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August 23, 2018

Nina Ruiz
El Paso County Planning and Community Development Department
2880 International Circle, Suite 110
Colorado Springs, CO 80910

Re: Judge Orr Ranchettes Preliminary Plan Application

Dear Ms. Ruiz:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the UBS District”), a formed and operating ground water management district with the powers enumerated in the Colorado Ground Water Management Act, C.R.S. § 37-90-101 *et seq.* The UBS District has reviewed John R. and Linda B. Jennings’ (“Applicants”) preliminary plan application for the Judge Orr Ranchettes, as well as the materials provided in support of this application. Based upon its understanding of the application and related documentation concerning this project, the UBS District provides the following comments.

Use of Septic Systems

Of concern to the UBS District is the potential contamination to the alluvial aquifer that may result from the discharge of wastewater from non-evaporative septic systems and leach fields in the Judge Orr Ranchettes development. With its application, the Applicants submitted a *Soils, Geology, Geologic Hazard and Wastewater Study* prepared by Entech Engineering in April 2017 (“*Entech Report*”). As stated in the *Entech Report*, individual onsite wastewater treatment systems are suitable for the Judge Orr Ranchettes development and “contamination of surface and subsurface water resources should not occur provided that the [systems] are evaluated, installed according to El Paso County and State Guidelines and properly maintained.” *Entech Report* at 11.

However, according to Entech’s analysis of soil conditions within the Judge Orr Ranchettes, seasonal shallow groundwater has been mapped in several areas. *Entech Report* at 6. In areas within the Judge Orr Ranchettes with a high water table, the wastewater discharged from the septic systems is significantly more likely to infiltrate into and contaminate the aquifer, resulting in injury to downstream well owners. Additional data is needed to evaluate the depth to the water table in the Judge Orr Ranchettes Development. The District suggests that a monitoring well be installed to monitor water levels in the development for at least twelve months. If development is planned in areas with a high water table, then individual onsite wastewater

treatment systems must be designed to accommodate the high water table that is present within the development area, to ensure that the wastewater discharged from the septic systems does not infiltrate into the water table.

The UBS District has enacted a policy in which it “encourages the use[] of central (municipal) water and wastewater systems, as opposed to the use of individual wells and septic systems . . . in order to minimize the possibility of contamination of the alluvial aquifer and to protect the already over-appropriated ground water resources of the Upper Black Squirrel Creek Designated Ground Water Basin.” As such, the District believes that a central wastewater treatment system must be required for this development to prevent contamination of the aquifer. However, if onsite wastewater treatment systems are permitted, these systems and associated wastewater discharges must comply with the state’s Water Quality Control Commission’s water quality standards set forth in Regulation Nos. 41 and 42, as well as all applicable requirements in Chapter 8 of the El Paso County Board of Health’s regulations concerning the construction, operation, and maintenance of OWTS within this development.

The UBS District reserves the right to provide additional comments at a later date founded upon information not readily ascertainable from the above-referenced application.

Sincerely,



Lisa M. Thompson
for
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cc: UBSCGWMD Board of Directors