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January 5, 2026

Adams County Planning and Development Division  
Attn: Greg Barnes  
4430 South Adams County Parkway  
Brighton, CO 80601

**Re: RCU2025-00026 - Comment #1 Response and Resubmittal**

Dear Mr. Barnes:

Jose Rosales (“Applicant”), the owner of the real property located at 1941 E 160th Avenue, Brighton, CO 80023 (parcel #0157302002001, 0157302000058, 0157302000026) (“Property”) and the applicant for RCU2025-00026 (“Application”), has engaged Foster Graham Milstein & Calisher, LLP (“FGMC”) to assist with the Application. FGMC has been working with County Staff to prepare a resubmittal for the Application and clarify certain items associated with this request.

This letter contains the Applicant’s responses to the County’s Review Comments #1, as shown below. Furthermore, the materials attached to this letter are the Applicant’s revised Written Explanation of the Project, revised Site Plan and Landscape Plan, septic permit, and emails from the City of Thornton.

### **PLANNING COMMENTS**

**PLN01:** *The request is for a conditional use permit to allow a landscape storage yard within the Agricultural-3 zone district on three parcels that are all zoned Agricultural-3, as required by Section 3-07-01 of the County's Development Standards.*

***Response:*** Correct. The request is for a conditional use permit for an outdoor landscape material yard on the Property as such conditional use permit is required by Section 3-07-01 of Adams County’s Development Standards.

**PLN02:** *Parcel 0157302002001 is currently developed with a single-family home. Per Section 3-08-02, only one principal use is permitted per lot. Any accessory use of this property for a use classified as industrial is not allowed. Home occupations are allowed but must conform to the*

*requirements of Section 4-03-03-02-07. The information submitted with this application leads staff to believe that the proposed use would not be allowed in conjunction with a single-family residential, dwelling.*

**Response:** Correct. The single-family home will not be used for residential purposes and instead will be a commercial office space for the operations of the yard.

**PLN03:** *No illustrations of fencing design has been provided in your application. We will need to see that. The proposed use is classified as industrial, and therefore subject to the following fencing requirements: Maximum height of ninety-six (96) inches, which may include more than four (4) strands of barbed wire forming the top eighteen (18) inches or less of the fence, placed at a forty-five (45) degree angle. The bottom of the fence shall be no more than six (6) inches above grade at any point. No fence shall be permitted within any required landscaped area. Electric fencing and fencing consisting only of barbed wire are prohibited as an external boundary fence. Long runs of fencing parallel to public roads are discouraged. Where long runs cannot be avoided, the horizontal alignment of the fences shall be varied to create visual variety and to provide planting pockets between the fence and the road. In addition, periodic breaks in fences should be considered to facilitate pedestrian, bicycle, and transit use. Traffic view obstruction as outlined in these standards and regulations, by any fence, wall, or screen, is prohibited.*

**Response:** Please see the revised site plan.

**PLN04:** *Your application illustrates that a six-foot-tall fence is proposed. Section 11-02-05-07-1 states that outdoor storage of rock, soil, mulch, and other non-living landscaping materials, and equipment, is permitted. Equipment and material storage areas must be screened from view from adjacent parcels and road right-of-way by an eight-foot-high minimum screen fence. Only products, materials, and equipment owned and operated by the landscape business may be stored on the site.*

**Response:** Please see the revised site plan. The height of the fence along the exterior of the Property is proposed to be eight (8) feet for adequate screening of the equipment and material storage areas from adjacent parcels and road right-of-way.

**PLN05:** *How will garbage be collected? Garbage area screening shall consist of a six (6) foot high minimum screen fence made of wood or masonry material. Fencing materials should be cleaned and maintained must be clean and maintained at all times to present an orderly appearance. No garbage storage area shall be located within twenty (20) feet of a public sidewalk.*

**Response:** Please see the revised site plan. The height of the garbage area screening is proposed to be six (6) feet, and the garbage storage area is proposed to be located further than twenty (20)

feet from any public sidewalk. The proposed fencing material will be regularly cleaned and maintained by the Applicant.

**PLN06:** *Please include an inventory of all vehicles and equipment that are planned to be stored on the property associated with this use. Section 11-02-05-07-4 states that in all Agricultural Zone Districts, no more than two (2) commercial vehicles and/or equipment in excess of seven thousand (7,000) pounds gross vehicle weight used for the landscape storage yard business shall be allowed per acre with a maximum of five (5) unless otherwise permitted through a Conditional Use Permit. Section 11-02-05-07-3 states that all commercial vehicles and/or equipment in excess of seven thousand (7,000) pounds gross vehicle weight and/or hardscape used for the landscape storage yard business shall be screened from any adjoining residentially zoned or used property with an eight (8) foot solid screen fence in accordance with the approved landscape plan*

***Response:*** No commercial vehicles or equipment will be stored on the property.

**PLN07:** *Your landscape plan will need to illustrate conformance with required bufferyards. The western side of the properties shall have a Type-D bufferyard, pursuant to Section 4-19-06-01. This requires a fifteen (15) foot minimum bufferyard width with three (3) trees per sixty (60) linear feet and a sight obscuring fence or wall located on the interior line of the bufferyard. The eastern side of the property shall have a Type-B bufferyard. This requires a ten (10) foot minimum bufferyard width with two (2) trees per eighty (80) linear feet of lot line. The portions of the properties with adjacency to Highway 7 and East 160th Avenue shall meet one of the required street bufferyard options found in Section 4-19-07-01. The most commonly selected option is a twenty (20) foot landscape area along the road right-of-way. Within the landscape area, one (1) tree and two (2) shrubs shall be planted per forty (40) linear feet of frontage. Drive aisles shall be counted as zero (0) feet in depth.*

***Response:*** Please see the revised site plan addressing conformance with buffer yard requirements.

**PLN8:** *Your landscape plan should demonstrate full compliance with Section 4-19-07-01. All developments shall be required to landscape a minimum of ten (10) percent of the lot area, which can include these. At least fifty (50) percent of the required landscape area shall be placed so it abuts adjoining public rights-of-way, excluding alleys and drives.*

***Response:*** Please see the revised site plan demonstrating full compliance with landscape area requirements.

**PLN09:** *Please provide a maximum pile height that is being proposed. Staff recommend that pile heights not exceed the fence height. An additional Conditional Use Permit may be requested if pile heights exceed fence height*

**Response:** The proposed maximum pile height for materials will not exceed fence height. As addressed in the Application, Applicant originally proposed to maximum pile height of six (6) feet, which is two (2) feet lower than the eight (8) foot fence height that is now proposed.

**PLN10:** *Please elaborate a bit more on the purpose of the storage space in the northernmost point of the site.*

**Response:** Please see the revised site plan. The “storage space” is for the keeping of excess materials that will be added to each of the landscape material piles in the yard as needed. It is not for extraneous outdoor storage.

