



July 17, 2026

Hillcamp Trail – Referral #2 Public Comments - Response Letter

The Hillcamp Project has received referral comments from neighboring residents as part of the development process with the City of Lone Tree.

Applications:

SB25-0014 – Hillcamp Trail Plat and Construction Plans

This letter responds to comments provided regarding Application SB25-0014 for the Hillcamp Trail Plat and Construction Plans. Responses to comments regarding the other two applications (SB25-0009 and SB25-0010) will be provided with the resubmittal of those applications.

While the applicant appreciates the concerns expressed about the proposed alignment, it stands by the conclusions of its 11/20/25 Technical Memorandum and reiterates the following:

- The primary purpose of the RidgeGate PDD was to establish land use controls for the City and vested zoning for the Property Owner. While the major arterial and collector roadway network are an important part of the PDD (and were studied with a master traffic impact analysis), it is much less precise about the exact details of smaller scale roadways.
- The access arrows shown on the PDD for the RR Planning Area (Hillcamp) were never intended to depict final roadway alignments for such long-horizon build out anywhere within RidgeGate and, in fact, many of the constructed roadways are in different locations due to design and engineering work done in conjunction with actual development.
- While Alternate 7 meets some of the technical requirements, it has several deficiencies including:
 - It does not connect the new neighborhood to Lone Tree and, instead, would connect it to a capacity constrained roadway that also has significant emergency access challenges. And while it may make sense one day to upgrade the Surrey Road I-25 underpass, that is a long-range regional project that should not be directly connected to the development of Hillcamp.
 - It would destroy significant wildlife habitat (vs. the loss of ~30% less Scrub Oak with Alternate 1) and eliminate an important east-west wildlife corridor. The project to bring utilities up this corridor can be constructed with minimal impact and revegetated successfully so that the wildlife values can be maintained. These were not factors that were considered during the RidgeGate PDD phase.
 - It would create visual impact on the view up the hillside from I-25 to the west, which is something that the City and RidgeGate intended to protect with the annexation and zoning.
- Alternate 1 was developed in collaboration with the City of Lone Tree beginning in 2016 during the time that The Retreat was starting its design and entitlement process (in fact, the April,

2016 City Council Preliminary Plan Approval for Tract GG (The Retreat) included a condition for the posting of signage informing the public about the roadway and future development of up to 346 homes on the mesa top). In July of 2016, a Sub Area Plan covering The Retreat was approved. Exhibits in this document clearly show the extension of Cabela Drive to the mesa top. And in 2019, the RidgeGate Section 22, Filing No. 1 Plat was amended and approved by the City to dedicate additional Right-of-Way for the future extension of Cabela Drive. Following this, a disclosure document about the roadway and future residential development was created and, ultimately, signed by every initial Buyer of homes in The Retreat. Also, the noticing signage described previously was installed and is still in place today in an effort to inform the public. And in 2020, approximately 450 acres of open space was conveyed to the City with an easement to allow for this roadway and utilities needed to support future development entitled in the RidgeGate and Southridge Preserve PDD's.

- In response to concerns from residents of The Retreat neighborhood, significant grading and landscaping has been added to Alternate 1 to mitigate visual and noise impacts. And the landscaping will be manually truck watered to further mitigate concerns about water line breaks that could create other impacts to The Retreat.
- The Pedestrian Bridge for the East West Trail to go over Hillcamp Street was added as an enhancement for trail users and Douglas County has agreed to take ownership and maintenance responsibility of the bridge (see attached letter), as they do for the East West Trail. Significant design enhancements have been added to the bridge to increase its visual appeal.
- The Traffic Analysis for Alternate 1 shows acceptable levels at intersections all the way to I-25. And because there will be no publicly accessible connections to Surrey Ridge or McArthur Ranch (in response to concerns from those neighborhoods), there will be no 'cut-through' traffic on Hillcamp Trail.
- Alternate 1 has been endorsed by both the South Metro Fire Rescue District, the Colorado Geologic Survey and Colorado Parks & Wildlife.

Drainage and Geotechnical Matters

- It is our understanding that it was a significant Southgate water main break that caused the slope failures in Tract C of The Retreat. And while we understand that this is still being litigated as to cause and responsibility, we do not think it is correct to cite this event as an indication that all of the slopes in this area are unstable.
- The City has engaged a third-party geotechnical engineer to review all submission materials and the Applicant has responded to all concerns that have been raised.
- The Colorado Geologic Survey has reviewed the application and approves the Plat moving forward.
- Stormwater drainage has been designed to capture and organize stormwater flows and convey them in a pipe network into the same regional stormwater system that supports The Retreat,

Montecito and other development in this watershed. This drainageway and watershed were planned and constructed to accommodate these flows as part of the Master Plan.

Construction Impacts

- Construction of Hillcamp Trail will not be utilizing or impacting Tract M of The Retreat.
- The single-track trail adjacent Hillcamp Trail will be relocated away from the road. The trail in its current condition functions as a social trail and the East-West trail will still be able to be accessed via this trail. The starting location of this trail is not changing.
- Construction noise and traffic will be limited to working hours in accordance with City of Lone Tree requirements (7am-7pm Monday through Friday, 8am – 6pm Saturday, Sunday, and State-recognized holidays). Typical construction methods are anticipated for both the road and the subdivision. The use of blasting bedrock is prohibited.
- Historic drainage patterns will remain unchanged. Flows collected via curb and gutter in the road will be treated for water quality before being released to the existing drainageways. All other flows will simply pass under the road. No flows will be directed towards the back of existing homes in the Retreat neighborhood. All disturbed areas will be reseeded with a seed mix that includes deeper rooting grasses to provide post-construction erosion control.

Wildfire Matters

- Alternate 1 will provide an emergency access route for The Retreat and Montecito residents in the unlikely event of a fire moving from the north to the south. Alternatively, it will enhance the overall regional safety for residents in Surrey Ridge and Mc Arthur Ranch to have an emergency access route in the case of a fire moving from either south/west to the north/east.
- The design of the Hillcamp subdivision will comply with all new wildfire mitigation measures adopted by the City and State including specialized landscaping, fire resistant building materials and fire sprinklered homes.
- Along with the construction of Hillcamp Trail, over 50 new Fire Hydrants will be installed which can be utilized to fight wildfires in the area.



CENTENNIAL AIRPORT
ARAPAHOE COUNTY AIRPORT AUTHORITY

7565 South Peoria Street, Unit D9
Englewood, Colorado 80112
main: 303-790-0598 | fax: 303-790-2129
www.centennialairport.com

April 10, 2026

Thank you for the review.

Chuck Darnell – Principal Planner
City of Lone Tree Community Development Department
9220 Kimmer Dr.
Lone Tree, CO 80124

Re: SB25-0014 – Cabela Dr. Extension

Dear Mr. Darnell,

Thank you for the opportunity to review the plan. The Arapahoe County Public Airport Authority has reviewed the documents and has no objection to the proposed development. We have the following comments to make on the project:

Please feel free to call me if you have any questions.

Sincerely,

Zachary Gabehart
Senior Planner - Noise & Environmental

COLORADO GEOLOGICAL SURVEY

1801 Moly Road
Golden, Colorado 80401



Matthew L. Morgan
State Geologist

May 1, 2026

Comment Responses are
provided under separate
cover by CTL.

Chuck Darnell
Principal Planner, City of Lone Tree
Chuck.darnell@cityoflonetree.com

Location:
Portion of Section 22,
T6S, R67W of the 6th P.M.
39.519, -104.8764

Subject: **Hillcamp Drive Final Plat – Application No. SB25-0014**
City of Lone Tree, Douglas County, CO; CGS Unique No. DU-26-0010_3

Dear Mr. Darnell:

The City of Lone Tree Planning Division requests (email dated April 14, 2026) the Colorado Geological Survey's (CGS) review of the resubmittal documents for a non-residential plat application proposed to include a collector roadway extension. This is in response to the comments the CGS provided to the City dated January 30, 2026, and following a meeting with CTL and the City dated March 4, 2026. The roadway extension is intended to serve as the sole access to a proposed 343-unit single-family detached residential development. The resubmittal documents include:

- Hillcamp Trail, Civil Construction Plans (JR Engineering, March 27, 2026),
- Final Plat (JR Engineering, March 26, 2026),
- Comment Response Letter (CTL Thompson, Revised March 27, 2026),
- Updated Preliminary Geotechnical Investigation and Slope Stability Evaluation, Ridgeway - Mesa Tops, Southwest of Ridgeway Parkway and Interstate 25, Lone Tree, Colorado (CTL Thompson Project No. DN52, 378-125-L2, March 27, 2026),
- Geotechnical Investigation, Ridgeway Mesa Tops Pedestrian Bridge, Southwest of Ridgeway Parkway and Interstate 25, Lone Tree, Colorado (CTL/Thompson Project No. DN52, 378-125R1R, March 26, 2026), and
- Phase III Drainage Report for Hillcamp Drive (JR Engineering, March 2026).

In addition to the roadway, the plat includes several tiered retaining walls, an elevated pedestrian and equestrian trail bridge over the roadway, and sub-fill drains intended to address drainage concerns related to the collection/conveyance of surface water on unstable slopes.

In general, CTL's updated study and evaluation address our previous concerns, and **we have no objection to approval of the final plat**. CTL's responses to our January 30, 2026 comments are repeated below, along with additional comments to consider as the project progresses through the design and construction phases.

CGS Comment (January 30, 2026): The geotechnical report and supplemental slope stability evaluation are described by CTL as intended for preliminary planning only.

CTL Response: *Additional subsurface exploration and slope stability analyses have been performed and results presented in a letter dated March 27, 2026 (DN52,378-125-L2). A design-level pavement investigation will be*

conducted once utilities have been installed (if any) and the road has been graded to a tenth of a foot of finished subgrade, per specifications from the Douglas County Roadway Design and Technical Criteria Manual Section 5.2.1.

CTL's subsequent report and slope stability evaluation generally address CGS's previous concerns regarding slope instability and the mapped geologic hazards within the site. CGS agrees that the pavement investigation for the final pavement design of the roadway should be completed once the roadway is near finished subgrade. The construction considerations and site development recommendations by CTL in their updated study appear to be preliminary. **CGS recommends that CTL finalize these recommendations prior to design and construction, and that they be strictly adhered to.**

CGS Comment (January 30, 2026): CGS recommends that additional subsurface exploration and analysis be performed prior to final plat approval.

CTL Response: *Additional subsurface exploration and slope stability analyses have been performed and results presented in a letter dated March 27, 2026 (DN52,378-125-L2).*

CTL's subsequent report and slope stability evaluation generally address CGS's previous concerns regarding slope instability and the mapped geologic hazards within the site. Eleven additional test holes and four additional slope cross-sections were analyzed. We offer the following additional comments, observations, and recommendations on CTL's updated study.

- CTL states (page 8), "*slope stability analyses imply existing and proposed slopes are stable. Addition of water to the subsurface from precipitation or irrigation reduces relative stability and may initiate slope failures. Surface drainage should be designed, constructed, and maintained to provide rapid removal of surface runoff.*" CGS recommends that the City require a **mitigation and maintenance plan** to limit infiltration into subgrade materials and preserve slope stability, and that the general approach be established and included in the final plans.
- CTL states (page 5), "*we preformed (sic) analyses considering these properties for any weathered claystone encountered towards the bottom of the slope, like MWW, to evaluate stability.*" Cross-section B-B' has a small pocket of weathered claystone modeled as residual; however, there does not appear to be a discussion on why the subsurface conditions vary from the original report, where a thicker layer of weathered claystone was previously modeled.
- Cross-section C-C' still does not have any subsurface data that justifies the profile shown in CTL's report. Just to the west of Section C-C', CTL mapped an area of observed site grade disturbance (nearmap DEM change detection, Fig. 5). Additionally, to the northwest, a slope failure occurred in 2024.
- Cross-sections G-G' and H-H' have a small pocket (about 50 feet) of weathered claystone modeled as residual. Potential landslide deposits are present between Sta 1+00 and Sta 3+00.

The additional evaluation performed by CTL is good; however, this area has known slope instability concerns and mapped hazards. Our observations above are a few areas that could be improved in the analysis. Since slope stability evaluations are based on theoretical models and interpreted subsurface conditions in some cases, ongoing maintenance, routine inspections of slopes for signs of failure, and improvements to surface drainage, subgrade protection, and erosion control must be implemented and maintained throughout the life of the roadway to reduce the risk of slope instability.

CGS Comment (January 30, 2026): CGS recommends that the retaining walls associated with the roadway extension of Hillcamp Drive be included in the slope stability analysis. Global and local stability should be evaluated.

