



September 15, 2026

Joe Letke

El Paso County Planning & Community Development

Transmitted via EDARP Portal: <https://epcdevplanreview.com/>

Re: Bradley Point Filing No. 1

Project EA No. EA20100 / File No. MS212

Location: Portions of the SE ¼ of Sec. 3, Twp. 15S, Rng. 66 W of the 6th P.M.

Water Division 2, Water District 10

Colorado DWR Assigned Referral No. 34747

Dear Joe Letke:

We have received the proposal to subdivide ±9.74 acres. The Letter of Intent states this is to be a “dry” subdivision for heavy construction material storage that uses bottled water for drinking purposes, hauled water for landscape and tree irrigation, and portable toilets. The letter of intent also states, “as a dry development there will not be any demand on the Security and Widefield Water and Wastewater District Supplies.” However, the submitted materials also includes a Water Resources Report written by M & S Civil Consultants, Inc. dated August, 2026, as well as a commitment letter from the proposed water supplier, Security Water and Sanitation Districts / Enterprises, and an estimated water demand included in a Water Supply Information Summary. The applicant should clarify in an updated Letter of Intent whether this subdivision will remain a “dry subdivision,” however, this letter assumes water will be supplied to the subdivision by a water provider, as indicated in the recent Water Resources Report.

Water Uses and Demand

The Water Supply Information Summary* includes the following water demand estimates:

- Irrigation water demand: 4.44 acre-feet per year
- Industrial water demand: 2.24 acre-feet per year

Therefore, the total water demand for the subdivision is estimated to be **6.68 acre-feet per year**.

*Note that the water use labeled as “Industrial” on the Water Supply Information Summary is labeled as “Domestic” in the Water Resources Report. Additionally, the Water Resources Report states that the amount of water for irrigation would be 3.68 acre-feet/year, rather than the 4.44 acre-feet/year indicated on the Water Supply Information Summary. Therefore, the Water Resources states the estimated demand is 5.92 acre-feet/year, with an additional 0.76 acre-feet/year of water for potential future landscaping irrigation.

Water Supply

The proposed source of water supply is service provided by Security Water and Sanitation Districts / Enterprises (“SW&SD”). A will-serve letter dated July 2, 2026 from SW&SD committing to provide 6.68 acre-feet per year for this subdivision was provided.

Information included in the Water Resources Report prepared by W.W. Wheeler & Associates, Inc. on June 23, 2025 (“Report”) indicates that the water supplier has 5,434 acre-feet of water available as a firm yield with 10% contingency. The report used a 10% contingency for both the amount of water yielded, as well as the commitments. However, this yielded amount appears to have included 1 share from the Chilcott Ditch that has not yet been changed through the Division 2 Water Court case no 06CW0119 (approximately 25 acre-feet, based on the Water Court case). Therefore, excluding this one share, this office estimates the total water supply yield with 10% contingency (reduction) to be **5398.6 acre-feet**.

The current demand, as outlined in the Report is stated to be 3879 acre-feet with 10% contingency. This amount appears to exclude four service commitments this office has

on file (Patriot Village, Waterview Phase III, Storage Time, and Crawford Multifamily), totaling an additional 259.3 acre-feet. Because no information was provided regarding the changed status of these commitments in the Report, this office included them as existing commitments, bringing the combined total to **4218.5 acre-feet**, with 10% contingency (increase).

Note that this office does not generally use a 10% contingency when calculating the amount of water available or committed, but is including it in the above amounts because the Report stated it was necessary for “planning purposes,” and “for climate change or other future reductions to Security’s Water supplies.” The amounts in the report also used the 10% contingency for the final amounts of water supply available and committed.

Using the above amounts, there is approximately 1180.1 acre-feet of uncommitted water available at SW&SD. This indicates a surplus of water is available should the entire amount of 6.68 acre-feet of water per year be needed for this subdivision, as committed by SW&SD in their commitment letter.

If this office must use the smaller commitment amounts indicated in the recent 2025 Water Supply Report for SW&SD, we will need an updated Water Supply Report highlighting the commitments previously on file for SW&SD that have had the commitment released and no longer will be supplied the water.

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 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 water supply is from the Fryingpan-Arkansas Project, and multiple wells, including alluvial wells that are currently considered to be a renewable source that can withdraw the water on an annual basis, and will not cause material injury to decreed water rights.

Additional Comments

The application materials indicate that a stormwater detention structure may be a part of this project. The applicant should be aware that unless the structure can meet the requirements of a “storm water detention and infiltration facility” as defined in section 37-92-602(8), C.R.S., the structure may be subject to administration by this office. The applicant should review DWR’s [Administrative Statement Regarding the Management of Storm Water Detention Facilities and Post-Wildland Fire Facilities in Colorado](#) to ensure that the notification, construction and operation of the proposed structure meets statutory and administrative requirements. The Applicant is encouraged to use the [Colorado Stormwater Detention and Infiltration Facility Notification Portal](#) to meet the notification requirements.

Please contact Katharine Anderson at Katharine.Anderson@state.co.us with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ailis A. Thyne".

Ailis Thyne, P.E.

Water Resources Engineer