



Montaño • Freeman • Sinor • Thompson P.C.

Lisa Thompson, Esq.
lthompson@troutlaw.com
303.339.5826

1120 Lincoln Street • Suite 1600
Denver, Colorado 80203-2141
303.861.1963
www.troutlaw.com

June 2, 2023

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

Re: Grandview Reserve Filing No. 1

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 and its water quality expert have reviewed Grandview Reserve Filing No. 1 and provide the following comments:

Water Quality

The proposed source of municipal and commercial water for Grandview Reserve Filing No. 1 is groundwater from the Arapahoe and Laramie-Fox Hills aquifers under Determination Nos. 510-BD and 511-BD. Water quality data are presented in the October 11, 2022 Water Resources Report for the Grandview Reserve Final Plat prepared by HR Green, LLC and are taken from well MSMD A-6 for the Arapahoe aquifer and well LFH-6 for the Laramie-Fox Hills aquifer. The Water Resources Report states that these are wells are the “nearest existing” wells but does not provide their location. El Paso County Land Development Code Section 8.4.7(B)(10)(e) requires that water quality samples “be collected within ½ mile of the project site or off-site source.” If no well is within ½ mile, “the determination of the location of the well shall be made by [El Paso County Public Health].” The location of wells MSMD A-6 and LFH-6 must be provided to ensure the water quality data are sufficient and collected in compliance with the Land Development Code.

The samples taken from the Laramie-Fox Hills aquifer through well LFH-6 were not analyzed for methane. Groundwater in the Laramie-Fox Hills aquifer is known to contain methane due to the downward migration from the overlying Laramie Formation. Groundwater should be sampled from the new Laramie-Fox Hills well and analyzed for methane. In addition, no data were provided for nitrate/nitrite, coliform or E. Coli for groundwater samples from the Arapahoe aquifer. This data should be provided from samples taken from the new Arapahoe well.

Shallow Groundwater

Shallow groundwater exists throughout the area underlying the Grandview Reserve Filing No. 1 and may cause geotechnical problems related to unwanted inflow to basements and detention ponds as well as erosion of detention pond side slopes. In addition, due to this shallow groundwater, structures developed in Grandview Reserve Filing No. 1 may need underdrains to capture and drain water that would otherwise flood those structures. Any underdrains will require a large capacity well permit from the Ground Water Commission and those well permits will require a replacement plan in compliance with Ground Water Commission Designated Basin Rule 5.6. Any such replacement plan should meet the requirements of Designated Basin Rule 5.6 by replacing any groundwater collected in any of the underdrains that is discharged to the surface and for the evaporation and ET associated with the exposure of groundwater caused by the underdrain.

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,



Lisa M. Thompson
for
TROUT RALEY