



October 2, 2026

Kari Parsons, Project Manager
El Paso County Development Services Department
Sent via online portal at: <https://epcdevplanreview.com>

Re: Pyramid Mountain Filing No. 1 - One Lot (3rd letter)

File #: SF262

Part of the SW ¼ of Sec. 23, Twp. 13 South, Rng. 68 West, 6th P.M.

Water Division 2, Water District 10

CDWR Assigned Referral No. 34556 (Related to Referral Nos. 20338 and 23181)

Dear Kari Parsons:

Our office received information regarding the Pyramid Mountain Filing No. 1 for one lot the size of 16.9466 acres. Our office last commented on this development on May 22, 2026, and this letter supersedes our previous comment letter.

This submittal does not appear to qualify as a “subdivision” as defined in section 30-28-101(10)(a), C.R.S. Therefore, pursuant to the State Engineer’s March 4, 2005 and March 11, 2011 memorandums to county planning directors, this office will only perform a cursory review of the referral information and provide informal comments. The comments do not address the adequacy of the water supply plan for this project or the ability of the water supply plan to satisfy any County regulations or requirements. In addition, the comments provided herein cannot be used to guarantee a viable water supply plan or infrastructure, the issuance of a well permit, or physical availability of water.

Water Demand

The estimated water requirements were included within the GWS-76 “Water Supply Information Summary,” as follows:



- Household use for 2 units (including outdoor irrigation): 0.6 acre-feet per year
- Stockwatering for 4 head of stock: 0.05 acre-feet per year
- Irrigation of 1000 square feet: 0.05 acre-feet per year

Water Supply

Water is to be supplied by Colorado Springs Utilities (“CSU”).

A response letter from CSU dated September, 2026, states the parcel is outside the City of Colorado Springs city limits but within their water service territory and can be provided with electric and water services. No allocation or amount of water supply was reserved to serve the subject property, and no commitments were made as to the availability of their utility service in the future. The letter also stated that CSU will commit the water required for the development upon payment of the tap fee.

This office did not receive an updated Water Resources Report from CSU, however, some information regarding the water availability was sent to us: the Water Rights Yield Assessment Report dated December 2019, the Integrated Water Resources Plan dated February 2017, and historical storage information.

Combining information from the above reports, the lowest firm yield from the Water Rights during a dry year was estimated to be 51,915 acre-feet of water. The smallest storage ever recorded was 23,569 acre-feet in April, 1978, however, since then, their storage capacity for CUS has increased substantially. This indicates that it may not be useful to use the lowest amount recorded because it is not representative of current conditions. The more-recent lowest storage occurred in 2003 at 102,424 acre-feet. Because this occurred after a very dry year (2002), this office will use this storage amount for planning purposes

The 2017 report estimates an anticipated “baseline” water demand of 88,000 acre-feet, however, the maximum demand ever recorded occurred in 2000 at 93,903.6 acre-feet. Should this higher demand occur again, with the lowest storage recorded in 2003, with a dry water year yield of 51,915 acre-feet, the amount of water supply remaining would be $102,424 \text{ acre-feet storage} + 51,915 \text{ acre-feet firm yield} - 93,903.6 \text{ acre-feet demand} = 60,435.4 \text{ acre-feet of supply remaining}$. If the demand is closer to the estimated 88,000

acre-feet amount indicated in the 2017 report, and as appears based on recent water consumption data trends, the supply may increase to be closer to 66,340 acre-feet.

This indicates that there is sufficient water supply remaining for CSU to serve the estimated 0.7 acre-feet water demand for the parcel.

State Engineer's Office Opinion

Pursuant to section 30-28-136(1)(h)(I) and 30-28-136(1)(h)(II), C.R.S., the State Engineer's Office offers the opinion that the proposed water supply appears to be adequate and can be provided without causing material injury to existing water rights so long as the water is used in accordance with applicable decrees and statute.

The El Paso County Land Development Code, Section 8.4.7.(B)(7)(b) states:

“(7) Finding of Sufficient Quantity

(b) Required Water Supply. The water supply shall be of sufficient quantity to meet the average annual demand of the proposed subdivision for a period of 300 years.”

The water supply is from sources that are currently considered to be a renewable source that can withdraw the water on an annual basis, and will not cause material injury to decreed water rights, especially with the additional water supply in storage.

Please contact me at Katharine.Anderson@state.co.us (303-866-3581 x8207) with any questions.

Sincerely,

Katharine Anderson
Water Resource E.I.T.