### **RIGHT OF WAY COMMENTS**

**ROW1:** *Revise the site plan showing (1) the record boundary with dimensions, (2) any existing and proposed easements, (3) location of existing public roads, (4) existing structures with the dimensions and ties to the record boundary, existing structures, well and septic systems if applicable, and (5) the location of any 100-year floodplain.???*

**Response:** Please see the revised site plan.

**ROW2:** *On the site plan, show the recorded information of the document providing right-of-way access to the site. Additionally, show all survey section corner information to help determine the location of the site boundary.*

**Response:** Please see the revised site plan. The reception number for the Nordstrom Subdivision is 824018.

**ROW3:** *Provide a title commitment dated within 30 days of application or more current to verify ownership, exceptions, and record chain of title. Provide hyperlinks to all cited documents or an abstract. It must have a current date, and this will revise the title NOTE.*

**Response:** As set forth by the Adams County Conditional Use Permit application form and checklist, proof of ownership may be satisfied by title commitment or warranty deed. The warranty deed was provided. Additionally, because the additional Highway 7 ROW is not needed, a title commitment is not required. Please do not hesitate to contact me if you’d like to discuss this request.

**ROW4:** *Pending engineering review, any storm water quality facilities will require a permanent drainage easement conveyed to the county by separate instrument. The easement agreement shall include a legal description and illustration depicting the legal description prepared by a licensed professional land surveyor.*

**Response:** Noted. Thank you.

**ROW5:** *According to Master Transportation Plan, East 160th Avenue is classified as a Minor Arterial. A dedication of 20 feet along the east half and 30 feet along the west half of the site of additional right-of-way is requested from the right-of-way line.*

**Response:** Per conversations with Greg Barnes, who confirmed with CDOT, the planned expansion of East 160<sup>th</sup> Avenue will not occur for many years and development on the south side of 160<sup>th</sup> Avenue could preclude such expansion. Therefore, the Applicant will forgo any dedication of ROW until and if the expansion is actually initiated by CDOT.

**ROW6:** *The proposed project may require a minor subdivision to allow the uses shown on the plat, including the residence*

**Response:** The home will not be used as a residence, but be converted to an office. Therefore, one primary use is occurring on the site, and no minor subdivision is required.

**ROW7:** *Note: Fence shall be located outside of any dedicated right-of-way.*

**Response:** Please see the revised site plan.

## **ENVIRONMENTAL COMMENTS**

### **WATER AND SEWER**

**ENV1:** *The applicant provided a water bill from N Washington Water Users for the existing residence. No proof of sewer or septic was provided. Proof of sewer or septic service for the specific proposed project is required for Adams County review.*

**Response:** The home has its own septic system. The permit is attached hereto.

**ENV2:** *What are the water requirements for the proposed project? Would a commercial account be required? The current water service is for the existing residence. Depending on the water usage and current water provider requirements, a will-serve letter from N Washington Water Users may be required for the specific proposed project, especially if separate (commercial) water is to be supplied for the business, including landscape requirements. The applicant must provide proof that sufficient water is available for the proposed project.*

**Response:** Noted. There are no water needs for the landscape materials yard use. The Applicant will comply with all requirements when the residence is changed from a residential to commercial use.

**ENV3:** *Will the proposed business use have employees? How will water and sewer facilities be provided for them?*

**Response:** Employees will use the restroom located inside of the home, which will be converted to an office.

**ENV4:** *Will water and sewer facilities be provided for the storage yard area?*

**Response:** No. No water and sewer facilities are needed for the business operations.

**ENV5:** *If the current residence uses a septic system, Adams County Health Department (ACHD) regulates On-Site Wastewater Treatment Systems (OWTS, also known as septic systems) through the issuance of permits to install, repair, expand, use, or operate a system. Records are available at <https://adamscountyhealthdepartment.org/onsite-wastewater-treatment-systems-septic-systems>. Please provide septic information for Adams County review.*

**Response:** The current residence does use a septic system. The permit is attached hereto.

**ENV6:** *Per ACHD Regulation O-22, setback distances from septic tanks, pipes, and soil treatment areas (also called leach fields) must be maintained for proposed and existing structures. The regulation, including setback requirements, can be found at <https://adamscountyhealthdepartment.org/onsite-wastewater-treatment-systems-septic-systems>.*

**Response:** Noted. Thank you.

**ENV7:** *Please provide an updated site plan that shows the actual location of each septic system component to include tank(s), soil treatment area (leach field), and piping system and horizontal distances in feet between septic components and site features (buildings, property lines, etc.).*

**Response:** Please see the revised site plan that identifies the area where the leach field is located. Due to the age of the Property, the County does not have detailed records of the septic system and the exact locations of the tanks and piping systems are not available.

**ENV8:** *No driving, parking, building, or storage would be permitted on top of the water well or septic system components*

**Response:** Noted. Thank you.

**ENV9:** *OWTS – Use Permit (Commercial) Per ACHD Regulation Number O-22, Section 4, an OWTS Use Permit must be obtained within 12 months prior to a change in use of the property from residential to commercial. To obtain a Use Permit, the OWTS will need to be inspected by a National Association of Wastewater Technicians (NAWT) Certified Use Permit Inspector. A list of Certified Inspectors is available here <http://www.nawt.org/search.html>. If it is determined by the inspector that the system has deficiencies that require repair, these repairs must be completed prior to ACHD issuing a Use Permit.*

**Response:** Noted. Thank you.

## **OPERATIONS**

**ENV10:** *Materials brought on site must meet the definition of clean, inert material. Control of the material and record keeping of the sources of the materials shall be the responsibility of the applicant/operator.*

**Response:** Noted. Thank you.

**ENV11:** *An Operations & Materials Management Plan will be required to include:*

*1) A description of the types of materials managed; 2) A description of amount of material on-site and anticipated turnover rate; 3) A description of the stockpile location and heights. Per requirements, the stockpiles may only be placed as specified in the design and operations plan. 4) Records maintenance and retention: records shall be maintained per requirements. 5) A description of materials not accepted at the facility and how such materials will be handled if discovered within incoming loads*

**Response:** Please see the Operations & Materials Management Plan that is included in the revised narrative.

**ENV12:** *Outdoor storage shall not exceed the height of the fence, unless otherwise approved.*

**Response:** Resolved. Please see our Applicant's response to PLN09.

**ENV13:** *Please provide descriptions that address how nuisance hazard impacts, including offsite vehicle tracking, fugitive dust, noise, lighting, waste, and vectors (e.g., mosquitoes), will be controlled.*

**Response:** As described in the Applicant's written narrative, the Property will not operate in an industrial or construction-type manner. As such, there are few anticipated nuisance impacts. The Applicant is providing ample landscape buffering and the site will be covered in road base.

Accordingly, vehicles will not be tracking dirt from an unpaved lot onto the street, nor will their vehicles be kicking up dirt. As stated in the traffic letter, no large semi-trucks will be coming to the Property, meaning that the noise generated by vehicles will not be extreme. Furthermore, the proposed site plan includes the required screening of the use and fencing of all trash areas.

**ENV14:** *Exposure to air pollution is associated with numerous health problems including asthma, lung cancer, and heart disease. Traffic in unpaved areas may contribute to increased fugitive dust emissions and offsite vehicle tracking. Applicant will be required to implement dust control measures to prevent off-site impacts if traffic into and within parcel occurs on non-paved surfaces and from operations.*

***Response:*** The areas of the lot that will be accessed by vehicle will be covered in road base to avoid any dust pollution.

