



May 10, 2023

Kari Parsons, Planner III  
El Paso County Development Services Department  
Transmitted via the EPC EDARP Portal: <https://epcdevplanreview.com/>

**Re: Grandview Reserve, Filing No. 1 - 6<sup>th</sup> Letter**  
Parts of the S ½ of Sec. 21 and N ½ of Sec. 28, Twp. 12S, Rng. 64W, 6<sup>th</sup> P.M.  
Water Division 2, Water District 10  
Upper Black Squirrel Creek Designated Basin

Dear Kari Parsons:

We have reviewed the above-referenced proposal to subdivide 37.564 acres into 119 single-family lots as part of the first filing of the Grandview Reserve PUD. This office provided comments on the entire Grandview Reserve sketch plan containing 768.23 acres on May 22, 2019. This office previously provided comments on Grandview Reserve PUD containing 189.47 acres on January 3, 2022 and May 31, 2022.

### Water Supply Demand

The proposed water uses for Filing No. 1 are single-family residential. The estimated water requirement for domestic use for Filing No. 1 is 42.01 acre-feet/year based on a rate of 0.353 acre-feet/year per Single Family Equivalent (SFE).

### Source of Water Supply

The proposed water supplier is the Grandview Reserve Metropolitan District (GRMD) consisting of 4 subdistricts with the initial district serving Filing No. 1. GRMD District No. 1 was formed by Order and Decree in the El Paso District Court dated November 24, 2021 consisting of 269.667 acres in parts of Section 32 and 28, Twp. 12S, Rng. 64W, 6<sup>th</sup> P.M. Proposed Grandview Reserve Filing 1 is within GRMD District No. 1. According to the March 2, 2022 letter from Emilie B. Polley with Monson, Cummins, Shohet & Farr, LLC (Polley Letter) GRMD has no other existing obligation beyond Grandview Reserve Filing 1.

According to the Water Resource Report updated October 11, 2022 ("Report"), GRMD will operate large capacity Arapahoe and Laramie-Fox Hills aquifer wells to meet the demands of Filing No. 1.

The Report indicates a total of 466.67 acre-feet/year based on a 300-year supply (140,000 acre-feet total) of water will be available to GRMD from the Arapahoe aquifer from Determination of Water Right no. 511-BD, as evidenced by the special warranty deed dated December 9, 2021 conveying 140,000 acre-feet of 511-BD from between 4 Site Investments, LLC and GRMD. Determination of Water Right no. 511-BD was amended on September 26, 2022 and allocated 140,000 acre-feet from the nontributary Arapahoe aquifer allowing 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 on the 8,905-acre Overlying Land. The proposed subdivision is within the Overlying Land Area of 511-BD.



The GRMD has filed an application for a well in the Arapahoe Aquifer pursuant to 511-BD (receipt no. 10027733), which is pending review upon the submittal of additional information requested from the applicant.

The Report indicates a total of 437.5 acre-feet/year based on a 300-year supply (131,250 acre-feet total) of water will be available to GRMD from the Laramie-Fox Hills aquifer from Determination of Water Right no. 510-BD, as evidenced by the special warranty deed dated August 18, 2022 conveying 131,250 acre-feet of 510-BD from between 4 Site Investments, LLC and GRMD. Determination of Water no. 510-BD was amended on September 26, 2022 and allocated 131,250 acre-feet from the nontributary Laramie-Fox Hills aquifer allowing 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 on the 8,905-acre Overlying Land. The proposed subdivision is within the Overlying Land Area of 510-BD.

The GRMD has filed an application for a well in the Laramie-Fox Hills Aquifer pursuant to 510-BD (receipt no. 10027734), which is pending review upon the submittal of additional information requested from the applicant.

The present demand on GRMD is less than the supply available from the Arapahoe aquifer and Laramie-Fox Hills aquifer under Determination of Water Right nos. 511-BD and 510-BD of 904.17 acre-feet/year.

#### **Additional 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.

#### **State Engineer's Office Opinion**

Based upon the above and pursuant to sections 30-28-136(1)(h)(I) and 30-28-136(1)(h)(II), C.R.S., it is our opinion that the proposed water supply is adequate and can be provided without causing injury to decreed water rights.

Our opinion that the water supply is **adequate** is based on our determination that the amount of water required annually to serve the subdivision is currently physically available, based on current estimated aquifer conditions.

Our opinion that the water supply can be **provided without causing injury** is based on our determination that the amount of water that is legally available on an annual basis, according to the statutory **allocation** approach, for the proposed uses on the subdivided land is greater than the annual amount of water required to supply existing water commitments and the demands of the proposed subdivision.

Our opinion is qualified by the following:

The Ground Water Commission has retained jurisdiction over the final amount of water available pursuant to the above-referenced decree, pending actual geophysical data from the aquifer.

The amounts of water in the Denver Basin aquifer, and identified in this letter, are calculated based on estimated current aquifer conditions. The source of water is from a non-renewable aquifer, the allocations of which are based on a 100 year aquifer life. The county should be aware that the economic life of a water supply based on wells in a given Denver Basin aquifer may be less than the 100 years (or 300 years) used for allocation due to anticipated water level declines. We recommend that the county determine whether it is appropriate to require development of renewable water resources for this subdivision to provide for a long-term water supply.

If you or the Applicant have any questions, please contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "K. Fuller".

Kate Fuller, P.E.  
Water Resource Engineer

Ec: Referral No. 26508  
Upper Black Squirrel Ground Water Management District