CTL Response: *Additional subsurface exploration and slope stability analyses have been performed and results presented in a letter dated March 27, 2026 (DN52,378-125-L2). A water sensitivity analysis was performed as part of our analysis. Results imply stable slopes.*

CTL provides global slope-stability analyses that incorporate retaining walls and yield “conservative” values for failure zones within the weathered claystone (based on information provided by MWW). Additionally, CTL included water sensitivity in their analysis. The additional evaluation performed by CTL is satisfactory and addresses CGS’s concern.

CTL states in their revised report (page 5), *“During our investigation we did not observe any indications that the weathered claystone unit we encountered has been disturbed or displaced via slope movements and do not believe residual strengths have developed within the weather claystone unit. To be conservative, we performed analyses considering these properties for any weathered claystone encountered towards the bottom of the slope...”* Landslides and slope failures have been mapped and documented in the area; therefore, CGS’s request that CTL incorporate residual strength parameters into the slope stability analyses is reasonable and critical for evaluating slope performance in mapped landslide terrain.

We agree with CTL that *“Changes to proposed grading, site grading techniques, and surface drainage will impact slopes stability along these sections.”* CGS recommends that the slope stability analyses be reevaluated at the time of the final design, and that the parameters used in CTL’s analysis be provided to the wall designer to perform local slope stability evaluation for the retaining walls.

CGS Comment: CGS recommends that the City require a clearly defined temporary cut/maximum bench height, bench geometry, and sequencing plan (not just a statement that *“bench heights of less than 4 ft will likely be required”*).

CTL Response: *Additional subsurface exploration and slope stability analyses have been performed and results presented in a letter dated March 27, 2026 (DN52,378-125-L2 and report dated March 27, 2026 (DN52,036-115-R2R). For interim conditions, some of the sections showed lower FOS values (1.3 to 1.4), but we believe these values are acceptable due to the short-term duration of these conditions. For benching, we assumed vertical heights of 4 feet in our analyses.*

CTL states, *“We assume that benches cut to allow fill placement will not remain open for more than a day or two. Where retaining walls require excavation into the slope (i.e. along sections D through F), we recommend limiting the extent of excavation to avoid over-exposing claystone bedrock. We modeled a temporary slope layback of about 1.6H:1V in our models.”*

CTL’s assumptions should be verified and recommendations modified as necessary, as the design and construction sequence is established.

CGS Comment: CGS recommends that water-sensitivity analyses incorporating saturated and perched-water conditions, as well as soil-strength sensitivity (failure conditions), be included in slope stability analyses.

CTL's revised and updated slope stability analyses for the roadway address CGS's previous comment. Reference to the residential development planned on the mesa top will be provided in subsequent reviews.

CGS Comment: CGS recommends that the final design explicitly demonstrate how drainage diversion and sub-fill drains will be implemented at these locations, and that their design, redundancy, outlet protection, and long-term performance are adequate to prevent saturation of fill and underlying slope materials and to maintain slope stability for the life of the roadway.

CTL Response: *It is not feasible for the drainageways to be rerouted. Doing so would impact the historical drainage patterns of the area and cause a significant amount of additional disturbance to the hillside. The project seeks to preserve the drainageways in their historical configurations while utilizing engineering solutions to provide long term stability to the roadway and associated slopes. These include the following: installation of curb and gutter which will organize all flows within the roadway and discharge them in to historical locations, sub-fill drains will be installed per Geotech recommendations, drainage swales will be lined with TRM, rip-rap will be installed on the upstream and downstream storm sewer discharge locations, low-tail water basins will be utilized to dis-sipate velocities and prevent erosion, and all slopes will be designed to a maximum of 3:1 and will be stabilized with vegetation for long term stability.*

During construction the Geotech benching recommendations will be adhered to. Minimal landscaping will be installed as part of the project and only native species will be utilized. This will require minimal temporary drip irrigation that will not comprise the integrity of the roadway or slopes providing long term stability.

CTL provides a discussion on engineering solutions that will be utilized for long term stability of the roadway: *"installation of curb and gutter which will organize all flows within the roadway and discharge them in to historical locations, sub-fill drains will be installed per Geotech recommendations, drainage swales will be lined with TRM, rip-rap will be installed on the upstream and downstream storm sewer discharge locations, low-tail water basins will be utilized to dis-sipate velocities and prevent erosion, and all slopes will be designed to a maximum of 3:1 and will be stabilized with vegetation for long term stability."*

CGS has no additional comments regarding the sub-fill drains and proposed drainage diversions. **CTL's recommendations should be strictly adhered to during design and construction.**

Thank you for the opportunity to review and comment on this project. If you have questions or require further review, please call me at 303-384-2632 or email acrandall@mines.edu.

Sincerely,



Amy Crandall, P.E.
Engineering Geologist

Project Name: Hillcamp Drive Filing 1

Project Number: RE2026-045

Date Received: 04/08/2026

Jurisdiction: City of Lone Tree

Due Date: 05/25/2026

Addressing Comments:

Hillcamp Trail – Requires revision. Street name is approved. The suffix should be Street.

Contact DCAAddressing@douglasco.gov or 303.660.7411 with questions.

Engineering Comments:

No Comments

Upon coordination regarding this street name, the Trail suffix was approved on 7/6/2026. See attached email correspondence.

Planner Comments:

No Comments

Kassandra Crump

From: DC Addressing <DCAddressing@douglasco.gov>
Sent: Monday, July 6, 2026 1:09 PM
To: Kassandra Crump
Cc: Kevin Rohrbough; Chuck Darnell
Subject: RE: Hillcamp Street Names - Variance Process

Categories: Mesa Tops

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

Hi Kassandra,

Thank you for providing the written narrative. Upon review, the street name Hillcamp Trail is acceptable for Hillcamp Ridgeway Preliminary Plan (SB25-0010 and RE2026-044). Please let me know if you need anything else!

Caitlin Zeiler | Planning & Addressing Specialist
Douglas County Community Development Department
Planning Resources Division
Address | 100 Third St., Castle Rock, CO 80104
Direct | 303-660-7449 **Main** | 303-660-7460
Email | czeiler@douglasco.gov

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From: Kassandra Crump <KCrump@jrengineering.com>
Sent: Wednesday, July 1, 2026 11:15 AM
To: DC Addressing <DCAddressing@douglasco.gov>
Cc: Kevin Rohrbough <krohrbough@jrengineering.com>
Subject: RE: Hillcamp Street Names - Variance Process

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Hi Caitlin,

Thank you for the phone call yesterday and the consideration of using Trail as the suffix for this road. Please see the attached letter with the applicant team's justification for the "Trail" suffix.

Please let us know how we should proceed with this street name for the resubmittal.

Kassandra Crump, PE

Project Lead | Land Development

JR Engineering, LLC

7200 S Alton Way, Suite C400

Centennial, CO 80112

Main: (303) 740-9393 | Direct: (303) 267-6217

kcrump@jrengineering.com

www.jrengineering.com

From: DC Addressing <DCAddressing@douglasco.gov>
Sent: Tuesday, June 30, 2026 3:50 PM
To: Cassandra Crump <KCrump@jrengineering.com>
Cc: Kevin Rohrbough <krohrbough@jrengineering.com>
Subject: RE: Hillcamp Street Names - Variance Process

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Thanks for speaking with me over the phone. As discussed, street suffixes are determined upon evaluation of the street alignment and in accordance with rules as recommended by the Denver Regional Council of Governments (DRCOG). The variance process outlined in the Addressing and Street Naming Manual is only appropriate when requesting an exception the 12-character limit.

Please provide a brief narrative for the request to use Hillcamp Trail rather than another suffix such as Street or Blvd. I will share that information with addressing partners and see if there is flexibility in the requirements in this case.

Let me know if you have any questions.

Caitlin Zeiler | Planning & Addressing Specialist
Douglas County Community Development Department
Planning Resources Division

Address | 100 Third St., Castle Rock, CO 80104

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Email | czeiler@douglasco.gov

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From: Cassandra Crump <KCrump@jrengineering.com>
Sent: Monday, June 29, 2026 9:10 AM
To: DC Addressing <DCAddressing@douglasco.gov>
Cc: Kevin Rohrbough <krohrbough@jrengineering.com>
Subject: Hillcamp Street Names - Variance Process

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Hi Caitlin,

Thank you for providing the comments regarding the street names on the Hillcamp Preliminary Plans and Hillcamp Drive Filing 1 application. We wanted to reach out to inquire about the variance process for street names. Rampart Range Metro District would like to request a variance on the Hillcamp Trail suffix. Can you please advise on if this may be allowed and if so, what the variance process is?

Thank you,

Kassandra Crump, PE
Project Lead | Land Development

JR Engineering, LLC

7200 S Alton Way, Suite C400

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July 1, 2026

Caitlin Zeiler
Planning & Addressing Specialist
Douglas County Community Development Dept.
Planning Resources Division
100 Third Street
Castle Rock, CO 80104

Re: Hillcamp Trail Suffix Justification

Dear Ms. Zeiler,

We are requesting that the street connecting Cabela Drive to the Hillcamp Subdivision be named Hillcamp Trail. According to the Douglas County Addressing and Street Naming Manual, "Through streets may take the suffix... 'Trail.'" The street:

- Provides through access from the City of Lone Tree to the Hillcamp Subdivision.
- Provides access from Ridgeway Parkway through the City to Stay True Street (formerly Stay True Trail).
- Provides the main access through the Hillcamp Subdivision to access the quadrants of the subdivision.
- Goes through the existing drainageway up to the mesa.

Please contact me should you have any questions or concerns regarding this justification at 303-267-6262.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Rohrbough".

Kevin Rohrbough, PE
Client Manager
JR Engineering

SOUTH METRO FIRE RESCUE

FIRE MARSHAL'S OFFICE



Chuck Darnell
Senior Planner
City of Lone Tree
9220 Kimmer Drive, suite 100
Lone Tree, CO 80124
720.509.1273

Project Name: Hillcamp Development
Project File #: **SB25-0009/SB25-0010/RG24-0007 (Hillcamp Preliminary Plan) & SB25-0014 Hillcamp Final Plat**
SMFR Review #: REFPDP25-00321

Review date: 2-04-26
Revision 1 date: 05-26-26

Reviewed by:	Scott Stene, Plan Reviewer 720-989-2249 scott.stene@southmetro.org	Rich Conroy, Deputy Fire Marshal 720-989-2250 rich.conroy@southmetro.org
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PROJECT SUMMARY:

1) Sub-Area Plan (Application Number RG24-0007)

- a. Description: Creation of a Sub-Area Plan that will guide future development of the proposed Hillcamp community, and the Sub-Area Plan will include framework plans, design guidelines, and design standards.
- b. Application Materials: Available on the [application webpage here](#).
- c. Comment Response Form: Available [here](#).

2) Preliminary Plan for the RidgeGate Rural Residential Planning Area (Application Number SB25-0010)

- a. Description: Identifies proposed preliminary development plans for 261 residential single-family detached lots, roadways providing access to each lot, and numerous tracts for public parks, public open space, private open space, an amenity center, and utilities/infrastructure.
- b. Application Materials: Available on the [application webpage here](#).
- c. Comment Response Form: Available [here](#).

3) Preliminary Plan for the Southridge Preserve Planned Development District Residential Planning Areas (Application Number SB25-0009)

SOUTH METRO FIRE RESCUE

FIRE MARSHAL'S OFFICE



- a. Description: Identifies proposed preliminary development plans for 82 residential single-family detached lots, roadways providing access to each lot, and numerous tracts for a public park, public open space, private open space, an amenity center, and utilities/infrastructure.
- b. Application Materials: Available on the [application webpage here](#).
- c. Comment Response Form: Available [here](#).

4) Final Plat for Proposed Extension of Cabela Drive to Provide Vehicular Access to Proposed Hillcamp Community (Application Number SB25-0014)

- a. Description: Identifies platting of public right-of-way for the proposed extension of Cabela Drive from its current terminus to the south to provide the main public street connection to the proposed Hillcamp community. The application also includes detailed construction plans for that proposed street construction.
- b. Application Materials: Available on the [application webpage here](#).
- c. Comment Response Form: Available [here](#).

REFERENCES:

- 1. [2021 International Fire Code \(IFC\)](#)
- 2. [2025 Colorado Wildfire Resiliency Code and Map](#)
- 3. [2025 City of Lone Tree Community Wildfire Protection Plan](#)
- 4. [2022 Douglas County Wildfire Protection Plan](#)
- 5. SMFR Fire Access Road Design Criteria (Attachment 1)
- 6. SMFR Response to Lone Tree Referral ZR02-11, Southridge Preserve Planned Development District (Attachment 2)

South Metro Fire Rescue (SMFR) has reviewed the above project. The following comments need to be addressed and/or further discussed prior to SMFR issuing a non-objection letter for the proposed development to move forward.

