



Date: November 26, 2025

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

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

From: Town of Palmer Lake Development Review Team

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 understanding:

- The expected Planned Development Plan is for the entire 28 acres (two parcels) owned by the Town of Palmer Lake;
- the PDP was to include the EcoSpa development as part of the PDP (e.g., first phase);
- 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.
- There is No Zoning indicated for the southern parcel. There is only PUD zoning for the northernmost property adjacent to Hwy 105;
- A PUD Amendment is not possible on the southern parcel.

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 2.80 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 2.8 acres identified as the EcoSpa area. There was no information provided for the remaining areas of 28 acre property.

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, and they were only for the EcoSpa area.

Survey

A boundary survey was not provided. All drawings provided are based on a PUD Mater Plan for the Salvation Army Camp Elephant Rock developed in 1986.

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

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 review please refer to the Completeness Review Memo provided to the applicant.

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.

The submittal provided is inadequate for approval 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.