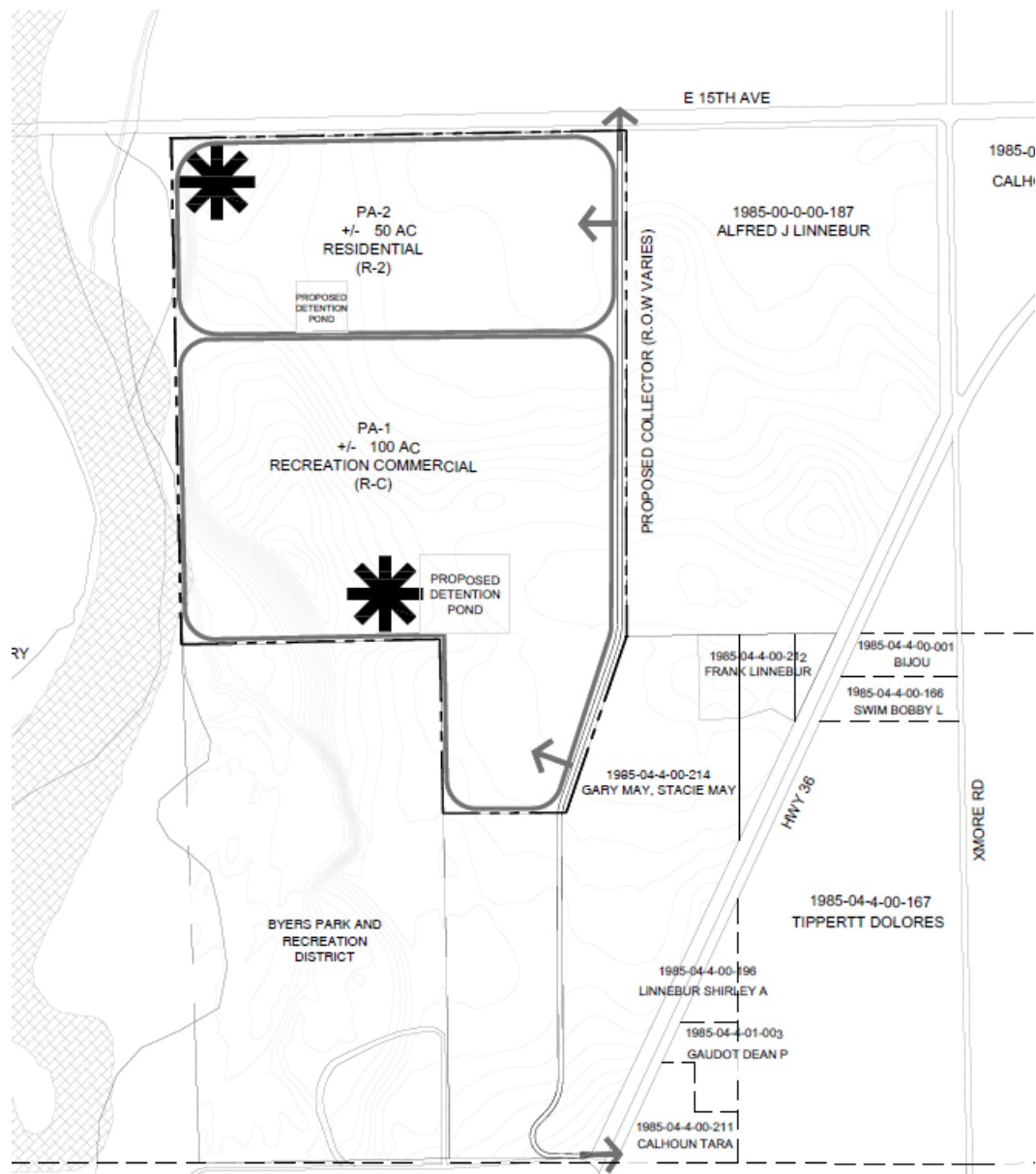
The application proposes a recreational vehicle and sanctuary on 150 acres located in Byers, Colorado. The proposed development will include 700 camp sites, 400 short-term residential units, and associated support amenities, including welcome centers, laundry, water park, and recreational equestrian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

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**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).