COMMENTS:

General:

- 1. The proposed development incorporates the Ridgeway Rural Residential Planning Area, for which SMFR does not have previous review comments on file. It also incorporates the Southridge Preserve Planned Development District, which was previously reviewed by SMFR in October of 2002. SMFR's response letter to that referral (Lone Tree ZR02-11) is provided as an appendix to this document. A summary of SMFR's comments from that referral are as follows:
 - a. Roadway design and access points were to be in accordance with the Uniform Fire Code and other SMFR and AHJ standards.

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- b. Fire protection water supply was to be provided in accordance with the Uniform Fire Code and other SMFR and AHJ standards.
- c. All structures were to be provided with fire sprinkler systems that complied with Uniform Fire Code and other SMFR and AHJ standards.
- d. Wildfire hazard mitigation was to comply with applicable standards (no specific standards were listed in the letter).

As the development did not materialize subsequent to the previous review, the references in the previous referral response have become outdated. SMFR's comments regarding the current proposed development will be utilizing updated references as provided above.

Applicant's Response:

- a. The project requires unique roadway standards which are defined in the preliminary plan and meet Fire Code and SMFR standards.
- b. Water supply meets Fire Code, SMFR and AHJ standards.
- c. All homes will be sprinklered.
- d. A full wildfire mitigation plan has been prepared and will be implemented for the development.

SMFR's Response:

No further information is needed at this time.

Noted.

Water Supply:

- 2. Approval of a residential water distribution system (RWDS) will be required from SMFR. The capacity of that system will establish maximum residential structure sizes for the proposed development based on fire flow requirements from the IFC.

Applicant's Response:

The water system is currently under design and will be provided with subsequent stages of the project.

SMFR's Response:

Acknowledged. No additional information is needed at this time.

Fire Department Apparatus Access:

- 3. The plan shows the following fire department apparatus access points into the proposed development:
 - a. Hill Camp Trail, which is proposed to be a full-movement road allowing for both emergency and non-emergency travel into and out of the development.

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- b. Heather Drive, which is proposed for emergency use only and not allowing non-emergency travel into or out of the development.
- c. McArthur Drive, which is proposed for emergency use only and not allowing non-emergency travel into or out of the development.

SMFR has no objection to the proposed apparatus access points, but clarity is needed regarding the number and location of gates to restrict access to emergency use only for Heather Drive and McArthur Drive. SMFR is not opposed to the installation of gates that comply with the requirements of the IFC. Permits for those gates will ultimately be required. If multiple gates are needed for a single access point, more information about accessing the road between the gates for maintenance (including snowplows) will be needed.

Applicant's Response:

Single gates will be utilized at the adjacent ROW connections to the Site. Maintenance of the roadways will be provided by RRMD.

SMFR's Response:

The plans currently show one gate at the top of McArthur Drive. The plans do not show a gate for Heather Drive. Update the plan to reflect the general location of each gate. Further details can come later during the permitting phase for the gates.

The "Emergency Vehicle Access" detail in the plans shows the Heather Drive and McArthur Drive apparatus access as unpaved. SMFR will require these to be a paved, all-weather surface.

Applicant's Response:

These have been adjusted to be paved surfaces.

Gates have been noted at both EVA locations now and details will be determined during the Final Plat stages.

SMFR's Response:

Acknowledged. No further information is needed at this time.

Noted.

No grading plan or auto-turn exhibit was provided with the submittal. SMFR will require a grading plan and auto-turn exhibit for all roads in the proposed development, including the Heather Drive and McArthur Drive access points to ensure the maximum 6% grade can be achieved for apparatus access.

Applicant's Response:

Grading Plans and Auto-turn exhibit have been provided.

SMFR's Response:

The grading plan shows grades steeper than 6% along the emergency access point from McArthur Drive. SMFR acknowledges that there are challenges with

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the topography that make 6% grades impractical. We can allow steeper grades due to the presence of sprinklered structures and the road not having structures being accessed directly from it for fire suppression purposes, but grades steeper than 6% shall be minimized wherever possible.

The auto-turn exhibit appears to show compliance with our ability to maneuver through the site generally, though several of the cul-de-sacs appear very close to non-compliance. See additional information in SMFR's response to comment number 7 below.

Noted.

4. Hill Camp Trail is shown as a bifurcated road with 11' wide all-weather surface travel lanes. The minimum width of a fire department apparatus access road per the IFC is 20' of all-weather surface. While the proposed road has 22' of paved width in total, the bifurcation effectively reduces the allowable width that could be used to navigate around traffic and/or accidents. The 11' width also leaves very little recovery room for vehicles traveling in wet or slippery conditions, increasing the likelihood of our primary apparatus access point into the proposed development being blocked. The travel lane in each direction needs to be 20' wide minimum all-weather surface to address these concerns.

Applicant's Response:

Each lane has been widened to 20' minimum.

SMFR's Response:

Acknowledged. No further information is needed at this time.

Noted.

5. Within the proposed development, the roadway design standards shown are consistent with the Rural Local Type I and II Functional Street Classifications contained in the Douglas County Roadway Design and Construction Standards. Per those standards, these roadway designs are intended for 2.5-acre minimum net lot sizes with 8 parking spaces required on each lot. The proposed development does not conform to the minimum lot size for this roadway design. No information has been provided about the number of parking spaces required on each lot. As designed, on-street parking would be prohibited throughout the entire development based on roadway widths, restricting residents and their guests to only parking in garages and driveways. In SMFR's experience, this is an impractical arrangement. More information is needed regarding how this prohibition will be communicated to residents and their guests (such as "No Parking – Fire Lane" signage on both sides of every street throughout the development). More information is needed on how enforcement of the parking prohibition will occur given the combination of public and private roads within the proposed development.

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Applicant's Response:

No parking signs have been added to the plan and on-street parking is prohibited. This will be enforced through the HOA and City of Lone Tree PD.

SMFR's Response:

The plan does not show the "No Parking" signs in adequate detail for SMFR to review. Clarification is needed on how the on-street parking prohibition is going to be documented for future enforcement. SMFR will need specific details on which streets are going to be enforced by the HOA as opposed to Lone Tree PD, including the legal justification for each entity to undertake enforcement actions, how those actions will be undertaken, and acknowledging their willingness and ability to do so.

SMFR remains committed to ensuring the safety of guests visiting this community and addressing parking concerns.

Exact locations of signs will be determined during the final plat stage and set to avoid driveways and other obstructions. In agreement with the City, the HOA will be required to help enforce no on street parking along the Private Roadways in the development.

6. The "Cul-de-Sac with Median" design is shown as a 16' all-weather surface. The minimum width of a fire department apparatus access road per the IFC is 20' of all-weather surface. This is especially necessary for these cul-de-sacs given they are located adjacent to structures.

Applicant's Response:

These have 16' of pavement with 2' ribbon curbs on either side which are flat curb and you can drive on them. This totals 20' of all-weather surface.

SMFR's Response:

Acknowledged. No further information is needed at this time.

Noted.

7. There are several cul-de-sacs on the plan for which no design standards were provided. Some appear larger than others. More information on the proposed design of those cul-de-sacs is needed to verify compliance with Appendix D of the IFC.

Applicant's Response:

Cul-de-sac's have been verified to be in compliance with the IFC.

SMFR's Response:

There is insufficient detail to verify this claim, and the cul-de-sacs appear to be smaller than what is required by Appendix D of the IFC. Provide cul-de-sac details and measurements to include cross sections as shown for other roadway designs.

Cul-de-sac measurements have been added to the Preliminary Plan for reference.

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8. The combination of the site layout, the housing density, and the topography are not allowing for compliant remoteness where two fire apparatus access roads are required by the IFC (portions of the development exceeding 30 dwelling units accessed from a single intersection). The cul-de-sac measurements have been added to the Preliminary Plan for reference.
- I. SMFR wing:

- a. Approved automatic fire sprinkler systems will be required for all dwellings within the proposed development.
- b. Turnaround points complying with Appendix D of the IFC must be provided near the halfway point of all dead-ends that exceed the 750' maximum length.

Applicant's Response:

- a. all homes will be sprinklered
- b. turn around locations have been provided on all dead-end over 750'

SMFR's Response:

SMFR acknowledges the comment that all homes within the Hillcamp Development will be sprinklered.

There are no turnaround locations shown on the map. The turnaround details need to be provided for review.

Turn around locations have been shown and criteria for max length dead-ends have been met.

9. As of the 3/27/2026 revision, the "Roadway Technical Criteria" table on the "Typical Road Cross Section" sheet contains a lot of inconsistent information when compared to the roadway section details. The names don't match and some details are missing from the table. These need to be made consistent to provide clarity and avoid potential construction mistakes.

Typical sections and Criteria have been updated.

Wildland Urban Interface (WUI)

10. Many of the lots in the proposed development are in a Moderate Intensity WUI risk area in accordance with the state map adopted by the Colorado Wildfire Resiliency Code Board. Based on previous conversations with Lone Tree staff and current referral processes underway, it is presumed by SMFR that by the time of permitting for structures within the proposed development, a WUI code that addresses structure hardening and site and area requirements will be in place. Developers and contractors should plan accordingly.

Applicant's Response:

Noted.

SMFR's Response:

No further information is needed at this time.

Noted.

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11. Both the City of Lone Tree and Douglas County have adopted Community Wildfire Protection Plans (CWPP), with SMFR contributing to the creation of those plans. The purpose of the CWPPs is to provide recommendations that help to mitigate WUI risks. Both CWPPs emphasize the need for primary and secondary emergency evacuation routes to be established from WUI risk areas. In addition to providing fire department apparatus access for the proposed development, the proposed connections to Heather Drive and McArthur drive will serve the purpose of providing secondary emergency evacuation routes from the proposed development as well as existing adjacent developments which are Moderate Intensity WUI risk areas. SMFR views this interconnectivity as important to the safety of not only the proposed development, but of the existing adjacent developments.

Applicant's Response:

The applicant agrees, thank you.

SMFR's Response:

No further information is needed at this time.

Noted.

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Attachment 1: SMFR Road Design Criteria

FIRE ACCESS ROAD DESIGN CRITERIA



BUILDING exterior walls (and any portion thereof) of any buildings that are more than 150 feet from the curb line of a public street shall be served by a Fire Apparatus Access Road which shall be unobstructed. This distance is measured by an approved route around the exterior of the building or facility. Additional allowances may be made for some sprinkler protected structures. Alternate access arrangements may be accepted based on site conditions and building fire protection features.

Due to the possibility of heavy vehicle traffic, residential and commercial collector and arterial roads may not be considered adequate for fire suppression operations; no credit for access to perimeter of buildings shall be given from collectors or arterials, unless specifically approved.

Sites not capable of meeting these requirements and any alternative means must be evaluated and approved by the Fire Marshal.

FIRE APPARATUS ACCESS ROADS shall be of an all-weather surface capable of supporting the imposed loads of fire apparatus. Maximum grade on site shall not exceed six percent (6%). Roads shall be asphalt or concrete. Other surfaces may be accepted on a case-by-case basis.

The minimum unobstructed width of the fire apparatus access road shall be 20 feet. In order to maintain the minimum width and prevent obstructions such as parking of vehicles fire lane signs shall be installed in an approved manner. A minimum vertical clearance of 13 feet, 6 inches shall be maintained for the entire required width of the access road.

