CGS comments, April 19, 2023

CGS recommends that the submittal not be approved until our comments about the debris flow hazard at this location are addressed. The submitted documents have not evaluated the debris flow hazard at this location. RMG's report (Soil and Geology Study, 3.18.22) states, p.10, *"The gradients and source materials on the subject property site are, in general, not conducive for generation of debris flows."* However, the gradients and source materials in the drainages that impact the site are conducive to the generation of debris flows or hyperconcentrated flows. We discussed this in our previous comments on August 5, 2022. The calculated flows for OS2, and 3, as shown on the drainage plan, do not indicate they are bulked for debris flows and appear to be only for clear water flow. These flows should be bulked with sediment, and the resultant onsite flow should have mitigation designed for it. It should be pointed out that wildfire will increase the likelihood of debris flows at this location.

Our previous comments have yet to be addressed and are repeated here.

The Colorado Geological Survey (CGS) agrees with the applicants' consultant that the proposed lots do not contain geologic conditions that would preclude the proposed residential use and density. However, a hazard within the site from potential debris flow/hyperconcentrated (high sediment yield) flow and potential for highly erosive flow require evaluation and mitigation. RMG's report (Soil and Geology Study, 3.18.22) states, p.10, *"The gradients and source materials on the subject property site are, in general, not conducive for generation of debris flows."* CGS visited the site (38.9087, -104.9847) on August 3, 2022, and noted that a hyperconcentrated flood and debris flow hazard exists for at least drainage OS2 (as labeled in the Preliminary Drainage Report by SMH dated 7.22). This hazard can be observed in the source area for OS2, which includes steep slopes and material available for transport, including fallen trees, boulders, and weathered granite (grus). The drainage report has calculated flows of 5.10 and 28.55 cfs for the five and 100-year storm events, respectively, in OS2. CGS recommends that these flows be bulked for high sediment and debris flow yields, as indicated in the following table of values. This table is a generalized but well-understood industry estimate of bulking factors for these types of flows.

Bulking Factor						
0	1.11 1.2	1.43	1.67	2.00	2.50	> 3.33
Sediment Concentration by Weight (100% by $WT = 1 \times 10^6 \text{ ppm}$)						
0	23 4	0 52	63	72	80	87 to 100
Sediment Concentration by Volume (specific gravity = 2.65)						
0	10 2	0 30	40	50	60	70 to 100
Normal Streamflow		Hyperconcentrated Flow		ebris Flow/ Mud Flow	Landslide	

Table 1. Flow Classification by Sediment Concentration (adapt. from Bradley, 1986).

This table indicates the calculated storm events expected at this location should be bulked by 1.25 to 1.67 to predict their volume. Flows can be highly erosive and contain sediment, boulders, and trees. It should be noted that calculated flows for the five and 100-year events are greater for OS3 than for OS2 (13.74 and 76.89 cfs, respectively), with potential impacts on the existing building on the Manning Property.

Excavations (test pits) can help evaluate if flows onto the sites have historically been primarily hyperconcentrated or have included debris flows. The flows can also be age dated by carbon materials to help determine recurrence intervals. Based on the volume of flow estimated, CGS recommends setback distances from the flow channel for building locations be determined and shown on the plans. We also recommend that the area of flows is depicted on the site plans and that the conveyance of the flows is evaluated, and the applicants' engineers discuss protection from deposition and erosion to the planned roadway and homesite locations.

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