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<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://efaidnbmnnnibpcajpcgclefindmkaj/abcbirds.org/wp-content/uploads/2022/05/ABC-lighting-collisions-position-statement-2022.pdf](https://efaidnbmnnnibpcajpcgclefindmkaj/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.

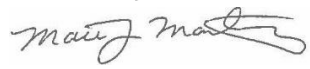
CPW would also like to bring attention and concern to the proposed development of a water park on the site. Water quantity and water use is of great concern in such a western arid environment. It is quite possible that the proposed water park will include pools, water slides and the need for water treatment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

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**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.

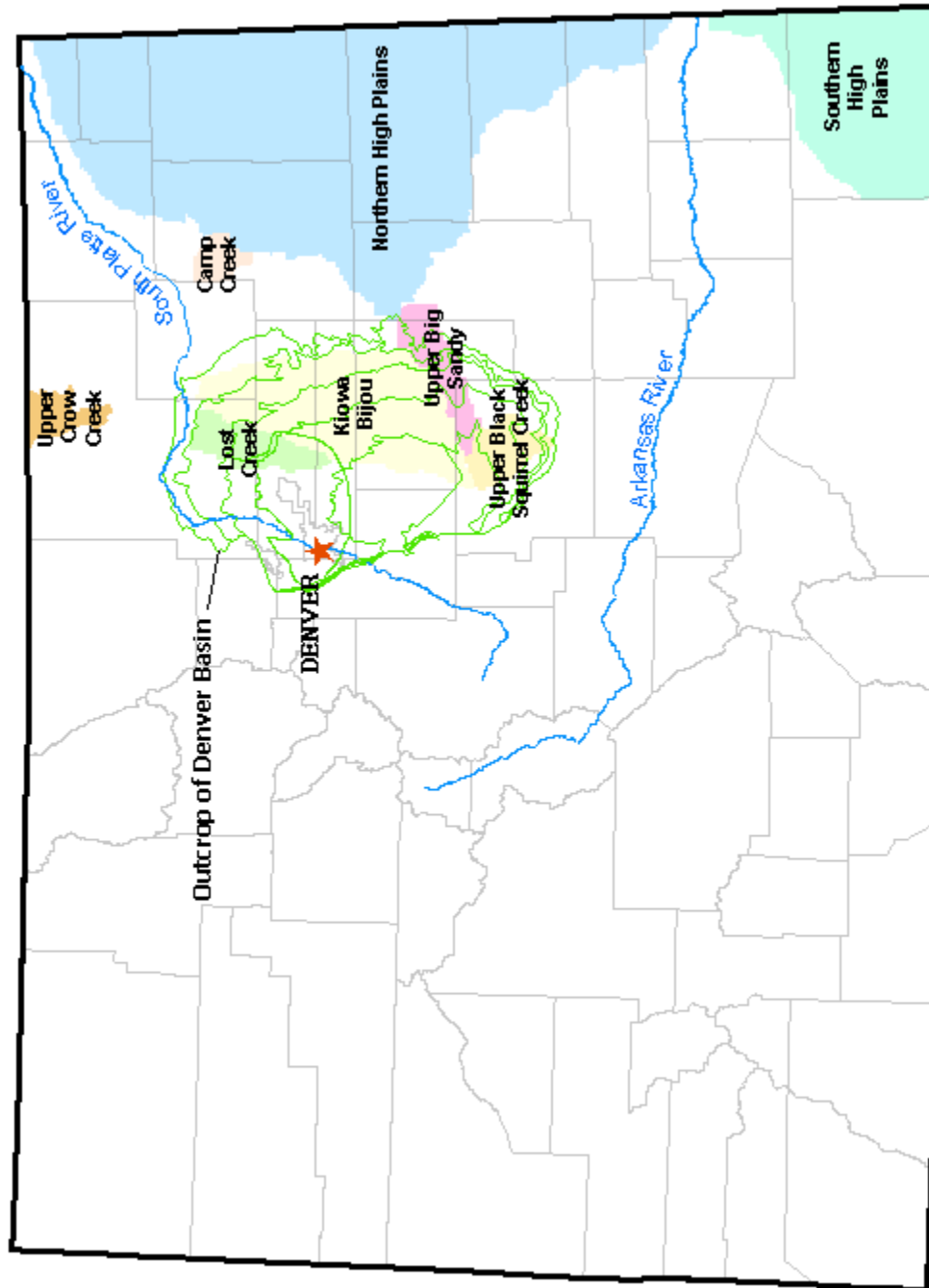
#### **Well Permit Evaluation for Areas Inside a Designated Basin**