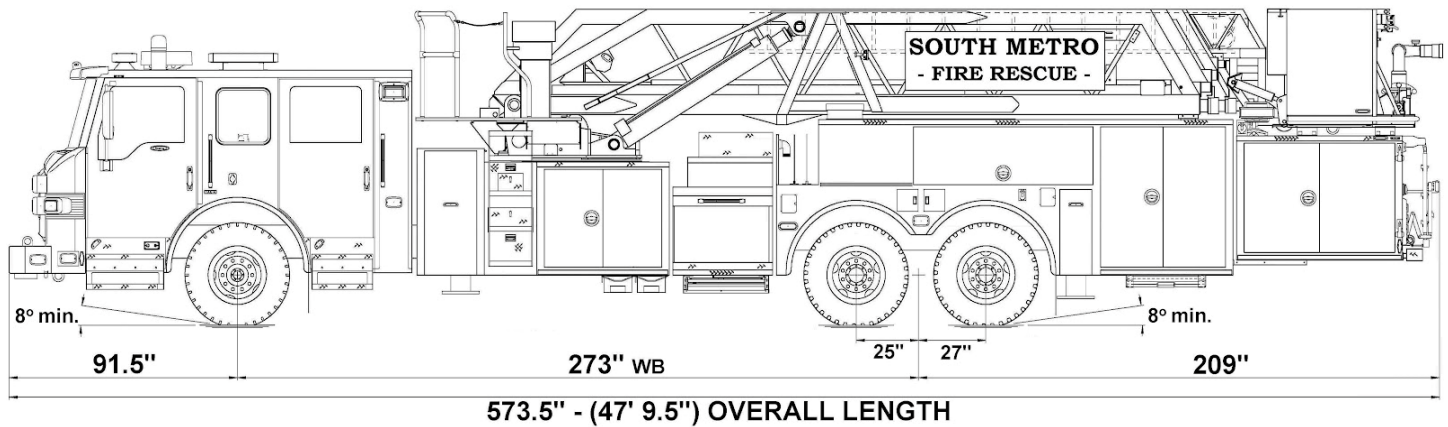
SOUTH METRO FIRE RESCUE

FIRE MARSHAL'S OFFICE



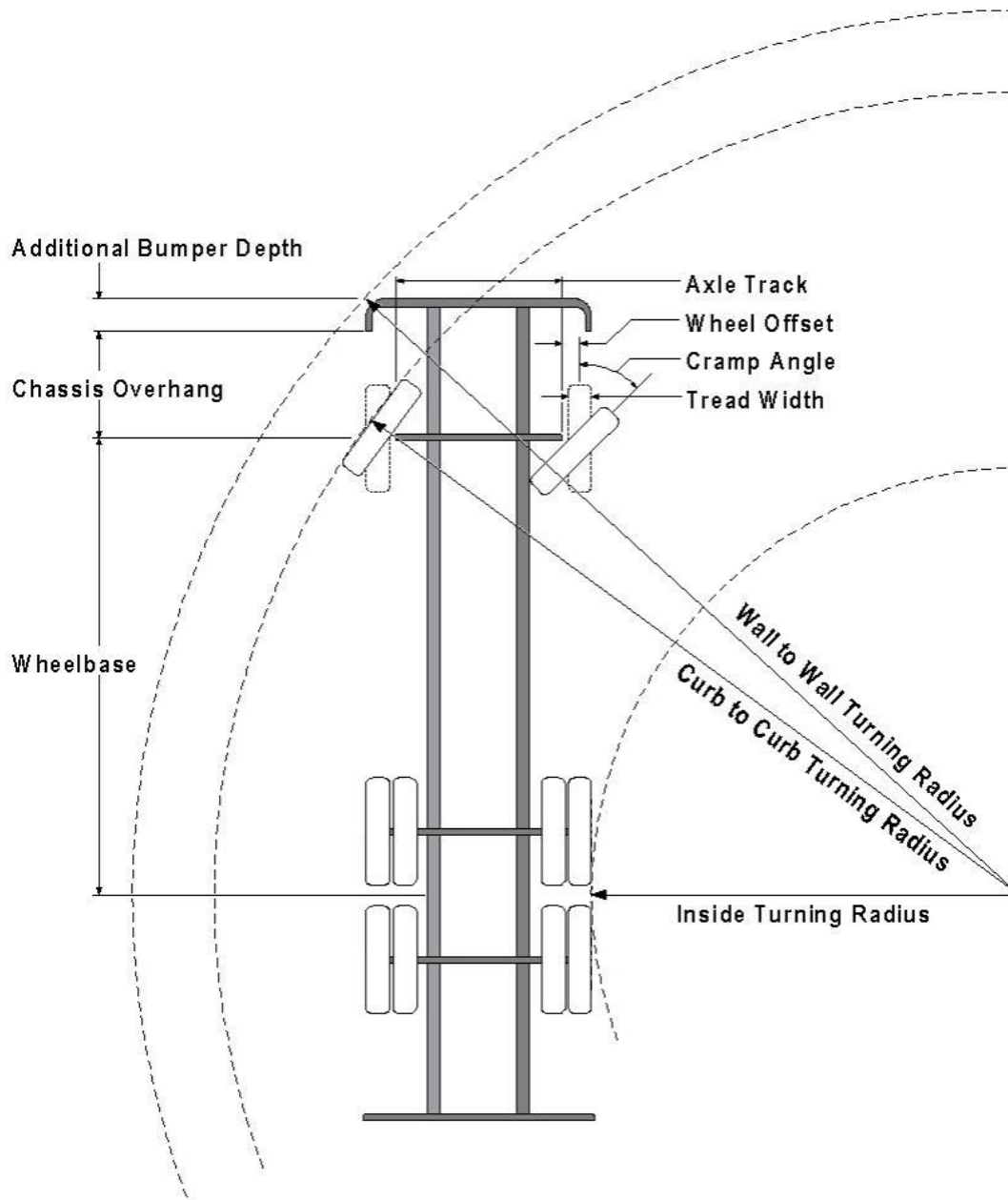
Any dead-end access road over 150 feet long shall be provided with an approved turnaround that may be a circle, tee, hammerhead, or other functional approved design.

VEHICLE SPECIFICATIONS are provided for the largest apparatus in use by South Metro Fire Rescue. Fire Apparatus Access Roads shall be capable of accommodating this apparatus.



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Vehicle Specifications

Length: 47' 9.5"

Width: 8' 5" - (10' 1" mirror to mirror)

Height: 10' 9"

Wheelbase: 273 in.

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Design load: 80,000 pounds

Inside Cramp Angle: 40°

Axle Track: 83"

Wheel Offset: 5.3"

Tread Width: 13.5"

Turning Radii:

Inside Turn: 26 ft. 1 in.

Curb to curb: 41 ft. 11 in.

Wall to wall: 46 ft. 8 in.

Where objects are present adjacent to the fire apparatus access road, particularly on turns and turn arounds which require backing, a reasonable safety margin shall be provided to prevent potential damage to the property and to the fire apparatus.

PRIVATE ROADS that provide access to more than two dwellings or one or more commercial buildings shall be constructed to meet the roadway standards approved by the South Metro Fire Rescue Authority for fire apparatus access. Private roads that do not meet the roadway standard may be accepted provided that alternative methods and materials are incorporated into the subdivision that address the fire and life safety of the citizens.

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Attachment 2: SMFR Review Comments for ZR02-11 (2002)

October 12, 2002

City of Lone Tree
Community Development Department
Kelly First
6750 S. Washington St.
Centennial, Co. 80122

RE: ZR02-11 SOUTHRIDGE PRESERVE

Dear Ms. First:

This letter is in response to your Referral Request for the above-mentioned project. I have reviewed the plans and drawings submitted. In such matters, South Metro Fire Rescue uses the 1997 Uniform Fire Code to guide comment on fire protection issues. I have the following comments about the project as proposed:

1. Fire Department Apparatus Access:

- a. The roads need to be designed and built to comply with the Uniform Fire Code, South Metro Fire Rescue policy and the Lone Tree Roadway Design and Construction Standards.
- b. Two points of access would be required for over 40 units. The proposed secondary fire department emergency access road needs to be designed and built to comply with the Uniform Fire Code and South Metro Fire Rescue policy. The secondary fire department emergency access road needs to be dedicated for ownership and maintenance. All gates, locks, and signs must be approved in advance by South Metro Fire Rescue.
- c. The submitted plans did not show proposed road grades. South Metro Fire Rescue policy states that road grades shall not exceed 6%. If any road grades exceed 6%, South Metro Fire Rescue would need to address this issue with the applicant and the city of Lone Tree.
- d. Shared driveways must be approved by South Metro Fire Rescue for fire apparatus access.
- e. Section 902.2.2.2 of the Uniform Fire Code requires fire apparatus access roads to be designed and maintained to support the imposed loads of fire apparatus. Fire apparatus access roads in the South Metro Fire Rescue district shall be designed as heavy traffic drive areas to support the imposed loads of 71,700 pounds. South Metro Fire Rescue is not responsible for damage to any fire apparatus access road.
- f. No construction should begin in the project until all access roads are complete within the project.

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2. Fire Protection Water Supply:

- a. The water supply system needs to be designed and built to comply with the Uniform Fire Code, South Metro Fire Rescue policy and local Southgate Water District standards.
- b. The water supply system and fire hydrant spacing plans need to be submitted for review and approval by South Metro Fire Rescue for compliance with fire codes.
- c. The required fire flow for the development must comply with Table A-III-A-1 of the 1997 Uniform Fire Code.
- d. The applicant has agreed to require the installation of internal fire sprinkler systems in all structures in compliance with South Metro Fire Rescue standards (which are more restrictive than NFPA 13D).
- e. Fire protection water supply cisterns may be required in some areas that won't be served by a municipal water supply system. The cisterns must be installed to the Douglas County Standards.
- f. No construction should begin in the project until all fire hydrants are complete in the project.

3. Fire Department Permits:

- a. South Metro Fire Rescue requires permits for all fire protection systems and cisterns. The developers should contact the fire department well in advance for plan review and permit requirements.

4. Wildfire Hazard:

- a. Some of this proposed project may be in a wildfire hazard area. Mitigation of wildfire hazards must comply with the applicable standards.

If the developer addresses the above mentioned issues, South Metro Fire Rescue would have no objection to this project.

If you need further information or assistance on this project please feel free to call me.

Sincerely,

A handwritten signature in black ink that reads "Roger Parker".

Roger Parker
Fire Marshal
South Metro Fire Rescue

4810 East County Line Road
Littleton, CO 80126
720.916.4003

May 19, 2026

Roshana Floyd
Planning Manager
9220 Kimmer Drive
Lone Tree, CO 80124

Dear Roshana,

Thank you for the opportunity to review the Hillcamp Sub Area Plan second submittal. We appreciate the continued coordination and the thoughtful work that has gone into advancing this project. The South Suburban team would like to offer the following comments for your consideration:

- The proposed trail network appears to serve the future neighborhood; however, connectivity to the broader community is limited. Given this limited connectivity, South Suburban does not anticipate assuming ownership or long-term maintenance responsibilities for these trails. Ownership and ongoing maintenance should be clearly defined and assigned to another entity.
- The proposed parks location presents some challenges related to public access and available parking. Given these considerations, South Suburban would be supportive of a cash-in-lieu contribution as an alternative approach to meeting park requirements.
- We request additional clarification regarding ownership responsibilities for the proposed open space areas. South Suburban recommends that the City assume ownership of contiguous open space areas, while maintenance responsibilities for any remaining disjointed areas be assigned to another entity.
- The proposed roadway alignment appears to intersect natural open space areas and may impact existing habitat corridors. We encourage evaluation of potential alternatives or design adjustments that could help minimize disruption and preserve ecological functions.
- Incorporating wildfire mitigation strategies will be important for long-term resilience. We recommend that responsibility for implementation and ongoing maintenance of these measures be clearly defined and assigned to another entity.

Thank you again for the opportunity to provide input. Please feel free to reach out if you have any questions or would like to discuss these comments in further detail.

Best regards,

AnaClaudia Magalhaes
Planning Supervisor
amagalhaes@ssprd.org

1. Trails will be owned by either the HOA or RRMD.
2. Cash-in-lieu is provided for the park dedication.
3. Ownership of each Tract has been identified with the City taking ownership of the contiguous areas adjacent to existing open space.
4. Roadway alignment alternatives have been previously considered, and the current alignment has been selected to provide access to the site while minimizing disturbance to the adjacent areas.
5. A full wildfire mitigation plan has been prepared and mitigation measures have been identified and will be incorporated into the development.



Right of Way & Permits

1123 West 3rd Avenue
Denver, Colorado 80223
Telephone: 303.285.6612
violeta.ciocanu@xcelenergy.com

May 21, 2026

City of Lone Tree Community Development Department
9220 Kimmer Drive, #100
Lone Tree, CO 80124

Attn: Chuck Darnell

RE: Final Plat for Proposed Extension of Cabela Drive to Provide Vehicular Access to Proposed Hillcamp Community, Case # SB25-0014 – 2nd Submittal

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the above-mentioned Final Plat and currently has **no apparent conflict**.

As a safety precaution, PSCo would like to remind the developer to call the Utility Notification Center by dialing 811 for utility locates prior to construction.

Noted, thank you for the review.

