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### **McCune Ranch, SP-18-006**

**Please accept the following revised comments from El Paso County Public Health (ECPH) regarding the proposed subdivision referenced above:**

- The proposed 766.66-acre, 143-residential lot and 1-commercial lot development will be served water by individual private wells, and wastewater services by onsite wastewater treatment systems (OWTS).
- There is a not a finding for sufficiency in terms of water quality for drinking water for the proposed development at this time. A finding for sufficiency is not required for the preliminary plan, but must be submitted and approved prior to submittal for final plat.
- The Entech Engineering, Inc., Preliminary Soil, Geology, Geologic Hazard and Wastewater Study dated 02Oct2018, for McCune Ranch was reviewed for the determination of suitability of the site for onsite wastewater treatment systems (OWTS) installations. The number of soil test pits (10) for the 143 lots proposed to use onsite wastewater treatment systems (OWTS) does not meet the Land Development Code requirement for the number of soil tests requirement of 20% of the total number of proposed lots. There are 29 soil tests minimum required for this subdivision. A determination on the suitability of the subdivision for the use of onsite wastewater treatment systems for wastewater service is pending review of the remaining soil tests and an acceptable response to the issues with the lots identified in the comments below.
- Note: The 10 soil test pits within the report did indicate that ground water was not encountered; however, the report did show the majority of the soil in the area is not suitable for conventional onsite wastewater treatment systems and will require professional engineers design. ECPH encourages the remaining 19 soil tests be conducted in a few of the lot areas listed below. The most common reason for concern are the lots identified on Figure 9 of the Entech Engineering, Inc., Preliminary Soil, Geology, Geologic Hazard and Wastewater Study dated 02Oct2018, for McCune Ranch showing "areas that are not suitable for onsite wastewater treatment systems".
- The identified unsuitable areas appear to bisect the following lots, and depending on whether these identified areas can be crossed by the access driveways, may place a potential house site and OWTS in an area on the lot too small for locating the house, OWTS, and well, but still have the ability to meet all the minimum internal and external lot OWTS installation setbacks. The lots listed are based upon review of the Figure 9 map only, and may not have created as significant of an access issue to the back area of the lot as they appear to have created.

Regardless, at this time there appear to be potential OWTS installation issues for the following lots:

- Lots 5 - 11
  - Lot 21
  - Lots 23 - 24
  - Lot 41
  - Lot 44 for an identified downslope creep area in mid-lot
  - Lot 49
  - Lot 52
  - Lot 55 for an unstable slope area in mid-lot
  - Lots 57 – 61
  - Lot 86
  - Lot \*127 (not Lot 128 as noted in the report narrative)
  - Lots 134 - 135
  - Lots 138 - 141
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- Radon resistant construction building techniques/practices are encouraged to be used in this area. The EPA has determined that Colorado, and the El Paso County area, have potentially higher radon levels than other areas of the country.
  - Earthmoving activity in excess of one acre, but less than twenty-five acres, will require a Construction Activity Permit from El Paso County Public Health. Go to <http://www.elpasocountyhealth.org/service/air-quality> for more information. If the earthmoving activity is in excess of twenty-five acres at one time, then a Construction Activity Permit is required from Colorado Department of Public Health and Environment, Air Pollution Control Division.
  - The storm water quality detention ponds to be built must be identified and are encouraged to be maintained for mosquito control reasons by the proposed Metro District/HOA mentioned in the Letter of Intent. Detention ponds that are not properly maintained provide mosquito breeding habitat and increase the risk of the general public to West Nile Virus.

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