

July 9, 2020

NEPCO
P.O. Box 714
Monument, CO 80132-0714

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EL Paso County Development Services Department
2880 International Circle, Suite 110
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Reference: Final Plat for Sterling Ranch Filing No. 2 (Phase 1)

NEPCO is providing the collective input from its membership that includes 9,500 homeowners, 45 HOAs and 20,000 registered voters within and around Monument. The purpose of NEPCO, a volunteer coalition of Homeowner Associations in northern El Paso County, is to promote a community environment in which a high quality of life can be sustained for constituent associations, their members and families in northern El Paso County. We collectively address growth and land use issues with El Paso County Planners and the Town of Monument, as well as addressing HOA issues of common interest among the members. NEPCO achieves this by taking necessary steps to protect the property rights of the members, encouraging the beautification and planned development and maintenance of northern El Paso County.

1. Since our last review of Sterling Ranch Filing No. 2 in August 2018, El Paso County has generally ignored our pleas to view this project's water use as either unjustified, excessive, or disproportional to the offsite impacts. Although we are glad to see the developer re-worked a number of documents where we pointed out water-related discrepancies/errors, we still feel strongly that this development is an unwise precedent for the future of water use and land use planning in El Paso County. A summary of our reasoning follows:
 - a. The rezoning allowed about a 4300% increase in water use!
 - b. The majority of this water will come from 2 deep wells drilled into the Arapahoe and Laramie Fox Hills aquifers – significantly affecting the entire northern portion of El Paso County, along with Donala Water, Woodmoor Water, Triview Metro, Timber Ridge Metro, Cherokee Hills Metro, Woodmen Hills Metro, and the Towns of Monument and Palmer Lake which all draw water from the Denver Basin aquifers. In accordance with EPC Land Development Code, Section 7.2.1.D3(f), Criteria for Approval for a Final Plat, we do not believe that off-site impacts were sufficiently evaluated or mitigated.
 - c. We think that the 5-sentence discussion of water demand in Section 2.1 of the Water Resources Report is wholly inadequate to fulfill the requirement contained in the EPC Land Development Code, Section 8.4.7., that the Water Resource report shall be based on...site specific data and shall include a detailed discussion of the water demand...for the proposed subdivision. The conjecture that "The unit user characteristic employed is

consistent with Sterling and other developed areas in the Falcon area. That value is 0.353 AF per SFE annually.”, is not a detailed discussion, nor site specific. We also did not see “complete documentation” to accompany the water demand of comparable projects.

- d. Unreasonable growth will hurt current and future residents’ (including nearby NEPCO residents) reliance on a stable/slowly growing/planned infrastructure for utilities, roads, water resources, and population increases.
- e. We saw nothing concerning lighting. All lighting -- commercial, municipal, and residential -- should be required to be Dark Sky compliant. The location, 9 miles east southeast of the Air Force Academy Observatory and consisting mostly of shortgrass prairie, should set the standard for night sky friendly lighting by minimizing glare while reducing light trespass and skyglow in our night skies.

Thank you for the opportunity afforded NEPCO to engage in this process to work with El Paso County to ensure we have planned, responsible growth. NEPCO requests that our organization be informed of subsequent actions related to this development and be a participant in the review and coordination process. Thank you.

//SIGNED//
Paul E. Pirog
Vice Chairman
NEPCO Transportation and Land Use Committee

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Greg Lynd
President, NEPCO