PLN1: Applicant has submitted Exhibit B which demonstrates compliance with the required setbacks for a principal structure in the A-3 zone district. Applicant has also received section line waivers from the Public Works Department.

PLN2: Applicant is currently working with the Building Safety Department to bring all unpermitted structures on the property into compliance and to receive building permits. Please provide an update on this process so that this information can be included in public hearing presentations and the staff report.

PLN3: Applicant has confirmed compliance with all performance standards for Gun and Archery Ranges.
   a. Performance standards for fencing, warning signs, and bufferyards are being addressed through a separate Administrative Relief from Landscaping Requirements application.
   b. Applicant is currently coordinating with staff to obtain waivers and disclosures from nearby residentially used properties (performance standard #2) that were not addressed during the last Conditional Use Permit application (2007). Conformance with the “Setback from Residential Properties” performance standard must be confirmed by the Director of Community and Economic Development Department prior to scheduling public hearings.

PLN4: The existing and proposed RV Pads have been determined by the Community and Economic Development Department to be an accessory use to the Gun and Archery Ranges rather than a second principal use (Recreational Vehicle Commercial Campground) that would require a separate Conditional Use Permit in the A-3 zone district. This accessory use was originally established through previous Conditional Use Permit approvals as overnight parking and camping.
   a. Exhibit A and the application resubmittal have demonstrated conformance with most performance standards for Recreational Vehicle Commercial Campgrounds, including minimum parcel area, maximum density, duration of stay at campground, access, common recreation area, landscaping (addressed through the separate administrative relief from landscaping application), recreational vehicle campground requirements, permitted accessory uses, manager housing, and garbage collection.
   b. Performance standards for Recreational Vehicle Campgrounds not met include direct access to an arterial road of highway as well as the requirement for all recreational vehicle and guest parking spaces and drives to be paved with asphalt or concrete (gravel has been proposed for all internal drives that provide access to the RV pads and guest parking, as well as for all RV pads and guest parking).

PLN5: Applicant provided response letters to TCHD, CDPHE, and CPW. A second round of request for comments along with the applicant’s response letters were sent by staff to the external referral agencies that provided comments during the 1st round of review.
   a. CDPHE responded with continued concern related to water quality and CPDHE’s Water Quality Control Division. Applicant can either contact the CDPHE reviewer directly in order to address their comments and provide written confirmation from the Water Quality Control Division that the water quality issues have been resolved, or the applicant can provide a response through the application resubmittal that staff will forward to the CDPHE reviewer through a third request for comments letter.
   b. TCHD and CPW did not respond with further concerns. No action required.
ENG 1: Flood Insurance Rate Map - FIRM Panel # (0800 l COS OOH), Federal Emergency Management Agency, January 20, 2016. According to the above reference, the western portion of the project site is located within a delineated 100-year flood hazard zone; A floodplain use permit will be required for any improvements within the floodplain area.
CRC Response: No proposed work or phased project is indicated to be in or anticipated to be constructed in a mapped 100-year flood hazard zone.
County Comment: Comment Closed

ENG2: The applicant shall be responsible to ensure compliance with all Federal, State, and Local water quality construction requirements. The project site is within the County's MS4 Stormwater Permit area. In the event that the disturbed area of the site exceeds 1 acre the applicant shall be responsible to prepare the SWMP plan using the Adams County ESC Template, and obtain both a County SWQ Permit and State Permit COR400000. The installation of erosion and sediment control BMPs is expected for any ground disturbance.
CRC Response: It was indicated by Matt Emmons at our staff review meeting that we are not in the Counties MS4 Storm water Permit Area. We will prepare a SWMP plan and install erosion and sediment control BMP as indicated.
County Comment: If the applicant is disturbing more than one (1.0) acres of ground a State Storm Water Permit is required.
Comment Closed

ENG3: LOW IMPACT DEVELOPMENT (LID) STANDARDS AND REQUIREMENTS Section 9-01-03-14: All construction projects shall reduce drainage impacts to the maximum extent practicable, and implement practices such as:
1. On-site structural and non-structural BMPs to promote infiltration, evapo-transpiration or use of stormwater,
2. Minimization of Directly Connected Impervious Area (MDCIA),
3. Green Infrastructure (GI),
4. Preservation of natural drainage systems that result in the infiltration, evapo-transpiration or use of stormwater in order to protect water quality and aquatic habitat.
5. Use of vegetation, soils, and roots to slow and filter stormwater runoff.
7. Treatment of stormwater flows as close to the impervious area as possible.
LID shall be designed and maintained to meet the standards of these Regulations and the Urban Drainage and Flood Control District's Urban Storm Drainage Criteria Manual, Volume 3.
CRC Response: The CRC will endeavor to implement all LID standards and requirements to the maximum extent practicable.
County Comment: Comment Closed

ENG4: Sustainable Development Practices Section 3-27-06-05-07-08:
To the maximum extent practicable, new buildings are encouraged to incorporate one or more of the following features:
1. Opportunities for the integration of renewable energy features in the design of buildings or sites, such as: solar, wind, geothermal, biomass, or low-impact hydro sources;
2. Energy-efficient materials, including recycled materials that meet the requirements of these regulations;
3. Materials that are produced from renewable resources;
4. Low-Impact Development (LID) stormwater management features;
5. A green roof, such as a vegetated roof, or a cool roof;
6. Materials and design meeting the U.S. Green Building Council's LEED-NC certification requirements;
7. A greywater recycling system.