**ENV15:** *Applicant/operator should limit engine idling to the maximum extent feasible to mitigate off-site noise and air quality impacts to surrounding properties and shall not exceed five minutes within any sixty-minute period, except as authorized. Refer to CRS Title 42 – Vehicles and Traffic Idling Standard, Article 14 – State Idling Standard, Section 42-14-105. Idling for Colorado law.*

***Response:*** The proposed use will be substantially more efficient than the previously approved use of the Property as a firewood sales site. Vehicle movement will be circular through the site, preventing congestion and decreasing the possibility of engine idling.

**ENV16:** *Regular exposure to elevated sound levels can have a negative impact on both physical and mental health by increasing the risk of stress, hearing impairment, hypertension, ischemic heart disease, and sleep disturbance. Noise attenuation shall comply with the Colorado Noise Statute (CRS 25-12-103) and applicable, local noise regulations. All necessary steps should be taken to mitigate off-site noise.*

***Response:*** As stated in the traffic letter, trips to the yard will be less than 20 trips per day, with very limited large commercial vehicles coming to the site. Therefore, vehicle noise will be limited.

**ENV17:** *Lighting facilities shall be arranged and positioned so no direct light or reflection creates a nuisance or hazard on any adjacent property or right-of-way.*

***Response:*** Please see the revised site plan.

**ENV18:** *The operator will need to ensure that refuse (trash) is properly controlled and collected as often as necessary to prevent nuisance conditions.*



**Response:** Applicant ensures that trash will be properly controlled and collected to prevent nuisance conditions.

**ENV19:** *Areas with shallow, stagnant water, and decaying organic matter provide suitable mosquito breeding habitat. To reduce the potential for human exposures to West Nile and other mosquito-borne viruses, developing and implementing an integrated mosquito control plan for the proposed project is recommended. The applicant may contact the Adams County Health Department at (303) 288-6816 or via email at [gcazier@adcogov.org](mailto:gcazier@adcogov.org) for more information regarding mosquito control measures. More information is available here <https://adamscountyhealthdepartment.org/vectorborne-disease>*

**Response:** The Property will not have any areas of stagnant or shallow water.

### **ENGINEERING COMMENTS**

**ENG1:** *The subject parcel is access by E 160th Ave. E 160th Ave is under the jurisdiction of the City of Thornton. The applicant will need to confirm with the City that they have a valid Access permit from the City for this use, or that one is not required for the proposed use. Applicant must submit a copy of the approved permit, or an email from the City stating that an access permit is not needed.*

**Response:** Please see the emails attached from the City of Thornton.

**ENG2:** *The Trip Generation Letter submitted with this application needs to include the number of truck trips per day. "Trucks" being defined by the Federal Highway Administration (FHWA) as vehicle classes 4 through 13. This information will be necessary to determine if a full Traffic Impact Study will be needed (see below).*

**Response:** The traffic letter was updated with the expected number of trucks identified between FHWA vehicle classifications 4 through 13. The total number of vehicles will not result in traffic impacts that will require a Full Traffic Impact Study.

**ENG3:** *Prior to scheduling the issuance of an approved Conditional Use Permit, the developer is required to submit for review and receive approval of all construction documents (construction plans and reports). Construction documents shall include, at a minimum, onsite and public improvements construction plans, drainage report, traffic impact study (if needed). All construction documents must meet the requirements of the Adams County Development Standards and Regulations. The developer shall submit to the Adams County Development Review Engineering division the following: Engineering Review Application, Engineering Review Fee, electronic copies of all construction documents. The development review fee for an Engineering Review is dependent on the type of project and/or the size of the project. The Development Review*

*few can be found in the Development Services Fee Schedule, located on the following web page:  
<http://www.adcogov.org/one-stop-customer-center>.*

**Response:** No development is occurring on the site that will necessitate construction drawings, a drainage report, or a traffic impact study.

**ENG4:** *Prior to issuance of a Conditional Use Permit, all approved site and traffic improvements must be constructed and approved by the Public Works Department.*

**Response:** Noted. Thank you.

**ENG5:** *development of this site will require drainage improvements. The drainage improvements will include stormwater detention and water quality features. The outfall for these drainage features is a concern, as there is no storm sewer infrastructure in this area. The applicant is encouraged to resolve this issue by identifying a viable storm sewer outfall for this site, prior to moving forward with this application, or submission of an Engineering Review application.*

**Response:** As stated in the narrative, there is not sufficient change in the site to warrant drainage improvements.

This letter, along with Applicant's revised Written Explanation of the Project, revised Site Plan, trip generation letter, and Letters of Support, constitute the resubmittal for RCU2025-00026. We look forward to working with County Staff on this Application. Please do not hesitate to contact me should you or Staff have any questions about this resubmittal.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik N. Carlson".

Erik N. Carlson  
for

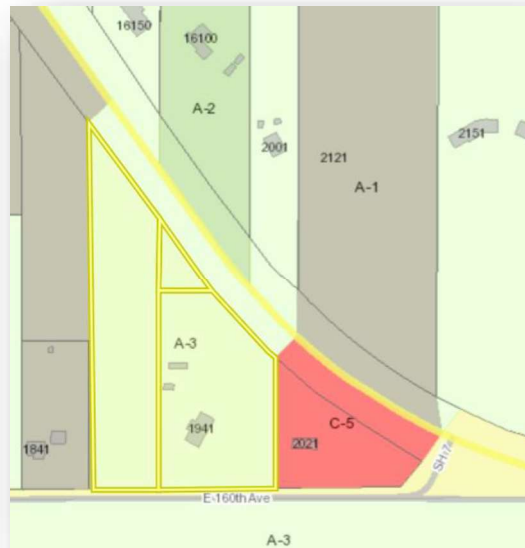
FOSTER GRAHAM MILSTEIN & CALISHER, LLP

### **WRITTEN EXPLANATION**

Foster Graham Milstein & Calisher, LLP (“FGMC”) represents Jose Rosales, the owner of Rosales Landscape, LLC. Mr. Rosales owns the real property located at 1941 E 160th Avenue (parcel #0157302002001, 0157302000058, 0157302000026) (“Property”) in relation to this application for a conditional use permit (“Application”). The Application seeks the approval of a conditional use permit to operate an outdoor landscape yard business on the Property. Adams County (“County”) previously granted this Property a conditional use permit for outdoor firewood sales for a previous owner. That permit has since expired, and Mr. Rosales seeks a new conditional use permit of the same character to operate an outdoor landscape yard materials business on the Property. **This written explanation is revised to respond to comment letter #1 from County Staff and was resubmitted on January 5<sup>th</sup>, 2026 and includes the Operations and Materials Management Plan attached as Exhibit A.**

### **PROPERTY INFORMATION**

The Property consists of three parcels, and each are located in the Agricultural-3 zone district (“A-3 District”). The Property is located on E 160<sup>th</sup> Avenue, near the intersection of State Highway 7.



*Figure 1: Parcel map showing the Property's three parcels in yellow.*

## **CUP REQUEST**

The Applicant seeks a conditional use permit to allow outdoor landscape material sales (“Proposed Use”) on the Property. As the owner of a landscape services business, this outdoor landscape materials sales on the Property will allow Rosales Landscape to offer expanded services to customers. At the Property, customers will be able to drive onto the Property, load their vehicles with landscaping materials, weigh their vehicle, and pay for the per-pound amount of material in the vehicle. The landscaping materials that will be available for purchase at the Property include mulch, gravel, rocks, firewood, and soils. The Proposed Use is not dissimilar from the outdoor firewood sales business that previously operated on the Property.

