



February 27, 2023

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

Re: Grandview Reserve Metropolitan District 1041 Application - 2nd Letter
File #: AASI213
Parts of Sections 21, 22, 27, and 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 re-referral concerning the above-referenced HB74-1041 application for the formation of the Grandview Reserve Metropolitan District (GRMD), consisting of four (4) subdistricts, and related water and wastewater infrastructure to service a 768.23-acre area in a portion of the S ½ of Sec. 21, a portion of the S ½ of Sec. 22, a portion of Sec. 27, and a portion of the N ½ of Sec. 28, Twp. 12S, Rng. 64W, 6th P.M.

This office most recently provided formal comments on the Grandview Reserve Subdivision water supply plan on May 31, 2022, which is related to this referral. This letter supersedes our previous comments regarding the GRMD's 1041 application.

This referral does not appear to qualify as a "subdivision" as defined in Section 30-28-101(10)(a), C.R.S. Therefore, pursuant to the State Engineer's March 4, 2005 and March 11, 2011 memorandums to county planning directors, this office will only perform a cursory review of the referral information and provide informal comments. The comments do not address the adequacy of the water supply plan for this project or the ability of the water supply plan to satisfy any County regulations or requirements. In addition, the comments provided herein cannot be used to guarantee a viable water supply plan or infrastructure, the issuance of a well permit, or physical availability of water.

Water Demand

The GRMD will provide an estimated 3 million gallons per day at full buildout of treated water for the proposed Grandview Reserve Subdivision. The GRMD anticipates serving approximately 3,340 single-family equivalents (SFEs) at full buildout.¹ At a rate of 0.353 acre-feet/year per SFE,² the total demand is estimated at 1,179 acre-feet/year for single-family residential, commercial, school, and church uses.³ The

¹ According to the 1041 Permit Application updated February 18, 2023 and Memo Re: El Paso County Water Master Plan dated August 13, 2021.

² From the Water Resources & Waste Water Report prepared by JDS-Hydro amended August 2020.

³ According to the Development Summary in Exhibit B.



present demand on the District consists of 577 SFEs or approximately 204 acre-feet/year associated with proposed Filing 1.⁴

Water Supply

According to the referral materials, the Grandview Reserve Subdivision filings will be supplied by the GRMD and 4 Way Ranch;⁵ however the water supply sources from 4 Way Ranch were not clear and evidence of ownership and control of the 4 Way Ranch water by the GRMD was not provided. The referral materials also proposed other potential water supply sources however no evidence of such other firm supplies was provided.⁶

The GRMD subdistrict nos. 1-4 were incorporated in the El Paso County District Court case nos. 21CV31595 through 21CV31598, respectively. According to previously submitted information, the GRMD will operate large capacity Arapahoe and Laramie-Fox Hills aquifers wells to meet the district's demands. A total of 904.17 acre-feet/year (based on a 300-year supply) of water will be available to the GRMD from Determinations of Water Rights for the Arapahoe and Laramie-Fox Hills aquifers.

There are 437.50 acre-feet/year based on a 300-year supply (131,250 acre-feet total) of nontributary Laramie-Fox Hills water available to the GRMD and 4Site Investments, LLC from amended Determination of Water Right No. 510-BD. Amended Determination of Water Right no. 510-BD allocates 2,429 acre-feet/year from the nontributary Laramie-Fox Hills aquifer. There are 466.67 acre-feet/year based on a 300-year supply (140,000 acre-feet total) of nontributary Arapahoe aquifer available to the GRMD from amended Determination of Water Right No. 511-BD. Amended Determination of Water no. 511-BD allocates 2,615 acre-feet/year from the nontributary Arapahoe aquifer. The allowed uses of the amended determinations are: domestic, livestock watering, lawn irrigation, commercial, industrial, replacement, augmentation and municipal use by Four-Way Ranch Metropolitan District and the Woodman Hills Metropolitan District; and all municipal purposes by the Grandview Reserve Metropolitan District No. 1 including: domestic, agricultural, stock watering, irrigation, commercial, industrial, manufacturing, fire protection, power generation, wetlands, piscatorial, and wildlife, either directly or after storage. The proposed Grandview Reserve Subdivision filings are within the Overlying Land Area of the determinations.

Our records show well permit nos. 64017-F and 64018-F withdraw the allocations from Determination of Water right nos. 511-BD and 510-BD, respectively. **In order for the wells to be used for municipal use by the GRMD they must first be re-permitted for such use.**

The anticipated demand on the District at full buildout is approximately 1,179 acre-feet/year, **which exceeds the GRMD's supply of 904.17 acre-feet/year.**

According to the report, well no. 273040 is located within the boundaries of the proposed subdivision. Permit no. 237040 was issued March 22, 2007 for the registration of an existing well first put to beneficial use on January 11, 1955. Based on the depth, the well likely produces from the nontributary Dawson aquifer. **Upon approval of the subdivision filing in which this well will be located, the well must be**

⁴ According to the 1041 Permit Application updated February 18, 2023.

⁵ According to the Water Resources and Wastewater Report revised August 2020.

⁶ According to the 1041 Permit Application updated February 18, 2023.

either plugged and abandoned or re-permitted pursuant to a determination of water right as a large capacity well.

Cursory Review 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.

In order to obtain a favorable opinion on subdivision(s) served by the GRMD, including filings for the Grandview Reserve Subdivision, a subdivision water supply plan must be submitted to our office including but not limited to the following information:

1. Evidence that the proposed water provider has an adequate supply to meet the subdivision’s demands.
2. Additionally, well permit nos. 64017-F and 64018-F must be re-permitted prior to municipal use by the GRMD.
3. If well no. 237040 is located within the subdivision, the applicant must clarify whether the well will be plugged and abandoned or re-permitted as a large capacity well pursuant to a determination of water right prior to subdivision approval.

The ability for the GRMD to obtain well permit(s), and the allowed uses, will be determined at the time that well permit application(s) are submitted to and reviewed by the State Engineer’s Office.

Please contact Wenli Dickinson at (303) 866-3581 x8206 or Wenli.Dickinson@state.co.us with any questions.

Sincerely,



Ioana Comaniciu, P.E.
Water Resource Engineer

Ec: Grandview Reserve Metropolitan District file
Referral No. 29054
Well Permit No. 237040 file
Upper Black Squirrel Ground Water Management District