

September 9, 2021



John Green  
El Paso County  
2880 International Circle  
Colorado Springs, CO 80910

Dear John,

Please see the responses to the comments received below.

**Previous Comment Response Letter:**

1. This needs to match the assessor. It cannot be the representative of the entity. All ownership and contact information has to match the assessor records.

**Response:** *Owner has been changed to read SFP-E LLC to match assessor records.*

**Written Comments:**

- Please see redline comments on soils report  
Please see redline comments on Site Development Plan  
Please see redline comments on Letter of Intent  
Please see redline comments on Landscape Plan Drawings  
Please see redline comments on Drainage Report  
Please see redline comments on Application Form

**Response:** *Please see comment responses broken out by item below*

- Review 2 comments will be uploaded by the project manager. Please address comments on the following documents:
  - Letter of Intent
  - Drainage ReportComments have been resolved on the following documents, please submit documents with appropriate stamps/signatures once PCD Engineering comments and EPC Stormwater comments have been completely resolved.
  - FAE
  - GEC plans
  - Site Plan

Reviewed by:

Lupe Packman

Review Engineer

[lupepackman@elpasoco.com](mailto:lupepackman@elpasoco.com)

**Response:** *Please see comment responses broken out by item below*

- Review 2: EPC Stormwater comments have been provided (in orange text boxes) on the following uploaded documents:

- Drainage Report....(to be uploaded by PM with PCD comments)
- GEC Checklist
- SWMP Checklist
- SWMP

EPC Stormwater comments have been resolved on the following documents:

- FAE
- GEC Plan
- PBMP Applicability Form

Reviewed by:

Glenn Reese, P.E.

Stormwater Engineer II

[glennreese@elpasoco.com](mailto:glennreese@elpasoco.com)

**Response:** Please see comment responses broken out by item below

#### **Application:**

1. Review Comment 1 Not addressed and no explanation provided please revise.

**Response:** Owner has been changed to read SFP-E LLC to match assessor records.

#### **Drainage Report:**

1. In a conclusion narrative placed after section 6.4 determine whether design will be compliant with originally proposed conditions. If there is an increase in runoff determine whether it is a negligible amount.

**Response:** A Conclusion narrative has been added as section 7.0 discussing how the design is compliant with existing stormwater treatment and how no additional stormwater infrastructure will be required.

2. Basin areas shown on this map only add up to 2.18ac whereas the report text above (and Basin X on previous page) states that the area is 2.48ac. Areas shown for each basin on Table 3.2 in report above appears to be more accurate than this map. Please revise report/map as needed to remove discrepancies.

**Response:** Basin areas on proposed drainage map have been corrected to list correct values shown on table 3.2

#### **GEC Checklist:**

1. Revise this statement. How it is currently written is not a sufficient reason for not having a TSB. Just because flows will follow historic paths does not mean that runoff isn't full of sediment and in need of treatment. Just say something like: TSB's are not needed because other proposed temporary BMP's are sufficient to minimize/reduce sediment loading in runoff. Also there is not one design point that has much more than 1ac of runoff tributary to it (which is the threshold for needing a TSB, according to our criteria).

**Response:** Justification as to why a sediment basin is not provided has been revised per comment suggestions.

[cushingterrell.com](http://cushingterrell.com)

### **Geotechnical Engineering Report:**

1. Are these areas going to be dedicated as no-build with the re-plat application? They must be shown on Site Development Plan if so dedicated.

**Response:** *This section of the geotechnical report is discussing the practicality of below ground maintenance pits that were originally discussed in the concept stages of this project. These maintenance pits are no longer part of the proposed structure and have been replaced with car lifts that will sit on grade. Due to this the concerns of below grade construction in this area being impacted by ground water are no longer applicable.*

### **Landscape Plans:**

1. PCD File Number not added

**Response:** *PCD File number is shown on the bottom right corner of the plan just to the left of the sheet number.*

2. Review comment #1 not addressed. Island must include tree, which is not shown

**Response:** *Tree has been added to the landscape island.*

### **LOI:**

1. Unresolved (referring to owner/applicant)

**Response:** *Owner has been changed to read SFP-E LLC to match assessor records.*

2. Unresolved: Please address findings from other reports on file, provide summary of water/wastewater service, utilities, etc.

**Response:** *A list and summary of finding from other reports has been added to the LOI. A separate section discussing utilities has also been added.*

3. This LOI is written for the Special Use application. Please revise to address the specific requirements for a Site Development Plan.

**Response:** *The LOI has been revised to be specific for the Site Development Plan*

4. Unresolved. Please address road impact fees for this application. Road impact fees are due for new land use actions and construction of structures. Please add a sentence or two that confirms applicant understands road impact fees will be due.