## **CUP APPROVAL CRITERIA**

Section 2-02-09-06 of the Regulations sets forth the approval criteria for a conditional use permit. The Planning Commission, in making their recommendation, and the Board of County Commissioners, in approving a conditional use permit, shall find that the criteria list below are met. This Application meets the criteria as follows:

### **1. The conditional use is permitted in the applicable zone district.**

The Proposed Use of outdoor landscape material sales is not a use that is explicitly listed in the Regulations. However, “landscape storage yard” and “heavy retail and heavy services” are conditionally permitted under the Regulations.<sup>1</sup>

“Heavy retail and heavy services” is a use category that is defined as, “Heavy retail and heavy service uses include retail and/or service activities that have large amounts of exterior service or storage areas or partially enclosed structures and may generate more off-site impacts such as: automobile dealers; automotive repair except top, body, upholstery repair, paint, and tire retreading shops; automotive services except wrecking or towing storage yards; mobile home and manufactured housing dealers with mobile home sales office; auto/truck rental/leasing; cold storage; cabinet manufacturing with sales; radio and TV broadcasting station; flea market; firewood sales, storage, and splitting; and pawn shops.” The Proposed Use falls squarely under this category because the Proposed use includes a retail sales activity that has a large amount of exterior services or storage areas and has offsite impacts because of the drive-up natures of the business. Therefore, the Proposed Use is permitted in the A-3 District.

“Landscape storage yard” is defined as, “[a]n unenclosed portion of the lot or parcel upon which a landscape business owner maintains a principal office or a permanent business. Designation of the lot or parcel as a landscape storage yard would allow this area to be

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<sup>1</sup> Adams County Development Standards and Regulations § 3-07.

used to store and maintain construction equipment and other materials customarily used in the trade.”<sup>2</sup> The Proposed Use will maintain Rosales Landscape as the permanent business on the site that will be open to customers and sells and stores materials customarily used in landscaping such as soils, mulches, and gravel. Because the Proposed Use falls under the category of heavy retail sales and service and is of the same character as a landscape storage yard, the Proposed Use is permitted in the A-3 District, and the first criterion is satisfied.

**2. The conditional use is consistent with the purposes of these standards and regulations.**

The Regulations state, “[t]hese standards and regulations are revised with deletions, additions, and amendments to control and assist in the orderly, efficient, and integrated development of the County, in order to preserve the health, safety, and welfare of the public, in accordance with established County policies and plans. These standards and regulations designate, regulate, and restrict the location of the buildings, structures, and use of land for residence, commercial, industry, agriculture or other purposes.”<sup>3</sup>

This Application is consistent with the purposes of the Regulations because establishment of the Proposed Use will promote the County’s intent to have integrated development. The Property is surrounded by an A-1 parcel to the west and a C-5 parcel to the east. The Property is uniquely situated in a position for which a transitional land use between agricultural and commercial land use is warranted. The Proposed Use integrates the agricultural features of landscape materials with the commercial nature of the retail sales of those landscape materials. Therefore, the Proposed Use is consistent with the purposes of the Regulations.

**3. The conditional use will comply with the requirements of these standards and regulations including, but not limited to, all applicable performance standards.**

The Proposed use is subject to multiple performance standards, each of which will be met. Section 4-09-01-04 of the Regulations requires that all outdoor storage be screened with a six (6) foot tall fence, which is included in the site plan. Materials will not be stacked higher than the six (6) foot tall fence.

Section 4-09-02-11 of the Regulation sets forth the performance standards for heavy retail and heavy services uses. The Proposed Use satisfies the requirement that the principal structure have at least one (1) road-oriented entrance and that outdoor storage materials have proper screening. Therefore, the Application satisfies the applicable performance standards.

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<sup>2</sup> Adams County Development Standards and Regulations § 11-02-321.

<sup>3</sup> Adams County Development Standards and Regulations § 1-01-03.

- 4. The conditional use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and the County. In making this determination, the Planning Commission and the Board of County Commissioners shall find, at a minimum, that the conditional use will not result in excessive traffic generation, noise, vibration, dust, glare, heat, smoke, fumes, gas, odors, or inappropriate hours of operation.**

As stated in paragraph 2 above, the Property is located in an area that is ideal for the Proposed Use due to the transitional positioning between A-1 and C-5 zoned properties. The Proposed Use is harmonious with the surrounding properties because the properties to the west have a semi-rural nature and the properties to the east have a commercial nature, and the Proposed Use offers a retail sales use of landscape materials. Therefore, the Proposed Use is an appropriate “blend” of agriculture and commerce that is suitable for the area. As stated in the trip generation letter, the traffic impacts of the Proposed Use will be minimal, and there is no anticipated noise, vibration, dust, glare, heat, smoke, fumes, gas, or odors. The hours of operation will be during normal business hours.

- 5. The conditional use permit has addressed all off-site impacts.**

As stated in the traffic impact letter, the Proposed Use will not generate substantial traffic and the existing street system should be able to accommodate the Proposed Use. Additionally, the landscape buffer and screening of the landscape yard materials is appropriate to address the impact to the neighboring property to the west. Operations of the Proposed Use during businesses hours will comport with the noise regulations of the County.

- 6. The site is suitable for the conditional use including adequate usable space, adequate access, and absence of environmental constraints.**

As stated herein, the Property was formerly used as a firewood sales site where drivers could enter the Property, load the firewood into the vehicle, pay, and leave the site. The Proposed Use will largely operate the same, but with substantial improvements to ensure the smooth circulation of vehicles through the Property. The site is suitable for the Proposed Use because, as shown on the site plan, the site has adequate usable space to support a well-designed layout for the landscape yard materials, and vehicle movement will be circular through the site as to prevent any access issues. There are no environmental constraints on the Property.

- 7. The site plan for the proposed conditional use will provide the most convenient and functional use of the lot including the parking scheme, traffic circulation, open space, fencing, screening, landscaping, signage, and lighting.**

As shown on the site plan, the Property is designed in a way that prioritizes traffic circulation, fencing and screening, appropriate landscape buffers, and signage. The Proposed Use will not occur at night, therefore no new lighting is proposed.

**8. Sewer, water, storm water drainage, fire protection, police protection, and roads are to be available and adequate to serve the needs of the conditional use as designed and proposed.**

The Property has proper water, sewer, drainage, fire protection, police protection, and roads necessary for the Proposed Use. The Applicant is willing to work with the County if improvements in any of these areas are required.

**RESPONSES FROM NEIGHBORING PROPERTY OWNERS**

The Applicant acknowledges and takes seriously the concerns raised by the neighboring property owners. As clarified in the revised trip generation letter that was prepared by a professional engineer, the number of large trucks (class 5-7 per the Federal Highway Administration) will be extremely limited. No semi-trucks will be coming to the Property because that is not the nature of this landscape storage yard. The Proposed Use will not contain any hazardous or nuisance-producing materials such as compost and manure. For clarity, the Proposed Use does not include sand and gravel creation. Therefore, the amount of noise and dust that will be produced will be minimal. To the extent that limited noise and dust is produced by customers coming to load their pickup trucks with landscaping materials, this will occur during daytime hours, not overnight.

The Applicant remains willing to discuss any further concerns about this Application with neighboring property owners.