Violeta Ciocanu (Chokanu)
Right of Way and Permits
Public Service Company of Colorado dba Xcel Energy
Office: 303-285-6612 – Email: violeta.ciocanu@xcelenergy.com



Department of Parks and Recreation

June 24, 2026

Planning Division
City of Lone Tree
9220 Kimmer Dr.
Lone Tree, Colorado 80124

Re: Hillcamp Drive — Pedestrian Bridge Ownership and Maintenance

Dear City of Lone Tree Planning Division:

The intent of this letter is to clarify ownership and maintenance responsibilities of the proposed pedestrian bridge associated with the development of Hillcamp Trail. Upon approval and recordation of the final plat, Douglas County has agreed to own and maintain the pedestrian bridge and bridge abutments, and Rampart Range Metropolitan District No.1 will own and maintain the associated retaining walls supporting the pedestrian bridge.

Please notify us if any further clarification is necessary.

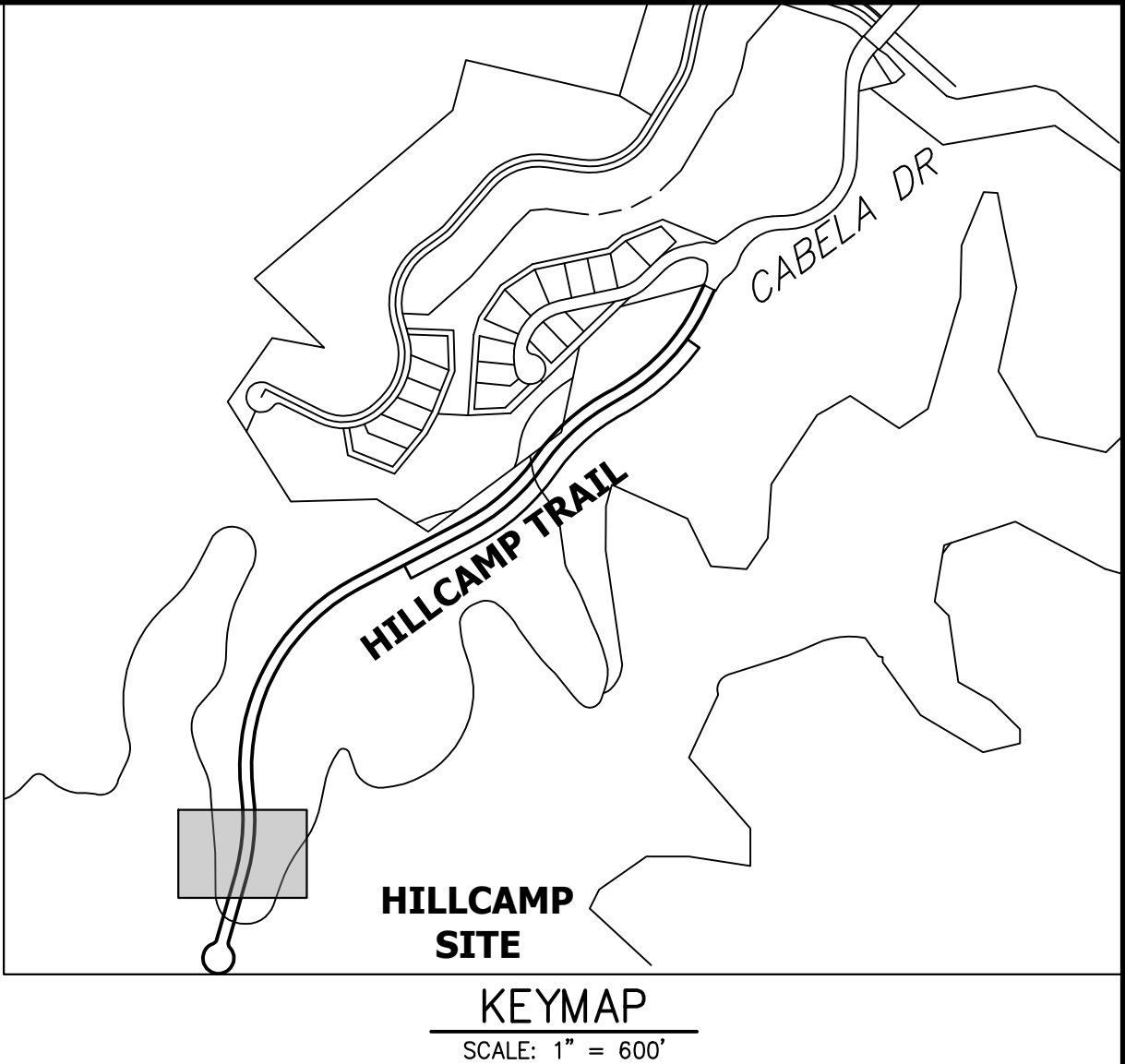
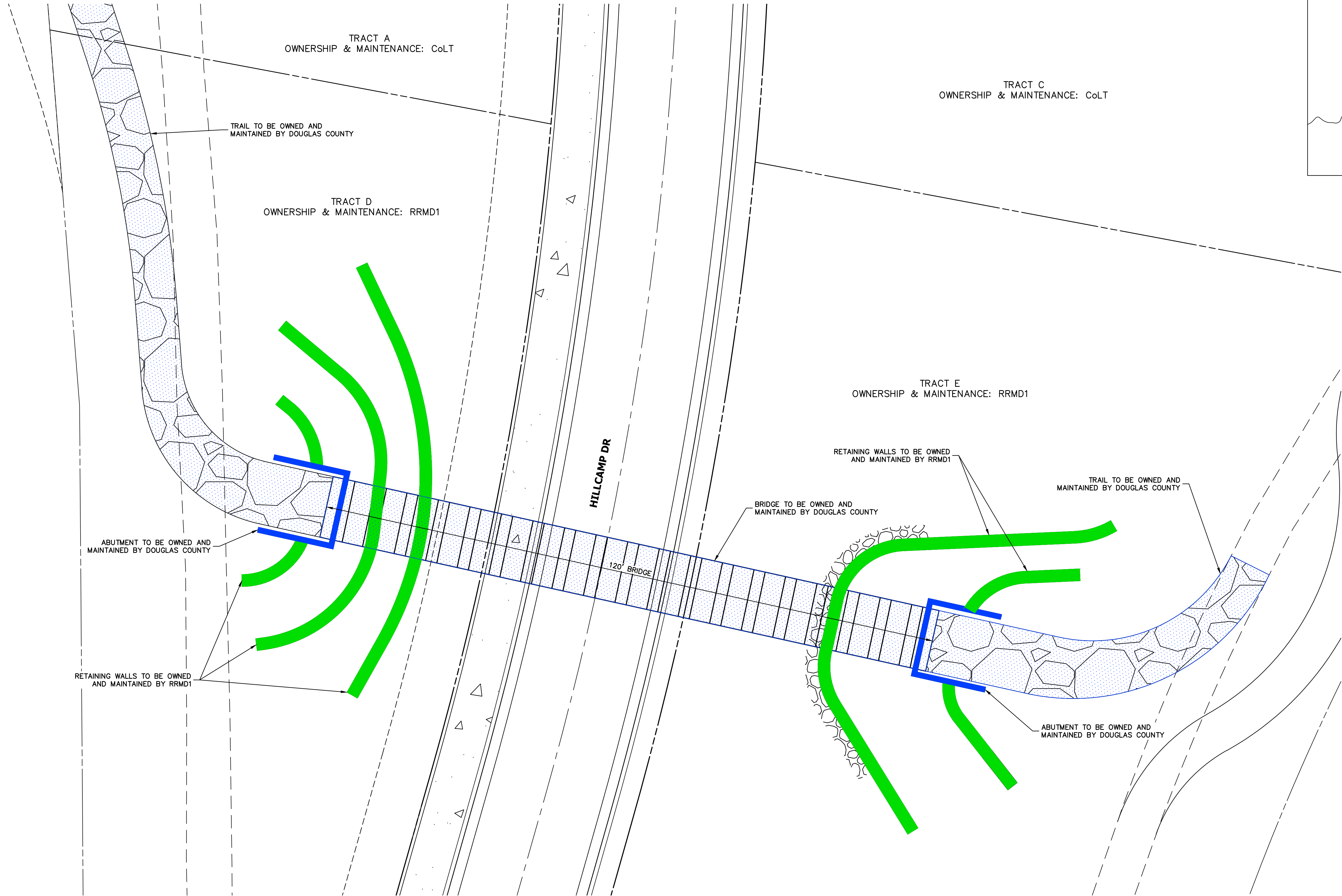
Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Shoultz', written over a horizontal line.

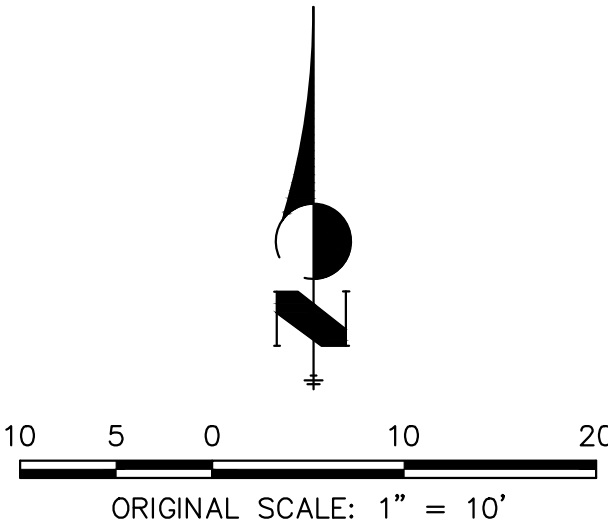
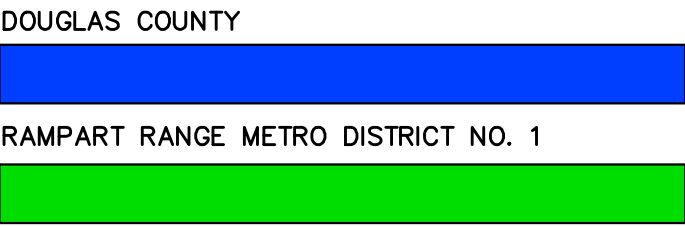
Steve Shoultz, Director
Douglas County Department of Parks and Recreation

HILLCAMP DRIVE

BRIDGE OWNERSHIP AND MAINTENANCE EXHIBIT



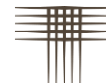
OWNERSHIP & MAINTENANCE LEGEND



BRIDGE EXHIBIT
HILLCAMP DRIVE
JOB NO. 15950.18
JUNE 10, 2026
SHEET 1 OF 1

J-R ENGINEERING
A Westrian Company

Centennial 303-740-9393 • Colorado Springs 719-593-2593
Fort Collins 970-491-9888 • www.jrengineering.com



June 23, 2026

JR Engineering, LLC
7200 South Alton Way, Suite C400
Johnstown, Colorado 80534

Attention: Kevin Rohrbough, PE
Client Manager

Subject: Comment Response Letter
Hillcamp (Ridgeway Mesa Top)
Lone Tree, Colorado
Project No. DN52,036-115-L2

CTL|Thompson, Inc. (CTL|T) performed a Geotechnical Investigation and Slope Stability Analysis for the proposed Hillcamp (Mesa Top) residential development in Lone Tree, Colorado. We presented results in a revised report (Project No. DN52,036-115-R2R2) dated March 27, 2026. We were requested to review comments provided by the City of Lone Tree (SB25-0010 – Hillcamp Ridgeway Comment Response Letter) dated May 29, 2026. Our responses are given below:

GEOTECHNICAL INVESTIGATION REPORT

We were provided with the following comments for Ridgeway Rural Residential and Southridge Preserve Parcel 4 & 5:

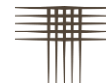
Ridgeway Rural Residential

1. Concern that the subsurface profile between 6,260 ft - 6200 ft has not been directly characterized and was interpreted to generally consist of sandstone/conglomerate bedrock. If subsurface conditions differ from those assumed in the model, the calculated FOS values for these sections could differ from those presented in the report.

Southridge Preserve Parcel 4 & 5

1. CGS's concern is that the subsurface profile between approximately elevations 6,260 feet and 6,200 feet has not been directly characterized and was interpreted to generally consist of sandstone (Dawson Fm) bedrock. If subsurface conditions differ from those assumed in the model, the calculated FOS values for these sections could differ from those presented in the report.

CTL|T Response: CTL|T generated cross sections of the subsurface utilizing data obtained from borings drilled at the top of bottom of the mesa slopes as well as extensive site reconnaissance and geologic field mapping of bedrock outcroppings, which were generally easily discernible. To further support our analyses, CTL|T is performing additional subsurface exploration and slope stability evaluations at the site by coring at five locations to depths up to 100 feet. It should be understood that subsurface conditions encountered in each exploratory boring are only representative of the conditions encountered at the location that was drilled. Subsurface variations not indicated by exploratory borings are possible, however; we believe our investigation is being conducted in a manner consistent with that level of care and skill ordinarily used by geotechnical engineers practicing under similar conditions.



