



September 16, 2021

Kari Parsons, Planner III
El Paso County Development Services Department
Transmitted via the EPC EDARP Portal

Re: Grandview Reserve, Filing No. 1 (File # PUDSP2110)
Parts of the S½ of Sec. 21 and N½ of Sec. 28, Twp. 12S, Rng. 64W, 6th P.M.
Water Division 2, Water District 10
Upper Black Squirrel Creek Designated Basin

Dear Kari Parsons:

We have reviewed the September 14, 2021 referral concerning the above-referenced proposal to subdivide 189.5 acres into 568 single-family lots, an institutional parcel (for a church or similar use), and open space. This office previously provided comments on the entire Grandview Reserve PUD (containing 768.23 acres) on May 22, 2019.

Water Supply Demand

According to Table 1b of the Water Resource Grandview Reserve PUD/Preliminary Plan report dated August 13, 2021, prepared by HR Green LLC (“Report”), the estimated water requirement for Filing 1 totals 203.79 acre-feet/year. This conflicts with the Water Supply Information Summary provided in Exhibit 2 of the Report which estimates a total demand of 204.85 acre-feet/year for Filing 1.

The Report also estimates the water requirement for the entire Grandview Reserve development (containing 3,260 single-family residences, school, recreation center, church, and commercial uses) as either 1,178.67 acre-feet/year (in Table 1a), or 1,177.1 acre-feet/year (in the Water Supply Information Summary for all of Grandview Reserve in Exhibit 2).

Source of Water Supply

The proposed water supplier is the Grandview Reserve Metropolitan District (GRMD), which is a new metropolitan district pending approval from El Paso County. According to a letter from the GRMD to 4 Site Investments LLC dated July 20, 2021, GRMD commits to serve the entire Grandview Reserve development subject to approval of the formation of the district.

According to the Grandview Reserve Filing 1 Letter of Intent dated August 13, 2021 and the Report, GRMD will operate large capacity Arapahoe and Laramie-Fox Hills aquifer wells to meet the district’s demands. The Report indicates a total of 4,434 acre-feet/year of water is available to GRMD, consisting of the following.

1. 1,400 acre-feet/year from 4 Site Investments LLC (the property owner). The water rights owned by 4 Site Investments LLC was not specified and evidence of GRMD’s ownership of those rights was not contained in the Report.
2. 3,034 acre-feet/year from 4 Way Ranch (2,023 acre-feet/year of Laramie-Fox Hills water and 1,011 acre-feet/year of Arapahoe water). The 4 Way Ranch’s water rights are Determinations of Water Right nos. 510-BD and 511-BD, summarized below.
 - a. Determination of Water no. 510-BD allocated 2,429 acre-feet/year from the nontributary Laramie-Fox Hills aquifer for use by 4-Way Ranch Metropolitan District



and Woodmen Hills Metropolitan District on the 8,905-acre Overlying Land. While the proposed subdivision is within the Overlying Land Area of 510-BD, 510-BD currently does not allow use by GRMD. Additionally according to the Report, 4 Way Ranch owns 2,023 acre-feet of this allocation, but Exhibit 5 of the Report shows 4 Site Investments purchased only 1,312.5 acre-feet of the 510-BD allocation, and the Report contains no evidence of GRMD's ownership or control of the right.

- b. Determination of Water no. 511-BD allocated 2,615 acre-feet/year from the nontributary Arapahoe aquifer for use by 4-Way Ranch Metropolitan District and Woodmen Hills Metropolitan District on the 8,905-acre Overlying Land. While the proposed subdivision is within the Overlying Land Area of 511-BD, 511-BD currently does not allow use by GRMD. Additionally, according to the Report, 4 Way Ranch owns 1,011 acre-feet of this allocation, the Report contains no evidence of GRMD's ownership or control of the right.

According to Table 2b of the Report, GRMD will use 2,712.5 acre-feet/year of its water (consisting of 1,312.5 acre-feet/year from the Laramie-Fox Hills aquifer and 1,400 acre-feet/year from the Arapahoe aquifer) for the "initial Filings". However, the source of these water rights was not specified and it is not clear what portion of these amounts are from 4 Site Investments LLC's water rights and what portion are from 4 Way Ranch's water rights in 510-BD and 511-BD.

The water rights owned or controlled by GRMD, and therefore the total available supply to GRMD, for use to supply Grandview Reserve Filing 1 (or the entire Grandview Reserve development) are not clear.

State Engineer's Office Opinion

Based on the above and pursuant to section 30-28-136(1)(h)(II), C.R.S., the State Engineer's Office has not received enough information to render an opinion regarding the potential for causing material injury to decreed water rights, or the adequacy of the proposed water supply. Prior to further review of the subdivision water supply plan the following information is required.

1. Clarification of the estimated water demand for Filing No. 1 that satisfies El Paso County's 300-year water supply requirement.
2. A map of GRMD's service area.
3. A complete summary of the water rights owned and controlled by GRMD, and evidence of that ownership or control.
4. The present demand on GRMD and the anticipated demand due to commitments for service entered into by the district that are not yet supplied.
5. The amount of uncommitted firm supply GRMD has available for future commitment and development.

Note that Items 4 and 5 can also be satisfied by showing that the district currently has adequate water to supply all of its water commitments at full build-out.

Additional Comments

According to the submitted material, storm water detention structure(s) will be developed on the site. The applicant should be aware that, unless the structure can meet the requirements of a "storm water detention and infiltration facility" as defined in Designated Basin Rule 5.11, the structure may be subject to administration by this office. The applicant should review Rule 5.11 to

determine whether the structure meets the requirements of the Rule and ensure any notification requirement is met.

If you or the Applicant have any questions, please contact Wenli Dickinson at (303) 866-3581 x8206 or at Wenli.Dickinson@state.co.us.

Sincerely,

A handwritten signature in black ink that reads "Keith Vander Horst". The signature is written in a cursive style.

Keith Vander Horst, P.E.
Chief of Water Supply, Designated Basins

Ec: Referral No. 26508
Upper Black Squirrel Ground Water Management District