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.<br>GWS-76<br>02/2005                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>WATER SUPPLY INFORMATION SUMMARY</b><br>STATE OF COLORADO, OFFICE OF THE STATE ENGINEER<br>1313 Sherman St., Room 818, Denver, CO 80203<br>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<br>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<br>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<br>Principal Meridian: <input type="checkbox"/> Sixth <input type="checkbox"/> New Mexico <input type="checkbox"/> Ute <input type="checkbox"/> Costilla<br><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<br>Easting: _____<br>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<br><input type="checkbox"/> DEVELOPED SPRING<br>WELL PERMIT NUMBERS<br>_____<br>_____<br>_____                                                                                                                                                                                                                                                                                                 |
| COMMERCIAL USE # _____ of S. F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | _____                                                                                                                                                                                                                                                                                    | _____                                                                                                                                                                              | <input type="checkbox"/> NEW WELLS -<br>PROPOSED AQUIFERS – (CHECK ONE)<br><input type="checkbox"/> ALLUVIAL <input type="checkbox"/> UPPER ARAPAHOE<br><input type="checkbox"/> UPPER DAWSON <input type="checkbox"/> LOWER ARAPAHOE<br><input type="checkbox"/> LOWER DAWSON <input type="checkbox"/> LARAMIE FOX HILLS<br><input type="checkbox"/> DENVER <input type="checkbox"/> DAKOTA<br><input type="checkbox"/> OTHER: _____ |
| IRRIGATION # _____ of acres                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | _____                                                                                                                                                                                                                                                                                    | _____                                                                                                                                                                              | <input type="checkbox"/> MUNICIPAL<br><input type="checkbox"/> ASSOCIATION<br><input type="checkbox"/> COMPANY<br><input type="checkbox"/> DISTRICT<br>NAME _____<br>LETTER OF COMMITMENT FOR<br>SERVICE <input type="checkbox"/> YES or <input type="checkbox"/> NO                                                                                                                                                                  |
| STOCK WATERING # _____ of head                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | _____                                                                                                                                                                                                                                                                                    | _____                                                                                                                                                                              | WATER COURT DECREE CASE<br>NUMBERS:<br>_____<br>_____<br>_____                                                                                                                                                                                                                                                                                                                                                                        |
| 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.<br>(This may be required before our review is completed.)                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12. TYPE OF SEWAGE DISPOSAL SYSTEM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <input type="checkbox"/> SEPTIC TANK/LEACH FIELD<br><br><input type="checkbox"/> LAGOON<br><br><input type="checkbox"/> ENGINEERED SYSTEM (Attach a copy of engineering design.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                          | <input type="checkbox"/> CENTRAL SYSTEM<br>DISTRICT NAME: _____<br><input type="checkbox"/> VAULT<br>LOCATION SEWAGE HAULED TO: _____<br><br><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)

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---

**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=000000&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

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**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](#)

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**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

