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

Marc A. Whorton, P.E.
Classic Consulting
619 N. Cascade Ave., Suite 200
Colorado Springs, CO 80921

Land First, Inc.
1378 Promontory Bluff View
Colorado Springs, CO 80903
rwaldthausen@yahoo.com

Re: Bent Grass Filing No. 3

Dear Ms. Parsons,

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the UBS District”). Applicant, Classic Consulting, on behalf of Land First, Inc., provided materials in support of its application for a Preliminary Plat for six commercial lots in the Bent Grass subdivision. Bent Grass is located within the UBS District. The UBS District reviewed the Applicant’s application materials and submits the following comments:

Wastewater Service

Applicant’s application indicates that Woodmen Hills Metropolitan District will provide Bent Grass’s wastewater services. However, Woodmen Hills’ treatment facility discharges wastewater within the Upper Black Squirrel Creek Basin, and the treated wastewater discharged is noncompliant with the water quality standards set forth in the Water Quality Control Commission’s (“WQCC’s”) Regulation Nos. 41 and 42. Compliance with all applicable site-specific water quality standards is essential to ensure that water quality within the Basin is not unreasonably impaired. Prior to additional effluent being generated at the Woodmen Hills

treatment facility, the County should support the UBS District's efforts to ensure that the discharge meets the groundwater standards for the basin.

Underdrains

Due to local high ground water and soil conditions in the area, structures developed in Bent Grass may need underdrains to capture and drain water that would otherwise flood those structures. Any underdrains will require a large capacity well permit and those well permits will require a replacement plan in compliance with Designated Basin Rule 5.6. Any such replacement plan should meet the requirements of Designated Basin Rule 5.6 by replacing any groundwater collected in any of the underdrains that is discharged to the surface and for the evaporation and ET associated with the exposure of groundwater caused by the underdrain. Applicant's application includes no information on whether underdrains will be required and, if so, how Applicant intends to meet the requirements of Designated Basin Rule 5.6.

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 "Mirko L. Kruse".

Mirko L. Kruse
for
TROUT RALEY

cc: UBSCGWMD Board of Directors