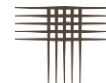
CTL|T will also provide a revised report that incorporates strength testing and additional laboratory testing from the previous investigation, as well as testing of samples obtained during the ongoing core drilling program.

Ridgegate Rural Residential

1. Additional slope stability evaluation does not appear to have been performed in the southeastern corner near Lots 138-139, 145-147, and 153-154. These lots are located near mapped landslide-prone terrain and steeper slopes near the rear of the proposed lots.
2. Additional clarification should be provided regarding the proposed relocation strategy and how pond placement and drainage design will avoid groundwater-induced slope instability and scour-related impacts to adjacent lots and slopes.
3. CGS's previous comments regarding the inclusion of water-sensitivity analyses incorporating saturated and perched-water conditions, as well as consideration of acceptable long-term stability for permanent slopes, were substantially addressed in CTL's updated analyses and discussion. However, soil-strength sensitivity (failure condition) analyses do not appear to have been included in the updated study.
4. Prior to approval of Lots 138 through 144, additional analyses and/or mitigation measures should be provided to further evaluate acceptable long-term slope stability for permanent residential development.
5. CGS recommends that site-specific mitigation measures and associated design assumptions be incorporated into the preliminary plans and tied to the applicable lots, grading areas, detention ponds, and slope segments, where appropriate.
6. Additional evaluation, clarification, and site-specific mitigation measures should be provided for the areas discussed above prior to preliminary plan approval.

Southridge Preserve Parcel 4 & 5

1. Additional clarification should be provided regarding the proposed relocation strategy and how pond placement and drainage design will avoid groundwater-induced slope instability and scour-related impacts to adjacent lots and slopes.
2. CGS's previous comments regarding the inclusion of water-sensitivity analyses incorporating saturated and perched-water conditions, as well as consideration of acceptable long-term stability for permanent slopes, were substantially addressed in CTL's updated analyses and discussion. However, soil-strength sensitivity (failure condition) analyses do not appear to have been included in the updated study.
3. Prior to approval of Lots 57 through 69, additional analyses and/or mitigation measures should be provided to further evaluate acceptable long-term slope stability for permanent residential development. Recommended mitigation measures should also be incorporated into the preliminary plans, where appropriate.



4. CGS recommends that site-specific mitigation measures and associated design assumptions be incorporated into the preliminary plans and tied to the applicable lots, grading areas, detention ponds, and slope segments, where appropriate.
5. CGS recommends that CTL's erosion and scour mitigation recommendations be incorporated into the design, grading, drainage, and construction of the development.

CTL|T Response: CTL|T is performing additional subsurface exploration and slope stability evaluations at the site using core drilling to better delineate subsurface conditions and refine the slope stability analyses. Our initial water sensitivity analysis evaluated the worst-case water condition with unlined detention ponds. Per JR Engineering, the detention ponds have been shifted away from the tops of slopes and they will be lined with a clay liner. Our models will be updated accordingly. JR Engineering will be providing updated lot-specific cross sections for the lots mentioned above to allow us to better evaluate the impact of proposed construction on slope stability as well as evaluate appropriate slope stability mitigation concepts as merited on a lot-specific basis. We will revise our models to include a soil sensitivity analysis.

Ridgegate Rural Residential

1. Figure 4 in CTL's report appears to be intended for preliminary planning purposes only. Because these lots are adjacent to mapped slope-stability concern areas and detention pond locations, clarification is needed on why Lots 50–68 and 86–87 are not included in the Figure 4 sub-excavation/heave mitigation mapping.

Southridge Preserve Parcel 4 & 5

1. Figure 4 in CTL's report appears to be intended for preliminary planning purposes only. Because these lots are adjacent to mapped slope-stability concern areas and detention pond locations, clarification is needed on why Lots 18-22, Lots 40-47, and 70-82 are not included within the Figure 4 sub-excavation/heave mitigation mapping.

CTL|T Response: CTL|T drilled exploratory borings within the referenced proposed lot locations and did not encounter expansive soils or bedrock conditions that would be expected to cause heave or adversely influence performance of shallow foundations and slab-on-grade floors. Practical rig refusal indicative of very hard bedrock was also encountered on or near some of these lots. Based on proposed grading configurations and our findings, CTL|T concluded that sub-excavation did not appear merited for these lots.

Hillcamp Trail CDs

1. Test Hole-103 was originally not bored due to a conflicting water line. It appears this conflict is no longer present, please gather information at this test hole.

CTL|T Response: CTL|T performed an Updated Preliminary Geotechnical Investigation and Slope Stability Evaluation (Project No. DN52,378.000-125-L2) letter dated March 27, 2026 for the subject road alignment. TH-202 and TH-203 were drilled near where TH-103 was originally proposed.

GROUND Engineering Referral Comments



1. Although, the inclusion of the Weathered Claystone (MWW values) provides a more conservative analysis for the slopes than previously presented, it may not provide a sufficiently conservative analysis for the City, given the history of slope instability and relatively recent wall failures in the project area.

CTL|T Response: CTL|T incorporated the MWW strength values in a manner consistent with how those values were applied in MWW's slope stability analysis. We request further clarification on this comment.

If you have any questions regarding the contents of this letter, please call or email.

Respectfully submitted,

CTL | THOMPSON, INC.

Sharone Richards
Staff Engineer

Reviewed by:

Erin Bouchet, P.E., P.G.
Associate Engineer | Denver Engineering Manager

Via email: krohrbough@jrengineering.com

September 30, 2026

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RE: Applicant Response to (A) The Retreat at RidgeGate Homeowners Association Referral Response to Hillcamp / Southridge March 27, 2026 Resubmittal 2 Packet and (B) Referral-Period Comments, Hillcamp / Southridge Preserve, Resubmittal 2 (Mar. 27, 2026)

Mr. Darnell:

This firm represents BC–RG Mesa Tops JV, LLC (the “Developer Applicant”), one of the applicants in connection with four applications for certain entitlements relating to a single-family residential neighborhood known as Hillcamp (the “Project”). We are joined for the purpose of submitting this letter by Megan Becher of the firm McGeady Becher Cortese Williams P.C., which firm represents Rampart Range Metropolitan District No. 1 (the “Metro District”, and together with the Developer Applicant, collectively the “Applicants”) in connection with the above-referenced applications. On behalf of our respective clients, we submit this letter as a response to the referral response opposition letters (the “Opposition Letter(s)”) submitted by legal counsel for The Retreat at RidgeGate Homeowners Association (the “HOA”) and the Concerned Residents of Surrey Ridge (the “Special-Interest Coalition”, and together with the HOA, the “Opposition Groups”) to the City of Lone Tree (the “City”), arguing against approval of the Applicants’ applications for (1) a Sub-Area Plan (RG24-0007) (the “Sub-Area Plan”); (2) Southridge Preserve Parcels 4 & 5 Preliminary Plan (SB25-0009); (3) Hillcamp RidgeGate Rural Residential Preliminary Plan (SB25-0010); and (4) a Final Plat – Hillcamp Drive Filing No. 1 (SB25-0014) (the “Final Plat”) (collectively, the “Applications”).

This response is limited in that it responds to certain generally applicable arguments raised by the Opposition Groups against all the Applications but is otherwise specific only to the challenges to the Final Plat, which provides for the platting of public right-of-way for the Hillcamp Trail (the Cabela Drive extension), the pedestrian bridge, and associated roadway and infrastructure construction. This letter does not address the proposed 343-home residential development, which is contemplated by the Sub-Area Plan and Preliminary Plan applications; the Applicants will respond to the challenges specifically applicable to the Sub-Area Plan and Preliminary Plan applications through resubmission of the materials for those applications. Nothing in this response is intended to waive any arguments or concede any points with respect to those challenges.

I. Introduction

The Opposition Letters repeat many of the HOA’s previous assertions that the Applications are defective. Impressively, the Opposition Letters advance no less than twenty arguments that the City must make specific additional findings or that the Applications are deficient in a multitude of ways without a single citation or reference to the City’s Municipal Code (the “Code”) and only one reference to the Lone Tree Elevated 2045 Comprehensive Plan, as amended December 2025 (the “Comp Plan”). To the contrary, the Applications meet or exceed all applicable requirements in the Code, as we detailed in our previous response letter dated March 27, 2026 (the “March Applicant Response”).

From the outset, we must note that many of the arguments raised in the Opposition Letters are wholly inapplicable and irrelevant to the City's review of the Applications to the point where the credibility of the entire content of the Opposition Letters is questionable. For example, the Colorado Wildfire Resiliency Code, 2025 Edition, as published by the Colorado Wildfire Resiliency Code Board in the Division of Fire Prevention & Control and adopted by the City, does not contain any Section 405 or Section 406, which the Special-Interest Coalition claims require certain fire-protection related findings. Additionally, the Colorado Revised Statutes (C.R.S.) Section 30-28-136, which the Special-Interest Coalition references in connection with the Colorado Geological Survey referral, appears in Title 30, a title of the C.R.S. that regulates county-level governments, and the cited section is inapplicable to a home rule municipality such as the City. Likewise, C.R.S. Section 24-65-105, which the Special-Interest Coalition argues requires specific extraterritorial impact findings, was repealed effective June 1, 2005. Consistent with their approach of scattershot objections, with little or no substance or legal support, the HOA's Opposition Letter is primarily a narrowed but repeated presentation of the same arguments contained in the HOA's February 10, 2026, referral-response comments (the "HOA's February Letter"). Indeed, the only reference in either of the Opposition Letters that appears to be applicable to the review criteria for the Applications is to the Applications' consistency with the Comp Plan, a criterion that demonstrably is met. Rather than providing an extensive rebuttal to each point raised in the Opposition Letters, this response letter will neither repeat our previous arguments nor argue exhaustively against arguments that have no bearing on the City's decision on the Applications. This letter will instead respond only to the claims raised in the Opposition Letters that have some discernible relevance to the criteria the City must consider, focusing on how the Applications continue to demonstrate compliance with the Code.

As we will discuss further below, the Final Plat application is consistent with the Comp Plan; the Code's zoning provisions; the applicable planned development district and its (currently proposed) Sub-Area Plan; the Subdivision Code; and the technical requirements of the City's adopted standards, regulations, policies, and other guidelines.

The Opposition Letters are a continued attempt to reopen the existing approved and vested PDD documents and appear to be intended to delay the ultimate development of this Project. The Final Plat application is facially consistent with the Code and its review criteria, and we believe the Opposition Letters are meant to disrupt and delay the City's review process by raising numerous irrelevant and baseless review demands.

II. Argument

Contrary to the numerous assertions in the Opposition Letters that various state statutes require mandatory findings, the City's review of the Final Plat must be guided by the Code. The following analysis shows that the Final Plat application for Hillcamp fully satisfies the applicable review criteria for approval under the Code and should therefore be approved.

A. The Final Plat Application Review

As provided in the Code and the proposed Hillcamp Sub-Area Plan and Design Guidelines, dated March 27, 2026 (the "Hillcamp SAP") (and included in the record of Application Number RG24-0007), review and approval of the Final Plat application, which provides for the nonresidential development of a road extension, are governed by Article V of the Subdivision Code. *Code*, § 17-5-10. Such a final plat may be approved upon a finding that it is:

- (1) consistent with the Comp Plan, Code Chapters 15 (the Public Works Chapter) and 16 (the Zoning Code), and, where applicable, the sub-area plans;

- (2) in compliance with the Subdivision Code and its stated purpose; and
- (3) in conformance with the Roadway Design and Construction Standards, the Storm Drainage Design and Technical Criteria Manual, the Grading, Erosion and Sediment Control Manual, the Flood Damage Prevention Ordinance, and other applicable regulations.

