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May 11, 2018

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

Re: The Reserve at Corral Bluffs Filing No. 2 – Final Plat Application

Dear Ms. Parsons:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the UBS 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 UBS District has reviewed Corral Ranches Development Company’s (“Applicant’s”) final plat application for The Reserve at Corral Bluffs Filing No. 2, as well as the materials provided in support of this application. Based upon its understanding of the application and related documentation concerning this project, the UBS District provides the following comments.

Water Supplies for the Reserve at Corral Bluffs

As explained in the Applicant’s letter of intent submitted with its application, Corral Ranches Filing No. 2 will consist of six single family residential lots, with a minimum lot size of five acres, for a total of 33.116 acres. A Water Resources Report was prepared by Curtis Wells in November 2011 for the entire Reserve at Corral Bluffs Development (“Corral Bluffs Development”), including the six lots that now comprise Filing No. 2. The 2011 Water Resources Report indicates that, at full build-out, the Corral Bluffs Development will consist of a total of thirty-one residential lots to be served by not-nontributary Denver or Arapahoe aquifer wells. *Water Resources Report* at 1-2.

These wells will operate pursuant to the Determinations of Water Rights issued in Case Nos. 516-BD (which allows an average annual withdrawal from the Arapahoe aquifer of 55.1 acre-feet) and 517-BD (which allows an average annual withdrawal from the Denver aquifer of 31.5 acre-feet). *See Findings and Orders*, Case Nos. 516-BD and 517-BD, attached to *Water Resources Report*. The Water Resources Report concludes that, on an annual basis, the thirty-one homes in the Corral Bluffs Development would require a total of 15.5 acre-feet of water per year, to be used for domestic, irrigation, and stock-watering purposes. *Water Resources Report* at 4. Thus, the

Water Resources Report concludes that Corral Bluffs has a sufficient water supply to serve its entire development, including Filing No. 2.

However, the only source of water for the Corral Bluffs Development is non-renewable Denver Basin groundwater. At the moment, the Corral Bluffs Development does not have a renewable water supply. Though it currently appears that the Applicant has access to enough water to supply this Development, it is possible that less water than originally estimated may actually be available in the Denver and Arapahoe aquifers, due to anticipated water level declines in the Denver Basin, as noted in the Division of Water Resources' Recommendation Letter regarding the Reserve at Corral Bluffs' Preliminary Plan. *See* Letter from Keith Vander Horst at 3 (June 4, 2013), submitted with *Water Resources Report*. Therefore, the County should consider requiring the Applicant to develop renewable water resources for a long-term water supply to serve the Corral Bluffs Development.

Use of Septic Systems

Of further concern to the UBS District is the potential contamination to the alluvial aquifer that may result from the discharge of wastewater from non-evaporative septic systems and leach fields in the Corral Ranches Development. With its application, Corral Ranches submitted a *Soils, Geology, Geologic Hazard and Wastewater Study* prepared by Entech Engineering in January 2012 ("*Entech Report*"). As stated in the *Entech Report*, individual onsite wastewater treatment systems are suitable for the Corral Ranches Development and "contamination of surface and subsurface water resources should not occur provided that the [systems] are evaluated, installed according to El Paso County and State Guidelines and properly maintained." *Entech Report* at 14.

However, according to Entech's analysis of soil conditions within the Corral Bluffs Development, seasonal shallow groundwater has been mapped in several areas. *Entech Report* at 7. In areas within the Corral Bluffs Development with a high water table, the wastewater discharged from the septic systems is significantly more likely to infiltrate into and contaminate the aquifer, resulting in injury to downstream well owners. Additional data is needed to evaluate the depth to the water table in the Corral Bluffs Development. The District suggests that a monitoring well be installed to monitor water levels in the development for at least twelve months. If development is planned in areas with a high water table, then individual onsite wastewater treatment systems must be designed to accommodate the high water table that is present within the development area, to ensure that the wastewater discharged from the septic systems does not infiltrate into the water table.

The UBS District has enacted a policy in which it "encourages the use[] of central (municipal) water and wastewater systems, as opposed to the use of individual wells and septic systems . . . in order to minimize the possibility of contamination of the alluvial aquifer and to protect the already over-appropriated ground water resources of the Upper Black Squirrel Creek Designated Ground Water Basin." As such, the District believes that a central wastewater treatment system must be required for this development to prevent contamination of the aquifer. However, if onsite wastewater treatment systems are permitted, these systems and associated wastewater discharges must comply with the state's Water Quality Control Commission's water quality standards set forth in Regulation Nos. 41 and 42.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "J Thompson".

Lisa M. Thompson
for
TROUT RALEY

cc: UBSCGWMD Board of Directors