CRC Response: The first phase Club House is only a 3,000 SF structure but to the maximum extent practicable we hope to incorporate one or more of the above features.

County Comment: Comment Closed

ENG5: Applicant is proposing to install over 3,000 square feet of impervious area on the project site. A drainage report and drainage plans in accordance to Chapter 9 of the Adams County Development Review Manual, are required to be completed by a registered professional engineer and submitted to Adams County for review and final approval. The applicant has previously stated that the site has no storm sewer outfall. If this is the case, the Applicant may submit a drainage map, showing the closed drainage basins and a letter of explanation; both documents are required to be stamped and signed by an engineer licensed in the State of Colorado.

CRC Response: A document intitled Exhibit BD has been prepared which shows a contour map indicating that our facility does not drain to a receiving stream. Matt Emmens had given us a contact with DWR being Joanna Williams. A Drainage Report with attached topographic information has been forward to both parties. Attached is a response from the DNR indicating that natural low lying areas are not considered as retention ponds. Per Matthew Emmens no detention or release facilities are required for the proposed improvements to our facility.

County Comment: Confirmation has been received from the Division of Water Resources. Stormwater Detention and Water Quality will not be required for this development. Applicant will not need to prepare a drainage report.

Comment Closed

ENG6: The applicant has submitted a trip generation letter with this application. The letter is sufficient as submitted.

CRC Response: We understand that no additional Traffic Reports or Studies will be necessary for this CUP application.

County Comment: Comment Closed

ENG7: If the applicant proposes to import soil to this site, additional permitting is required. Per section 4-05-02-07, of the Adams County Development Standards and Regulations, a Temporary or Conditional Use Permit is required to ensure that only clean, inert soil is imported into any site within Unincorporated Adams County. This regulation applies to ANY amount of soil imported to a site.

CRC Response: The CRC does not intend on importing any soil to this site. We may be bringing in gravel or filter material, but it will come from a registered, approved quarry.

County Comment: Comment Closed

ENG8: Prior to the issuance of any building permit(s), the developer is required to submit for review and receive approval of all construction documents (construction plans and reports). Construction documents shall include, at a minimum, onsite and public improvements construction plans, drainage report, traffic impact study/letter. All construction documents must meet the requirements of the Adams County Development Standards and Regulations. The developer shall submit to the Adams County Development Review Engineering division the following: Engineering Review Application, Engineering Review Fee, two (2) copies of all construction documents. The development review fee for an Engineering Review is dependent on the type of project and/or the size of the project. The Development Review fee can be found in the Development Services Fee Schedule, located on the following web page:
CRC Response: The CRC will be preparing construction documents and building plans for review by the engineering and building departments. We will be preparing preliminary documents in conjunction with the CUP process, but all formal submittals will be submitted after approval of the CUP. Staff indicated that no additional Traffic Study/Letter will be required.
County Comment: Comment Closed

ENG9: The developer is responsible for the repair or replacement of any broken or damaged County infrastructure.
CRC Response: The CRC will take responsibility for any damages we inflict on the County owned infrastructure.
County Comment: Comment Closed

Commenting Division: Development Services, Right-of-Way
Name of Reviewer: Marissa Hillje
Email and Phone Number: MHillje@adcogov.org / 720-523-6837

ROW1: No comments for the conditional use case.

ROW2: The applicant has requested a section line waiver of 50ft for the clubhouse. The section line waiver was approved by Public Works.

ROW3: The applicant has begun the process for right-of-way dedication for Rector Leader Road - but is still under review.

Commenting Division: Development Services, Environmental Analyst
Name of Reviewer: Katie Keefe
Email and Phone Number: KKeefe@adcogov.org / 720-523-6986

ENV1. Please provide for review, if available, a Lead Management Plan for the Colorado Rifle Club shooting range detailing best management practices utilized by the facility to prevent migration of lead into the environment.

ENV2. The western side of the project area is partially covered by the 100-year floodplain.

ENV3. Associated with the floodplain is the Natural Resource Conservation Overlay (NRCO), which aims to protect important wildlife areas and designated floodplains and their riparian areas, among other things. See Section 3-38 of the Adams County Development Standards and Regulations for more details.