Id. § 17-5-20(1)–(3). As applied to a plat whose sole improvement is a road extension, the controlling provisions of the Subdivision Code are those governing the final-plat exhibit and the dedication of right-of-way and easements, the provision of legal and physical access, and the final development reports pertinent to roadway construction. The final-plat exhibit must provide legal and physical access by public right-of-way or recorded easement acceptable to the City Engineer in compliance with the Roadway Design and Construction Standards, and must depict all right-of-way widths, bearings, curve data, and easements, together with any Special Flood Hazard Areas and the corresponding Flood Insurance Rate Map numbers. *Code* §§ 17-5-60(10)–(12). The final plat application must be accompanied by sufficient supporting materials necessary for review, including but, not limited to, a Phase III drainage report, final road construction plans, grading and erosion-control plans, soil and geologic reports, and, for plats adjacent to open space, a wildfire risk assessment and mitigation plan, subject to certain exceptions. Some of these materials may be deferred to a future site improvement plan as approved by the Community Development Director. *Code* § 17-5-70.

a. The Final Plat is Consistent with the Comp Plan, Public Works Chapter, Zoning Code, and Sub-Area Plan

The Final Plat implements, rather than departs from, the land use and infrastructure framework established in the Comp Plan. The Final Plat advances the Comp Plan’s Goal #6, Objective 2, by supporting the development of trails, greenways, sidewalks and streets that safely connect residents and employees to different districts, amenities, and destinations around the City. *Comp Plan*, 37. The contemplated Cabela Drive extension is roadway infrastructure that supports the Comp Plan goal framework: it establishes the primary public access point and primary connectivity route for the anticipated Hillcamp planning areas, consistent with the applicable planned development district’s conceptual circulation framework, which contemplates that the precise roadway location will be fixed at the time of final platting. *See RidgeGate, 7th Amendment, Planned Development District Plan* (the “RGPD”), Sheets 4–5. As a road-extension plat, the Final Plat contributes to the Comp Plan through providing transportation infrastructure and connectivity, and it advances the Comp Plan’s Goal #8 objective by providing a roadway network that supports both daily traffic flow and emergency evacuation. *Comp Plan*, 38.

Consistency with the Code’s Public Works Chapter and Zoning Code is also established by the application materials. All subdivision proposals must be consistent with the Flood Damage Prevention Ordinance, which requires that they provide adequate drainage to reduce exposure to flood hazards, and locate and construct public facilities to minimize flood damage. *Code* § 15-3-230(a), (d), (e). The road extension conforms to those requirements because road-related stormwater is released below historic rates into existing drainageways through stabilized outfalls, maintaining historic drainage patterns. *See JR Eng’g, LLC, Phase III Drainage Report, Hillcamp Drive*, 8–9 (Mar. 2026) (the “Phase III Drainage Report”). Because the property is zoned planned development, the Floodplain Overlay District would apply (where mapped) as a supplemental regulation superimposed on the underlying PDD zoning. *Code* § 15-4-30. However, the FEMA National Flood Hazard Layer reflects no floodplains on or adjacent to the site, meaning this criterion does not apply. *See Phase III Drainage Report*, National Flood Hazard Layer FIRMette.

The Final Plat application does not contemplate any construction of buildings or any increase in density, meaning that the land-use, setback, density and building-height regulations of both the RGPD and the Southridge Preserve Planned Development (the “SPPD”), as well as the concurrently submitted Hillcamp SAP, are not implicated by the Final Plat’s proposed development. *See Hillcamp SAP*, §§ 2.6–2.8; *RGPD*, Sheets 1–4.

b. The Final Plat is Compliant with the Requirements and Purposes of the Subdivision Chapter

The resubmitted Final Plat application satisfies the general submittal requirements of Code Section 17-5-50, meets the plat exhibit specifications of Code Section 17-5-60, and, with the exception of certain items to be delivered at a later date (for example, the special warranty deed conveying the roadway), was accompanied by the required related documents, reports and plans pursuant to Code Sections 17-2-60, 17-2-70, and 17-5-70, and therefore is in compliance with the requirements of the Subdivision Chapter. *See Code* § 17-5-20(2). As detailed in the following subsections, the Final Plat application also achieves the Subdivision Chapter purposes:

- (1) To promote the general health, safety and welfare of the present and future inhabitants of the City. Land proposed for subdivision shall be such that it can be used safely for the intended purpose without danger to health or peril from fire, flood, geologic hazards or other natural hazards.
- (2) To ensure that the necessary services and facilities are available and have sufficient capacity to serve the proposed subdivision. Land proposed for subdivision shall not be approved until the necessary provisions have been made for: road improvements, access and traffic controls; water supply and wastewater disposal; police and fire protection; parks, trails and recreation; drainage and water quality and other reasonably necessary improvements and services. The cost and installation of such improvements, which primarily benefit the land being subdivided, shall be borne by the owners/developers of such land.
- (3) To provide for the preservation and conservation of unique or distinctive natural areas, topographic features and landmarks; significant stands of vegetation; critical wildlife habitats, including breeding grounds, nesting areas, migration routes and wintering areas; drainage, riparian and wetland areas; scenic views; historic features and archeologically sensitive sites as determined by the City, recognizing the irreplaceable character of such resources and their importance to the quality of life in the City.
- (4) To design subdivisions with lots that are of an appropriate size and configuration for the site and natural resources characteristics and intended uses with: adequate connections between neighborhoods, services, shopping and recreational areas when possible; a road system designed to preserve the integrity and function of the roadway network and stream network and corridors, and to minimize road cuts, fills and site grading; the conservation of water, land and energy resources; and to encourage a diversity of housing types and densities in order to assure adequate housing for all persons.
- (5) To provide for an adequate and accurate system to record land subdivisions, ensuring proper legal descriptions and survey monumentation, in order to inform the public and especially future residents of the facts about the subdivision, thereby safeguarding the interests of the public, the homeowner, the subdivider and the City.

See Code §§ 17-1-20 & 17-5-20(2).

i. Protects Health, Safety, and Welfare

The Final Plat promotes the general health, safety, and welfare of the present and future inhabitants of the City because the proposed clustered single-family residential use of this land is in substance identical to what was previously contemplated and approved within the applicable planned development districts, further demonstrating that this type of development in this area of the City is—and has always been—considered consistent with the public health, safety, and general welfare. *See Code* § 17-1-20(1). The Final Plat application materials include the geotechnical, drainage, wildfire risk and environmental studies and engineering documentation necessary to comprehensively demonstrate that the land proposed for subdivision can be used safely without danger to health, safety, or welfare from fire, flood, geologic hazards, or other natural hazards. The site-specific geotechnical investigation and slope stability evaluation, prepared by CTL Thompson and encompassing multiple phases of subsurface exploration analysis, as has been amended and supplemented throughout the application process, concludes that no geologic hazard identified within the scope of the investigation will preclude the proposed development, provided that the recommended mitigation measures are implemented during construction. The Phase III Drainage Report demonstrates that the site is located outside of FEMA designated floodplains and that the proposed development will have no adverse impact on the quantity, quality, or timing of stormwater discharges to downstream tributary drainage systems. *See Phase III Drainage Report*, 2, 9. The grading and erosion-control plans, prepared in accordance with the GESC Manual and the Code’s Public Works Chapter, satisfy the minimum erosion and sediment control standards and have no unaddressed or outstanding Public Works comments. *See Hillcamp Trail Filing No. 1, Comment Responses*, 22–23 (Mar. 27, 2026) (the “Comment Responses”). The construction documents further implement the geotechnical engineer’s recommendations. The plat is also accompanied by a wildfire risk assessment and mitigation plan prepared by a Wildfire Mitigation Specialist, dated February 12, 2025 (the “Wildfire Risk Assessment”), as required for plats adjacent to open space, which is consistent with the *Lone Tree Community Wildfire Protection Plan* (the “CWPP”) recognition that vegetation management along access routes can serve as effective fuel breaks. *See CWPP*, 29. The Wildfire Risk Assessment determined that the overall wildfire risk for the “Hillcamp proposed plat is currently low.” *See Wildfire Risk Assessment*, 16. Accordingly, the Final Plat application materials demonstrate that the land proposed for subdivision can be used safely for its intended purpose without danger to health or peril from fire, flood, geologic hazards, or other natural hazards. *See Code* § 17-1-20(1).

ii. Satisfies Infrastructure and Service Capacity Requirements

The Final Plat application demonstrates that the necessary services and facilities have been provided for—or, where they will be addressed through subsequent stages of the broader Hillcamp development, have been appropriately accounted for—consistent with the scope of a road-extension plat. The Final Plat application is accompanied by final road construction plans conforming to the Roadway Design and Construction Standards, a Phase III Drainage Report demonstrating that the proposed stormwater management system will have no adverse impact on the quantity, quality, or timing of discharges to downstream tributary drainage systems, GESC Plans and a GESC Report showing that the stability and geologic conditions do not pose a barrier to construction, and a traffic study confirming that roadways and intersections will continue to operate within the City’s level-of-service standards at buildout.

The road extension itself advances the provision of police and fire protection by furnishing an engineered, all-weather primary access corridor into the Hillcamp planning areas, and the Applicants have coordinated with South Metro Fire Rescue throughout the review process to ensure that emergency access and evacuation needs are met. The broader Hillcamp development will dedicate approximately half of the project acreage to permanent open space, providing additional community benefits including hard and soft-surface trail connections to expand upon and integrate with the existing Bluffs Regional Trail system. *See JR Eng’g, LLC, Hillcamp Community Response*

Letter, 2 (Mar. 27, 2026) (the “Community Response Letter”). Pursuant to the concurrently-submitted Development Agreement, the costs and installation of the necessary roadway improvements shall be borne by the Applicants. The Final Plat therefore demonstrates that all necessary services and facilities have been provided for. *See Code* § 17-1-20(2).

iii. Preserves Natural Resources, Wildlife Habitats, and Historic Features

The Final Plat application and accompanying studies show that the proposed roadway alignment has been carefully sited and designed to preserve and conserve the natural resources, topographic features, wildlife habitats, drainage areas, scenic views, and historic and archaeological sites identified by the Code as warranting protection. *See Code* § 17-1-20(3). The Biological Assessment and Cultural Resources Records Review prepared by CTL Thompson evaluated the subject property for the presence of jurisdictional wetlands, threatened or endangered species and critical habitat, and registered archaeological or historic sites. *See CTL Thompson, Inc., Biological Assessment and Cultural Resources Records Review, RidgeGate Mesa Tops—Hillcamp Drive*, 1–2 (dated Aug. 6, 2025, and last revised March 26, 2026) (the “BCA”). The BCA concluded that (a) no Waters of the U.S. or State Waters were observed on the property; (b) wetlands are not present on the property; (c) with appropriate control measures, the development will not significantly adversely impact federally listed or state-listed threatened or endangered species; (d) no potential raptor or bald and golden eagle habitat was observed; and (e) no historical or archaeological sites or surveys were identified on the subject property by History Colorado’s Office of Archaeology and Historic Preservation. *See id.* 5–22. Colorado Parks and Wildlife (CPW) reviewed the proposed Project as a referral agency, confirmed that the development occurs within designated moderate-quality habitat and does not impact any identified wildlife resources, and provided recommendations for reducing potential disturbance to wildlife. *See CPW, Referral Comment Letter*, 1–4 (Jan. 19, 2026). Douglas County’s Department of Open Space and Natural Resources independently confirmed that “the natural resources, wildlife, and trail concerns have been addressed within the subarea plan, PD designs, and various studies and analyses submitted with the applications,” and that the development provides wildlife corridors and habitat conservation areas connecting the I-25 wildlife underpass to Bluffs Park and the Highlands Ranch Backcountry Wilderness Area. *See Douglas Cnty. Dep’t of Open Space & Nat. Res., Referral Response*, 1–2 (Feb. 9, 2026). Accordingly, the Final Plat satisfies the Code’s preservation and conservation criterion as applied to a road-extension plat, and the application materials demonstrate that the proposed development will not have a detrimental impact on the natural resources, wildlife habitats, drainage areas, or historic features. *See Code* § 17-1-20(3).

iv. Meets Subdivision Design, Connectivity, and Resource Conservation Standards

The Final Plat satisfies this criterion by providing a road extension that establishes the primary connectivity link between the Hillcamp planning areas and the City’s existing roadway network, neighborhoods, services, shopping, and recreational areas, while preserving the integrity of the existing drainage network and minimizing site disturbance. *See Code* § 17-1-20(4). The roadway alignment is consistent with the conceptual circulation framework of the RGPD, which contemplated that the precise roadway location would be fixed at final platting, and it matches the existing Cabela Drive roadway section to provide a continuous, rural-oriented collector road. *See RGPD*, Sheets 4–5, 8; *Community Response Letter*, 1. The road system has been designed to preserve the natural stream and drainage network with any modifications designed to avoid adverse impacts to the downstream infrastructure. Indeed, the Phase III Drainage Report confirms that the proposed development is consistent with existing drainage patterns and releases road-related stormwater at or below historic rates into existing drainageways, maintaining historic drainage patterns with no adverse downstream impact on the quantity, quality, or timing of stormwater discharges. *See Phase III Drainage Report*, 9. The Applicants’ design affirmatively seeks to minimize road cuts, fills, and site grading, as the construction documents implement geotechnical recommendations for benching, sub-fill drainage, and slope stabilization, and the project preserves existing

drainageways in their historical configurations rather than rerouting them, “utilizing engineering solutions to provide long term stability to the roadway and associated slopes” while avoiding unnecessary hillside disturbance. *See Comment Responses* 8. The traffic study, prepared consistently with the Roadway Design and Construction Standards, demonstrates that the City’s roadways and intersections will continue to operate within level-of-service standards in both short-range and buildout conditions. *See JR Eng’g, LLC, Hillcamp Development–Traffic Study*, 3 (Mar. 24, 2026) (the “Traffic Study”). Finally, this criterion applies to the Final Plat as a road-extension plat; however, we note that the adjacent transportation network was designed and constructed with the anticipation of the traffic associated with the proposed Hillcamp neighborhood because the existing PDD documents always expected this level of development for the location, and the housing-type and density related elements of this criterion are addressed separately through the resubmitted Hillcamp Preliminary Plans and Sub-Area Plan. *See Code* § 17-1-20(4).