## **EXHIBIT A**

### **OPERATIONS AND MATERIALS MANAGEMENT PLAN**

#### **ROSALES LANDSCAPE – LANDSCAPE MATERIALS YARD**

This plan provides an overview of the landscape materials yard located at 1941 East 160<sup>th</sup> Ave in Adams County Colorado (“Property”). Included herein is (1) the types of materials managed; (2) description of amounts of materials kept on site; (3) description of material pile location and heights; (4) records maintenance and retention; and (5) unauthorized and prohibited materials.

(1) **Materials:** The materials kept on site shall be natural materials including, but not limited to:

- Mulch
- Gravel
- Rocks
- Wood
- Soil

(2) **Material Volumes:** As stated in the written narrative for the associated conditional use permit, materials will be kept in piles on the Property stacked no higher than six (6) feet. Each material pile will be approximately twenty five (25) feet wide. Accordingly, each material has a different height, weight, and mass, so the volume of each pile will vary, but never will exceed six (6) feet in height.

(3) **Material Locations:** As shown on the site plan for the Property, the material piles are arranged in vertical columns on the Property. The piles will be spaced 15’ apart vertically and 50’ apart horizontally.

(4) **Records:** All records of material deliveries and sales will be kept by Rosales Landscape, Inc.

(5) **Unauthorized and Prohibited Materials:** The Property will not sell nor accept delivery of any flammable, pollutive, or hazardous materials, and any material otherwise prohibited by Adams County regulations. Rosales Landscape, Inc. will place all orders for stock of materials, so delivery of an unauthorized material is unlikely. However, in the event an unauthorized material is erroneously delivered, Rosales Landscape, Inc. will either refuse the delivery or arrange for expeditious removal of such material.













December 11, 2025

Mr. Erik Carlson  
Foster Graham Milstein & Calisher, LLP  
c/o Rosales Landscape, LLC  
360 Garfield Street  
Suite 600  
Denver, CO 80209

Re: Landscaping Storage Yard  
Trip Generation Letter  
Adams County, Colorado

Dear Mr. Carlson,

This letter documents the results of a trip generation analysis for the proposed Landscaping Storage Yard to be located on the 1941 E 160<sup>th</sup> Avenue property in unincorporated Adams County, Colorado. Specifically, the project is located north of 160<sup>th</sup> Avenue and west of State Highway 7 (SH-7). The purpose of this letter is to assess the anticipated traffic generation of a single-family home and the overall 4.1 acres of land to be used for landscaping storage and materials sales as part of a Conditional Use Permit (CUP). A concept plan for the project is attached.

#### **EXISTING PROJECT SITE**

The existing 1941 E 160<sup>th</sup> Avenue property includes an approximately 1,641 square foot existing home and 4.1-acre lot used as an outdoor storage and firewood business. Access to the single-family residence from 160<sup>th</sup> Avenue is not gated but access to the northern lot is gated internal to the site. As noted, this project is requesting a Conditional Use Permit (CUP) for the use of landscaping storage and materials sales. Of note, the existing site operated with a CUP for firewood sales and storage. An aerial photo that illustrates the vicinity of the site and approximate lot size is shown below (north is up).





*Approximate Project Location*

## TRIP GENERATION

Site-generated traffic estimates are determined through a process known as trip generation. Rates and equations are applied to the proposed land use to estimate traffic generated by the development during a specific time interval. The acknowledged source for trip generation rates is the Trip Generation Manual<sup>1</sup> published by the Institute of Transportation Engineers (ITE). ITE has established trip rates in nationwide studies of many types of land uses. For this analysis, Single Family Detached (ITE Land Use Code 210) was used for the trip generation of the existing house. Based on the proposed use of landscaping storage and materials for sale yard, the ITE Trip Generation Manual does not have a land use code that aligns well with this use case. It should be noted that the existing site was used as outdoor storage and a firewood business.

To provide a basis for the most relevant ITE land use code available, this analysis includes trip generation estimates for a Nursery Garden Center (ITE 817) and Mini Warehousing (ITE 151). According to the ITE Trip Generation Manual, the Nursery Garden Center ITE land use code typically involves a smaller acreage for sites and would be expected to generate more trips than landscaping material sales nature of this proposed use. To avoid inflating anticipated volumes by too much, it is assumed that the Nursery will occupy 1 acre of the 4.1-acre lot while the remaining 3.1 acres are anticipated to be allocated to Mini Warehousing. Based on the ITE Trip Generation Manual, the number of storage units is the independent variable for Mini Warehousing use and data points for land acreage or square footage are not available. A typical storage facility can have approximately 130 storage units per acre; therefore, and to be able to estimate trip generation for the storage component of this site, 400 units (130 units x 3.1 acres) were used for the ITE trip generation estimate. While the proposed site is anticipated to be used for landscaping storage and materials for the sale yard and will not hold a nursery or storage warehouse building, particularly of this size, this is used for trip generation estimate purposes only. The following table summarizes the estimated trip generation based on the ITE trip generation estimates for traffic associated with the development (calculations attached).

**Landscaping Storage Yard Traffic Generation**

Land Use and Size	Weekday Vehicles Trips						
	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
ITE Trip Generation Estimates – ITE Trip Generation Manual, 11 <sup>th</sup> Edition							
Nursery Garden Center (ITE 817)- 1.0 Acres	110	2	1	3	4	4	8
Mini Warehousing Storage (ITE 151)- 400 Units (3.1 Acres)	72	3	2	5	3	3	6
Single Family Detached (ITE 210)- 1 Dwelling Unit	10	0	1	1	1	0	1
Total Site Generated Trips	192	5	4	9	8	7	15
Truck Trips (FHWA Class 4 – 13) *	6	1	1	2	1	1	2

\* = Included in the total trip values and conservatively assigned two truck trips during both peak hours

<sup>1</sup> Institute of Transportation Engineers, *Trip Generation Manual*, Eleventh Edition, Washington DC, 2021.

As shown in the table and based on ITE Trip Generation calculations, the Landscaping Storage Yard could be expected to generate approximately 192 weekday daily trips, with nine (9) of those trips occurring during the morning peak hour, and 15 of those trips occurring during the afternoon peak hour. The project is anticipated to have approximately six (6) truck trips per day of the Federal Highway Administration (FHWA) classification 4 or higher and is not expected to exceed classification 8. Based on the nature of the landscaping material sales compared to a typical nursery garden center which would be expected to generate a higher volume of trips, it is believed that the trip generation estimates in this study could be conservative.

## CONCLUSIONS

Based on the traffic analysis presented in this report, the following outlines the conclusions from our traffic analysis:

- The existing 1941 E 160<sup>th</sup> Avenue property includes an approximately 1,641 square foot existing home and 4.1-acre lot.
- The proposed site is anticipated to be used as a rental property, landscaping storage, and materials for the sale yard. These land uses could be expected to generate approximately 192 weekday daily trips, with nine (9) of those trips occurring during the morning peak hour, and 15 of those trips occurring during the afternoon peak hour. This equates to one trip occurring every four minutes and a trip entering and exiting every eight minutes during the peak hour. The project is anticipated to have approximately six (6) truck trips per day of the Federal Highway Administration (FHWA) classification 4 or higher and is not expected to exceed classification 8. Therefore, the site is believed to be a very low trip generator and that the existing street system should be able to accommodate the proposed conditional use.
- The existing site was used as a single-family residence, firewood sales, and storage yard with the use of a CUP.

