

December 18, 2020

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Reference: Rezoning Request (RR-5 to RS-6000) and Preliminary Plan for Homestead North at Sterling Ranch

NEPCO is providing the collective input from its membership that includes approximately 9,500 homeowners, 45 HOAs, and 20,000 registered voters within and around Monument, Colorado. The purpose of NEPCO, a volunteer coalition of Homeowner Associations in northern El Paso County, is to promote a community environment in which a high quality of life can be sustained for constituent associations, their members, and families in northern El Paso County. We collectively address growth and land use issues with El Paso County Planners and the Town of Monument, as well as addressing HOA issues of common interest among the members. NEPCO achieves this by taking necessary steps to protect the property rights of the members, encouraging the beautification and planned development and maintenance of northern El Paso County.

Since our last two reviews of Sterling Ranch “developments/phases” (August 2018 and July 2020), El Paso County has generally ignored our pleas to view this project’s water use as either unjustified, excessive, or disproportional to the offsite impacts. We still feel strongly that this development is an unwise precedent for the future of land use and water use planning in El Paso County. A summary of our reasoning follows:

1. The Letter of Intent for rezoning this area states on page 2 that, “The zone change to RS-6000 transitions from the PUD zoning to the north and east and the RR-5 zoning to the west of Vollmer and the RS-5000 zoning to the south. This development continues the urban density approved with the Sterling Ranch Phase I Preliminary Plan through to the urban density approved with the Retreat at Timber Ridge PUD.”
 - a. In our view, the developer seems to ignore a great deal of nearby RR-5 zoned property to the east and southeast of this development – at least according to the El Paso County Tax Assessor’s Office property search website data. Although El Paso County allowed a toehold to urban density when they approved the original Sterling Ranch proposal years ago, now that approval is being used as a cudgel-like basis to force additional urban density as one moves further north northeast. In our opinion, this rezoning to RS-6000 is not a true “transition” but ends up as a north/south slice of urban density between RR-5 communities to the east and west. More Powers Boulevard-like density is not appropriate in this area!
2. This rezoning allows over 12 times the water use the community was reasonably expecting (what should have been 12 homes expands to 147 homes)!

- a. The majority of this water appears to come from 2 deep wells drilled into the Arapahoe and Laramie Fox Hills aquifers – significantly affecting the entire northern portion of El Paso County, along with Donala Water, Woodmoor Water, Triview Metro, Timber Ridge Metro, Cherokee Hills Metro, Woodmen Hills Metro, and the Towns of Monument and Palmer Lake which all draw water from the Denver Basin aquifers. In accordance with EPC Land Development Code, Section 7.2.1.D2(e), Criteria for Approval for a Preliminary Plan, we do not believe that the proposed subdivision is in general conformance with the goals, objectives, and policies of the Master Plan, in particular the following provisions:
 - i. Policy 3.1.6 – Support the systematic monitoring and careful administration of the bedrock aquifers to avoid over-allocation of groundwater;
 - ii. Policy 3.1.8 – Promote water supply systems and augmentation arrangements which maximize the effective use of near-surface ground water supplies without jeopardizing existing water rights or established wells; and
 - iii. Policy 3.1.9 – Discourage the severance of all water rights from overlying properties unless an alternate water supply can be guaranteed. This supply should be adequate to support uses consistent with the adopted master plan for the area.
 - b. In support of this opinion, we use the developer’s own words from his Letter of Intent, Page 6, that the 2060 water supply for Region 3 is projected to be 8,284-acre feet per year and the projected demand is 8,307-acre feet; and that in the year 2060 the Sterling system is expected to serve 7,310 single family equivalent homes requiring 2,580-acre feet per year. This means that the Region 3 water supply will be over-allocated and that the Sterling Ranch need is almost one third of this demand!
 - c. In addition, in order to meet future demands, the developer admits that off-site resources will be required – encouraging the severance of off-site water rights from their overlying properties – at least in the next several years. Please also see the letter from the Upper Black Squirrel Creek Ground Water Management District which highlights this important issue.
3. Unreasonable growth will hurt current and future residents’ (including nearby NEPCO residents) reliance on a stable/slowly growing/planned infrastructure for utilities, roads, water resources, and population increases.
 4. Will this development include street lights? All lighting -- commercial, municipal, and residential -- should be required to be Dark Sky compliant. The location, 12 miles east southeast of the Air Force Academy Observatory and consisting mostly of shortgrass prairie, should set the standard for night sky friendly lighting by minimizing glare while reducing light trespass and skyglow in our night skies.

Thank you for the opportunity afforded NEPCO to engage in this process to work with El Paso County to ensure we have planned, responsible growth. NEPCO requests that our organization be informed of subsequent actions related to this development and be a participant in the review and coordination process.

//SIGNED//
 Paul E. Pirog
 Vice Chairman
 NEPCO Transportation and Land Use Committee

//SIGNED//
 Greg Lynd
 President, NEPCO