



September 12, 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 second referral on 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. This letter supersedes the comments provided by this office on June 5, 2024.

Water Supply Demand

According to the updated Water Supply Information Summary provided in the referral, the estimated household use demand for 342 units in the proposed development is 94.72 acre-feet per year (84,563 gallon per day). No irrigation demand is proposed for any of the lots.

Source of Water Supply

The proposed water supplier is Woodmoor Water and Sanitation District (“District”). According to an updated letter dated August 7, 2024, the District is committed to serving 94.719 acre-feet per year of water required for this development. However, according to the August 7, 2024 letter the District is committed to serving 303 multi-family attached units/lots on 40.52 acres and 37 single-family detached residential lots on 7.99 acres. Since there is a discrepancy on the number of multi-family attached units/lots the District is committed to supply and the number of lots identified in the Water Resource Report, prior to further review the Applicant shall clarify the number of lots to be created by this development and if necessary the District shall provide an updated letter of commitment for the correct number of lots. In addition, the Applicant shall clarify the acres associated with the 37 single-family detached residential lots since the acres identified in the District’s letter are different from the acres identified in the Water Resource Report.

Based on the August 7, 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.



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).

As indicated in our previous letter our records show permit no.167104-A located on the subject property. Based on the information in the Water Resource Report the District would like to plug and abandon this well. In addition, the Water Resource Report indicated that the Division of Water Resources database shows that this well is abandoned. We note that the original well permit no. 167104 is abandoned. However, the well was re-drilled under permit 167104-A, therefore the re-drill well will still need to be plugged and abandoned. A Well Abandonment Report (available at <https://dwr.state.co.us/eforms>) must be filed with this office prior to the subdivision approval to affirm that this well was properly abandoned.

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. Clarify the number of multi-family attached units/lots to be created by this development and the numbers of acres associated with 37 single-family detached residential lots.
2. If necessary, provide evidence that the District is committed to supply 37 single-family detached residential lots on 18.96 acres and 305 multi-family attached units/lots on 40.52 acres for a total 342 residential units.

3. The re-drilled well under permit 167104-A, must be plugged and abandoned prior to the subdivision approval. A Well Abandonment Report (available at: <https://dwr.state.co.us/eforms>) must be filed with this office prior to the subdivision approval to affirm that this well was properly abandoned.

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

Sincerely,



Ioana Comaniciu, P.E.
Water Resources Engineer

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