ENV4. If the land area disturbance within the NRCO is greater than one (1) acre, then a Resources Review must be completed so that findings and recommendations may be taken into consideration. All development must comply with the NRCO buffers/setbacks requirements in section 4-11-02-04-02.
External Referral Agency Comments

Re: Request for Comments: RCU-2019-00039 Colorado Rifle Club CUP Amendment 3

Hi, Sherry,

Thank you for confirming that the proposed project is less than 20 acres. Although the grading project is unlikely to last for six months or more, if it is expected to last for longer than six months, a land development APEX would be required. Again, this sounds unlikely. However, it is important to note that even if a permit is not required, fugitive dust control measures included the Land Development APEX (Form APO-222) must be followed at the site.

Air Quality

The Water Quality Control Division (WQCD) has continued concerns. The applicant responded back as if the single building was the issue. WQCD has concerns that (1) the overall operation generates greater than 2,000 gallons of domestic wastewater per day, (2) the proposed expansion will exacerbate the issue, and (3) the applicant has not provided sufficient information to demonstrate the facility’s wastewater treatment and disposal. The WQCD needs additional information to verify the current and proposed loadings to wastewater treatment facilities. Please provide sufficient information that will allow the division to evaluate the design capacity of existing and proposed wastewater treatment systems for the facility.

The system will likely meet the definition of a public water system once the club house construction is complete in 2020. Per communications, the owner is aware of the definition of a public water system and will contact the WQCD of any changes in the near future. The systems plans to use an existing well for the club house. Once a public water system, the owner must submit an application to the WQCD for drinking water sources, treatment, and storage and receive approval of all drinking water infrastructure prior to commencement of construction.

Please contact Bret Kenogle with the WQCD if you have any additional questions about water quality (bret.kenogle@state.co.us, 303-692-3270).

Thank you,

Sonya Hackett
Environmental Health

P 303-692-3562 | F 303-692-7702
4100 Cherry Creek Drive South, Denver, CO 80246
December 30, 2019

Holden Pederson
Adams County Community and Economic Development
4430 South Adams County Parkway, Suite W2000A
Brighton, CO 80601

RE: Colorado Rifle Club, RCU2019-00039
    TCHD Case No. 6046

Dear Mr. Pederson,

Thank you for the opportunity to review and comment on the resubmittal of a Conditional Use Permit Amendment for a range expansion and clubhouse addition located at 76099 E. 96th Avenue. Tri-County Health Department (TCHD) staff previously reviewed the application and provided comments in a letter dated October 3, 2019. TCHD received a response from the applicant, dated October 30, 2019. After reviewing the resubmittal, TCHD has the following comments.

On-Site Wastewater Treatment System (OWTS) – New or Expanded
Proper wastewater management promotes effective and responsible water use, protects potable water from contaminants, and provides appropriate collection, treatment, and disposal of waste, which protects public health and the environment. Based on the information submitted by the applicant, and dated October 3, 2019, TCHD has no objection to the property being served by OWTS provided that the systems are permitted, inspected and operated in accordance with TCHD’s current OWTS Regulation. Based on the applicant’s description, a permit for the installation and final approval of the OWTS is required. In order to start the process, the applicant may contact the TCHD Aurora East Office, 15400 E. 14th Place - Suite 115, Aurora, CO 80011, 303-341-9370. More information is available at http://www.tchd.org/269/Septic-Systems.

Wastes from RV Holding Tanks
The case referral materials indicate that an RV dump station is proposed. RV waste typically contains chemicals, e.g. formaldehyde and bromopol, which may be toxic if placed in a typical OWTS. Due to the toxicity of RV waste, TCHD requires that a designated holding tank or vault be used for the disposal of this waste. The vault or holding tank will need to be permitted, constructed, and operated in conformance with TCHD’s current regulation. In order to start the process, the applicant may contact TCHD Aurora East Office, 15400 E. 14th Place - Suite 115, Aurora, CO 80011, 303-341-9370. More information is available at http://www.tchd.org/269/Septic-Systems.
Public Water System
Public Water Systems are subject to regulation by the Colorado Department of Public Health and Environment (CDPHE). The applicant shall obtain written proof from the CDPHE Drinking Water Section indicating that the system, as described, does not meet the definition of a Public Water System. The Drinking Water Section may be contacted at (303) 692-3500 or https://www.colorado.gov/pacific/cdphe/drinking-water.

Please feel free to contact me at 720-200-1575 or kboyer@tchd.org if you have any questions about TCHD’s comments.

Sincerely,

Kathy Boyer, REHS
Land Use and Built Environment Specialist III

cc: Sheila Lynch, Dylan Garrison, Michael Weakley, TCHD
Public Comment

None received.