



October 28, 2024

Loretta Daniel, Larry Mugler  
Arapahoe County  
5334 S. Prince St.  
Littleton, CO 80120

**Re: Arapahoe County Water Supply Study - Public Comments**

Dear Ms. Daniel and Mr. Mugler:

The Forsgren team has reviewed the public comments received on the Arapahoe County Water Supply Study, and we have categorized them as follows:

- Minor/editorial
- Hydrogeology
- Environmental stewardship
- Reuse, graywater quality
- Supply and demand projections

**Minor/editorial.** Most of the 25 comments received were relatively minor, including some typographical errors and editorial suggestions on adding context to clarify statements. They also included recommendations to rephrase some text to improve comprehension and ensure consistency throughout the Study. We will edit the Study accordingly.

**Hydrogeology.** Some comments centered on a concern for using the groundwater characteristics of Region 2 to inform growth management strategies in Region 1. The comments highlighted that modeling of Region 2 groundwater would differ from that of Region 1. As a result, applying the Region 2 groundwater analysis to Region 1 growth policies may not fully account for the specific water resource needs and conditions of Region 1.

These comments are taken under advisement for when a policy on production factors is considered by the County, but do not prompt a revision of the Study. Although the groundwater characteristics may vary somewhat between Regions 1 and 2, they are generally similar. The recommended aquifer-specific production factors will identify expected production for both regions more accurately than either the State's 100-year allocation or the 300-year rule proposed in the County's 2018 Comp Plan. The policy recommendation on production factors would also allow applicants to submit a site-specific groundwater analysis for a possible variance if expected to differ significantly from the recommended factors.

**Environmental stewardship.** There was one comment regarding environmental stewardship and the use of water for fracking. This concern is not addressed in the Study as water for oil and gas development in Arapahoe County is largely imported from outside the county and represents a very small share of water used in the county.

**Reuse, graywater quality.** There were a few comments regarding the use of graywater and reuse water. One requested additional context to clarify what type of reuse was being referred to in the Study and that will be clarified. Another raised concerns over the use of graywater

systems within a utility service area and the legal liability of those systems if someone was to get sick.

A new state law that will take effect January 1, 2026 prompts counties and municipalities to allow graywater systems for new construction, subject to a memorandum of understanding with the local health authority and water/wastewater service providers that would need to address that potential liability. The Study recommendation to allow graywater systems is based on adequately addressing those concerns.

**Supply and demand projections.** Additional comments concerned the water supply data for East Cherry Creek Valley (ECCV) Water and Sanitation District, and Arapahoe County Water and Wastewater Authority (ACWWA), and a request for information on proposed reservoirs near Aurora. The supply and demand data provided by ECCV and ACWWA will be incorporated into the Study and some information on the reservoirs will be included.

There was significant public engagement throughout our work on the Study, and the public comments on the draft were very helpful. Generally, there are no major corrections or edits to be made based on the feedback received. We will make the clarifying edits previously noted.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wilbur L. Koger".

Wilbur L. Koger, P.E.  
Vice President/Division Manager