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Re: Homestead North Preliminary Plan, Revised March 2021

Dear Ms. Parsons:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the District”). Applicant, NES Inc., on behalf of SR Land LLC, provided revised materials in support of its application for a Preliminary Plan for its proposed Homestead North Phase I subdivision development. Homestead North will consist of 147 lots on 60 acres and would be located outside the District’s boundaries. The District submitted comments for Applicant’s original application on December 10, 2020 and briefly summarizes those comments which equally apply to Applicant’s revised application:

*Water Export*

Applicant’s Water Resources and Wastewater Report, updated February 28, 2021 (“Report”), indicates that water may be obtained for Homestead North in the future by connecting into the Cherokee Metro District and Woodmen Hills Metro District. Those supplies are sourced

from wells within the District. Such a supply, if consummated in the future, would constitute an export of water requiring approval from the District pursuant to the District's Rule 7.

*Wastewater*

Applicant states that wastewater from Homestead North will be discharged into the Meridian Metropolitan District's treatment facilities. Letter of Intent at 8. The District has water quality concerns with Applicant's proposed wastewater plan. Meridian discharges its treated effluent into the UBS Basin at two locations (Woodmen Hills' wastewater facility located in the northern portion of the UBS Basin and Cherokee's wastewater facility in the southern end), and this effluent becomes subject to all rules and regulations of the Colorado Ground Water Commission and the District as designated groundwater. Currently, Meridian's discharges at the Woodmen Hills wastewater facility do not meet the Water Quality Control Commission's site-specific water quality standards for groundwater discharges. Compliance with all applicable site-specific water quality standards must be required to continue to add additional wastewater discharges and to ensure that water quality within the UBS Basin is not impaired. Discharge at the Cherokee facility is also not currently in compliance with site-specific water quality standards for groundwater discharges but is on track to come into compliance. Due to the location of the discharge at the southern end of the Upper Black basin, it is currently unclear how applicant would "convert some reusable flows to available physical supplies." *Id.* Applicant should provide more information and explanation for this assertion.

The District reserves the right to provide additional comments at a later date founded upon information not readily ascertainable from the above-referenced application.

Sincerely,



Mirko L. Kruse  
for  
TROUT RALEY

cc: UBSCGWMD Board of Directors