



June 5, 2024

Kylie Bagley
El Paso County Development Services Department
Sent via online portal at: <https://epcdevplanreview.com>

RE: Monument Ridge East Preliminary Plan
N1/2 of Section 2, Twp. 11S, Rng. 67W, 6th P.M.
Water Division 1, Water District 8
CDWR Assigned Subdivision No. 32357

Dear Kylie Bagley,

We have received the above-referenced submittal to subdivide 63 acres into 37 single-family detached residential lots on 18.96 acres and 305 multi-family attached units/lots on 40.52 acres. The proposed source of water supply and wastewater disposal is to be served by the Woodmoor Water and Sanitation District.

Water Supply Demand

According to the Water Supply Information Summary provided in the referral, the estimated household use demand for 342 units in the proposed development is 95.24 acre-feet per year (85,032 gallon per day) and the irrigation demand of 3.52 acre is 9.99 acre-feet per year (8,919 gallons per day), for a total demand of 105.23 acre-feet per year (93,951 gallons per day).

Source of Water Supply

The proposed water supplier is Woodmoor Water and Sanitation District (“District”), and an April 24, 2024 letter from Woodmoor was included with the submittal, committing to providing 95.3075 acre-feet per year for the 342 units. Based on the April 22, 2024 commitment letter the District is committed to providing water and sewer services to the development provided the developer complies with the District Rules, Regulations, specification and policies regarding water and wastewater service and the developer enter into an agreement with the District for supplemental water service. We do not know if the applicant has met these requirements.

In addition, it appears that the District commitment does not include the irrigation water requirement, therefore it is unknown if the District is also committed to supply the proposed irrigation demand. Prior to further review the District shall provide an updated letter of commitment that specifies a committed supply of 105.23 acre-feet per year for the proposed development.

According to the December 2022 *Woodmoor Water and Sanitation District Long Range Plan (LRP)*, included in the referral material, the District utilizes two water supply sources. The first supply of water comes from the Denver Basin Aquifers, which the District can pump up to 6,322.4 acre-feet per year (based on a 100 year aquifer life) or 2,107.47 acre-feet per year (based on a 300 year aquifer life). The second supply of water comes from diversions on Monument Creek and Dead Woman Creek that occur via an exchange of treated wastewater effluent for surface water, which supplied an average of 347 acre-feet per year over the period 2017-2020 (an annually renewable supply with no



administrative lifespan). Combined, the Denver Basin water rights (based on a 300-year aquifer life) and surface water exchanges (annually renewable with no administrative life span) exceed the average annual water demand of 2,122 acre-feet estimated for current build-out (based on Section 1.4.1 of the 2022 LRP).

A review of our records shows permit no.167104-A located on the subject property. Based on the depths, well no. 167104-A is constructed into the not-nontributary Dawson aquifer. The well is currently located on Lot 1 of the Heights Filing No. 1 subdivision and was decreed by Division 1 Water Court in case no. W-5996 as Plowman Well No. 1. Section 37-92-602(3)(b)(III), C.R.S. requires that the cumulative effect of all wells in a subdivision be considered when evaluating material injury to decreed water rights. Therefore, this well must be included in an augmentation plan or must be plugged and abandoned upon subdivision approval since the provisions of section 37-92-602, C.R.S. which allowed for issuance of the well permits will no longer apply.

Additional Comments

The applicant should be aware that any proposed detention pond for this development, must meet the requirements of a “storm water detention and infiltration facility” as defined in section 37-92-602(8), Colorado Revised Statutes, otherwise 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 Colorado Stormwater Detention and Infiltration Facility Notification Portal, located at <https://maperture.digitaldataservices.com/gvh/?viewer=cswdif>, to meet the notification requirements.

State Engineer’s Office Opinion

Based on the above and pursuant to section 30-28-136(1)(h)(II), C.R.S., the State Engineer’s Office has not received enough information to render an opinion regarding the potential for causing material injury to decreed water rights, or the adequacy of the proposed water supply. **Prior to further review of the subdivision water supply plan, the following information is required:**

1. Evidence that the District is committed to supply the estimated demand of 105.23 acre-feet for the development.
2. Clarification whether well permit no. 167104-A will be included in a court-approved augmentation plan or will be plugged and abandoned prior to subdivision approval.

Please contact me at 303-866-3581 x8246 or ioana.comanicu@state.co.us with any questions.

Sincerely,



Ioana Comanicu, P.E.
Water Resources Engineer

Ec: File for well permit no.167104-A
District File