**Response:** *A statement has been added reflecting that the developer recognizes that road impact fees will be required for this development.*

### **SDP Plans:**

1. Show ADA access Route

**Response:** *ADA access route has been added and labeled on sheet C100*

### **SWMP Checklist:**

1. Add PPR-21-023

**Response:** *PPR-21-023 added.*

2. Checklist item 8 not satisfied

**Response:** *Additional discussion added regarding erosion potential including the Soil Texture Triangle and the Universal Soil Loss Equation.*

3. Checklist item 10 not satisfied

**Response:** *Additional potential pollutant sources have been added as noted on SWMP redlines.*

4. Checklist item 12 not satisfied

**Response:** *Section 4.12 has been added stating no concrete batch plants are anticipated for this development.*

5. Checklist item 13 not satisfied

**Response:** *Section 4.10 has been added discussing waste disposal.*

6. Checklist item 15 not satisfied

**Response:** *The ultimate receiving water of the west tributary of the falcon basin has been added in section 2.0.*

7. Checklist item 21 not satisfied

**Response:** *Section 5.0 SWMP revision procedure has been added.*

8. Checklist item 22 not satisfied

**Response:** *The description of long-term stormwater quality has been added in section 3.0*

9. Checklist item 23 not satisfied

**Response:** *This specification has been added in section 3.0 of the report.*

10. Checklist item 26 not satisfied

**Response:** *A discussion regarding the existing PLD and Detention pond has been added to section 3.0. in addition, language stating no construction stormwater facilities will be used that are owned or operated by another entity has been added.*

11. Please do not attach the SWMP to the SWMP Checklist since they are uploaded as separate items to EDARP.

**Response:** *Noted, Checklist and SWMP have been uploaded as separate documents.*

#### **SWMP:**

1. Add text: PCD Filing No.: PPR-21-023

**Response:** *Text has been added*

2. Please sign electronically so that all pages of the form do not have to be scanned. It is much easier for us if the form is in the original state (ie: still a searchable pdf and not skewed from scanning). Or only scan the page that gets stamped. This applies to all documents including the GEC/SWMP Checklists, PBMP Form, etc.

**Response:** *Noted, electronic signature will be used*

3. Update this description per how you updated in the FDR: Revise to discuss PLD and label detention pond as Pond WU.

**Response:** *Description has been modified to be consistent with FDR and reference detention pond WU.*

4. Address checklist Items 10, 13, 15, 21, 22, 23.

**Response:** Please see checklist comment responses above for each individual item

5. Item 8. Include soil erosion potential and impacts on discharge

**Response:** Additional discussion added regarding erosion potential including the Soil Texture Triangle and the Universal Soil Loss Equation.

6. Update per latest drawing revisions if necessary.

**Response:** Limits of disturbance area has been updated.

7. revise to 2022

**Response:** Date has been corrected

8. Item 13. Discuss inspection procedure for checking waste disposal bins for leaks and overflowing capacity. And discuss frequency that they will be emptied (or at what level of capacity would trigger the need to be emptied)

**Response:** A waste disposal section has been added to discuss procedures for checking waste disposal bins and emptying frequency.

9. Discuss the use of portable toilets on site. Include the following details: Portable toilets will be located a minimum of 10ft from stormwater inlets and 50ft from state waters. They will be secured at all four corners to prevent overturning and cleaned on a weekly basis. They will be inspected daily for spills.

**Response:** Section discussing use and maintenance of portable restrooms have been added

10. Item 12. Note that this project does not anticipate utilizing batch plants in the SWMP text

**Response:** Note added stating batch plants are not anticipated

11. Identify QSM in the SWMP and provide documentation of their credentials and/or state: "The QSM will be sufficiently qualified for the required duties per the ECM Appendix I.5.2.A"

**Response:** Section 4.1 has been added for the QSM. The QSM is noted as TBD as the contractor for this project has not yet been selected.

12. add "or snowmelt event that causes surface erosion"

**Response:** Snowmelt event has been added as trigger for BMP inspection

13. Item 21. Add text stating that the SWMP should be viewed as a "living document" that is continuously being reviewed and modified as a part of the overall process of evaluating and managing SW quality issues at the site. The QSM shall amend the SWMP when there is a change in design, construction, O&M of the site which would require the implementation of new or revised BMPs or if the SWMP proves to be ineffective in achieving the general objectives of controlling pollutants in SW discharges associated with construction activity or when BMPs are no longer necessary and are removed.

**Response:** Language regarding the SWMP being a "living document" has been added to section 5.0 of SWMP.

14. Item 26. Add a note stating that this project does not rely on control measures owned or operated by another entity.

**Response:** Language discussing control measures owned or operated by another entity has been added in section 3.0

Sincerely,

**Zack Graham, PE**