

# **Dunlop Environmental Consulting, Inc.**

# Environmental Public Health Planning for the Future

May 17, 2022

Town of Snowmass Village Jim Wahlstrom, Senior Planner PO Box 5010 130 Kearns Road Snowmass Village, CO 81615

Re: Snowmass Town Park: Special Review Application

Dear Mr. Wahlstrom,

As per your request, Dunlop Environmental Consulting, Inc. (DEC) has reviewed the Snowmass Town Park Special Review Application. The project packet was reviewed, including reports from other consultants to this project. DEC made a site visit on May 16, 2022. Given the fact that snowmelt runoff was occurring through the property, observations were made from existing trails and bike paths for safety reasons. However, a clear observation of the area was made.

This review is limited to identifying concerns that may occur in and around the wetlands that currently exist. It is apparent from narrative in the application that the wetlands are being designed to be an integral feature of the park. Taking what has existed for decades, a waterway intersection of Brush Creek and an ancillary drainage, and enhancing it into a public amenity is a goal of this project.

Existing uses of the immediate project area include the Town of Snowmass Village Recreation Facility, a skateboard park, rodeo grounds, kids park, tennis courts, Town parks equipment storage, volleyball courts and hiking trails. It is apparent that completion of the project is intended to create a public amenity through development of the waterway. Most of the work will not involve buildings, except for the redesign of the rodeo arena.

#### Wetlands

From an environmental perspective critical attention must be paid to working near and in the wetlands. As is clearly stated in the SGM report of findings dated 7/28/21, the US Army Corps of Engineers (USACE) will be engaged regarding permitting to work in wetlands. The USACE will detail requirements to work in this environmentally sensitive area.

Paved parking lots are being proposed to add spaces to existing paved areas. Drainage from paved surfaces is being designed to collect and drain into a holding pond prior to discharge to

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the wetlands. Other areas of the project are being designed to "sheet flow" into the wetlands. It is common knowledge that parking areas have the potential to collect hydrocarbons and other chemicals from vehicles. It is reasonable to state that during time of rain or snowmelt events the leaked products can migrate off the parking areas and into surrounding waterways. The report submitted by JVA consulting dated 1/18/22 states drainage from the West parking lot will be collected and discharge into a detention pond prior to discharge to wetlands. Discharge from the East parking lot will "...be conveyed via sheet flow and curb and gutter flow to a series of existing grassed/cobble swales and CMP pipes which ultimately outfall to the existing wetland area. Flows from the remaining improvements including the rodeo, sports fields, and associated walks will sheet flow into the existing wetland area."

Wetlands have a natural capacity to act as filters and clarifiers of contaminants within reason. There is no mention in the application of an estimate of what impact runoff from these areas may have to receiving waters. The JVA report mentioned above concludes their comments on site drainage with "It is not anticipated that any of the proposed improvements will negatively impact any downstream facilities." JVA may be able to provide more detail to their conclusion that there will be negative stream impact.

It is suggested that an engineering consideration be given to installation of oil/grease/sand interceptors be installed to minimize uncontrolled runoff into the wetlands and waterway. Should interceptors be installed, a responsible party should be identified to maintain the interceptors on a regular schedule. To accomplish this the interceptors should be positioned for 12-month access.

## Snowmelt

Snow storage has the potential to concentrate contaminants found on roadways and parking areas. The identified snow storage areas should also be considered for capture and treatment of contaminants found in melting snow prior to discharge to receiving waters.

## **Dredging**

Enhancement of the existing pond will involve dredging sediment to increase volume. This is a relatively straight forward process but must be done with care to not increase sediment load to Brush Creek. Construction documents, when submitted, will be helpful in reviewing this part of the project. In the BRUSH CREEK IMPACT AREA, Hydrology section the following appears "The project team is currently evaluating the impact of the proposed development on the stream channel and hydrologic conditions of the creek. All impacts will be mitigated per TOSV and FEMA requirements." An evaluation of sediment load resulting from dredging should be addressed in the hydrology report.

### **Construction Management**

There is confusion regarding submittal of a Construction Management Plan (CMP) for this project. In the LANDSCAPING, GRADING, AND OTHER DESIGN STANDARDS section the following appears "h) Construction Management. This application does not propose a PUD,

amended PUD or subdivision development. If a CMP is desired for the Special Review application please request."

In the BRUSH CREEK IMPACT AREA, BRUSH CREEK DEVELOPMENT STANDARDS, section the following appears "A construction management plan will be submitted with the building permit for this project detailing the prevention of any hazardous materials and sediment entering the creek during construction."

It is recommended that a CMP be developed, submitted and approved for this project. The reference guidance is Ordinance 12, Series of 2007, standards and regulations for construction management.

Air quality

The application mentions that fugitive dust will be at a minimum during the construction phase. With the removal of the existing dirt parking lot serving the rodeo, future windblown dust will be minimized in the general vicinity. The existing rodeo arena is scheduled to be slightly relocated. It is suggested a fugitive dust control plan be submitted to address the arena deconstruction and construction.

Recreational use of the pond

The pond landscaping design indicates that future uses of the pond encourages direct human contact with the water. For example, creation of a sandy beach will be an attraction for use of the pond beyond what is existing. Water sports such as paddle boarding, kayaking, swimming, fishing, etc. come to mind as possible future uses. In a conversation with Andy Worline on 5/18/22, he mentioned that ultimate uses of the pond have not been fully explored, but agreed that water sports have not been ruled out.

Should the pond be developed as mentioned above, the Town should investigate State of Colorado regulations on swimming areas in natural settings. Direct human contact with natural waters requires special attention for the safety of users of the facility.

This concludes findings of this review. Contact me with questions.

Sincerely,

Momas S. Dunlop, MPH, REHS

President



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