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September 1, 2023

El Paso County Planning and Community Development Department
2880 International Circle, Suite 110
Colorado Springs, CO 80910

Re: Saddlehorn Ranch Filing 4

El Paso County Planning and Community Development Department:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (the “UBSC 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 UBSC District has reviewed the request for administrative approval of the 162.32-acre Saddlehorn Ranch Filing No. 4 Final Plat, which includes 42 lots at 2.5+ acres per lot, two tracts, and 14.52 acres of right-of-way, submitted by Gorilla Capital Co. & Saddlehorn Ranch LLC (“Applicants”) and provides the following comments for your review and consideration:

Shallow Groundwater

As noted in the Letter of Intent, shallow groundwater exists throughout the area underlying the Saddlehorn Ranch Filing 4. Accordingly, structures developed in this area may need underdrains to capture and drain water that would otherwise flood those structures. Any underdrains will require a large capacity well permit and those well permits will require a replacement plan in compliance with the Ground Water Commission’s Designated Basin Rule 5.6. Any such replacement plan should meet the requirements of Rule 5.6, including by replacing evaporation and evapotranspiration associated with the exposure of groundwater caused by the underdrain. Applicants’ application recognizes the need to investigate whether shallow groundwater exists on each lot but includes no information on the use of underdrains and how Applicants intend to meet the requirements of Rule 5.6.

Water and Wastewater System Policy

The application also states that Applicants intend to utilize onsite wastewater treatment systems. The proliferation of septic systems within the Upper Black Squirrel Creek Designated Basin degrades the basin’s alluvial water quality and threatens the already over-appropriated ground water resources of the basin. Accordingly, the UBSC District has enacted a policy that “encourages the uses of central (municipal) water and wastewater systems, as opposed to the use of individual wells and septic systems in any proposed subdivision consisting of three or more lots.”

The UBSC 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