



October 6, 2026

Kari Parsons, Project Manager

El Paso County Development Services Department

Sent via online portal at: <https://epcdevplanreview.com>

Re: Church at Bent Grass Meadows

File #: SF268

Part of the E ½ of the NE ¼ of Sec. 1, Twp. 13 South, Rng. 65 West, 6th P.M.

Water Division 2, Water District 10

CDWR Assigned Referral No. 34809

Dear Kari Parsons:

Our office received information regarding the Church at Bent Grass Meadows Final Plat for one lot the size of 8.34 acres for the development of a church.

This submittal does not appear to qualify as a “subdivision” as defined in section 30-28-101(10)(a), C.R.S. Therefore, pursuant to the State Engineer’s March 4, 2005 and March 11, 2011 memorandums to county planning directors, this office will only perform a cursory review of the referral information and provide informal comments. The comments do not address the adequacy of the water supply plan for this project or the ability of the water supply plan to satisfy any County regulations or requirements. In addition, the comments provided herein cannot be used to guarantee a viable water supply plan or infrastructure, the issuance of a well permit, or physical availability of water.

Water Demand

The estimated water requirements were included within the GWS-76 “Water Supply Information Summary,” as follows:

- Indoor use: 4.406 acre-feet per year



- Irrigation of 11,192 square feet: 0.632 acre-feet per year
- “Other” water use: 0.38 acre-feet per year

The total demand is estimated to be 5.418 acre-feet per year.

Water Supply

Water is to be supplied by the Woodmen Hills Metropolitan District (“District”).

A response letter from the District dated April 14, 2026, states 5.419 acre-feet of water per year, or water for 17 Single Family Equivalents, will be provided. The letter also stated that adequate water supply and wastewater treatment capacity currently exist with the District.

Information this office has on file indicates the District has a 300-year supply of 1597.4 acre-feet per year, and a commitment (including this development) of 1379.3 acre-feet per year. This means that the uncommitted supply remaining is 218.1 acre-feet.

The referenced Basin Determinations in the Water Supply Information Summary are 373-BD, 562-BD, 372-BD, 561-BD, 371-BD, 560-BD, and “numerous additional determinations and other water rights.” The basin determinations outlined in the summary total 245.7 acre-feet for 100 years, or 81.9 acre-feet of water per year for 300 years, from the Denver, Arapahoe, and Laramie-Fox Hills aquifers, to be used within the District’s boundaries (1971 acres). These are known as the Bentgrass (Case Property) water rights. The development lies within the place of use for those Determination of Water Rights’.

State Engineer’s Office Opinion

Pursuant to section 30-28-136(1)(h)(I) and 30-28-136(1)(h)(II), C.R.S., the State Engineer’s Office offers the opinion that the proposed water supply appears to be adequate and can be provided without causing material injury to existing water rights so long as the water is used in accordance with applicable decrees and statute.

The proposed source of water for this development is a bedrock aquifer in the Denver Basin. The State Engineer’s Office does not have evidence regarding the length of time for which this source will be a physically and economically viable source of water. According to section 37-90-107(7)(a), C.R.S., “Permits issued pursuant to this subsection (7) shall allow

withdrawals on the basis of an aquifer life of 100 years.” Based on this **allocation** approach, the annual amounts of water determined in the Basin Determinations are equal to one percent of the total amount, as determined by Rule 5.3.2.1 of the Designated Basin Rules, 2 CCR 410-1. Therefore, the water may be withdrawn in those annual amounts for a maximum of 100 years.

The El Paso County Land Development Code, Section 8.4.7.(B)(7)(b) states:

“(7) Finding of Sufficient Quantity

(b) Required Water Supply. The water supply shall be of sufficient quantity to meet the average annual demand of the proposed subdivision for a period of 300 years.”

The State Engineer’s Office does not have evidence regarding the length of time for which this source will “meet the average annual demand of the proposed subdivision (development).” However, treating El Paso County’s requirement as an **allocation** approach based on 300 years, the allowed average annual amount of withdrawal of 245.7 acre-feet/year would be reduced to one third of that amount, or 81.9 acre-feet/year. That amount, and including additional supplies available from the District, indicate the District has enough supply to serve the demand for this development. As a result, the water may be withdrawn in that annual amount for a maximum of 300 years.

Please contact me at Katharine.Anderson@state.co.us (303-866-3581 x8207) with any questions.

Sincerely,

Katharine Anderson
Water Resource E.I.T.