



Date: November 26, 2025

To: Glen Smith, Interim Town Administrator, Town of Palmer Lake (TOPL)
Erica Romero, Town Clerk, Town of Palmer Lake
Scott Krob, Town Attorney

CC: Mark Morton, PE, GMS, Inc., Consulting Engineers,
John Chavez, Chavez Consulting Inc., LLC, Stormwater Consultant,
Barb Cole, Founder/Executive Director, Community Matters Institute

From: Town of Palmer Lake Development Review Team (DRT)

Re: Elephant Rock Town-owned and EcoSpa Planned Development Plan Submittal
Completeness Review

Background

The Development Review Team (DRT) conducted a completeness review of the Planned Development Plan submittal for the town-owned Elephant Rock parcels. The Town of Palmer Lake Planned Development Plan (PDP) Checklist was the basis for determining completeness of the submittal. In addition to the checklist, Town of Palmer Lake Resolutions 52-2025 and 58-2025 and attachments were used to evaluate consistency of the submittal with the scope of work approved by the Board of Trustees.

The DRT approached the review with the following understandings:

- The expected Planned Development Plan is for the entire 28 acres (two parcels) owned by the Town of Palmer Lake.
- The Town-owned property was to follow the same regulations as applicable to all other PDP's processed by the Town. No exceptions to the Town Code.
- The PDP was to include the EcoSpa development as part of the PDP (e.g., first phase).
- The southern parcel is not zoned per the assessor's records. There is only PUD zoning for the northernmost property adjacent to Hwy 105.
- There is no recorded PUD as required by Town Code, approvals expired after 3 years.
- A PD Amendment is not possible per adopted land use regulations (see 17.2160 -fka 17.72).

The following documents, provided by Prism Design and Consulting Group, were reviewed:

1. A completed PD checklist
2. One page graphic entitled EcoSpa PD Amendment, Updated October 2025,
3. EcoSpa Site Plan for 3.74 acres- no dimensional requirements are noted, and it references "height per PUD zone or in original PUD zone"- nothing was ever submitted nor recorded per Town research. Dimensional requirements must be established.
4. EcoSpa at Chautauqua Springs Willin's Proposal.
5. EcoSpa Addition/Remodel- Noted as "Final Development Plan (FDP)."

Completeness Review Results

The submittal is not representative of the entire Elephant Rock property. The entire submittal is focused only on the 3.74 acres identified as the EcoSpa area. There was no information provided for the remaining areas of 28-acre property.

Even if the Planning Commission and Board of Trustees were comfortable with allowing the EcoSpa to move forward as a 'first phase', the submittal is not complete. As a phased PD, the other Planning Areas need to be defined, and all required data and text needs to be submitted.

Checklist Requirements

Of the sixteen (16) items listed on the PDP Checklist as "Submittal Requirements," only five items were provided. Most required items were incorrectly identified as "Not Applicable," "unchanged," or "no change," and not provided. Of the thirty-one (31) Drawing Requirements identified in the PDP Checklist, only seven (7) items were provided, for the EcoSpa area and do not contain the information required by the PD ordinance.

Survey

A boundary survey was not provided. All drawings provided are based on a PUD Master Plan for the Salvation Army Camp Elephant Rock, developed in 1986. None of these drawings are scalable and the surveys do not meet Code requirements nor contractual requirements.

Civil Engineering Services

Preparation of Phase 3 Drainage Analysis Plan was not conducted and is required for the entire 28-acre site. A Phase 1 Drainage letter may be acceptable upon development of the Phase 3 Analysis.

At a minimum, a Grading and Erosion Control Plan is required at this point for the EcoSpa project.

A PD exhibit is required for the entire 28-acre site and was not submitted.

The entire Elephant Rock property will exceed greater than one (1) acre of land disturbing activity during the redevelopment of the site. Therefore, the Town's Municipal Separate Storm Sewer System (MS4) permit requirements will apply to the development of the site. Even though the EcoSpa development may disturb less than one (1) acre of land, it is part of a larger plan of development (or sale) that will disturb more than one acre of land. None of the Town's MS4 requirements have been addressed.

CDOT has requested a State Access Permit as noted in an email to the Willians.

Conclusion

The memo serves only as a brief overview of the Elephant Rock property submittal review. For complete descriptions of the issues identified in the DRT review please refer to the Completeness Review Memo provided to the applicant and Planning Commission.

The submittal provided is inadequate, and neither the EcoSpa PDP nor the PDP for the entire town-owned property should be approved at this time. The DRT recommends that the matter be continued until such time as the consultant can provide all the required documentation for approval of the PDP and address the MS4 permit requirements.