



Montaño • Freeman • Sinor • Thompson P.C.

Lisa M. Thompson, Esq.  
lthompson@troutlaw.com  
303.339.5826

1120 Lincoln Street • Suite 1600  
Denver, Colorado 80203-2141  
303.861.1963  
www.troutlaw.com

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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

HR Green Development LLC  
Attn: Phil Stuepfert  
5619 DTC Parkway, Suite 1150  
Greenwood Village, CO 80111  
pstuepfert@hrgreen.com

4 Site Investments LLC  
1271 Kelly Johnson Blvd, Suite 100  
Colorado Springs, CO 80920  
paulinfinity1@msn.com

Re: HR Green Development/4 Site Investments – Sketch Plan

Dear Ms. Parsons:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the UBS District”), a ground water management district formed and operating under the Colorado Ground Water Management Act, C.R.S. § 37-90-101 *et seq.* Applicant, HR Green Development LLC, on behalf of 4 Site Investments, LLC, provided materials in support of its application for a Preliminary Sketch Plan for its proposed Grandview Reserve subdivision development. Grandview Reserve is located within the UBS District and, as explained in the Applicant’s application, will consist of 3,261 residential units on 768.2 acres bounded by the north by 4 Way Ranch, the south by Waterbury, the east by Highway 24, and the west by Eastonville Road. The UBS District reviewed the Applicant’s application materials and submits the following comments:

*Water and Wastewater Service for Grandview Reserve*

According to Applicant’s April 2020 Water Resources and Wastewater Report (“Report”) included in Applicant’s application, Grandview Reserve will require 1059 acre-feet per year, or

314 gallons per day per single family equivalent, to service its water supply needs. Section 30-28-133(d), C.R.S. requires that the Applicant submit “adequate evidence that a Water supply that is sufficient in terms of quantity, quality, and dependability will be available to ensure an adequate supply of water.” Applicant has not provided sufficient information regarding source of water supply. First, the proposed source of Applicant’s water supply is unclear. Applicant’s Letter of Intent states that water service will be provided by the Grandview Reserve Metropolitan District No. 1 whereas Applicant’s Report states that supply will be met from future wells in the Arapahoe and Laramie Fox-Hills aquifers underlying the subdivision and neighboring lands. Further, Applicant does not provide information on the efforts to create a metro district nor does Applicant’s application include a determination of water rights from the Colorado Ground Water Commission. A determination of water rights is needed to establish the total groundwater available beneath property owned by Applicant, the annual rate of withdrawals permitted for this groundwater, and the respective replacement requirements. Without this information it is not possible to determine if the proposed water supply is sufficient in quantity, quality, and dependability for Applicant’s proposed development.

Applicant’s Report states that Grandview Reserve will generate an estimated average of 172 gallons of wastewater per day per single family equivalent (residential unit), totaling 560,892 gallons per day. If 314 gallons per day of supply are required for each single family equivalent, it is unclear how the remaining 142 gallons per day factor into Applicant’s wastewater calculations. The Report also states that Woodmen Hills Metropolitan District will provide Grandview Reserve’s wastewater services. However, Woodmen Hills’ treatment facility discharges wastewater within the UBS Basin, and the treated wastewater discharged is currently noncompliant with the applicable 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 UBS 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.

#### *UBS District’s Regulations on Large Capacity Well Use in Subdivisions*

The wells Applicant proposes for its water supply must comply with the UBS District’s rules and regulations. UBS District’s Rule 17.A. limits withdrawals from large capacity wells in subdivisions. Specifically, Rule 17.A. requires that the production of all wells supplying the subdivision shall not exceed the product of the number of single family residences, single condominium units, apartment units, single units within a multiple-dwelling unit or equivalent within the subdivision by 0.5 acre feet per year. And further, Rule 17.A. states that well production must be limited to the rate or amount set forth in the determination of water rights issued for the well by the Colorado Ground Water Commission. Applicant’s application includes no information on Applicant’s intended compliance with this rule.

#### *Underdrains*

Due to local high ground water and soil conditions in the area of Grandview Reserve, structures developed in Grandview Reserve 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.

*Site Drainage*

Applicant does not provide adequate information on how surface run-on and run-off will be managed for Grandview Reserve. The materials provided indicate four natural drainage channels traverse the property from the Northwest to Southeast and that these drainages will be incorporated into drainage control. However, there is insufficient information regarding annual run-on and run-off volumes and what treatment might be necessary prior to exiting the 768 acre property.

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,



Lisa M. Thompson  
for  
TROUT RALEY

cc: UBSCGWMD Board of Directors