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July 17, 2017

VIA E-MAIL

Nina Ruiz, Project Manager
El Paso County Planning and Community Development Department
2880 International Circle, Suite 110
Colorado Springs, CO 80910
NinaRuiz@elpasoco.com

Re: Woodmen Hills Metropolitan District's Regional Water Reclamation Facility Application

Dear Ms. Ruiz:

This firm represents the Upper Black Squirrel Creek Ground Water Management District ("the UBS District"), a formed and operating ground water management district with the powers enumerated in the Colorado Ground Water Management Act, C.R.S. § 37-90-101 *et seq.* The UBS District has reviewed the application submitted by Woodmen Hills Metropolitan District ("Woodmen Hills") to construct a new activated sludge wastewater treatment facility at the same site as the existing lagoon wastewater treatment facility in Falcon, Colorado, as well as the materials that Woodmen Hills provided in support of its application. Based upon its understanding of the application and related documentation concerning this project, the UBS District provides the following comments regarding this application.

The supporting materials provided by Woodmen Hills do not incorporate any discussion of or information regarding the water quality standards for the new facility. Rule 8 of the UBS District's Rules and Regulations requires that all permits and approvals associated with wastewater treatment plant site applications include appropriate terms and conditions for the protection of the groundwater quality within the designated basin. In particular, any permit or approval for Woodmen Hills' upgraded treatment facility may only be issued upon the condition that any water discharged to the designated basin must meet or exceed the applicable water quality standards. These standards include, but are not limited to, all terms and conditions included in any discharge permit issued by the Colorado Department of Public Health and Environment for the upgraded facility, including the Water Quality Control Commission's standard of 400 mg/dL for the discharge of total dissolved solids within the designated basin, as required by WQCC Regulation No. 42 (5 CCR 1002-42).

Additionally, the application materials submitted by Woodmen Hills describe the new treatment facility as consisting of a number of below-grade concrete treatment basins, the construction of which, as explained by the geotechnical report prepared by CTL Thompson in September 2015, will require dewatering at the project site, since the treatment basins will be constructed into the groundwater table. According to the CTL Thompson report, dewatering with local sump pits or sump pumps during construction will not be effective if the basins are excavated more than two feet below the groundwater surface; consequently, that report concludes that a sophisticated dewatering system will be necessary for excavation and construction of these basins. The CTL Thompson report also acknowledges that the dewatering system should account for potential influences on surrounding, off-site water wells. *See* CTL Thompson, Inc., *Geotechnical Investigation, Wastewater Treatment Plant Expansion, Meridian Ranch Blvd. & Stapleton Dr., Falcon, Colorado*, at 6 (September 24, 2015), attached as Appendix B to Woodmen Hills' Stormwater Management Plan. Any dewatering system or excavation for below-grade walls (up to 20 feet in depth) implemented by Woodmen Hills must be sufficient to insure that no injury results to any vested rights to designated ground water within the UBS Basin.

The UBS District reserves the right to provide additional comments at a later date founded upon information not readily ascertainable from the above-referenced application.

Sincerely,

A handwritten signature in blue ink that reads "Lisa M. Thompson". The signature is written in a cursive style with a large initial "L" and "T".

Lisa M. Thompson
for
TROUT RALEY

cc: UBSCGWMD Board of Directors