If you have any questions or require anything further, please feel free to call me at (720) 943-9962.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.

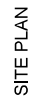
Jeffrey R. Planck, P.E.  
Project Traffic Manager





## Conceptual Site Plan

**SITE PLAN**  
ADAMS COUNTY, COLORADO



SHEET 1 OF 1

[illegible]

NOT FOR CONSTRUCTION

CONDITIONAL USE PERMIT  
1941 E. 160th Avenue  
Adams County - Broomfield, Colorado

Adams County - Broomfield, Colorado



Legend:

- PROPOSED TREE: A circle with a diagonal line through it.
- EXISTING TREE: A circle with a cross inside.
- MATERIAL PILE: A circle with a stippled pattern.
- EXISTING BUILDING: A solid gray rectangle.
- STORAGE SPACE: A rectangle with a grid pattern.
- ROAD BASE: A rectangle with a dashed border and a stippled pattern.
- 6' FENCE: A dashed line.

LARGE BINS 30X30	6
MATERIAL PILES	26
PARKING SPOTS	14
STORAGE SQFT.	3,467
SITE ACREAGE	4.10
SITE S.F.	178,845

## Trip Generation Calculations

**1941 E 160th Avenue Landscaping Yard Trip Generation Summary**

Land Use and Size	Weekday Vehicle Trips						
	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Nursery - Garden Center (ITE 817) - 1.0 Acres	110	2	1	3	4	4	8
Single Family Detached (ITE 210) - 1 Dwelling Unit	10	0	1	1	1	0	1
Mini-Warehousing Storage (ITE 151) - 400 Units (3.1 Acres)	72	3	2	5	3	3	6
<b>Total Site Generated Trips</b>	<b>192</b>	<b>5</b>	<b>4</b>	<b>9</b>	<b>8</b>	<b>7</b>	<b>15</b>

Project Landscaping Yard Adams County  
Subject Trip Generation for Mini Warehouse  
Designed by JRP Date August 14, 2025 Job No. 296296000  
Checked by \_\_\_\_\_ Date \_\_\_\_\_ Sheet No. \_\_\_\_\_ of \_\_\_\_\_

**TRIP GENERATION MANUAL TECHNIQUES**

ITE Trip Generation Manual 11th Edition, Average Rate Equations

Land Use Code - Mini-Warehouse (151)

Independent Variable - 100 Storage Units (X)

Storage Units = 400

X = 4.0

T = Average Vehicle Trip Ends

**Peak Hour of Adjacent Street Traffic, One Hour Between 7 and 9 a.m. (Page 120)**

Weekday Average Directional Distribution: 51% ent. 49% exit.  
T = 1.21 (X) T = 5 Average Vehicle Trip Ends  
T = 1.21 \* 4.00 3 entering 2 exiting

$$3 + 2 (*) = 5$$

(\*) TRIP END WAS CHANGED BY 1 TO SATISFY THE TOTAL

**Peak Hour of Adjacent Street Traffic, One Hour Between 4 and 6 p.m. (Page 121)**

Weekday Average Directional Distribution: 50% ent. 50% exit.  
T = 1.68 (X) T = 6 Average Vehicle Trip Ends  
T = 1.68 \* 4 3 entering 3 exiting

$$3 + 3 = 6$$

**AM Peak Hour of Generator (Page 122)**

Weekday Average Directional Distribution: 58% ent. 42% exit.  
T = 2.04 (X) T = 8 Average Vehicle Trip Ends  
T = 2.04 \* 4.00 5 entering 3 exiting

$$5 + 3 = 8$$

**PM Peak Hour of Generator (Page 123)**

Weekday Average Directional Distribution: 48% ent. 52% exit.  
T = 2.07 (X) T = 8 Average Vehicle Trip Ends  
T = 2.07 \* 4 4 entering 4 exiting

$$4 + 4 = 8$$

**Weekday (Page 119)**

Weekday Average Directional Distribution: 50% entering, 50% exiting  
T = 17.96 (X) T = 72 Average Vehicle Trip Ends  
T = 17.96 \* 4 36 entering 36 exiting

$$36 + 36 = 72$$

**Saturday (Page 124)**

Directional Distribution: 50% entering, 50% exiting  
T = 16.29 (X) T = 66 Average Vehicle Trip Ends  
T = 16.29 \* 4 33 entering 33 exiting

$$33 + 33 = 66$$

**Saturday Peak Hour of Generator (Page 125)**

Directional Distribution: 56% entering, 44% exiting  
T = 2.67 (X) T = 12 Average Vehicle Trip Ends  
T = 2.67 \* 4 7 entering 5 exiting

$$7 + 5 = 12$$

Project Landscaping Storage Yard Adams County  
 Subject Trip Generation for Single-Family Detached Housing  
 Designed by KW Date August 14, 2025 Job No. 296296000  
 Checked by \_\_\_\_\_ Date \_\_\_\_\_ Sheet No. \_\_\_\_\_ of \_\_\_\_\_

## **TRIP GENERATION MANUAL TECHNIQUES**

ITE Trip Generation Manual 11th Edition, Average Rate Equations

Land Use Code - Single-Family Detached Housing (210)

Independent Variable - Dwelling Units (X)

$$X = 1$$

T = Average Vehicle Trip Ends

### **Peak Hour of Adjacent Street Traffic, One Hour Between 7 and 9 a.m. (200 Series Page 220)**

Average Weekday	Directional Distribution:	26% ent.	74% exit.
(T) = 0.70(X)	T = 1	Average Vehicle Trip Ends	
(T) = 0.70 * (1.0)	0 entering	1 exiting	
	0 + 1 = 1		

### **Peak Hour of Adjacent Street Traffic, One Hour Between 4 and 6 p.m. (200 Series Page 221)**

Average Weekday	Directional Distribution:	63% ent.	37% exit.
(T) = 0.94(X)	T = 1	Average Vehicle Trip Ends	
(T) = 0.94 * (1.0)	1 entering	0 exiting	
	1 + 0 = 1		

### **Weekday (200 Series Page 219)**

Average Weekday	Directional Distribution:	50% entering, 50% exiting
(T) = 9.43(X)	T = 10	Average Vehicle Trip Ends
(T) = 9.43 * (1.0)	5 entering	5 exiting
	5 + 5 = 10	

Project Landscaping Yard Adams County  
 Subject Trip Generation for Nursery (Garden Center)  
 Designed by JRP Date August 14, 2025 Job No. 296296000  
 Checked by \_\_\_\_\_ Date \_\_\_\_\_ Sheet No. \_\_\_\_\_ of \_\_\_\_\_

## **TRIP GENERATION MANUAL TECHNIQUES**

ITE Trip Generation Manual 11th Edition, Average Rates

Land Use Code - Nursery (Garden Center) (817)

Independent Variable - Acres (X)

Acres = 1.0

X = 1.0

T = Average Vehicle Trip Ends

### **Peak Hour of Adjacent Street Traffic, One Hour Between 7 and 9 a.m. (800 Series Page 97)**

(T) = 2.82 (X)		Directional Distribution:	54% ent.	46% exit.
(T) = 2.82*	(1.0)	T = 3	Average Vehicle Trip Ends	
		2 entering	1	exiting
		2 + 1 = 3		

