COLORADO GEOLOGICAL SURVEY

1801 Moly Road
Golden, Colorado 80401

Matthew L. Morgan
State Geologist

November 3, 2026

Ryan Howser
El Paso County Planning & Community Development
2880 International Circle
Colorado Springs, CO 80910

Location:
NE ¼ of NE ¼ of Section 25
T11S, R66W of the 6th PM
39.0700°, -104.7236°

Subject: **Sundance West Final Plat**
El Paso County, CO
File # SF2527; CGS Unique No. EP-26-0025_2

Dear Ryan,

As requested in the County's October 14, 2026 email, the Colorado Geological Survey (CGS) reviewed the resubmitted materials for the Sundance West Final Plat. These include the final plat and comment responses, Entech Engineering's March 20, 2025 soils and geology and wastewater reports, the drainage report revised October 13, 2026, the September 2026 grading plans, and supporting documents. The proposal would subdivide approximately 19.5 acres at 5525 Hodgen Road into seven residential lots, retaining the existing residence on Lot 5.

CGS cannot recommend approval until the groundwater evaluation described below establishes suitable residential and primary and replacement onsite wastewater treatment system (OWTS) areas on the affected lots. CGS recommends a focused resubmittal addressing this evaluation and the pond-crossing discrepancy.

Groundwater Evaluation

CGS's October 10, 2025 letter recommended seasonal groundwater monitoring from late winter through spring, covering at least March through June, with a full year preferred. The October 2026 resubmittal does not include monitoring results or otherwise document completion of that recommendation.

El Paso County Public Health's October 27, 2025 review found OWTS use acceptable based on Entech's studies. To address the remaining seasonal groundwater concern, CGS recommends that Entech submit monitoring results with its interpretation, or a substantiated site-specific alternative assessment through the County, for CGS review. Existing monitoring records may satisfy this recommendation if adequate.

The evaluation should demonstrate that the proposed building and OWTS areas remain suitable under seasonal high-groundwater conditions, accounting for the proposed grading and drainage. It should identify any necessary location or elevation restrictions, limitations on below-grade construction, groundwater drainage provisions, and constraints on OWTS placement.

CGS would consider an alternative assessment using soil profiles, subsurface geology, topography, and groundwater observations to support avoidance of groundwater constraints or justify conservative groundwater elevations for design. Targeted additional field investigation may be needed. The assessment should explain how the proposed development, including any restrictions or drainage measures, would accommodate those groundwater conditions. Placement outside mapped wet corridors or a prohibition on basements alone does not establish adequate groundwater separation for OWTS facilities.

Where the available evidence cannot demonstrate suitable development areas under defensible seasonal high-groundwater conditions, the monitoring recommendation would remain.

Plat Notes and Development Restrictions

The response materials indicate that groundwater mitigation notes have been added; however, the submitted final plat does not show those provisions. CGS recommends identifying the affected areas and incorporating the restrictions and mitigation provisions established through the groundwater review into the plat and applicable approval documents before plat recording. A general reference to reports on file does not communicate those restrictions.

OWTS provisions should reflect the applicable El Paso County Public Health requirements and the proposed system, replacing the blanket four-foot separation and elevated-system language in our earlier recommendation. If shared groundwater drainage facilities are needed, CGS recommends documenting the discharge arrangements and long-term maintenance responsibility in the applicable approval documents.

Pond Crossing and Geotechnical Coordination

The revised drainage report identifies a 12-inch pipe at the pond crossing used for the Lot 7 driveway, while the grading plan identifies a 42-inch pipe at that crossing. CGS recommends that the civil engineer reconcile the plans and report and coordinate with Entech so that the geotechnical recommendations address the proposed crossing, embankment, and associated grading. Hydraulic adequacy remains subject to the County's engineering review.

CGS generally agrees with Entech's recommendations for addressing expansive soils, shallow bedrock, uncontrolled fill, and foundation drainage. Lot-specific geotechnical investigations, detailed foundation recommendations, and individual OWTS designs may follow during permitting, consistent with the groundwater restrictions established through subdivision review.

Thank you, Ryan, for the opportunity to comment on this project. Please contact me at jlovekin@mines.edu with questions or to coordinate further CGS review. Applicant and consultant questions, requests for clarification, and requests for meetings with CGS should be submitted through the County's planning office. The County will coordinate these requests with CGS.

Sincerely,



Jonathan R. Lovekin, P.G.
Senior Engineering Geologist