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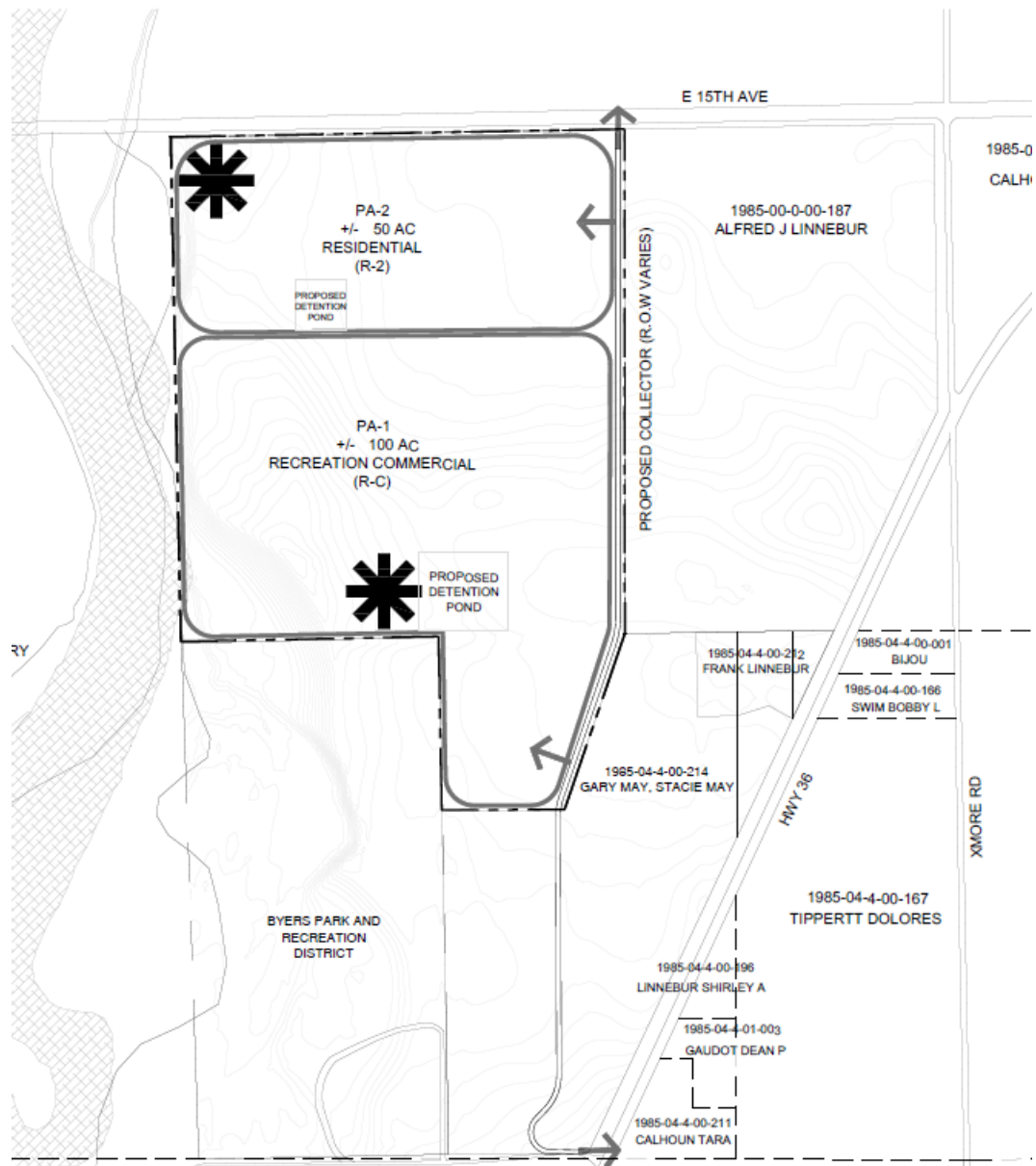
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Comments should be sent no later than **Monday, May 19, 2025.**

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

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

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**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**

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

**Planning Division**

***Referral Routing***

|                      |                                                                                   |
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| 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>          |
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|                                     | 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

---

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## **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.

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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

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

Tracy Carter  
303-947-4669

