



January 27, 2025

Kari Parsons, Project Manager
El Paso County Community & Development Services
Transmitted via email: kariparsons@elpasoco.com

Re: Preamble at Hannah Ridge Filing No. 3 - 3rd DWR Letter
File #: SF251
Sec. 32 Twp. 13S Rng. 65W 6th P.M.
Water Division 2, Water District 10

Dear Kari Parsons:

We have received information regarding the above reference proposal to subdivide a 7.44-acre tract of land into 38 to 42 single-family residential lots with 4.14 acres of open space. Note that there are inconsistencies in the number of single-family lots across the supplied documentation (e.g. the Application states there will be 39 lots, the Subdivision Summary states there are 38 lots, the Drainage Report states there will be 42 lots, and the Commitment Letter from the water supplier states there will be 39 lots).

The units are being placed on compact lots, each about 2400 sq-ft in size. The proposed Preamble at Hannah Ridge Filing No. 3 is a replat of Tract CC Hannah Ridge at Feathergrass Filing No. 1 and Midtown at Hannah Ridge Filings 3; our office previously provided comments for these on May 13, 2013, and October 2, 2020, respectively. The proposed supply of water and wastewater disposal continues to be served by the Cherokee Metropolitan District ("Cherokee").

Water Supply Demand

The Water Supply Information Summary provided estimates a demand of 8.34 acre-feet/year for 38 units based on 0.2 acre-feet/unit for indoor use, and 0.0195 ac-ft/yr of irrigation per unit. This calculation includes indoor use (drinking and sanitary) totaling 7.6 ac-ft/yr, and limited landscape irrigation, totaling 0.7410 ac-ft/yr. It should be noted that standard water use rates, as found in the Guide to Colorado Well Permits, Water Rights, and Water Administration, are 0.3 acre-foot per year for each ordinary household, 0.05 acre-foot per year for four large domestic animals, and 0.05 acre-foot per year for each 1,000 square feet of lawn and garden irrigation. 0.0195 ac-ft/yr of irrigation per lot is estimated to be enough water to irrigate approximately 380 sq-ft of lawn and garden per lot. There is no information regarding the water demand of the 4.14 acres of open space. The Landscape Plans appear to label the open space as "irrigated native seed," which indicates at least some of the open space may need to be irrigated.



Source of Water Supply

The proposed source of water for the development is to be served by Cherokee and a letter of commitment from Cherokee dated December 30, 2024 was included with the submittal. According to the letters, they have committed to supply 14.74 acre-feet/year to the proposed development, including 11.78 ac-ft/year for indoor household uses and 2.96 ac-ft/year for irrigation. Note that these water volumes differ from the Water Supply Information Summary.

Our office's records for Cherokee's available water supply and current commitments are in the process of being updated. Water currently available from developed water rights will need to follow El Paso County's 300-year availability requirement.

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

“(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 State Engineer's Office does not have evidence regarding the length of time for which this source will “meet the average annual demand of the proposed subdivision.” However, treating El Paso County's requirement as an **allocation** approach based on 300 years, the allowed average annual amount of withdrawal would be reduced to one third of that amount. As a result, the water may be withdrawn in that annual amount for a maximum of 300 years.

This office cannot make a statement regarding whether Cherokee has adequate supplies to cover the water demands of this subdivision until we have updated records.

Additional Comments

Should the development include construction and/or modification of any storm water structures, the applicant should be aware that unless the structure can meet the requirements of a “storm water detention and infiltration facility” as defined in § 37-92-602(8), C.R.S, the structure may be subject to administration by this office. The applicant should review [DWR's Administrative Statement Regarding the Management of Storm Water Detention Facilities and Post-Wildland Fire Facilities in Colorado](#), to ensure that the notification, construction and operation of the proposed structures meet statutory and administrative requirements. The applicant is encouraged to use [Colorado Stormwater Detention and Infiltration Facility Notification Portal](#) to meet the notification requirements.

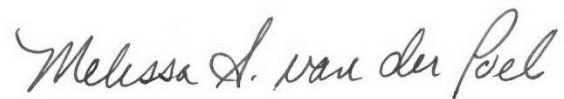
State Engineer's Office Opinion

Additional information is required before the State Engineer's Office can offer an opinion on this subdivision's water supply. Please update the submitted documents to have the correct number of lots listed across all documentation, and update the Water Supply Information Summary and Water Supplier commitment letter to reflect the needed water supply amounts. Additionally,

please verify whether the open space areas will be irrigated, and provide documentation supporting the low estimated water demand for indoor and outdoor use for the residential lots.

Please contact Katharine Anderson at (303) 866-3581 x8207 or at katharine.anderson@state.co.us with questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Melissa A. van der Poel".

Melissa van der Poel, P.E.
Water Resource Engineer

Ec: Referral No. 21286
District File