### **Peak Hour of Adjacent Street Traffic, One Hour Between 4 and 6 p.m. (800 Series Page 98)**

(T) = 8.06 (X)		Directional Distribution:	46% ent.	54% exit.
(T) = 8.06 *	(1.0)	T = 8	Average Vehicle Trip Ends	
		4 entering	4	exiting
		4 + 4 = 8		

### **Weekday (800 Series Page 96)**

Average Weekday		Directional Distribution:	50% ent.	50% exit.
(T) = 108.10 (X)		T = 110	Average Vehicle Trip Ends	
(T) = 108.1 *	(1.0)	55 entering	55	exiting
		55 + 55 = 110		

700

TRI-COUNTY DISTRICT HEALTH DEPARTMENT

8021 E

FILE ADDRESS Northern Sta 1600 W. Wash. PULL 9-15-83 10-15-83 Class

NAME Norm Newkirk PHONE W - 4151-1331

FROM Ad. Co. Bldg Dept - Reno ADDRESS  PHONE

TO Alan DATE 9/83 OFFICE

MESSAGE Travis moved in - Complaint called people  
going outside it was further - not value if

ACTION Septic system installed or not -

9-1-83 Norm has spoke to re about system installation	23
is obtaining periscope + soil info to get system in -	51
9-10-83 Contacted Russ - Ad. Co. Bldg - say	52
Bld Dept they say if less than 35 agree for to off hour	57
assigne to make into. Request holding up system	58
Permit notted advance in granted.	59
10-21-83 - Russ Port 2 - Bldg Dept - soil come in and	60

Applied for Variance - will issue system is granted - Ad. Co.  
 TCDHD S-3 rev. 3-800



## Amelia M. Stefan

---

**From:** Greg Barnes <GJBarnes@adamscountyco.gov>  
**Sent:** Tuesday, October 14, 2025 9:18 AM  
**To:** Amelia M. Stefan  
**Subject:** [EXTERNAL] FW: Improvements to Highway 7?

**[EXTERNAL EMAIL]** CAUTION: This email originated from outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Amelia,

Please see CDOT's reply regarding Rosales Landscaping. It sounds like the Highway 7 expansion is 10-20 years in the making.



**Greg Barnes**

Principal Planner, Community and Economic Development *Department*  
4430 S. Adams County Parkway, Suite C1000

Brighton, CO 80601

o: 720.523.6853 | [gjbarnes@adamscountyco.gov](mailto:gjbarnes@adamscountyco.gov) | [adamscountyco.gov](http://adamscountyco.gov)

---

**From:** Lucero - CDOT, Abel <abel.lucero@state.co.us>

**Sent:** Thursday, October 9, 2025 5:02 PM

**To:** Matthew Emmens <MEmmens@adamscountyco.gov>

**Cc:** Thayeng Chang <TChang@adamscountyco.gov>; Greg Barnes <GJBarnes@adamscountyco.gov>; steven.loeffler <steven.loeffler@state.co.us>; Mekonnen Mulugeta - CDOT <mekonnen.mulugeta@state.co.us>; Aaron Eyl <aaron.eyl@state.co.us>; Joseph Tripple - CDOT <joseph.tripple@state.co.us>

**Subject:** Re: Improvements to Highway 7?

You don't often get email from [abel.lucero@state.co.us](mailto:abel.lucero@state.co.us). [Learn why this is important](#)

**Please be cautious: This email was sent from outside Adams County**


Hi Matt,

Yes, we have plans for widening CO 7 in this area, please see attached PDF of the 15% design for this section of CO 7. We currently do not have any construction funds for this project, but we are hoping to get additional funding in the next 10-20 years.

Seems like there will be no access to CO 7 from E 160<sup>th</sup> Ave, but I am not sure about the cul-de-sac.

I hope this helps.

---

 23157 CO7 R1 15% Segments H-M Design Roll Plot.pdf

Abel R. Lucero, P.E.  
Resident Engineer, Region 1 North / I-76 Metro Residency



4670 Holly Street, Denver, CO 80216

P 303.489.7028 | [www.codot.gov](http://www.codot.gov) | [www.cotrip.org](http://www.cotrip.org)

On Thu, Oct 9, 2025 at 6:59 AM Loeffler - CDOT, Steven <[steven.loeffler@state.co.us](mailto:steven.loeffler@state.co.us)> wrote:

Matt,

I have copied members of our North Program Engineering group.

Abel and Mekonnen, please see Matt's inquiry below.

Thanks,

**Steve Loeffler**  
Permits Unit- Region 1



P 303.757.9891 | F 303.757.9053

2829 W. Howard Pl. 2nd Floor, Denver, CO 80204

[steven.loeffler@state.co.us](mailto:steven.loeffler@state.co.us) | [www.codot.gov](http://www.codot.gov) | [www.cotrip.org](http://www.cotrip.org)



On Wed, Oct 8, 2025 at 4:04 PM Matthew Emmens <[MEmmens@adamscountyco.gov](mailto:MEmmens@adamscountyco.gov)> wrote:

Hi Steve,

We received a development application for a property located at the intersection of Hwy 7 and E 160<sup>th</sup> Ave (see picture below). Does CDOT have any plans for widening Hwy 7 in this area? The applicant had a realtor, or someone, tell them a major CDOT project is planned for Hwy 7, and that it would include closing off the intersection with E 160<sup>th</sup> and putting a cul-de-sac on the East end of 160<sup>th</sup>. I've heard that Thornton wants to put

a cul-de-sac on 160<sup>th</sup>. But the only CDOT projects I've heard of are a resurfacing of Hwy 7. Any info you can give me would be helpful.



Sincerely,

Matt Emmens

Matt Emmens, P.E.

Senior Engineer, *Community and Economic Development*

ADAMS COUNTY, COLORADO

4430 S. Adams County Parkway, W2000B

Brighton, CO 80601

o: 720.523.6826 | [MEmmens@adamscountyco.gov](mailto:MEmmens@adamscountyco.gov)

[www.adamscountyco.gov](http://www.adamscountyco.gov)

*My County operating hours: Monday through Friday, 8 a.m. to 4:30 p.m.*

## Amelia M. Stefan

---

**From:** Amelia M. Stefan  
**Sent:** Monday, January 5, 2026 9:16 AM  
**To:** Warren Campbell  
**Cc:** Erik N. Carlson; David Foster; Matthew Koenig  
**Subject:** RE: [EXTERNAL] RE: 1941 E 160th Ave.

Hi Warren,

Happy New Year! Thank you for forwarding this along.

Matt—please let me know if I can provide any additional information for you.

Thank you,  
Amelia



**Amelia M. Stefan**  
Associate  
**Foster Graham Milstein & Calisher, LLP**  
360 South Garfield Street | Suite 600  
Denver, CO 80209  
**Main:** 303-333-9810  
**Fax:** 303-333-9786  
[astefan@fostergraham.com](mailto:astefan@fostergraham.com)

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**From:** Warren Campbell <Warren.Campbell@thorntonco.gov>  
**Sent:** Monday, December 29, 2025 1:36 PM  
**To:** Amelia M. Stefan <astefan@fostergraham.com>  
**Cc:** Erik N. Carlson <ecarlson@fostergraham.com>; David Foster <david@fostergraham.com>; Matthew Koenig <Matthew.Koenig@thorntonco.gov>  
**Subject:** RE: [EXTERNAL] RE: 1941 E 160th Ave.

