



July 10, 2026

Lacey Dean, Project Manager

El Paso County Development Services Department

Sent via online portal at: <https://epcdevplanreview.com>

RE: Cathedral Rock Church - Minor Final Plat; a.k.a. Suthers Ranch Filing 2A
Case No: SF2611
Section 36, T11S, R65W
Water Division 2, Water District 10
CWDR Reference No. 34707 (also related to CDWR Reference no. 29173)

Dear Lacey Dean:

We have reviewed the submittal to subdivide 5.08 acres (currently, “Tract A, Struthers Ranch, Filing No. 2”) into three lots: Lot 1 (167,653 sq-ft), Lot 2 (43,560 sq-ft), and a smaller Tract A (10,303 sq-ft; water quality pond), known as the “Struthers Ranch Subdivision Filing No. 2A.” The submittal focuses on the development of a 16,375 sq-ft building to be used for a religious institute.

Water Supply Demand

The water demands for the subdivision are summarized in **Table 1** based on the Water Supply Information Summary:

Table 1 - Cathedral Rock Church Minor Final Plat - Initial Water Demands

Land Use	Quantity	Maximum Total (acre-feet/year)
Commercial	16,375 sq-ft	1.47
Irrigated landscaping	0.5 irrigated acres	0.118
Total Demand:		1.588



The projected amounts per lot are anticipated to be 1.02 ac-ft/year on Lot 1, 0.45 ac-ft/year on Lot 2, with an additional 0.118 ac-ft/year of irrigation across all lots. There does not appear to be a water supply associated with Tract A. Although a “water quality pond” was included in the Water Resources Report included in the submittal, there was no explanation regarding how the pond’s evaporative depletions would be augmented.

Water Supply

The water supply for the subdivision will be provided by the Donala Water and Sanitation District(“District”). On December 29, 2025, the District wrote a commitment letter to provide 0.4 acre-feet/year of water for the subdivision, which is less than the amount indicated in the water supply information summary.

The Division of Water Resources (DWR) currently only has documentation about water rights the District had since 2015, and not the District’s current water rights portfolio and commitments. The Water Resources Report included in the submittal referenced the District commitment amounts from 2014. Before DWR can approve this subdivision’s water supply, we need updated tables of the District’s current water rights portfolio and water supply commitments.

Stormwater Detention Ponds

The application materials indicate that a stormwater detention structure may be constructed as 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.

State Engineer's Opinion

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

1. An updated Water Commitment letter and/or Water Information Summary that shows enough water is to be committed from the District to cover the water demands of all lots of the new development.
2. An updated Water Report from Donala Water and Sanitation District detailing their water rights portfolio, present-day water supply and commitments, and whether the existing commitments are for a 100-year or 300-year period.
3. Clarify in the Water Resources Report if the new Tract A will have a water supply associated with it, and if it will not, provide an explanation why it does not need a water supply.
4. Clarify in the Water Resources Report and Water Supply Information Summary how the evaporative depletions from the Water Quality Pond on Tract A will be augmented.

Should you have any questions, please contact Katharine Anderson of this office at Katharine.Anderson@state.co.us, or 303-866-3581 x8207.

Sincerely,



Ailis Thyne, P.E.