v. Accurately Records and Discloses Subdivision Information

The Final Plat Application provides a Code compliant and accurate system for recording the proposed subdivision, with proper legal descriptions and survey documentation that informs the public and safeguards the interests of all parties. *See Code* § 17-1-20(5). The plat exhibit depicts the platting of 20.739 acres across three tracts within the RidgeGate Planned Development, with a legal description reconciled to the current title commitment, a dedication statement in accordance with Code Section 17-8-40, and a Surveyor’s Certificate will be sealed before final submittal and recording pursuant to Code Section 17-8-70(a). *See Hillcamp Trail Filing No. 1, Final Plat (SB25-0014)*, Sheets 1–2. The accompanying construction documents include comprehensive horizontal control plans with coordinate geometry, a full monumentation legend identifying all found and set monuments (including section corners, quarter-section corners, benchmarks, and right-of-way markers), and a survey protection note requiring the contractor to preserve all existing monumentation and replace any that is damaged or disturbed during construction. *See Hillcamp Trail Filing No. 1, Civil Construction Plans*, Sheets 3, 9 (Mar. 27, 2026). Accordingly, the Final Plat provides an adequate and accurate record of the proposed subdivision that will inform the public and future residents and will adequately protect the interests of the public, the property owner, the subdivider, and the City. *See Code* § 17-1-20(5).

c. The Final Plat Conforms With the City’s Engineering and Public-Safety Standards

The application includes the final development reports required for a roadway, each prepared in accordance with the governing manual as adopted in Code’s Public Works Chapter. The final road construction plans conform to the Roadway Design and Construction Standards and the roadway centerline radii meet City collector-street standards, and the accompanying pedestrian bridge is designed to accommodate wide and oversized vehicles and meets applicable federal clearance standards. *See Code*, § 17-5-70(2); *Comment Responses*, 3. The Phase III Drainage Report conforms to the Storm Drainage Design and Technical Criteria Manual and details how the road-related runoff will be managed through a variety of techniques including low tailwater basins, sub-fill drains, and flared end sections upstream from the roadway, with maintenance provided by Rampart Range Metropolitan District No. 1. *See Code*, § 15-1-10; *Phase III Drainage Report*, 2; *Comment Responses*, 8, 11. Grading and erosion-control plans and reports for the roadway improvements were prepared in accordance with the Grading, Erosion, and Sediment Control Manual (the “GESC Manual”), and satisfy the minimum erosion- and sediment-control standards of the Code’s Public Works Chapter, Article V, which requires that such plans be prepared under the Storm Drainage Design and Technical Criteria Manual and GESC Manuals. *See Code* §§ 15-1-30, 15-5-50(1); *see, generally, Hillcamp Drive GESC Plans*, Job No. 15950.18; *JR Eng’g, LLC, Grading, Erosion and Sediment Control Plan for Hillcamp Trail* (Mar. 2026).

The initial geologic and slope-stability investigations (as have been supplemented by additional borings and drillings made pursuant to agency review responses) required under the Code for construction of the roadway and bridge on this terrain have been performed and these investigations, as further supplemented by the most recent CTL Thompson, Inc., Updated Preliminary Geotechnical Investigation and Slope Stability Evaluation, concluded that existing slopes are stable, that the design achieves acceptable factors of safety, and that no geologic hazard precludes the roadway improvements, provided that any recommended mitigation is implemented. *See Code* § 17-5-70. Additionally, the Traffic Study, prepared under the applicable City criteria and the Roadway Design and Construction Standards demonstrates that the roadways and intersections will continue to operate within the City's level-of-service standards in both short-range and buildout conditions. *See Traffic Study*, 3, 21.

Because the roadway alignment is adjacent to open space and undeveloped land, the plat is accompanied by a wildfire risk assessment and wildfire mitigation plan prepared by a Wildfire Mitigation Specialist, as required for such plats. *See Code* § 17-5-70(14). The CWPP recognizes that vegetation management along access routes "can serve as effective fuel breaks to provide fire protection, assist in fire suppression efforts, and improve effective evacuation." Consistent with the CWPP's recognition, the road extension furnishes an engineered, all-weather corridor that advances the City's identified need for reliable ingress, egress, and evacuation capacity in the Wildland-Urban Interface. *See CWPP*, 29.

Accordingly, the Final Plat satisfies each finding required by Code Section 17-5-20 and conforms to the City's controlling subdivision, right-of-way, roadway-design, access, drainage, grading, floodplain, and wildfire standards as applied to a road-extension plat. The Planning Commission should recommend, and the City Council should grant, approval of the Final Plat.

III. The Opposition's Arguments

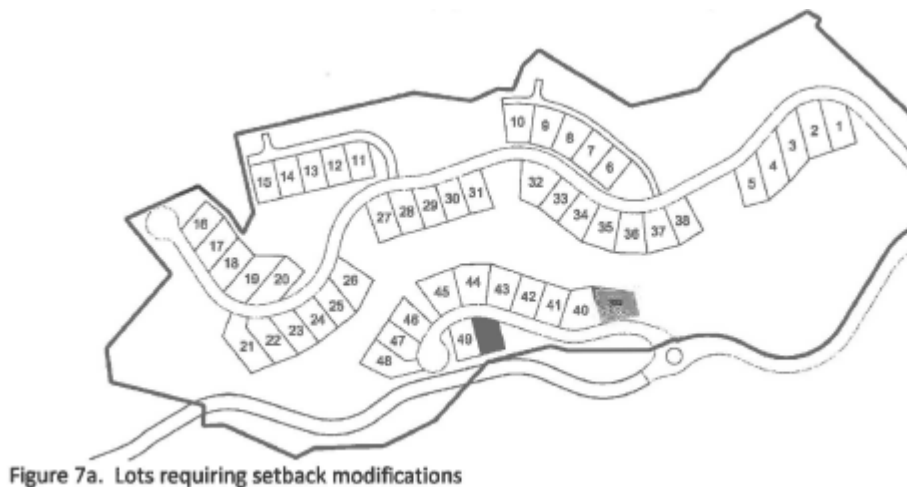
Contrary to the multiple assertions that state-level statutes and case law broadly require the City to make numerous findings that are implied by a grab bag of statutory text and case law excerpts, the City's review of the Applications must be rooted first and foremost in the applicable Code as provided above. To the extent that the arguments raised in the Opposition Letters may apply to a final plat and warrant a reply, we provide the following points in response.

a. The Main Access Road is not an Unauthorized PDD Modification

In the HOA's February Letter, the HOA argued that the RGPD designated the "Main Access Road" for any mesa-top development off Surrey Ridge Drive, that this location had been maintained since 2000, and that the Hillcamp/Cabela alignment was never shown in any approved PDD and that no amendment was sought. This argument was echoed by both Opposition Letters, with minor supplementation consisting of various depictions from PDDs and satellite images that the HOA argues show that other approved PDDs retained the originally depicted road location, and therefore the main access point for Hillcamp must remain as previously shown in PDD conceptual renderings. Notably, there is not a single citation to anything, in the Code or otherwise, to support the contention that this is required or that a departure from the conceptual rendering's road depiction requires an amendment to the PDD. This is also an incomplete picture of the situation.

In the RGPD, the suggested roadway access "arrows" are noted as conceptual only and were not studied for technical feasibility. *RGPD*, Sheet 3. There are other roadways shown in the RGPD (in the Charles Schwab Campus area, for example) that were not constructed as shown on the original RGPD. Additionally, in 2017 and in conjunction with planning work for The Retreat neighborhood, the City and RidgeGate did considerable work on the alignment shown in the current application in order to be able to disclose the access to the future Retreat homebuyers. RidgeGate has documentation from the City confirming their agreement with this alignment.

This goes to show that the proposed location for the roadway access has been studied and refined iteratively over time by the Applicants in dialogue with the City. Indeed, the approved Sub-Area Plan for The Retreat at RidgeGate, publicly available on the City's website and labeled "Tract GG (Planning Area 11) Sub Area Plan Standards & Guidelines," revised July 11, 2016 ("The Retreat's SAP"), expressly recognized the extension of Cabela Drive as proposed under the Applications. For example, in Section 4.1.9.1.4, The Retreat's SAP includes this depiction of the anticipated road extension on Cabela Drive that is quite similar to the road proposed in the Applications:



The Retreat's SAP, 7.

The Retreat's SAP also provides that "the developer shall post a large map in the sales office and provide a map to purchasers and prospective purchasers of lots that shows the extension of Cabela Drive to the bluffs, with a note that states that there will be a maximum of 346 residential units zoned for development on the mesa tops." See The Retreat's SAP, 9. Consistent with The Retreat's SAP, a sign was erected (and it is still present) to inform the public about this future roadway and, in addition, every homebuyer within The Retreat was provided a disclosure document that described the road and the future residential development now known as Hillcamp. Purchasers of homes within The Retreat signed and acknowledged this document.

This alignment also serves to connect the Hillcamp community to the City and provides an emergency exit route to I-25 not only for Hillcamp, but potentially also for residents of Douglas County located to the south and west of Hillcamp (using the emergency vehicle access points) which, we believe, provides an invaluable and currently nonexistent option for those Douglas County residents who have less development, fewer fire hydrants and other firefighting infrastructure, and more open space and combustible vegetation.

b. The Environmental Infeasibility and Lack of Connectivity of Alternative Alignment 7

The HOA's February Letter argued the Applicants rejected Alternative Alignment 7 (the Surrey Ridge corridor) as "environmentally infeasible," yet simultaneously planned a 12-inch Zone 3 water transmission main through the identical corridor, and they claimed this proved the infeasibility claim was pretextual. This argument is echoed in both May 26 Opposition Letters: the HOA's Opposition Letter repeats the point, including the signature line "If the corridor can accommodate a 12-inch transmission main, it can accommodate a roadway," and attributes the rejection to cost avoidance on I-25 underpass improvements. The Special-Interest Coalition makes the same argument, citing the October 2023 Southridge Preserve Water Demand Study and additional PWSD materials as demonstrating that the Applicants' position is inconsistent.

As the Applicants have consistently stated, the potential for access to Hillcamp from Surrey Ridge Drive through a ravine where an old ranch road still exists has been studied extensively, but it has been determined to be infeasible for the main access point because its slope exceeds grade requirements, making it unsuitable for a main access point. Moreover, Alternative Alignment 7 terminates in an area with no connections to other portions of the City—unlike the selected Cabela Drive alignment, which connects Hillcamp directly to the existing City roadway network. Moving the access point to Alternative Alignment 7 would therefore be contrary to the Comp Plan’s Goal #6, Objective 2, which calls for “advancing the development of trails, greenways, sidewalks and streets that safely connect residents and employees to different districts, amenities, and destinations around the City.” *See Comp Plan*, 37. Additionally, placing the main access road in this location would cause a significant degradation to an extensive area containing wildlife habitat, undermining the call in the Comp Plan’s Goal #10, Objective 1 to protect natural systems and balance preservation with intentional development. *See Comp Plan*, 39. This corridor is anticipated to be used for certain utility systems, but these can be installed in an area that was already cleared and disturbed by construction of the historic ranch road, and the steep slope is not an issue for these utility systems.

IV. Conclusion

We appreciate the City’s continued attention and review of the Final Plat and this matter. As discussed above, the Final Plat contains comprehensive information demonstrating that it satisfies the criteria in Code Section 17-5-20 and conforms to the applicable subdivision, right-of-way, roadway-design, access, drainage, grading, floodplain, and wildfire standards. The Planning Commission should recommend, and the City Council should grant, approval of the Final Plat—Hillcamp Drive Filing No. 1 (SB25-0014).

Sincerely,



Carolynne C. White

And

Megan M. Becher

Megan Becher