Amelia,

This inquiry is outside the purview of Current Planning. I am including Matt Koenig in our Traffic Engineering team to see if they can address this request from the County Planners.

-Warren C.

---

**From:** Amelia M. Stefan <[astefan@fostergraham.com](mailto:astefan@fostergraham.com)>

**Sent:** Tuesday, December 23, 2025 2:45 PM

**To:** Warren Campbell <[Warren.Campbell@thorntonco.gov](mailto:Warren.Campbell@thorntonco.gov)>

**Cc:** Erik N. Carlson <[ecarlson@fostergraham.com](mailto:ecarlson@fostergraham.com)>; David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>; Jason O'Shea <[Jason.OShea@thorntonco.gov](mailto:Jason.OShea@thorntonco.gov)>

**Subject:** (External) RE: [EXTERNAL] RE: 1941 E 160th Ave.

Hi Warren,

I hope you are well! I am reaching out again in regard to the Adams County conditional use permit application our client is processing. We received the comment below from the County.

**Resubmittal Required**↵

**ENG1:** The subject parcel is access by E 160th Ave. E 160th  
The applicant will need to confirm with the City that they have  
that one is not required for the proposed use. Applicant must  
from the City stating that an access permit is not needed.↵

Are you able to link me with the appropriate person at the City to request an existing access permit or are you able to confirm that an access permit if not required for the proposed use? I am happy to provide any additional information you may need.

Thank you in advance, and please let me know if you have any questions or would like to discuss.

Have a nice holiday!

Amelia



**Amelia M. Stefan**

Associate

**Foster Graham Milstein & Calisher, LLP**

360 South Garfield Street | Suite 600

Denver, CO 80209

**Main:** 303-333-9810

**Fax:** 303-333-9786

[astefan@fostergraham.com](mailto:astefan@fostergraham.com)

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**From:** Amelia M. Stefan

**Sent:** Thursday, November 13, 2025 2:28 PM

**To:** 'Warren Campbell' <[Warren.Campbell@thorntonco.gov](mailto:Warren.Campbell@thorntonco.gov)>

**Cc:** Erik N. Carlson <[ecarlson@fostergraham.com](mailto:ecarlson@fostergraham.com)>; David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>; Jason O'Shea <[Jason.O'Shea@thorntonco.gov](mailto:Jason.O'Shea@thorntonco.gov)>

**Subject:** RE: [EXTERNAL] RE: 1941 E 160th Ave.

Hi Warren,

Thank you for the phone call and for your response regarding the application. I appreciate it! We will pass this message along to the County and let you know if the County seeks any further input from the City.

Thanks again,  
Amelia



**Amelia M. Stefan**

Associate

**Foster Graham Milstein & Calisher, LLP**

360 South Garfield Street | Suite 600

Denver, CO 80209

**Main:** 303-333-9810

**Fax:** 303-333-9786

[astefan@fostergraham.com](mailto:astefan@fostergraham.com)

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**From:** Warren Campbell <[Warren.Campbell@thorntonco.gov](mailto:Warren.Campbell@thorntonco.gov)>

**Sent:** Wednesday, November 12, 2025 1:07 PM

**To:** Amelia M. Stefan <[astefan@fostergraham.com](mailto:astefan@fostergraham.com)>

**Cc:** Erik N. Carlson <[ecarlson@fostergraham.com](mailto:ecarlson@fostergraham.com)>; David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>; Jason O'Shea

<Jason.O'Shea@thorntonco.gov>

**Subject:** RE: [EXTERNAL] RE: 1941 E 160th Ave.

Amelia,

Thaks for chatting with me on the phone. Per our discussion the proposed landscaping material yard that is desired for the property would not meet the Future Land Use Designation currently applied to the property. The designation of Regional Mixed-Use contemplates for of a traditional commercial component of the property. As discussed a limitation on the time frame for the CUP approval sounds appropriate as to allow for options in the future should the property propose annexation.

Please let me know if you need anything more.

**Warren Campbell**

*Current Planning Manager*

**City Development - City of Thornton**

9500 Civic Center Drive, Thornton CO 80229

**Direct Phone: 303-538-7278**



We are always looking for ways to improve service to our customers and appreciate any feedback you may have. Please go to our [webpage](#) and submit your comments or call us at 303-538-7576.

---

**From:** Amelia M. Stefan <[astefan@fostergraham.com](mailto:astefan@fostergraham.com)>

**Sent:** Tuesday, November 11, 2025 8:54 AM

**To:** Warren Campbell <[Warren.Campbell@thorntonco.gov](mailto:Warren.Campbell@thorntonco.gov)>

**Cc:** Erik N. Carlson <[ecarlson@fostergraham.com](mailto:ecarlson@fostergraham.com)>; David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>; Jason O'Shea <Jason.O'Shea@thorntonco.gov>

**Subject:** (External) RE: [EXTERNAL] RE: 1941 E 160th Ave.

Thanks, Jason.

Hi Warren,

Do you have some time later this week or early next week to discuss our pending land use application in Adams County that is situated within Thornton's growth boundary area? Please let me know some times that work for you.

Thanks,  
Amelia

|





**Amelia M. Stefan**  
Associate  
**Foster Graham Milstein & Calisher, LLP**  
360 South Garfield Street | Suite 600  
Denver, CO 80209  
**Main:** 303-333-9810  
**Fax:** 303-333-9786  
[astefan@fostergraham.com](mailto:astefan@fostergraham.com)

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**From:** Jason O'Shea <Jason.O'Shea@thorntonco.gov>  
**Sent:** Tuesday, October 28, 2025 7:39 PM  
**To:** David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>  
**Cc:** Amelia M. Stefan <[astefan@fostergraham.com](mailto:astefan@fostergraham.com)>; Warren Campbell <[Warren.Campbell@thorntonco.gov](mailto:Warren.Campbell@thorntonco.gov)>  
**Subject:** [EXTERNAL] RE: 1941 E 160th Ave.

**[EXTERNAL EMAIL]** CAUTION: This email originated from outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

My schedule is not great this week, so Warren Campbell (current planning manager) is going to reach out to discuss and I can follow up at a later time if necessary.

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**From:** David Foster <[david@fostergraham.com](mailto:david@fostergraham.com)>  
**Sent:** Monday, October 27, 2025 4:31 PM  
**To:** Jason O'Shea <Jason.O'Shea@thorntonco.gov>  
**Cc:** Amelia M. Stefan <[astefan@fostergraham.com](mailto:astefan@fostergraham.com)>  
**Subject:** (External) 1941 E 160th Ave.

Hi Jason,

I hope you are well. I am reaching out on behalf of a client who is processing a conditional use permit in Adams County. His property is located at 1941 E 160<sup>th</sup> Ave., and is within Thornton's growth boundary area. We received some basic referral comments from the City's planning staff on the application. The County staff said that they didn't have any information about what the City is planning for the area. We wanted to reach out and get a better sense from you regarding any expansion plans, and how we might be able to improve our application for the City's benefit.

Are you available next week for a short call to discuss the City's thoughts? Please let me know some times that work for you.

Many thanks. David.



**David Wm. Foster, JD, MPA**

Partner

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