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Advocates for our rivers

Madison Harris
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February 22, 2021

RE: Referral comments for Belden Place Plan

Dear Ms. Harris,

Thank you for the opportunity to provide comments regarding the Belden Place project. Eagle River Watershed Council (ERWC) advocates for the health and conservation of the Eagle River and its tributaries in order to protect and enhance the high-quality natural and human values provided to our communities by rivers. Vigorously protecting our aquatic systems ensures they will continue to provide their numerous social, economic, and ecosystem benefits in perpetuity.

The project application contemplates combining six existing parcels for redevelopment to create a new subdivision. The project has many admirable design features and seeks, in part, to address ongoing issues in local full-time residential housing and avoid loss of Minturn's small town character. Our comments remain focused primarily on impacts to aquatic ecosystems and community values associated with our region's excellent rivers and streams. As such, they are primarily focused on Belden Place's stormwater infrastructure design and potential increased human impacts to the Eagle River corridor through increased usage of the Boneyard Open Space as a de-facto 'backyard' for the new development's residents.

STORMWATER

The project's drainage report suggests that stormwater will predominantly be conveyed west towards the undeveloped USFS lands in the open space near the Martin Creek Trailhead, where it will be infiltrated to the valley bottom alluvium prior to entering the river. This is likely to provide strong water quality protections for surface water on the Eagle River, and infiltration of runoff rather than direct piping to surface waters. This is highly consistent with Low Impact Design/Green Infrastructure practices strongly promoted by ERWC. However, it should be noted that the limited wetlands occurring on this low-lying adjacent USFS site will to a large degree now functionally assume the role of treatment wetlands for the development, and it may be worthwhile to consult USFS aquatics staff on this prospect prior to approving this measure. (contact: melvin.woody@usda.gov)

The newly proposed P1 basin of approximately 20 acres on the northeast portion of the development will drain to an open space parcel where additional infiltration is anticipated prior to conveyance to the river. A small portion of this basin will be draining new impervious surfaces from Belden Place while the majority will remain as a pervious undeveloped surface. At times when infiltration capacity is exceeded and surface flows are generated, they will then be culverted under the highway and cross the Boneyard Open Space prior to discharging to the Eagle. The developer has proposed a culvert conveyance northwards across the Boneyard.

NET EFFECTS OF BELDEN PLACE AND POTENTIAL FUTURE DEVELOPMENT IN SOUTH MINTURN

Stormwater drainage proposals for Belden Place have a good focus on infiltration whenever possible prior to conveyance to surface waters. We applaud the developers for this design paradigm, which is broadly consistent with Low Impact Development/Green Infrastructure concepts that strive to reduce the amount of polluted runoff entering streams from urban and suburban surfaces. These practices seek to utilize natural site characteristics to manage stormwater runoff, promote infiltration to groundwater over direct surface runoff, and avoid directly connecting impervious areas to streams.

Belden Place currently benefits largely from the undeveloped characteristics of adjacent public lands. However, the town should be highly cognizant that this is not necessarily a permanent condition. Development conversations regarding the USFS staff housing parcel, as well as the open lands near the Martin Creek trailhead, have occurred on multiple occasions in the past, and are likely to arise again in the future pending ongoing pressures tied to the region's housing issues and continually growing residential and visitor populations. It is highly reasonable to consider that both of these parcels (the USFS staff housing complex and the Martin Creek trailhead zone) may be transferred to private ownership and further developed at some point in the future. At this time, the cumulative impacts of impervious surfaces and stormwater runoff that overlap with the Belden Place Development will require significant consideration by town planners if negative water quality impacts to the Eagle River are to be avoided.

It is prudent to consider these potentials now and ensure that within Belden Place sufficient stormwater treatment spaces are reserved, and the potential need for active stormwater technologies and best management practices remain on the table at this site. It may not always be possible in the future for Belden Place to rely on nearby public lands to treat its stormwater runoff. Retrofitting active treatment appurtenances on the P1 and P2-P4 basins to accommodate potential future developments and loss of pervious coverages in these areas could be an expensive and logistically difficult prospect if access and adequate space for these infrastructure types are not considered now, well ahead of actual developments.

INCURSION INTO NATURALIZED OPEN SPACES

As new developments increase the residential density, there is often a tendency for the human uses and traffic patterns of adjacent public spaces to change significantly. Increasing development in south Minturn is likely to increase use pressure on the Boneyard Open Space and Martin Creek Trail with attendant impacts such as new/increasing social trails, pet waste and impacts to riparian areas beside the Eagle River. Projects to address these uses such as formalizing trails, exclusions for vegetation protection and increased trash/dog waste pick-up by town staff, will incur increased financial costs to the town that may be unanticipated during the current development review. We encourage the town to consider these creeping impacts to the river and public open spaces and consider ensuring an appropriate long-term funding mechanism is in place prior to development approval so that these costs are appropriately borne by the new development's residents, and not unintentionally transferred to the town over time.

CLOSING

Thank you for providing the opportunity to comment on this project. If you have additional questions on our comments or require additional information, please contact us at your convenience.

Sincerely,
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